

Subject: Response on proposed NHDC Plan

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Summary of why the proposed plan fails on grounds of "soundness"

- KB4 site inclusion has had no community involvement; and the legal compliance of doing so is questionable
- Coalescence. The removal of green belt land will create an urban sprawl into Stevenage
- Green belt land. Removing green belt land runs counter to national policy and the land of KB4 is identified in NHDC's own studies as being a "significant contribution" to the green belt; this contrasts with lesser green belt land which is not under proposal for development
- Infrastructure. The plan in its current form is uninformed and does not address significant local worries and realities with regards to how Knebworth would cope with a housing increase of 33%.
- Schooling (vague suggestions in the plan which are not mathematically sound)
- Doctors (currently at over capacity and the plan incorrectly says there will be a new doctors surgery; it will be a replacement surgery of the same size)
- Roads (KB4 will spans Watton Road, a road that is essentially a single track road due to on street parking; in addition parking in the village centre already creates significant congestion - "traffic modelling" suggested in the local plan appears to be desktop in nature and does not represent reality
- Trains (peak commuter trains are under threat from a down grade in frequency and timing from the current operator. They are at full capacity already. A population increase of +33% with no provision for employment opportunities in Knebworth or surrounding towns will lead to the obvious result of increased commuters into London)
- Bridges (the rail bridges can not be changed - with a particular dangerous pinch point vulnerable to increased traffic)
- Alternative options. The plan is not positively prepared as it ignores the option of a new garden city, or a more eloquent solution of using land sufficient for 3,000 homes to the west of Stevenage; bizarrely this land has been removed from the green belt for development but is not under consideration for development in this consultation

Is the plan “positively prepared”? No, for the following reasons the plan is NOT “sound”

1. No community involvement. Site KB4 has not previously been included as one of the sites which is a preferred option until this final plan. This is contrary to the Council’s Statement of Community Involvement and therefore the legality of this site being included at all is questionable and it fails to meet the Legal Compliance criteria.
2. Residents have not been adequately listened to. This is demonstrated by the inclusion of site KB4 post the previous consultation document dated Dec-14. In the Dec-14 document the housing proposal was for 433 homes which contrasts to the current proposal of 663 homes. Given the objections formally submitted previously based on evidence including infrastructure deficiencies, I cannot see how the plan has been positively prepared to the point that the current proposal is for +53% more dwellings than the last consultation in Dec-14
3. Coalescence – Contrary to evidence in “North Hertfordshire Green Belt Review – July 2016”. On page 20 of this review, it states that Knebworth green belt is of the highest strategic importance; “makes a significant contribution to Green Belt purposes, helping to prevent sprawl, merger and encroachment”. It goes on further (page 42-43) to highlight again the “significant contribution” the green belt plays at site KB4 (e.g. 8b in the “Green Belt Review”), performing a vital “separation function” between Stevenage and Knebworth. Additionally land in this document (8c) which is site KB4 is cited as being an “elevated position creat[ing] a sense of openness”. The removal of this would permanently damage the landscaping of Knebworth to the east of the village and create a sprawl into Stevenage
4. The plan includes inconsistent information with regards to Knebworth. Knebworth is a village (both by feel for the residents and definition in the plan as a category A village). This is contrary to supporting documents to the plan, namely the “North Hertfordshire Green Belt Review – July 2016”. In this document, Knebworth is incorrectly defined as a town (2.1.11, page 9)
5. Infrastructure – the plan is not positively prepared as it fails to promote sustainable development as there is no reference to the infrastructure challenges Knebworth currently faces which will only accentuate with an increase in village size by 33%. See points 12 and 13 relating to infrastructure below.
6. Alternative solutions (West Stevenage) – the approach of North Herts District Council is not justified in the manner which it has discounted certain options which are both more viable, have fewer implementation challenges and would not damage the character or green belt of rural villages such as Knebworth. In the proposal Strategic Policy 8, paragraph 4.104 (page 50), the plan identifies an area of land west of the A1(M) and Stevenage which is “identified as a suitable location for a substantial urban extension to the town”. It goes on to say that this site is being removed from the Green Belt and is to be “safeguarded for future use”. This area of land is sufficient for c.3,000 homes which would easily mitigate the imposition of extra housing on green belts of existing villages with inadequate infrastructure. Stevenage has much greater capacity to absorb more housing than Knebworth does
7. Alternative Solutions (New Garden City) – The North Hertfordshire New Settlement Study (Apr-16) concludes that a new Garden City will be required in Hertfordshire post 2031 but this has been left too late for consideration in this consultation. It is clear that the plan in its

current form has not been positively prepared and should be withdrawn as it is not assessing the options that are both (a) the most viable; and (b) the least disruptive and manageable within the constraints of local communities. A new Garden City would be able to take account of the needs for highways, social and affordable housing, education, health and other transport infrastructure.

Is the plan “justified”? No, for the following reasons the plan is NOT “sound”

8. Green Belt – there are no “exceptional circumstances” in any of the evidence to justify the destruction of the Green Belt around Knebworth, particularly on site KB4 which is working agriculture land. By permitting this development, the very existence of the Green Belt through to Stevenage will be at risk. I see that this is setting a precedent for destroying the green belt and lacks any understanding of what a village like Knebworth stands for. It is a village with a clear and distinct rural boundary which is both green belt and working agricultural land. Opening this up to developers is only positive for the developers who will profit substantially and is to the detriment to all residents (new and existing) of the village. There is no infrastructure plan which is a disaster – see section below
9. Green Belt – land on site KB4 in North Hertfordshire’s own “North Hertfordshire Green Belt Review – July 2016” categorises the KB4 site as making “a significant contribution to the Green Belt” (pages 115 & 211, site ref 55, 56, 58, 211). The development of KB4 would “break the boundary” with Stevenage. It is therefore not justified or effective in line with the principles of Green Belt in the UK. It should be noted that of all the sites proposed in Knebworth, KB4 is the only site classified as making a “significant” contribution to the Green Belt, in contrast to the other sites that are classified as “moderate”. Notwithstanding this point, the development of any of the sites in Knebworth do not address the major infrastructure points raised below.
10. Fairness – the plan is proposing to increase the village size by 33%, a much higher rate than other areas in North Hertfordshire and also other areas that do not have infrastructure constraints like Knebworth does (healthcare and rail at capacity, road congestion, flood risk etc)
11. Economy & Town Centres – there is no provision for local employment in the plan for Knebworth, in fact there is the risk of reducing employment opportunities due to the removal of site KB3 into residential properties and the mitigations that will likely be required to limit parking in the village centre which will have a knock on effect onto the strength of the remaining retail businesses. It is clear that the majority of the population growth proposed (+33%) in Knebworth will work outside of Knebworth, placing greater pressure on roads and the station which is already at capacity for peak commuter services into London.

Is the plan "effective"? No, for the following reasons the plan is NOT "sound"

12. The plan lacks any coherent strategic approach between housing, cumulative development and infrastructure need to support growth and sustainability. Rather it appears to be a box ticking exercise so North Herts Council can claim to have met the requirements of National Housing Policy by having a "plan". Whilst other developments in North Herts which have over 500 proposed new homes have the benefit of a Strategic Policy, this approach has not been adopted for Knebworth, despite 663 homes (a minimum) being forced on a community that already suffers from sub-standard and stretched infrastructure (see infrastructure below). This appears to be due purely to these homes being spread over "4" sites when in reality they are on 2 sites on east and west Knebworth which means that our community do not have a coherent Strategic Policy. Given the proposal in its current form has the number of dwellings increasing by 33% it would have been appropriate for Knebworth to have its own specific Strategic Policy which would have been able to address the challenges population growth in Knebworth will suffer from and therefore conclude in short order what the constraints are. Without this, there is the risk that piecemeal development leads to none of the infrastructure concerns being managed in a collective manner. Any Strategic Policy should cover:
 - a. Road access to the sites and the traffic implications
 - b. Educations
 - c. Parking implications (high street, Watton Road and Station parking)
13. The plan fails to address any of the crucial issues around adequacy of infrastructure which at present is very vulnerable and over stretched and would not be able to cope with an increase in the size of the village by 33%.
 - a. Roads – Roads and parking continue to be a major problem in Knebworth.
 - i. Knebworth is a "rat-run" used when the A1(M) is congested, for access to Welwyn Garden City and for access to South / East Stevenage / Hertford all of which takes traffic down Watton Road
 - ii. Watton Road (which will dissect KB4) – point 1. Watton Road is essentially a single track road from the mini roundabout through to the last house on Watton Road (number 49). It has speed bumps every 50-100 yards which funnel traffic into a single lane. In addition, cars are permanently parked on the north side of the road which makes it a single tracked road. The cars parked are a mixture of residents (who have more than 1 or 2 cars) and overflow onto the road, commuters using Knebworth train station and overflow from the recreational ground which houses a tennis club, bowls club, 2x play areas and 4 football pitches). As a consequence, the road is at all times log jammed meaning cars have to give way and drive on the pavement to pass each other creating a danger for young mothers and their children and elderly residents. I would welcome the Inspector to visit this road between the hours of 7-9am and 5-7pm to witness the volume of traffic and tailbacks this creates. I walk to the station in the morning and it is not uncommon for me to be walking much faster than the cars given the traffic.

- iii. Watton Road (which will dissect KB4) – point 2. At the point where Watton Road becomes a country lane (past the entrance to Bell Close), it lacks central road markings demonstrating its unsuitability to carry more traffic and at speed. It has no provision for pedestrians or cyclists. It is already a dangerous stretch of road, hence the speed bumps were added in the approach into the village to limit speeds. It is also the access route for the crematorium meaning traffic volumes are high. KB4 is a highly unsuitable site to have incremental traffic and there is no evidence or planning proposed to address any of these issues meaning the plan as currently proposed is ineffective from the beginning.
- iv. Other potential access points to KB4. As highlighted Watton Road is inadequate to service incremental traffic volume into KB4. Additionally, other roads into KB4 suffer from congestion and are inadequate. Swangleys Lane is not wide enough to cope with traffic from any new development. Haygarth is not viable to access B197 (London Road). Old Lane is too narrow and has already had measures to reduce its use enforced by changing the junction on to Watton Road to be one way. St Martins Road is a private road (no pavements) and traffic is accentuated in this area due to the School meaning tail backs are quite common. The replacement doctors surgery and redeveloped library on St Martin's road will only increase traffic in this area meaning any development of KB4 is not viable or effective based on accessibility.
- v. "Transport Modelling" – the plan mentions very vaguely that there has been "transport modelling" and rather alarmingly states that said "modelling does not identify any specific mitigation scheme requirements for Knebworth". I, and the rest of our village, find such a statement to be highly irresponsible. There are severe issues with the robustness of Knebworth's road infrastructure which should the village increase in size by 33% as proposed would become insufferable and increase the risk of accidents (or death) on the roads.
- vi. High Street – The plan does highlight the high street as a "pinch point" and vaguely says that this could be resolved through managing "short stay parking". This is inconsistent with other elements of the Strategic Plan which want to encourage employment and community in Knebworth. Without parking for the local businesses, they would have insufficient custom and would fail. This is quite a circular argument in the plan! Parking on the high street is only used for short stay parking and is essential to service local businesses.
- vii. Railway underpass (Station Road) – This is one of the most dangerous pinch points in Knebworth where it is a single track road with only one very narrow pavement meaning pedestrians walking in opposite directions have to cross each other by stepping onto the road. The road width is only 4.5m, insufficient for two large vehicles so essentially it becomes a single lane. Road visibility on the approach to the tunnel is restricted due to the road alignment. For mothers with children and elderly residents it is already very

dangerous. Having only one pavement through the tunnel requires multiple road crossings and associated danger with cars (often at high speeds) going to and from the station and village centre. The proposed sites at KB1, KB2, KB3 and KB4 would naturally divert traffic to this pinch point (as well as the High Street) creating greater volume of traffic, congestion and as consequence risk of accidents or death on the roads. The facts are that there is no mitigation for this, rather it is not effective for a village of Knebworth's size and historical infrastructure to house an extra 663 houses, an increase of 33%.

- viii. Adjacent villages - the adjacent proposed developments in Codicote and Woolmer Green will also place additional pressure on Knebworth's roads and rail as it is used as a commuter station for other villages.
- b. Rail (bridges)
 - i. The pinch point highlighted above cannot be mitigated given the cost and complexity of widening the bridges used to support the East Coast Mainline. The reality is that these will never be widened due to the complexity and the associated impact on train journeys (national and commuter) into London Kings Cross using this infrastructure. It is yet another reason why the plan is ineffective.
- c. Rail (station capacity)
 - i. The station is already at full capacity for morning journeys into London. The fast journeys to London (0711 and 0811) are already standing room only with the platform full at these times with commuters. Current proposals by the train operator are to potentially reduce service numbers and remove these fast trains. The pressure on remaining services will therefore only increase, notwithstanding the impact of an extra 663 homes (+33% village size). The adjacent developments in Codicote and Woolmer Green will also place additional pressure on Knebworth's roads and rail as it is used as a commuter station for other villages. The plan is not effective in addressing this as there is no coherent linkage to rail infrastructure.
- d. Doctors – the plan (paragraph 13.200) includes a misleading statement about a “new” doctors surgery. It fails to mention that this is a replacement doctors surgery to replace the current site on Station Road. This is highly misleading as the doctors surgery is already under immense pressure with GP appointment waiting times regularly 3-4 weeks away and often residents are directed to go to the Marymead Surgery in Stevenage as an alternative – an option which is not possible for those that are elderly or do not have a car. The site proposed for the replacement doctors surgery is already being challenged by local residents and there is clearly not enough room to develop this site any further to manage a population increase of 33% as currently proposed.
- e. Schooling – Knebworth has one primary school and no secondary school, Secondary education provision is currently available in neighbouring towns such as Stevenage and Hitchin. The plan in its current form has a very limited and high level mitigation to the addition of 663 homes by suggesting a new primary school on KB1 and the even higher level notion of a possible “all through school” on KB4. Simple maths

and assumptions based on 663 homes show that the lack of schooling would be a major issue. If one was to assume that there were 0.5 children per home from the ages of 4-11, additional children from the ages of 4-11 would be 331, based on classes of seven age groups at a primary school this would be 47 children per class. The statutory maximum number of children per class is 30 pupils; this highlights the huge black hole in this proposal on the inadequacy of schooling making the plan ineffective. This is not to mention the impact on the roads of additional "school runs" – see section above.

- f. High Street Retail – Site KB3 is removing retail from the centre of Knebworth, which surely runs against trying to make Knebworth village centre a thriving centre.
- g. Drainage – the plan has very vague statements that the Rye Meads wastewater draining facility near Hoddesdon "should" have sufficient capacity to handle all planned development within its catchment until at least 2026 and this downgraded to "reasonable prospect" for development through to 2031. This is clearly not an effective proposal for such a serious issue as water management and associated drainage. KB4 has specific issues with surface water drainage and often Watton Road looks like it is close to flooding.

Is the plan “consistent with national policy”? No, for the following reasons the plan is NOT “sound”

14. Consultation timeframe – this is the first time that KB4 has been included in any Local Plan as a preferred site for development. Including it now in this fashion with limited time for consideration and comment is out of line with standard national planning cycles and processes. As a result, NHDC could be sanctioned for not following agreed due process.
15. Green Belt – The development of land on KB4 would breach criteria set out in the National Planning Policy Framework (paragraph 80) in relation to the purpose of green belt land. These conditions include:
 - a. To prevent neighbouring towns merging into one another;
 - b. To assist in safeguarding the countryside from encroachment; and
 - c. To check the unrestricted sprawl of large built up areas
16. Coalescence – this is one of the main reasons for the existence of green belt land, in order to prevent neighbouring conurbations to merge and become an urban sprawl. The current local plan runs counter to this and essentially is sanctioning a north to south sprawl from Stevenage, through Knebworth into Welwyn Garden City and through to Hatfield. Green Belt land on site KB4 in North Hertfordshire’s own “North Hertfordshire Green Belt Review – July 2016” categorises the KB4 site as making “a significant contribution to the Green Belt” (pages 115 & 211, site ref 55, 56, 58, 211). The development of KB4 would “break the boundary” with Stevenage. It is therefore not justified or effective in line with the principles of Green Belt in the UK. It should be noted that there are other sites noted as a “moderate contribution to green belt” which have not been proposed for development.
17. Agriculture Land – KB4 is working agricultural land and is classified as “good to moderate” in the supporting documents. Development would impact the operation of Swangleys Farm which is a working farm with Swangleys Road the only road accessible to move heavy agriculture machinery and for heavy transportation to move crops to market. The removal of working good quality land is counter to national agriculture policy.
18. Landscape – Site KB4 in particular will destroy the landscape to the east of Knebworth and create an urban sprawl merging with Stevenage. If allowed to be developed it will dominate the sky line given the undulations in the land around Knebworth

Potential Changes

- Consistency with national policy on green belt - KB4 should immediately be removed from consideration given its "significant nature" to the green belt
- Infrastructure - with no consideration or action to address current constraints (and future constraints with housing growth in and around Knebworth), no further development should be sanctioned. The representations in their current form in the current plan as to what actions may be taken are insufficient and in turn make the plan NOT "sound". It is clear there has been insufficient (if any at all) cooperation with other public bodies under the principle of "duty to cooperate" and this plan is therefore non-compliant
- Consider other options that are more deliverable over the longer term; which would be more effective and justified. These include land West of Stevenage (Strategic Policy 8, paragraph 4.104) or a new Garden City