



# WELWYN GARDEN CITY SOCIETY

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Clerk of the Committee  
Communities and Local Government Select Committee  
House of Commons  
Parliament Square  
Westminster  
London

Dear Sir

## **Your Review of the National Planning and Policy Framework**

Please find appended our submission on the NPPF. It is concerned with paragraph 52, which calls for more garden cities to be considered.

Our paper makes it clear that the structure and funding of local government are not compatible with building sustainable garden cities. As residents of the only garden city under the control of local authorities, we have first-hand experience of the issues they will face.

No doubt, you will circulate our paper to any other House of Commons Environmental Audit Committee as you think appropriate.

If you require any further information or if anything is unclear then please contact me. If you would like us to appear before your Committee, we would be glad to do so.

Yours faithfully

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Chairman  
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## Submission to the Select Committee on NPPF

Our comments relate to Section 52 of the NPPF, which reads as follows:

“The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of garden cities.

Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development. In doing so, they should consider whether it is appropriate to establish green belt around or adjoining any such new development.”

### 1. Summary

- Section 52 does not specify what “garden city principles” are and we think that certain key criteria should be specified in more detail. The use of the term “garden city” or “garden suburb” should only occur in the name of the place if the location meets those criteria.
- Essentially a “garden city” or “garden suburb” requires both the built and natural environment to be designed and then managed as a single entity by a single authority. Local authorities are not structured to do this.
- It is essential that residents be allowed an effective say in how their “garden city” should be built and developed over time. The overarching objective of any “garden city” must be to enable residents to live and work in a beautifully designed, healthy and harmonious place.
- A beautiful and successful garden city depends on good design in all matters. Detail matters. It is of little use framing a high level statement about what a good idea it is to use garden city principles to build more houses as Section 52 of the NPPF does, unless other legislation and supporting organisational structures enable good design down to a detailed level.
- Responsibility for all services into any new “garden city” should be controlled by its single authority. So, for example, nothing should change in a garden city without the proper overall consideration and approval for that being agreed by its single authority.
- Similarly, where smaller “garden suburbs” are concerned, local authority input should be restricted by covenants to ensure that the design is not compromised but enabled.
- Our overall recommendation to your Committee is that any new garden city should be managed outside normal, current, local government control since conflicting interests only destroy the very thing that is being promoted.
- In our view, “garden cities” and “garden suburbs” will cost more to develop than mere estates and new towns. Politicians should recognise this from the outset, face the issue and make provision for it. Like any garden, its ongoing management requires care and nurture and must be set up to operate sustainably.

## 2. Who we are

We are the Welwyn Garden City Society, a civic society concerned for the town of Welwyn Garden City, the second garden city, and the only one wholly controlled by local authorities.

Our comments are based on our own experience of residing in a garden city now managed by two authorities - Welwyn Hatfield Borough Council (WHBC) and Hertfordshire County Council (HCC). Neither are organised to undertake the task, for reasons explained below. Our comments have been limited to those which, from our perspective, we think are essential if the notion of “garden cities” is to be used to promote greater house building in future.

This town is reaching its 100th year anniversary in 2020 and no doubt the shortcomings of our town will be highlighted then. These will detract from the idealised notion of “garden cities” and so may adversely affect the building of new homes based on this model.

## 3. Background

Whilst we applaud the desire to build new houses in a fashion that make them more attractive to the world at large, there is a great danger that the end result will simply destroy the concept of the “garden city” as conceived by Ebenezer Howard. There is also a danger that every large housing development will lay claim to “garden city” status just by planting a few trees and laying out a few pretty planting beds. This will not help any government of the future to build more houses since these sorts of estates or towns will be seen to be what they really are - aspirant “new towns” or “new estates” being marketed as something else.

## 4. Rationale

*The management of the built and natural environment:* this should be managed as a single entity. Currently, local county and borough authorities have separate responsibilities over aspects of the same place. Planning and local authority rules and policies should be superseded by those of a single, elected authority in charge of any new garden city. This is to avoid conflicts of authority and policies, as the following examples show:

Although it may seem trivial, lampposts and other street fittings should adhere to a constant design. Here in Welwyn Garden City, we are presented with multiple types of lampposts because the County Council has periodically changed its own standard or decided to buy different models. It is a struggle to get the County Council to recognise the local appearance of the town which has always had its own style of lamppost and street fittings from its inception.

Policies on kerbs, pavements, verges should adhere to an agreed constant design. Here in Welwyn Garden City for example, verges are part of the intrinsic design of the town and need to be properly managed; but the County Council starts with the premise that these are mere encroachments upon the carriageway that must be periodically hacked back or only repaired if they become a safety hazard. The town’s approach to verges is therefore an irritation.

Policies on parking and their enforcement should fall within the remit of the garden city. Here in Welwyn Garden City we have one authority responsible for enforcement and the other responsible for maintaining pavements. There is a conflict, always denied, between the two authorities so that we see little action over parking on pavements. This is made worse by guidance notes from central government on how cash in transit vehicles may park and use the highway and pavements, even though generally here there is specifically built,

secure parking at the back of buildings. The end result is cracked pavements. We have lost count of the number of times the pavements in one of our main thoroughfares, Howardsgate, have had to be re-laid.

Service suppliers such as gas, water, etc. should be subservient to the requirements of the single authority managing a garden city as to where such service suppliers place their equipment and its visual impact. Here we have had examples of service suppliers installing their equipment in places that are quite inappropriate.

Signage is a matter of periodic contention between authorities but, even throughout the County, there is little comprehension of the effect of erecting brand new signs when there is no need for them. The visual impact of signage as a significant part of the streetscape is vital in a garden city.

Here, the Commission for New Towns was able to enforce strict control for many years over most items for which it was responsible, whilst the District Council, as it was then, took some delight in being just a little different in some overlapping areas. Council houses were therefore identifiable amongst the mass of housing, by being fitted with a different window pane standard. This was a tragedy as it led to a “them” and “us” situation which would have been an anathema to the founding fathers.

*Involvement of residents:* Residents’ involvement should be a key component of the building and running of any future garden city from the outset. Currently, this town is within WHBC which seeks to manage the entire borough in a single consistent manner. This causes conflicts over issues that need to be managed differently in this garden city.

There has been a suggestion of a town council here but since this would not control either the environment or planning, it fails to meet the requirements for managing a “garden city”.

The Society looked at seeking to manage the place under a neighbourhood plan under the Localism Act but again, it did not see this meeting the requirements of a “garden city”, since managing the environment is not a planning matter. Moreover, the means of funding a “garden city” properly do not exist.

*Trees and the natural environment:* There is a multiple responsibility for trees in this town that should be managed as a single entity and as a key part of the way the town is managed.

We have a WHBC Tree Strategy which does not allow for the management of trees to enhance the visual scene. So pruning, pollarding and lopping of trees as part of the overall environment (and which was a feature of the town’s management of trees from the outset) is no longer done and there are constant rows about this. The strategy is designed for the borough as a whole.

We have a separate HCC Tree Policy which is part of the county policy of managing trees in verges and close to the highway. It does not allow for trees to be managed from the point of their appearance.

Perversely, HCC contracts with WHBC to implement the County Tree Policy within the town. So this means that not only does WHBC have to check to whom a tree belongs before taking any action, it has to implement two different tree regimes in the same town – neither of which are appropriate to the place. It is absurd.

*Duration of any special planning authority:* The authority over a garden city should remain separate from borough, county and regional structures for at least 100 years. It should then be up to the residents to determine if they want their garden city to re-join, as it were, national organisation structures.

*Planning laws within garden cities:* Planning laws within any garden city should be subject to the overall design formula designing the garden city from the outset. Those in control of the planning process should have access to independent advice to settle design controversies that may arise from time to time.

Appeals to the Planning Inspectorate should not be allowed and should be settled by reference to that independent planning advice or, failing that, to independent arbitration where the overall design concept is the basis for interpretation.

*The management of a “garden city” is crucial:* If a garden city is to succeed, it will have to give close and continuing attention to the natural environment in which the built environment sits. Conservation legislation does not do this. For example, this does not cover hedges or front gardens adequately. In a garden city, if these are features of the design then the local legislation of that town should encompass these.

In this garden city, there were countless small flower beds that have been allowed to get out of hand. Because they are in a mess, they are then removed by the Council and turned over to grass as this is cheaper to maintain. However, the real cost is that the town is surely losing what it stands for. Slowly, over the years, the ethos of the place is being neglected, and then tidied away into oblivion. Meanwhile, local politicians like to pour praise on the town centre which is maintained on a different basis (ie, as it should be) to the rest of the town.

*Cost of a garden city:* Inevitably, garden cities will incur costs that are higher than those found to be the norm in other areas. That needs to be recognised from the outset and planned for into the future. Little explanation is needed for this as the whole of the natural environment has to be managed in accordance with a plan. This is simply not the norm in local government. It is more akin to managing a garden which has to be managed over a very different and long term time frame.

Enforcement of the overall plan is essential. Currently, enforcement of both planning and estate management rules is virtually non-existent in this town as WHDC does not wish to incur cost. These costs, as well as the continuing education of subsequent generations coming to a garden city, are key components of any garden city that wants a future.

The means of funding that higher cost of operation must be part of the design concept of the town so that it is insulated from the pressures of local authority funding as set out by the Treasury from time to time. The “garden city concept” saw a community that worked and lived in the same town. Whilst this is simply not possible or likely today, it did provide the town with income to manage its own environment. Rents from factories went towards the higher cost of maintaining the garden estate. This made it sustainable.

When the Commission for New Towns was abolished, the proceeds from its local estate in this garden city were taken as a “dividend” by the Treasury and no alternative method of support was put in place. No allowance is made to the local authority that it has to manage an estate comprising the largest group of twentieth century domestic houses in a single conservation area, or to the costs of managing the Estate Management Scheme. So the local authority has never had the means to look after the place properly.

Interestingly, Letchworth Garden City, which was not part of the Commission for New Towns, managed to retain its industrial property portfolio. This was placed in trust so that the income it produces is now used to massive advantage to keep the place as it should be. This model is one that your Committee might consider.

*Boundaries of garden cities:* Where a garden city is envisaged crossing two local authority boundaries, those boundaries should be altered so that the “garden city” remains within a single management entity. Here there is a proposed development named “Birchall Garden Suburb” which falls partly into the neighbouring local

authority area of East Herts. We see this as fraught with peril. It is difficult enough to deal with two local authorities but to deal with a third that has absolutely no history of “garden city” management or even more important, the “ethos” of one, is something we fear.

*Wider borough planning:* Section 52 suggests that local authorities should consider planning green belts around new garden cities. This is commendable but this suggestion needs to be incorporated properly into the fuller planning cycle. Currently, this town is protected by green belt around it so that it does not coalesce with either Hatfield to the south, St Albans to the west or Hertford to the east.

A requirement for building some 16,000 homes on WHBC in the planning cycle to 2031 is being suggested and green belt protected areas around the town may well have to be sacrificed to enable that target to be reached. In the case of Welwyn Garden City, a key component of its founding – namely that it would be anchored in the countryside – is now at risk. If green belts are set up to protect new garden cities, then succeeding administrations and law must support the notion that they are permanent green belt areas otherwise it is all rather futile.

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