

GARDEN COMMUNITIES

- Why Communities Say No

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Foreword By Griff Rhys Jones



So here we go. We are in the throes of another "emergency" and this is one that has been so long coming and has been so urgent for such an extended period that we must sometimes wonder whether we have been driving on towards the cliff wearing a blindfold. We need houses. Of course. We need to expand the stock of live-able places. Yes. We have done so for a long time. It is now apparently a "crisis". OK.

But it is really a crisis of thinking, organisation and intent, not a crisis of build, build, build. In every emergency, the standard warning prevails. Don't license panic. You will make things worse. Bad emergencies make for bad results.

Let's examine a main concept here before we go any further. "Planning" by definition means looking to the future. That must mean the long-term future as well as the next few years. We need to recognize that people who urge care, caution and attention are not dwelling in the past. They are protecting the future. More than anything, the conservation of scarce resources, the promotion of good design, the creation of live-able places and the building of new urban areas (especially in virgin sites in that limited resource - our countryside) needs to be done with an eye on a long-term future. This is the real meaning of sustainability.

We are doing something that will affect the well-being of our children, their children and their descendants for centuries ahead. It is about what we make and what it will become. It is about creating a new heritage, not solving a selfish need. We have to do it well. We have seen the failure of urban sprawl created by an opportunistic free-for-all. We must learn from it. When we saw what we had done in the thirties, as a society, we introduced rules to contain ourselves. They included national parks and green belts. They included restrictions on urban sprawl and blight. And they were good.

It might appear that "garden communities" as envisaged by the Government as a reaction to the above emergency, and detailed in these pages, are in the same vein. There was talk of new garden cities. There were promises to provide affordable homes with the consent and advice of communities. There were high sounding words offering to create beautiful new places with adequate transport to ensure that they were also sustainable and "green".

Read this document. The pages that follow show that fine words are meaningless without leadership. Good intentions are worthless unless you stick to them. Guidelines are dangerous without the strength to ensure that they are acted upon.

Here, below, we have the real plan. Here are disordered schemes that ignore local communities and build on flood plains and unsuitable sites. We encounter proposals that are not going to answer local needs for housing at all, but will waste precious countryside by building low density sprawling estates and creating expensive houses. These are nearly all extensions and not new settlements. Many of these faults are happening because of the absence of any proper procedures to control the price of land. Proposals for compulsory purchase have been abandoned. Alongside that a willingness to create affordable houses has been abandoned too. We read of the absence of proper transport and of the vaguest possible lip-service to community facilities: no cycle paths, no parks, no shops, no provision of upgrade in facilities such as water, waste disposal, healthcare or education. No "places" at all, in fact. Just more sprawl.

What sort of a new Jerusalem are we intending to create in Britain's green and pleasant land? Having travelled the length and breadth of this country, I can report that it is still a beautiful place. But it needs enlightened protection. To preserve a country worth living in we must do this sort of building properly. It must be well designed and thought through. Mark my words, every five years hence, there will be a new emergency. It is inevitable. Can our leaders and planners promise that we have the guidelines in place to respond to them well?

CPRE have once again researched the figures. Brownfield land in England can accommodate one million houses. So get on with it and use that. But if we do need to go out into the countryside let us provide the right sort of new communities and let's do it by bringing down the cost of land, by rewarding owners of these sites but not enriching them beyond their wildest dreams, by not impoverishing our own future with a shoddy scramble of free-for-all opportunism, seemingly based on the principle that the winner takes all and leaves nothing for the rest of us except desolate blight. We might then create genuine affordable useful homes in good places that will last the course.

The protests, assessments and legitimate concerns gathered below make sober reading. There is a simple rule in building which every craftsman knows. Prepare properly and it will last longer. Build only on good foundations. These major works envisaged to smother the countryside seem to be scrappy, hurried and unskilled. They will come to haunt us if they go ahead.

Griff Rhys Jones President, Civic Voice

Introduction

"Garden communities" – garden cities, garden towns, garden villages or, in reality, usually garden suburbs – are a central plank of the Government's drive to get more homes built. In England the Government is supporting development of 10 garden towns or cities and 14 garden villages, while the Welsh Government is also supporting a garden town outside Cardiff. Beyond those, dozens of substantial greenfield developments are being promoted as garden villages by their promoters.

Communities secretary Sajid Javid recently said that "locally led garden towns have enormous potential to deliver the homes that communities need". Many of the communities involved in having a garden community imposed on them, however, disagree. Cash-strapped local authorities may have been financially induced to support the schemes, but the communities themselves are, for the most part, strongly opposed. Yet they have been denied a voice; the developments are not locally led and will do little to provide the homes the country, and still less the communities themselves, actually need.

In May 2017, the Smart Growth UK coalition published a report² on the Government's proposals for Government-supported garden towns and villages in England. *Garden Towns & Villages – Unwanted, Unnecessary and Unsustainable* examined the 24 proposals in relation to "garden city principles", their use of land, their demand for infrastructure, their impact on housing need, their proposed transport links and the views of local communities. The report proposed an alternative way of providing homes based on the Smart Growth approach.

Despite the opposition, the Government has continued to promote its garden community plans and more and more unofficial proposals continue to be mooted. But there is a gathering tide of anger about the greenfield sprawl now being promoted across the country and, while garden communities would, in reality, only account for a small proportion of this, their advocates claim they demonstrate an intellectual and moral case for such low-density, car-dependent developments.

Effective local campaigns are running in opposition to many of the garden community proposals but they are finding their perfectly legitimate concerns ignored. They face a system which has become increasingly geared to sweeping opposition aside and securing the support of local authorities whether they really want the developments or not.

Supporters of garden communities, particularly those with substantial vested interests in their development, will dismiss opponents as "NIMBYs". Yet that term is generally used to attack people who are defending their local environment by those who are seeking to profit from its destruction. Standing up for your local environment and conservation is not merely a basic right, however, it's a moral obligation.

In this report we are giving many of those voices a chance to be heard in unison. Here they set out their views on the damage these plans would do.

Why the Communities Are Saying No



Huge areas of farmland are threatened with destruction [Hands Off Wivenhoe]

The case against garden communities was set out in detail in our report last year³ and can be read there. In summary the objections are:-

- few of the proposals are the new stand-alone settlements demanded by garden city principles and some are merely unrelated urban extensions many miles apart;
- most proposals would have low-densities, squandering precious land wastefully;
- few make significant or, in many cases, any use of brownfield land;
- the proposals would all necessitate extensive new infrastructure and, in many cases, no provision has been made;
- most of the proposals are largely or wholly dependent on road transport, increasing greenhouse gas emissions, and most would further exacerbate congestion on local roads;
- despite the requirement that they be "locally supported", in reality this amounts to little more than acceptance by local authorities in response to offers of cash;
- many are the subject of fierce local opposition.

Smart Growth is an holistic approach to planning and transportation to secure sustainable development and achieves the most when all the parts work in harmony with one another. Not all of the groups here represented support all of the approach in its entirety, but certain themes emerge regularly from their input which lend support to the Smart Growth concept. These include the need to protect our land and the ecosystem services it provides, the high infrastructure cost of greenfield development, particularly at remote locations and the unlikelihood of that full need being met and the inevitable car-dependency of new, low-density settlements far from rail-based networks. Dispersed greenfield development is high-carbon development.

Garden Communities Endorsed by the Government

The Government is supporting 10 "garden towns and cities" and 14 "garden villages" in England though some are, confusingly, also called garden communities. Very few of them are the stand-alone developments demanded by the prospectus and some are just aggregations of urban extensions to existing towns, sometimes many miles apart.

The developments are supposed to be "locally-led", but often this simply means that hard pressed local authorities have been inveigled into supporting such developments to gain a share of the funding the Government is offering. In October 2017 the Department for Communities and Local Government allocated further funding of £2.5m to nine of the ten "garden towns" (the exception being the predominantly brownfield Ebbsfleet).

"Garden towns being supported by Government are committed to delivering high quality, well-planed [sii] and well-designed new communities that will stand out as exemplars of good development in years to come⁴," said the announcement.

Further proposals are also likely to gain Government support. In November 2017, the National Infrastructure Commission published a plan⁵ for the "Cambridge-Milton Keynes-Oxford Arc" which proposed building a million new homes in this stretch of countryside over the next 33 years. To achieve such a high and possibly unprecedented rate of urban sprawl, the Commission suggested exploiting developments, from smaller scale garden towns up to two new city-scale garden cities of up to 150,000 homes. This, it said, would include new settlements and major urban extensions between Oxford and Milton Keynes and Bedford and Cambridge.

Many of the proposals are attracting serious local opposition and a number of organised campaigns have been set up. Here we present the views of some of the leading ones.

Bailrigg Garden Village

by Citizens of Lancaster Opposed to Unnecessary Development (CLOUD)

The Proposed Development

Bailrigg Garden Village (BGV) was announced, without any prior notification to Lancaster residents, on 2 January 2017 as one of the 14 garden villages approved by the Government. According to Lancaster City Council: "Bailrigg Garden Village presents the best opportunity in generations to extend Lancaster's strategic housing supply in a manner which respects and reflects the ethical beliefs of the local community about sustainable living, local identity, and high levels of connectivity through public transport and cycling".

Since the Council did not seek the views of the local community before issuing this statement, its validity must be in doubt. It is proposed that BGV will consist of 3,500 houses, rising potentially to 5,000, located on green fields mainly to the west side of the mainline railway to the south of Lancaster and straddling Lancaster Canal. The Garden Village boundary extends from the Lancaster suburb of Scotforth to just short of Galgate, taking in the Lancaster University campus.

The Land Under Threat

This is an enormous housing development. It would be nearly three times the size of Galgate (currently 1,200 houses). The land is farmland, and other amenities include the Lancaster Canal, ancient woodland and significant Roman archaeological sites at Burrow Heights. To be viable, the Garden Village would require extensive, costly new road links to provide access both under and over the West Coast Mainline railway to connect to the A6 and to the M6, plus a reconfiguration of M6 Junction 33, as well as a road crossing of the Canal.



The land, looking towards Lower Burrow [CLOUD]

Reference to our map shows that BGV fails to meet the Government's own criteria for a garden village. "The garden village must be a new discrete settlement, and not an extension of an

existing town or village," said the *Call for Garden Villages*⁷. "This does not exclude proposals where there are already a few existing homes."

In fact, BGV represents urban sprawl. Indeed in the *Final Report on the Local Plan consultation* published in February 2016, that is prior to the Government call for garden village proposals, a key segment of the land, now designated BGV, was Urban Extension 1 (UE1). See page 14 of Lancaster's local plan report in 2016⁸. Moreover, the supposed area of separation from Galgate is not secure, with part already likely to have road infrastructure running through it and no guarantee of its survival beyond a 15-year period. Indeed, we understand that the infrastructure to be put in place would be sufficient to support further housing development.

Background to Opposition

A local community action group of concerned residents was formed in January 2017 during the City Council consultation period. This began as an informal group which set up_Galgate Community Action Group Facebook. They drew up a petition which was signed by nearly 400 residents from Galgate, Bailrigg and Burrow and was presented to a meeting of Lancaster City Council in April. Councils are obliged to debate petitions with this level of signatories. For legal reasons the Council decided to defer this debate until December 2017, when the draft local plan was debated.

Citizens of Lancaster Opposed to Unnecessary Development (CLOUD) evolved from that original group. It was formally constituted in October 2017.

The Scale and Immediate Impact

Existing local services - such as schools and GP surgeries in south Lancaster and indeed the Royal Lancaster Infirmary - are already at crisis point. Fire, police and ambulance services are also already overstretched. And yet at the Council drop-in sessions for the local plan, the planners only offered vague assurances on how these vital needs would be addressed.

Traffic Congestion and Air Quality

Roads in Lancaster are already congested. BGV would add to these problems, especially along Ashton Road and on the A6, the routes from it into the city centre. It is already officially acknowledged that traffic at the Pointer Roundabout where these routes meet is, to quote, "above capacity", hence the congestion.

But more serious than queues are the scientific studies which, on the A6 corridor into and out of Lancaster and in town, have shown high levels of air pollution, with consequent health risks. More traffic is inevitable from 3,500 houses because the location encourages car dependence, whilst the re-configuration of the motorway junction to a site adjacent to Lancaster University makes this site especially attractive for long distance commuters for Preston and Manchester.



Pointer Roundabout [CLOUD]

There would be between 8,400 and 12,000 people of all ages in BGV, depending on how many dwellings are actually built. This would place an additional load on the transportation system. The Council has admitted that this has not yet been modelled, so the impact cannot yet be predicted. However, we know that the majority of journeys into and out of the Village - as it is in all predominantly residential areas - would be generated by journeys to and from work and to and from school, the "school run" potentially creating four journeys a day rather than two.

Moreover, the Council cannot yet say where BGV people would work, other than inviting us to infer that a large proportion would work at the University, "the largest employer in the city". We discount this on the basis that, while we believe that around 2,000 people work at the University at the moment, we are not aware (and we doubt that the Council is) of any expansion plans by the University which would create such a significant amount of employment, particularly now at a time of Brexit-generated uncertainty for higher education in this country. Neither can the Council tell us where the school places (say between 2,000 and 3,000) would be provided.

In sum, irrespective of any other arguments, the lack of planning to cope with an unknown load being placed on an already congested traffic system means that the decision to proceed with such a concentrated development in south Lancaster is, and remains, reckless until adequate modelling has been carried out and convincing responses devised. Rapid bus transport and a cycling superhighway are aspirations, not carefully worked out solutions.

Moreover, air quality is already a major issue, as reports by Lancaster Air Quality make clear⁹. It is especially a problem in Galgate, along the A6 corridor, and on Ashton Road leading to the Pointer Roundabout into Lancaster. Reconfiguring Junction 33 to by-pass Galgate might improve air quality on the A6 in Galgate, but increased traffic flows from BGV would inevitably worsen it on the A6 corridor through Scotforth and around the Pointer Roundabout.

Houses Rather than Jobs

Lancaster's local plan and particularly BGV concentrate on the provision of additional housing, rather than the extra jobs which Lancaster really needs. The plan envisages the construction of 13-14,000 new houses by 2031, but the generation of only 9,500 new jobs. Why would so many people want to move to Lancaster when there are not going to be jobs for them? What impact would such a large influx have on employment prospects for existing residents? A 2012 City Council report analysed the reasons people had for moving out of Lancaster. Poor employment prospects were by far the single largest cause, cited by half the respondents. Moreover, what is really needed here is more affordable housing, not the kind of up-market properties which will largely be constructed by developers in a garden village. Because of some of the infrastructural costs they will be obliged to meet, the homes they build must inevitably be expensive.

Lancaster University is one of Lancaster's largest employers and much has been made of the rising employment prospects from a new Health Innovation Campus to be built on land adjacent to BGV. Page 17 of the public reports pack that went to Lancaster City Council Cabinet on 3 October 2017 quotes potentially 3,000 new jobs and 4,000 new students at the University in the next decade. That would represent an unprecedented growth during a period of high uncertainty for higher education. There are questions around fees, and the effect of Brexit on both staff and student recruitment and research funding. Where are the new students coming from? On the Health Innovation Campus, Phase 1 of the Health Innovation Centre simply involves moving the existing Medical Faculty down to the new site so no new jobs? Even Phase 2 with emphasis on innovative small business and business engagement is unlikely to bring masses of new jobs to the campus, rather a "slow burn".

Objectively Assessed Need

There have long been doubts expressed about the objectively assessed need for housing in Lancaster, based on projections_provided by Turley Economics¹⁰. Their 2014 report was shown to have been based on out of date Office of National Statistics data and was revised. Turley still projected a rate of house building of 675 a year from 2011-31. This is more than twice the average building rate of the last 15 years. Calls from the Green Party for an independent audit of the Turley figures were rejected by Lancaster City Council. A further revision is currently underway, but there remains significant doubt about exaggeration in the figures and the implications for BGV. A good overview of the issues is provided by the Virtual Lancaster website.

Flooding

Flooding has been for years, and remains, a major threat to people's lives and well-being around Lancaster. People in Halton, Bowerham and Hala, as well as Galgate, were all badly affected by the November 2017 floods¹¹. Because of climate change, we know it is going to get worse. A huge investment in flood protection is already needed, not least to control the Burrow Beck, a cause of much damage upstream - and downstream it runs through the Garden Village site. But such measures, though necessary, would not provide flood security for homes in Galgate. These were not swamped by Burrow Beck but by the River Conder and the Whitley Beck, and need urgently and separately to be addressed.



Land between Galgate and Burrow [CLOUD]

The construction of a slip road from Junction 33 across the flood plain of the Conder risks making matters even worse. The planners claim that addressing flood risk to the Garden Village from Burrow Beck would also reduce risks for Galgate is not credible. Galgate is setting up a flood resilience group to which CLOUD will be affiliated.

Cost

To service BGV it was estimated in 2016 that £90m needed to be spent, largely on changes to Junction 33 and the two crossings of the railway, but not included were the costs of a proposed road and a bridge over the Lancaster Canal to connect the Garden Village to Ashton Road. Lancashire County Council's 2016 Transport Plan includes the estimates set out in Table 1 below.

This is quite apart from the promised schools, health services, flood defences and much needed transport improvements. The aim appears to be to raise some of the finance from the Lancashire Enterprise Partnership (LEP) through the <u>Growth Deals</u> or <u>Road Investment Strategy</u> with a bid of £150m being submitted to the Housing Infrastructure Fund. The recent history of Lancashire road projects running over budget gives added cause for concern. In 2001, outline costs for the Bay Gateway were put at £62m; Lancashire County Council estimates in 2004-5 stood at £87m; the final cost in 2016 was around £140m. This is especially worrying given that the Bay Gateway, linking the M6 at Junction 34 to an existing major road into Heysham, is less than 3 miles away from the proposed Junction 33 reconfiguration.

Table 1: 2017-2024 Road Expenditure Estimates associated with BGV

Junction 33 Reconfiguration	Final outturn cost dependent on option and delivery subject to securing Growth Deal, developer and/or Road Investment Strategy funding.	£40-60m
Lancaster South Supporting Infrastructure: Local Road Network including 2 crossings of Mainline railway	Final outturn cost subject to Garden Village design considerations and delivery subject to developer funding. Assumes two crossings of the West Coast Main Line required.	£22m
A6 South Lancaster to City Centre Route Management Plan £10m A6 South Lancaster to City Centre Route Management Plan	Final outturn cost dependent on scale of works and full delivery may be dependent on securing developer contributions and future integrated transport block allocations.	£10m

So does BGV with its attendant high infrastructure costs really offer value for money for local and national taxpayers? Lancaster City Council has been committed, since the early 2000s, to the regeneration of Morecambe. Now that the Bay Gateway is open this could at last be achieved to the benefit of the whole city. There is also the potential for further business development and the building of affordable housing on brownfield land. Such costed alternatives should have been presented, so that Lancaster residents could compare their merits to what is claimed for the Garden Village.

The Current Situation

Lancaster City Council voted to adopt the local plan in a packed meeting on 20 December 2017 at Morecambe Town Hall. BGV is of course one of the key elements of this plan. A CLOUD representative gave a 5-minute address in this Council debate, summarising our reasons for opposing BGV. They were supported by 40 CLOUD members who filled the public gallery.

But the subsequent debate was led by the planners, rather than the elected representatives, and it did not address the issues we had raised. Moreover, the City Council even voted against an amendment to delay the decision on the local plan until revised flood risk assessment reports had been received. With the exception of the Green councillors, one Conservative City and County Councillor and an abstention by the Mayor, the City Council voted for the local plan. The local plan was published in February and is currently under public scrutiny. The plan, together with objections from CLOUD (and no doubt others as well), will then go to central government after

the 6 April deadline. A planning inspector will be appointed to review the plan, and any objections will be aired at public hearings currently expected in the autumn of 2018.



To be lost forever? [CLOUD]

Dunton Garden Village

by Residents Against Inappropriate Development

The Proposed Development

A major development west of Basildon, with 4,000 to 6,000 houses, was first put forward by Basildon and Brentwood Borough Councils under the name Dunton Garden Suburb. Following a hostile response to consultations, Basildon stopped supporting the idea but Brentwood continued to propose a 2,500 home development called Dunton Garden Village. This subsequently secured Government backing in January 2017 and the number of homes proposed had actually been increased to 3,500 as a longer term objective.



[R.A.I.D.]

The Dunton Hills Garden Village proposal is now being promoted jointly by Brentwood Council and its development partner CEG and is intended to meet a third of the borough's "identified housing need". "Garden Village status will enable accelerated opportunities to support a vibrant London by providing new homes and contributing to an efficient labour market," said Brentwood's 2016 Expression of Interest¹². The Council is now running a preferred site allocations consultation in a last ditch effort to get more support before submitting its local plan later this year.

The Land Under Threat

The land under threat is located between Brentwood and Basildon and the Council stresses its direct road links to the A127 which adjoins the northern boundary, as the A128 does the western. West Horndon is near the western boundary and Laindon is a little further from the eastern.



Productive farmland threatened by the garden village development [R.A.I.D.]

The 224ha site is mostly productive farmland, with a golf course and small areas of linear woodland running along a watercourse which is bounded by Flood Zone 2 land. The site also has a group of listed buildings including Dunton Hills Farmhouse at its centre. The land is all within the Metropolitan Green Belt.

Our Objections

Dunton village has a character and history that goes back to at least the Domesday Book. The surrounding countryside is a wildlife corridor carrying protected animals from its ancient woodlands and ponds along ditches and hedgerows to the nearby nature reserves of Langdon Hills Country Park. Parts of it have been designated as local wildlife sites but the planners conveniently neglected to mention that in their habitat assessments. We must continue to protect it from the forces of urban sprawl for benefit of future generations, and we must remember that this is part of a bigger battle to save green belt and protected countryside everywhere.

The local infrastructure of roads, rail, schools and hospitals are already used way beyond their intended capacity and in these times of austerity there is little prospect of the major improvements needed to cope with the ballooning urban areas. We face ever more congestion on the roads, oversubscribed schools and long waiting times at health centres.

We can cope with our growing population by building more well managed higher density accommodation in cities where it is needed, but we must also seek to create more jobs away from London, in the South West and North East where there is more space. The only force that is driving this threat to our countryside is the power of money behind big construction companies who can make huge profits. Agricultural land that is worth just thousands of pounds per hectare soars in value to as much as a million pounds per hectare as it becomes land for housing developments.

North Essex Garden Communities

by the Campaign Against Urban Sprawl in Essex (CAUSE), Hands Off Wivenhoe and Stop Erosion of Rural Communities in Local Essex (SERCLE)

The Proposed Developments

The initial focus of our concern was an unsustainable, undeliverable and unviable proposal for 24,000 homes, known as West Tey. From this, the North Essex Garden Communities project has since evolved to include the 9,000-home East Colchester and the 13,000-home Andrewsfield, known as West of Braintree, and the groups have become increasingly concerned about the project as a whole.

To add to these three "garden communities" already in the north Essex pot, a fourth is now being promoted, the 15,000-home Monks Wood adjacent to Coggeshall. The authorities' obsession with very large, stand-alone settlements means that this equally unsustainable proposal must be treated seriously.



The sites were proposed by land owners themselves [CAUSE]

All four sites are proposed by land owners, not selected for any strategic reason. In fact, the *North Essex Garden Communities*, Section 1, states that the locations are unsuitable unless garden city principles are applied in policy. All would be heavily car dependent, there is no employment strategy to support the garden communities, no feasibility studies have been carried out on the promised "mass rapid transit" and we have very serious questions about the viability of the project. Local people's views have been ignored throughout the three-year plan-making process.

No less than 8,500 people oppose West Tey and only 4% of people we approached when going door-to-door did not wish to sign our petition. CAUSE arguments were made to the examination in public¹³.

The Land Under Threat



The plans threaten 43 square kilometres of land [Hands Off Wivenhoe]

The West Tey proposal would occupy up to 1703ha, East Colchester up to 816ha, Andrewsfield (West of Braintree) up to 996ha and Monks Wood up to 810ha of greenfield land. Most of the land under threat is highly productive grade 1 and 2 farmland. A number of hamlets and villages would be subsumed by the proposed settlements. The proposal would represent the wholescale urbanisation of a corridor of rural north Essex.

Status of the Project

The North Essex Garden Communities project (East Colchester, West Tey, West of Braintree) was examined by an inspector in 2018. The promoter of Monks Wood – Lightwood - believes that their proposal has not been fully considered as an alternative option. In addition, the Monks Wood representations were not sent to the inspector by the North Essex Authorities (Braintree, Colchester, Tendring with Essex) with the result that Lightwood missed Week 1 and a rerun of part of the hearing may have to be arranged.

It is clear from our participation in all 12 sessions of the examination in public that our concerns about viability, deliverability, land ownership, infrastructure, spatial strategy and employment are correct. The North Essex Garden Communities have received £2m from Government and the authorities have spent a further £2m, yet the Section 1Plan is nothing more than three broad areas of search. We have particular concerns that the promises of a "step change" cannot be met

in practice and that there were repeated attempts by the authorities to pass the buck down the line to future development plan documents. The opposition groups argued consistently that *if* the Plan is found sound, garden city principles must be "hard-wired" into policy in the Plan to ensure delivery.

Viability

The authorities admitted at the examination that land finance costs have not been included in the viability appraisal. This could raise the debt burden over the lifetime of the project (West Tey alone) to as much as £4bn if all land is bought up-front. Nor has inflation been included in the model...because it is too difficult to forecast.

These are omissions which go to the core of the deliverability the garden communities.

Delivery vehicles

The land owners do not wish to participate in the Council delivery vehicles, nor do they wish to accept less than market value for their land, which is why no land deals have been signed.

It was confirmed by land owners at all three garden community sites that no negotiations are in progress. Stephen Ashworth, the NEGC lawyer, confirmed that land owners had become less willing to participate in discussions since their land was included in the *Draft Publication Plan*. There is no reason to believe that the land owners would become any more willing to negotiate, particularly at the below market value in the minds of the authorities.

The authorities, therefore, have no control over any of the land, which makes it impossible for them to deliver any of their promises.

The legislation they wish to use for development corporations does not exist yet. CAUSE¹⁴ and the authorities have submitted responses to the Government consultation.

Compulsory purchase at existing use value is not an option, even though local residents have repeatedly been told by Council officers at drop-in events that this is how the infrastructure would be funded. Hope value must be paid. This would have an impact on viability and infrastructure.

The land owners' consortia and their developers wish to develop the respective sites independently, thus making it difficult to see how the authorities will be able to deliver the garden communities from the 'elevated position' they aspire to.

Conflicts of Interest

Interest farming: The authorities would profit from their own delivery vehicles by borrowing from Government, lending to them and receiving interest back.

Master-developers' profit: The authorities' viability appraisal includes a 15% profit for each garden community.

The authorities are therefore in a difficult position when assessing planning applications from other developers outside the garden communities. They will be conflicted because they are making money from their own scheme and may be tempted to reject other schemes.

Infrastructure

The inspector invited infrastructure providers to attend the infrastructure session and asked each of them questions about certainty, timings, costs, delivery. Apart from water and broadband, the session confirmed many uncertainties about infrastructure delivery.

All are at early stages of scoping and therefore practicalities and funding are not clear. There is no deliverable transport plan. When the inspector asked one question about where funding for MRT would come from, the answer was: "synergies"...

Highways

There is no certainty about the dualling of the A120 and won't be unless and until the Government includes the A120 in the next Road Investment Strategy. If it does not go into RIS2, then funding would have to come from somewhere else. "Another ministry" was cited as a possibility. There are no feasibility studies or costings for the A120/A12 link road/'parkway' – no feasibility studies or costings.

Healthcare

There are no identified costs for primary healthcare or any health infrastructure. Doctors' surgeries would not be sufficient. The new "hub & spoke" model might be appropriate.

Population numbers and demographics would be required for planning. If there is any additional estate, the CCG has responsibility to meet costs and would have to apply for a revenue allocation on a recurrent basis. Both approval for capital and revenue would have to be successful. There is a workforce issue.

Railways

A number of interventions required to meet demand on the Great Eastern Mainline (GEML) were set out in the *Anglia Route Study*. Previously, interventions would have been included in a control period. Now, each project must be assessed on its own merit and a business case made. Under questioning, Network Rail stated that there are as yet no costings for the interventions required. A full business case must be made and then this would have to go through an approval process with the DfΓ.

Abellio's new fleet of trains will result in only a 20-30% capacity increase on the GEML, not 55% as often quoted, which includes West Anglia. No timetabling work has been done to see if it is possible to move Marks Tey station.

Mass Rapid Transit

There was a preliminary report on the proposed mass rapid transit (MRT) which concluded only that MRT could be looked at and that an economic case *could* be formed. It was not a feasibility study to demonstrate practical deliverability. The assumptions assumed high self-containment of the garden communities and aspirational modal shift.

Unlike the employment study, which used an "aspirational scenario" to attempt to achieve a goal of one job per household or nearby, a conservative scenario from the same study was used for MRT modelling. Such a lack of consistency is worrying.

There are no clear answers on funding of MRT, with terms like "synergies", "may get subsidies", "aiming to run as close to cost neutral as possible" bandied about. It could not be funded by the garden communities alone and would have to 'take into account the entire population".

Education

New schools would depend on developer contributions.

Employment

There is no evidence whatsoever of a strategy for employment growth aside from allocating land and hoping jobs would come. Discussion at the examination was about the amount of employment land for the Plan, not about how to attract businesses to the garden communities and encourage economic growth. A key report on the evidence base which found that it would not be possible to create one job per household within the garden communities or nearby had not been referenced in preparation of the employment figures.

Spatial strategy

We remain extremely concerned about the spatial strategy to distribute three very large garden communities at random along the A120. What we heard at the examination gave us no reassurance.

With regards to West Tey, we heard that the justification for a minimum of 15,000 homes is a desire is to provide new residents with a choice of two secondary schools with eight to ten forms. This is not a strategy for deciding on the size of a development. Essex County Council guidelines state that 3,000-5,000 homes are required to support a new secondary school and there is simply no need for two huge schools. A smaller community could support a new school, or existing schools could be expanded.

We have long had concerns about the sustainability appraisals and consideration of alternatives. We were backed up by Lightwood on this point. However, the result is that a possible challenge by Lightwood to the Plan is a risk and is of concern to us. The authorities' narrow focus on large, stand-alone communities in Section 1, to the exclusion of other options, has resulted in the unsustainable Monks Wood proposal and, as a result, yet more greenfield land is at risk.

None of this was helped by the late appearance of Lightwood in week two of the Examination, due to an oversight on the part of the authorities, who did not submit Regulation 19 representations from Lightwood to the Planning Inspectorate.

"Objectively Assessed Need" (OAN)

The prevailing view of the developers at the session was that the higher the OAN, the greater the chance of affordable housing being delivered. We disagree. We have concerns about the focus on supply rather than *need*, and in Colchester's case we have concerns about the fly-wheel effect of fast growth.

We submitted a paper¹⁵ to the Government on this topic.

The points we made at the examination were clear about this:-

- there must be robust evidence to justify a departure from DCLG projections and we have been unable to find evidence for the uplifts applied in Braintree or Colchester;
- high targets, and delivery left to developers, do not deliver more affordable homes. Colchester, despite being the fastest growing district in Essex over five years, and second fastest last year, only delivered 44 "affordable" homes. Affordable need must be addressed in policy, not OAN. In addition concerns were raised, and discussions held, about the proposal by councils for a 50:50 split of housing on each site and how this would work out in practice.

Conclusions

The core issues of infrastructure, misrepresentation and misleading justification are the underlying facts of these proposed developments. If ever there were a template for an ill-conceived and poorly administered plan, these "garden communities" top the leader board.

Otterpool Park Garden Town

by No Otterpool New Town

The Proposed Development

The communities comprising the historic villages of Lympne, Westenhanger, Newingreen and Sellindge in the district of Shepway (Folkestone) in East Kent face annihilation by burial under a so-called "garden town" comprising 12,000 houses and the massive infrastructure needed to support the development in this essentially unspoilt rural area.

In that event we would be covered by an urban sprawl several miles across.

Our Objections

The criteria laid down in the DCLG prospectus *Locally-Led Garden Villages, Towns and Cities*¹⁷ published in March 2016 supposedly governing such developments have been largely ignored, the most blatant of which was the *Expression of Interest*¹⁸ registered by our Folkestone & Hythe District Council with DCLG, on receiving a very large sum of money, without there being any evidence of support from the communities named above.

Quite the opposite was and still is the case as exit polls carried out during two perfunctory and highly prejudicial public consultations barely registered 3% public support.

Our campaign is known as the No Otterpool campaign and we have already had three big public demonstrations filling the town of Hythe with 750+ angry residents with banners. Were this ill-conceived, socially and environmentally destructive plan to proceed we will be out on the streets again to stop it.

Many of our councilors wouldn't acknowledge the truth of what is going on here if it bit them in the leg. The Executive is only interested in the money.

Oxfordshire Cotswolds Garden Village

by the Eynsham Planning Improvement Campaign (EPIC)

The Proposed Development

When Eynsham residents prepared their neighbourhood plan as the village's contribution to the wider local plan being compiled by West Oxfordshire District Council (WODC), they took their responsibilities very seriously. There was thorough and accountable consultation with local people, and recognition that more houses were necessary in Eynsham for *local* needs. Indeed, the neighbourhood plan recommended over 700 new homes, itself a 35% increase in the size of the village, which residents nevertheless felt Eynsham could just about absorb, not least because it could fund construction of a much-needed new primary school.

The preparation of Eynsham's neighbourhood plan was far advanced when, out of the blue and without any prior warning or consultation with Eynsham, WODC imposed a "garden village" of 2,200 new houses on Eynsham parish, together with a park & ride and a massive "science park", while increasing the number of new homes in the village itself to 1,000.

The reason WODC gave for the sudden addition of 3,200 new homes was their "duty to cooperate" (note, this is not a "duty to obey") in meeting Oxford City's controversial "unmet housing need". Of these 3,200, 2,750 are specifically West Oxfordshire's quota of Oxford housing, leaving just 450 for locals. WODC, possibly in a panic, decided to dump the whole quota on a single parish, Eynsham. This means that both the garden village and Eynsham itself would together become a dormitory suburb of Oxford, an outcome actively discouraged by the Government's guidelines on garden towns and villages.

Furthermore, the garden village, if constructed, would be less than 100m away – the width of the intervening A40 – from the north of Eynsham, another breach of the guidelines. During construction, garden village residents would be fully dependent on Eynsham facilities, which are already under strain. Once constructed, if the garden village were to be genuinely self-sustaining, it would compete directly with Eynsham's businesses and services. In truth, it would never be likely to be separate from Eynsham but just a northward excrescence, with links across the A40, including an apparently "iconic" bridge, as if that made it all OK.

As WODC have since admitted, its *Expression of Interest* in competing for one of the garden villages was "completely separate from the statutory local plan process". This helps to explain, but in no way excuses, the lack of consultation with Eynsham. When a protest against this absence of accountability, and other concerns, were registered with central government – the Homes and Communities Agency (HCA), acting for the Department for Communities and Local Government – the HCA said we "should raise these points with the local authority . . . as these are all matters they will need to take account of as part of their statutory planning process".

In other words, central government was washing its hands of any responsibility for a decision that was undemocratic and taken in a parallel planning universe and WODC could now say that the decision to go ahead with their garden village had been taken by central government, not

them, and was beyond their power to alter. How handy for both parties – but exasperating for Eynsham.

The Land Under Threat

Another grave flaw in the planning process was the assessment of the suitability of the proposed garden village site for such extensive development. An earlier document prepared for Oxfordshire County Council (OCC) by Land Use Consultants (LUC) had assessed only the southern half of the site, incidentally pointing out some negative impacts there. WODC seized upon this and arbitrarily doubled the size of the site to accommodate a garden village, leaving the northern and more sensitive half entirely unassessed. The HCA therefore had incomplete and seriously misleading evidence on which to base its decision.



Arable land on the site, looking towards Wytham Hill [EPIC]

(The same flaw was repeated for the increase in homes in Eynsham village. The LUC report had assessed the development area proposed by Eynsham's Neighbourhood Plan, but not an area to the south which was now to be built over, and which residents were keen to keep free of development for a number of reasons, including flood risk, access to the countryside, and the presence of historic monuments and good quality agricultural land.)

The Northern Part of the Site

Because WODC's Expression of Interest was based on assessment of only the southern half of the proposed site, it completely missed the following:-

• the presence of an area of Flood Zone 3 in the north of the site, where a brook regularly overflows its banks. WODC also ignored the risk of groundwater flooding down the whole eastern side of the site, which was identified in the West Oxfordshire Level 1 Strategic Flood Risk Assessment of 2016. Recent snow and rain has seen the brook burst its banks again and groundwater flooding in substantial patches in several fields in the eastern half of the site;

- the presence of a large industrial aggregate recycling operation, with a permanent licence to operate and constant HGV traffic, in the middle of the proposed site. Not really suitable for a *garden* village;
- the presence of a cluster of four 220-year-old Grade II listed stone farm buildings at City Farm in a rural setting, which Historic England say should be protected;
- the designation by Plantlife (the botanical equivalent of the RSPB) of the *whole* of City Farm as a Site of European Importance for Arable Plants. Much of City Farm lies within the proposed site. Arable plants are rare and endangered, and non-intensive farming here over many years has allowed them to survive, flourish and attract an unusually wide variety of insects, birds and mammals. Amphibians also thrive here;
- proximity to a Local Wildlife Site (LWS) immediately to the north of the garden village, which would also be adversely by construction, particularly of proposed new roads, and light pollution;
- the remains, yet to be uncovered and explored, of a deserted medieval village, Tilgarsley, along with its field system and an ancient road. Tilgarsley was depopulated and abandoned as a result of the plague in the 14th century.



City Farm and its listed barns [EPIC]

The Southern Part of the Site

The southern half of the site, assessed by LUC, has its own problems. As their report pointed out: "This site is mainly greenfield land and the majority of the site (77%) is Grade 3 agricultural land [not broken down into 3a and 3b]. The remainder of this site (approximately 18%) comprises Grade 1 and 2 agricultural land . . ." Land graded 3a or above is a national resource and should not be lost to development. LUC added: "it is assumed that development here would have a significant negative effect on efficient land use and preserving soil quality".

In one corner of the southern half is Millennium Wood, owned by the Woodland Trust. The garden village would almost entirely cut off the connectivity of the wood with neighbouring habitats.

Furthermore, the southern half is well used by local dog-walkers, ramblers and joggers using the network of footpaths, some of them ancient, that carry on north, west and eastwards. The garden village would enclose these in narrow "green corridors", which, despite the jargon, are no substitute for non-intensively-farmed open-field biodiversity.

Wychwood Forest

The proposed site is part of a Mineral and Strategic Resource Area (sharp sand and gravel). The garden village would "sterilise" this resource. Like the rest of Eynsham, the site also lies entirely within the area covered by the ancient Wychwood Forest. The Wychwood Project, a charity "hosted" by OCC and WODC, says in a recent *Position Statement on Development*: "The Wychwood Project . . . uses the focus of the Royal Hunting Forest of Wychwood to encourage local people to *understand, conserve and restore its rich mosaic of landscapes and wildlife habitats*". How would building houses, shops, roads, a science park and park & ride over it do that?

Water and Wastewater

As WODC have admitted, in dry periods the area is subject to "demonstrable water stress". Climate change will increase the risks of alternate deluge and drought and it seems counter-intuitive to build an extensive development in such a vulnerable place. Furthermore, WODC's tame consultants admit that "the local Waste Water Treatment Works *does not have existing headroom* to accommodate the proposed scale of development" (the same admission is made about the enlarged extension of Eynsham village). Bland assurances that this can be handled at a later date are not reassuring.

Congestion

The 700 or so new homes proposed by Eynsham's neighbourhood plan were still a source of concern to residents in relation to the A40 and the B4044 to Oxford over the 250-year-old Swinford Toll Bridge. These two roads are congestion black spots; the A40 is a regional as well as local problem. OCC hope that a bus lane along part of the A40 and the proposed park & ride would solve the problem. However, the park & ride would not be used by the occupants of the 3,200 new houses, although they may take advantage of more buses – if the bus companies think it sufficiently profitable. And the 500 or even 1,000 extra parking spaces proposed would be quickly annulled by all the traffic from the 16,000 new homes in the West Oxfordshire District planned in total, many of which will be near or along the A40 corridor.

In any case, much of the traffic along the A40 does not go into Oxford and its nearby employment areas, but onwards to London and other easterly destinations, or north and south along the A34 and northbound M40. Adding or enlarging junctions to cater for access to the garden village and science park, the park & ride and a western bypass of Eynsham would be a recipe for even more congestion. Eynsham residents strenuously object to the bypass, because it would cut off access to the countryside on all sides of the village.

Furthermore, the prevailing wind from the south-west would convey the noise and pollution straight into the garden village right next to it. In addition, WODC originally said in their local plan that: "A new main road is also likely to be provided *through the garden village site* [our italics] connecting the A40 with Cuckoo Lane and Lower Road to the east thereby allowing greater

journey choice". How odd to construct a *garden* village around a new main road. It's almost as if the garden village and enlarged extension to the west of Eynsham have been dreamt up to justify new road-building. The "new main" road may have been dropped for now, but we can expect it, or something like it, to be resurrected in future, cutting off habitat contiguity.

A Colossal Waste of Space

The "garden" development concept as a whole has a major problem that has become more acute as our population has increased: it uses space wastefully. The Oxfordshire Cotswold Garden Village – proposed on a site that is almost entirely greenfield, when the guidelines recommend the use of brownfield sites – will embody this same problem. WODC commissioned Aspinall Verdi to assess the "economic viability" of the site. Not surprisingly, the consultant said it was viable, but it based its assumptions on 75% of the new houses having three, four or five bedrooms. There were no one- or two-bedroom apartments. The houses are also likely to be generously supplied with patches of barren "amenity" lawn.

The Government has just published A Green Future: Our 25 Year Plan to Improve the Environment. The examples of how the Oxfordshire Cotswold Garden Village proposal flies in the face of the Government's aspirations are too numerous to mention here. Suffice it to say that it represents old ways of thinking that are generally no longer appropriate and, specifically to this area of Oxfordshire, highly damaging.

Welborne Garden Village

by Inform Fareham

The Proposed Development

Fareham is a borough covering some 7700ha (19200 acres) with a population of about 45,000 (2011 census) souls, so the proposed Welborne Garden Village, a new development of 6,000 homes, would mean a massive increase in the local population.

The borough sits effectively between Southampton and Portsmouth, with the Gosport promontory to the south and the South Downs National Park to the north. The original numbers for the additional housing required to be built in the area were arrived at from a report prepared by an independent consultancy at the behest of an organisation called the Partnership for Urban South Hampshire (PUSH) – the chairman of this organisation at the time of the report was, and still is, also Fareham Borough Council's executive leader.

This report was supposed to have been put out for consultation but never managed to achieve such, so effectively the whole of south Hampshire, from the New Forest in the west to Havant in the east were presented with a fait-accompli such that, by the time any consultation was possible, it was already too late for local residents to have any voice in how much and where development was to take place.

Whilst Welborne has now been more or less accepted by local people the big fear is that an equal number of dwellings are also required to be accommodated within the existing boundaries of the borough.

The Land Under Threat



The Welborne site [Imagery ©2018 Google]

Welborne was first discussed in May and June 2013 and published for consultation in February 2014. It was to be a new development of 10,000 houses, subsequently reduced to 6,000, on 377ha (931 acres) of mainly good agricultural land north of the M27 around Junction 10. It is part of Fareham's local plan which also requires another 4,000 houses to be built within its existing boundary. To the existing residents of Fareham it had always been understood that this area was sacrosanct and would never be used for development. You can imagine what a shock this caused through the area although many residents were never aware, and still aren't, of the ramifications that this massive development, the size of some of the local towns, would have on the community.

At the start, local organisations were involved in taking this plan forward and have always tried to be constructive, discussing the future with the Borough Council and the land owner who was bringing the plan forward. Unfortunately, the proposer only actually owned about half of the land, the rest being owned by siblings who refused to sell. Legal action was taken in the High Court to resolve the problem during which the Borough Council decided to try and muscle in on the act by spending £2m in threatening to bring a compulsory purchase order (CPO) to bear with the idea of speeding the process. The High Court ruled that the land must be sold long before any CPO could have had any effect and subsequently, in 2017, all of the proposed land came under the control of Buckland Development, the original proposer.

When the Borough Council started on the very expensive, unnecessary and aborted CPO route, all consultations with local groups were abandoned; obviously our Council wasn't interested in what the local residents thought although good relations were maintained between Buckland and the local groups who still consult together.

Welborne was originally planned to be a 'self-contained' development with adequate employment and local facilities to minimise traffic flow in and out of the village. The biggest problem in this area is that because of the late delivery of this plan, planning appeals have found that there is no longer an adequate five-year land supply so developers are jumping on the band wagon and applying for development status for areas that have always formed part of the green space.

Transport

Transport infrastructure is not only inadequate for such expansion but there is not the space to increase the road system in such a well-established area. Because of the geography, all exits from new developments will meet major roads that are already completely gridlocked for parts of the day on a very regular basis and this would only make matters worse.

Recently Fareham Borough Council have been required to address a traffic pollution problem which is the fifth worst in the country.

Welborne is bounded on the east by the A32 and to the south by the M27 – no additional access roads are planned although Junction 10 of the M27 which is currently a restricted access junction is planned to be turned into an all-moves design. This is supposed to be the first major infrastructure project and it has always been stated that it must be resolved before any development takes place.

Currently the M27 is planned to be converted to a "smart motorway" between Junctions 2 and 10; it is accepted as being one of the most dangerous roads in the country with over 180 accidents and other incidents occurring in 2017 although it is only 21 miles long. The stretch of this motorway that seems to be most prone to accidents is between junctions 10 and 11. Junction 10 will form the second southern access into Welborne.

The A32 which will be the access into the village from the North is already subject to major



congestion to the south of Welborne where it joins the other non-motorway major trunk road, the A27. The A32 carries on and forms one of only three access routes to the whole of the Gosport peninsular and it is a regular occurrence for these roads to be at gridlock.

There are plans to introduce a "Rapid Bus Transport" route from Welborne to Fareham Station although there is nowhere for the additional infrastructure that would be necessary for this to be developed without causing chaos to the original transport system. Mutterings have been heard about a station for Welborne at a small village to the west called Knowle (an ex-mental hospital).

[Inform Fareham]

Health

Welborne sits between two clinical commissioning groups which has caused problems in the past, although this now seems to have been resolved. The outline planning application originally called for an eight-GP surgery to be provided although, since then, the Fareham and Gosport Clinical Commissioning Group (CCG) who seem to have taken lead responsibility has stated absolutely categorically that they will not support this in any way. The best that they will offer is a so-called "health and fitness hub" although nobody knows quite what this entails and no further information is available. Fareham currently has 11 GP surgeries, all of which are oversubscribed with patients sometimes waiting up to four weeks for an appointment.

Recently Fareham Community Hospital (basically a clinic in the most distant western ward of Fareham) has a same-day service operating as an experiment which strips existing GP surgeries on a rota basis to allow the service to operate. It has no public transport link so is pretty inaccessible to anybody without access to a car. There is another GP surgery in Wickham, in the other CCG catchment area, which is supposed to be helping handle the problem, but they are already starting to reach saturation and actually come under the other CCG which could well cause major problems in the future. So much for self-containment.

Queen Alexandra Hospital in Cosham, some six miles to the east is regularly in the news with horrendous stories of ambulances waiting for hours to discharge patients. At one point in 2016, 44% of all of the ambulances in the local area were queued there. Q.A. is backed up by St Mary's Hospital further in toward Portsmouth and Gosport War Memorial Hospital down the already crowded A32 towards Gosport. Over the last twenty or so years various excellent local units have been closed, including Haslar, a military hospital open to the general public at the end of the Gosport promontory. This was always recognised as being one of the best establishments in the area but has now been sold for development as yet more housing.

Education

Welborne is planned to have one secondary school and three primary schools. The secondary school is not due to be completed until the very last phase of the development, so all pupils will have to be found places in the existing establishments which are already over-subscribed as are all of the local primary schools. Once again, so much for self-containment.

House prices

Fareham housing is already completely out of the reach of virtually all local first-time buyers, even with the subsidies that the Government is currently offering. Presumably many of the new residents will be employed in Portsmouth, Southampton and almost certainly London. It has always been touted as a dormitory town for Portsmouth and Southampton. Solent City was a plan back in the last century and it would seem that it is still alive and kicking – one urban sprawl right along the 21 mile length of the M27. Welborne may be intended to be a village but will it stay that way? Again so much for self-containment.

Other Problems

There is a high pressure gas main running right through the middle of the site from north-west to south-east. High voltage power lines run across the north of the development. So far statutory consultees concerns and refusals have been received from:-

- HCC Transport and Environment;
- Sport England;
- East Hampshire Catchment Partnership;
- Scottish and Southern Energy Power Distribution plc;
- Health and Safety Executive;
- West Hampshire Clinical Commissioning Group;
- Highways England.

Additional Pressures

Whiteley, a development site just to the north of Junction 9 of the M27 and already causing



major traffic problems, is due to have another 3,500 houses with three exits on to a small, winding, single carriageway that is already prone to gridlock at each end.

Junction 9 is due for redevelopment, but residents have major doubts whether this will resolve any problems, especially in light of the new development site.

[Inform Fareham]

Neighbouring authorities have also been tasked with large development numbers. Eastleigh Borough Council has no current local plan and as such is being inundated with planning proposals to which they have no response.

Gosport Borough Council has its own problems with their development requirements as all access to the borough is via one of two access roads, both of which must pass right through Fareham and are both currently regularly at a complete standstill. One of these roads, the A32, can sometimes take up to an hour to clear at peak flow times and every day is reported as having "the normal hold-up".

Although Welborne is due to have its own industrial areas, one of the main up-and-coming high-tech employment areas is at the old Daedalus airfield – recently re-christened Solent Airport, almost as far away from Welborne as you can get while still being in the borough. A new by-pass is planned to assist this but traffic is already ridiculously heavy in this area and although the Council insist that it will not happen, many residents expect another development of 1,000 houses to be built that will exit directly on to the new by-pass.

Other Garden Village Proposals

Any developer can dub any substantial residential development as a "garden village" and many have done so, and while the officially sponsored garden communities are expected to conform to the standards laid out in the Government's prospectus (though few do in reality), there are no standards at all for the rest. Most are little more than a marketing or promotional tool and a huge majority of such developments are predominantly or wholly greenfield.

Particularly impressive is Lighthorne Heath in Warwickshire which claimed not only to be embodying the principles of the garden city movement, but also those of the urbanist movement which are directly at odds with them.

Dozens of developments are being dubbed "garden villages" by their promoters and many have provoked active campaigns of opposition. We present a very small selection here.

Buckover Garden Village

by Thornbury Residents Against Poorly Planned Development (TRAPP'D)

The Proposed Development

Buckover Garden Village is a proposal by the Tortworth Estate to build up to 3,000 homes on 191ha of farmland east of Thornbury in South Gloucestershire and west of the M5. Its consultant, Hunter Page Planning, says: "the study area can accommodate a garden village without resulting in urban sprawl or coalescence".

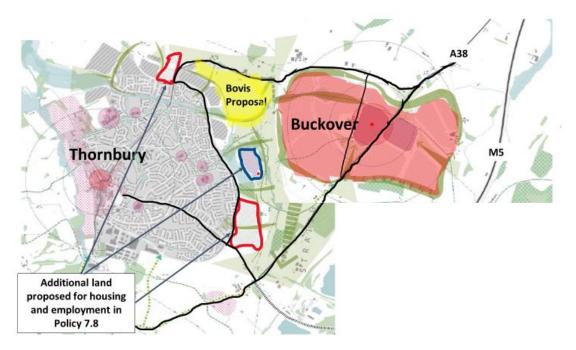
The site is under the sole ownership of Tortworth Estate and has been promoted through the West of England Joint Spatial Plan (JSP) which would impose a requirement for South Gloucestershire Council to accommodate at least 24,000 homes by 2036. The West of England Joint Authority is, however, beginning to realise that the Buckover proposal would be extremely difficult to deliver.

The JSP fails the test of soundness because Policy 7.8 (Buckover Garden Village) cannot be delivered within the timeframe of the Plan due to the unsuitability of the specific site selected, and it does not meet the Government criteria for garden villages. In the second phase of consultation (Towards the Emerging Spatial Strategy Document¹⁹, November 2016) there was assumed to be 2,200 dwellings built within the timescale (Page 19). In the final consultation, published less than one year later²⁰, that amount had dropped by 32% to 1,500 with the first houses developed in 2027. This is a clear admission that the proposal is struggling.

In addition, our understanding is that the agreement between the land owner and proposed developer at Buckover is a joint venture, with both parties being involved in the development. From experience in such complicated arrangements timeframes for completions are extremely long and do not produce the expected annual housing numbers. Large-scale developments are hindered by only having one builder on site at any one time and can easily get tired, especially if they lack the necessary infrastructure. We do not believe this will deliver 250 houses in one year, as is conveniently inserted into the last year of the plan. Furthermore, the slow build-up means that, for up to a decade, it will be relying on Thornbury for provision of all services such as GPs.

The Land Under Threat

There is a pretence in the *JSP* that Thornbury and Buckover are two separate strategic developments. This is a complete nonsense, not only from the fact of the reliance that Buckover would place on Thornbury for its services, but just from the proximity of the Buckover development. Local roads, not designed even for current levels of traffic, would become rat runs. In the chart below we have matched, combined and annotated the concept diagrams for strategies 7.8 and 7.11, as presented in the *JSP* WEJA report on 30 October 2017 in order to remove any doubts that Buckover and Thornbury should be treated as one development.



In reality, Buckover is not a "garden village", but two massive housing estates adjoining Thornbury and separated by the busy A38. The developer/land owner gave the game away on this in their initial submission to the JSP consultation in January 2016 when their map described the proposal as a "potential self-contained extension to Thornbury".

The green space around Thornbury is much valued by local residents and visitors alike and, in our view, is outstandingly beautiful, being criss-crossed with public footpaths popular with hikers and dog-walkers. Much of this green space around the town is "best most versatile" Grade 2 land which is now a rare commodity in the region. The *National Planning Policy Framework*²¹, in Paragraph 112, states that: "Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality".



Transport

There are further fundamental problems with the site selected, not least of which is the fact that the busy A38 runs straight the middle of it. This is the designated relief road for the M5, fast and busy at the best of times, and at a standstill when there are problems on the M5 (which can be simply down to heavy holiday traffic on a Friday and Saturday in the summer).



Transport officers in South Gloucestershire Council know that transport is a major issue for this proposal. An email from the head of transport and strategic projects Emma Blackham, obtained in 2016 via a freedom of information request, stated that: "the A38 is still of concern. The submission shows this going straight through the middle of the development This is the strategic alternative to the M5 motorway and during busy times this is an extremely busy route with holiday traffic often backed through this area and beyond". The email goes on to say: "I think on transport grounds alone I would struggle to be supportive...". Then, most damning of all: "... I wouldn't pursue this on transport grounds alone. But this could be 'fudged' for the presentational purposes If other factors make this attractive to the Council".

The *JSP* also acknowledges this is a problem, but Policy 7.8 simply states: "Consideration will also be required to ensure the A38 can continue to act as an effective relief road to the M5 without detriment to the new resident's health and wellbeing". This is simply not good enough. Having been twice rejected for Government funding for this project, the local authority is desperate to gain some respectability for Buckover that would come with its inclusion with the *JSP*, even though it doesn't know how to fix one of its biggest shortcomings. In effect it wants to be given a free hand to be its own judge and jury of a satisfactory solution to this problem; it should not be allowed to get away with this, particularly in the light of Ms Blackham's comment about "fudging" the transport issues.

A railway station is proposed for Charfield, which is a welcome development for that town, but is unlikely to be much benefit for commuters from Buckover as they would be travelling five miles in what, for most people, would be the wrong direction (versus 10 miles to Bristol Parkway).

The Metrobus concept is unproven. Only 6% use public transport to commute in South Gloucestershire, and we have data that shows this figure is even lower in and around Thornbury. There is no research or comment published about the anticipated proportion of commuters that would leave their cars behind and use this service to get to work. In addition, we are sceptical about the feasibility of developing this service along the A38 as far as Buckover, without significant permanent contraction in its ability to handle large volumes of other road vehicles, given the ribbon development all along this road. We find this unacceptable given that the Metrobus seems to be the only real mitigation mechanism for the additional commuting volume that this development would lead to.

Conclusions

We are not surprised that Buckover twice failed the Government tests on garden villages, as set out in *Locally-Led Garden Villages, Towns and Cities*²² published in March 2016. The requirement for a "garden village" is that it must be genuine - not just use the label "garden" as a marketing tool, and the eligibility criteria include the following important points. It must:-

- be a free-standing settlement. In reality it would simply coalesce with Thornbury;
- meet local housing need. In reality it is designed to make up a shortfall in the wider WEJA region (in a different HMA). Local housing needs have already been exceeded by the excessive developments in progress and approved;
- demonstrate it has local political support. In reality it is opposed by Falfield parish councillors, Thornbury town councillors, district councillors, the local MP and the metromayor who pledged his opposition in his electoral manifesto;
- be able to demonstrate strong local commitment and support. In reality we have seen almost no local support, as demonstrated by the survey conducted by our MP, Luke Hall, and reported in the *Thornbury Gazette* on 27 March 2017.

Unsurprisingly, the Buckover proposal was twice rejected for a Government support package because it simply does not meet the criteria to be a "garden village". By ignoring the overwhelming level of opposition to BGV from local residents and political representatives, WEJA is ignoring the first core principle in Paragraph 17 that states a plan should "*be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area*". WEJA is further ignoring the 5th, 6th and 7th core principles, including the need to:-

- recognis[e] the intrinsic character and beauty of the countryside;
- support the transition to a low-carbon future in a changing climate;
- contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value.

The development proposal at Buckover also fails the *NPPF* in Paragraph 34 which states that: "Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised". We have drawn attention to the problems of pollution created by additional commuter traffic, and Policy 7.8 of the *JSP* is a particular culprit of this, bringing danger to health for both existing residents and those that would settle in this development.

London Colney Garden Village

by Campaign for Colney (C4C)

The Proposed Development

We have independent consultants to thank for the South West Hertfordshire Strategic Housing Market Assessment which resulted in Hertsmere Borough Council setting a target of 9,000 new homes by 2034. This was double its previous target and was always going to be a challenge as 79% of the borough is designated as green belt.

The Council responded by looking at a range of options, including garden suburbs, enlarging villages and a new "garden village" and its local plan work suggested green belt land could be "suitable" for a garden suburb or garden village.

Its *Issues and Options* Report suggested a garden village could include 4,000 homes, with scope to increase that by a further 2,000 later on. The Report admitted the borough's countryside is already "relatively crowded" and that areas of undeveloped land in the green belt are "limited". It said the M25 prevents further outgrowth of London into green belt, so the preferred option for a garden village would be land north of the M25 Junctions 22 and 23.

Here, it suggested, 200ha could make way for 4,000 homes, shops, services and leisure facilities and, potentially increasing housing shortages still further, there should be a new office/high tech business park. A whole raft of new infrastructure would be necessitated including four primary schools and a secondary school, healthcare, affordable housing, bus routes, road improvements and possibly an enlarged motorway junction.

The Council did admit, however, that managing traffic would be a challenge and upfront costs would be significant, including the junction upgrade and that the lead time for the new homes would probably be 10-20 years.

One complication is that the site adjoins St Albans City Council territory. The City's local plan, providing for 4,000 new homes by 2031, many on green belt, was rejected at examination-in-public in 2016 as the Council had not co-operated fully with surrounding districts who had objected. Hertsmere, Three Valleys and Decorum Councils challenged St Albans' local plan in 2017. St Albans lost and was sent back to the drawing board. The result is that the Government has placed St Albans on a short list of councils 'on notice' for failing to progress its local plan. Only 15 out of 218 councils are currently deemed to have made "insufficient progress". In effect, St Albans has been forced into hastily putting together a new draft plan and public consultation round by 31 January 2018 in order to satisfy Sajid Javid that the Government does not need to take control.

This could potentially be still more disastrous for London Colney and its surroundings. In addition to the garden village, it is possible hundreds more homes could be added to the development by Government diktat. Added to this cocktail of disaster, bearing in mind London Colney currently has 4,500 dwellings, with the Hertsmere plan adding a proposed 4,000-8,000

more, is the St Albans revised local plan. It has proposed a new development on the other side of the village, close to Napsbury Park, size unknown. Mary Maynard, portfolio holder for planning, stated in a public meeting that the development is "likely" to happen.

The Land Under Threat

The land under threat is completely green belt land and 79% of all Hertsmere land is designated as green belt. Hertsmere's consultation was not fit for purpose; it undertook public consultation events in conurbations such as Potters bar and Borehamwood giving only the options of whether Hertsmere should regenerate current housing or build new garden villages elsewhere. Unsurprisingly, Hertsmere residents, when given this stark choice, opted for building a new garden village many miles away from their current built-up areas on the St Albans border at London Colney.

Hertsmere refused to engage. The MP Oliver Dowden, a self-proclaimed advocate of the countryside, has backed the Hertsmere plan publicly and refused to attend a public meeting in London Colney arranged by Campaign for Colney. Every other Hertsmere representative refused to attend and address residents' concerns. Refusal for consultation was given due to residents not being "Hertsmere constituents". In the meantime Mr Dowden continues to have his constituency office located in London Colney.

The land in question is open farmland enjoyed by hikers, mountain bikers and offers a haven for all manner of wildlife including a colony of bats. It is green belt in its entirety and stretches from London Colney, straddling the M25, up toward Shenley village.

Tytennhanger stream also runs through much of the land, creating a diverse habitat, as well as providing natural run off for surface water. The area still tends to flood, something a large development would exacerbate in neighbouring areas. Per capita, it is estimated that a village London Colney's size should house 43 new dwellings to 'do our bit'. Currently we have two plans, one for a minimum of 4,000 new dwellings on entirely green belt land.

In Hertsmere Borough Council's own *Green Belt Assessment (Stage 1)*²³, it notes that the land has "strong" green belt status and roughly a dozen areas within the district score lower. It is specifically noted that the land in question scores highly on the criteria of "safeguarding the countryside from encroachment". In the recommendations it was not considered for Stage 2 precisely for this reason. Despite this, the Council has gone ahead and put out to consultation a proposed garden village, which would have a huge impact on the area beyond any other kind of developments.

Our Objections

The Campaign for Colney was set up in response to a threat which could see our village double or treble in size. We have not been consulted over this.

We object to the complete lack of consultation. London Colney Parish Council (funded by the St Albans precept) has not defended residents' wishes. St Albans City Council (fresh from losing in the High Court and being wrapped over the knuckles), has not opposed Hertsmere's plan.

The local roads (M25/A414) are currently among the most dangerous and congested roads in the UK. There is no detail regarding the size and scope of this development. Is it 4,000 or 8,000 homes? What are the plans for infrastructure? If this is not addressed, then already stretched local services will be put under immeasurable strain.

Local residents moved to a village as they enjoy the countryside and the village way of life. To double or treble the size of the village is totally unacceptable, bearing in mind the complete disdain residents have been held in regarding the consultation process.

There is one land owner willing to sell. Hertsmere portfolio holder for planning, Harvey Cohen, told C4C head, Brett Ellis that this garden village is the Council's "preferred option" and asked: "What other choice do we have?"

The green belt, once eradicated, would be lost forever. Roads infrastructure would be put under immeasurable strain. There is no plan for affordable housing and there are concerns over prospects for local employment opportunities.

North Uttlesford Garden Community

by StopNUtown action group

The Proposed Development

North Uttlesford Garden Community (NUGC) is a proposed 5,000-house development of which 1,900 is to be delivered within the life of the local plan to 2033. It is one of three garden communities in the emerging Uttlesford district plan. The plan is awaiting a Regulation 19 consultation (expected in summer 2018) and Uttlesford District Council (UDC) is talking of submitting to the inspector in mid-2019. This will be the Council's third attempt at a local plan. The first was withdrawn in late 2014 at the suggestion of the inspector (and at a cost of £2m to ratepayers). The second was readied for publication in October 2016 and then aborted by the council at the eleventh hour, without explanation (cost yet to be fully assessed).

Evolution of the Uttlesford local plan is a trail of muddle, manoeuvering and political expediency and would be a laughable were it not so important to the future of this area. Part of the problem has been the scale of task imposed on the Council. Uttlesford is a physically large district (640km²) though sparsely populated (c.80,000). UDC is a small under-resourced rural council attempting three simultaneous garden community developments when it has never previously done even one. These new settlements are an attempt to meet the unrealistically high "objectively assessed need" for house building.

The Land Under Threat

NUGC (which was added to the local plan in mid-2017) is in the extreme north of the district in the parish of Great Chesterford. It starts less than a mile north-east of the village and is hard against the district and county boundary. Immediately to the north is South Cambridgeshire District Council. Three miles to the south is the medieval town of Saffron Walden.

Almost the entire 1,100 acre site is productive farmland and much of it is at an elevation that presents significant landscaping issues. It also sits over important chalk aquifers providing water to south Cambridgeshire. The hilly terrain feeds a flood plain. The site had previously been discounted as unsuitable. By now adopting it within the local plan the Council is disregarding several opposing opinions including that of its own landscape officer, who said: ""this site cannot accommodate the development without causing significant and unacceptable harm to the important visual qualities of the site and the wider landscape".

Transport

As a district, Uttlesford has a "split personality." The south of the district contains Stansted Airport, which dominates the economy of that area (east along the A120 from Bishop's Stortford/M11 to Braintree) and south to Harlow; whereas the north of the district is more aligned to the character and economy of Cambridge City and south Cambridgeshire. The council's employment forecast for the local plan period points to 90% of new jobs being in or around Stansted airport yet we now have a significant part of the district's new housing

allocation farthest away from the airport and with no public transport links to it. The roundtrip by car is 38-miles, hardly a model of sustainability. In reality, NUGC will serve people working north of the district border around Cambridge and also commuting to London. This highlights one of the fundamental weaknesses of "localism" policy – there is no strategic regional overview.

Considerable question marks exist over road impact and the council has yet to carry out a meaningful traffic assessment or to co-operate with South Cambridgeshire District Council, which will carry the brunt of the traffic problems.

The Council is claiming adherence to Town & Country Planning Association (TCPA) garden city principles, but NUGC is very unlikely to be able to meet those principles and at the same time be viable. There is an inherent contradiction in the choice of site: the TCPA and DHCLG are promoting new "garden communities" as a way of creating housing without putting pressure on existing towns and infrastructure, but that is exactly what NUGC would do. It would put pressure on the local medieval town (Saffron Walden) for shopping, schooling, medical and leisure resources. Access to Saffron Walden is via a narrow winding country road leading into a bottleneck street. To reach most of the resources residents of the new settlement would require (few of which would ever be provided on the site of the new town) would involve driving through a town that already has illegally high levels of exhaust pollution. To provide the infrastructure to make this a sustainable community and to mitigate the effect on already oversubscribed roads leading to the M11 motorway and to Cambridge would require a massive spend, so high that it will almost certainly render the project uneconomic.

Conclusions

This site, like so many of the proposed "garden villages/communities/cities" is a land-hungry, low-intensity development that will struggle to meet its design aspirations.

At the outset there was incredulity from all quarters as to how this site could be viable and sustainable. Evidence is mounting that it will not be. As of February 2018 the Council has provided no information of how NUGC is to be delivered except for introducing a developer (Grosvenor Estates). Grosvenor appear to be struggling to make the site work. The site has been chosen simply because through the "call for sites" process it is being offered by a group of farmers. Now a poorly reasoned strategy is being retro-fitted to justify its inclusion as part of the local plan.

Tandridge Garden Villages

by Tandridge Lane Action Group

The Proposed Development

Plans to build a "garden village" of up to 8,000 houses in Tandridge, East Surrey, are the very antithesis of Smart Growth. They also represent one of the biggest intrusions into the green belt in the designation's history and breach the core principles of *National Planning Policy Framework* (NPPF) in 10 different ways.

They are a travesty even in their own terms, perpetuating the very kind of development Lord (Matthew) Taylor specifically sought to avoid in his 2015 Garden Villages report, and running directly counter to the Government's own eligibility criteria.

Yet Tandridge District Council appears determined to include what it calls a garden village in its local plan. It is set to choose between three sites in the next weeks. Blindley Heath, on the A22 between Godstone and East Grinstead, would take around 3,000 homes. South Godstone, a few miles to the north, would take 4,000-5,000. The third site – Redhill Aerodrome, which would be shared with the neighbouring Reigate and Banstead Borough Council – would have 6,000-8,000.

The Land Under Threat



All three sites are designated green belt [Tandridge Lane Action Group]

All three sites are entirely within the green belt. Building what would amount, in size, to a new town at either location would set a dangerous precedent, paving the way for others to pockmark the supposedly protected designated area encircling London.

It would be especially inappropriate since the *New London Plan*, which went out for consultation earlier this year, makes clear that development of the green belt will not be permitted and that its boundaries will only be changed to increase, not reduce, its extent.

Two of the sites – Blindley Heath and South Godstone – are in countryside that Surrey County Council found to be "sparsely settled, remote and deeply rural", adding that the planning strategy should be "to conserve its peaceful unsettled character". Both sites are almost entirely greenfield land, with very limited brownfield opportunities. Much of Redhill Aerodrome was previously developed, but was designated as greenfield by an appeal court decision in 2014.

Our Objections

The problem originates in Tandridge Council's acceptance of an "objectively assessed need" (OAN) of 9,400 houses between 2013 and 2033. This is largely based on projecting forward anomalously high housebuilding figures over the previous decade, when large military and health service sites fell vacant in Tandridge and most of its major employers left. The land they left was mainly used for housing: thus building took place at a much higher rate than in the rest of Surrey.

As the Council has itself admitted, these circumstances "will not be repeated". Those sites will not fall vacant twice! But the OAN would force the high level of building to continue. Since Tandridge has very low population growth, some 90% of the houses will be bought by people coming into the area, rather than meeting local need. And since it has limited employment, and little prospect of attracting new jobs, most of the new residents will commute out of it to work, especially to London.



Tandridge has the highest proportion of green belt in England [Tandridge Lane Action Group]

94% of Tandridge is in the green belt, the joint highest proportion in England. So the Council says it has no alternative but to build on it. Yet the *NPPF* and *National Planning Practice Guidance* permit the OAN to be reduced when meeting it would conflict with national policies. Unlike many other councils, Tandridge has chosen not to cut it, even though its plans threaten repeatedly to breach the *NPPF*'s core principles.

One of these, of course, is to protect the green belt. The "garden village's" size would massively change its boundaries. That, the *NPPF* lays down, can only be done in "exceptional circumstances": housing need does not qualify. The Council has so far given no indication of such circumstances, and it is not easy to see what they could be.

The Tandridge Lane Action Group, covering the Blindley Heath and South Godstone sites, found that developing them would also cause another nine breaches. One is the need to recognise "the intrinsic character and beauty of the countryside": The Surrey County Council assessment, which laid down that the area should not be developed, was carried out precisely to inform councils of how this principle should be applied.

Another principle is the requirement to prioritise brownfield land, something for which the sites received the lowest possible score – a "double negative" - in the Council's own Sustainability Appraisal, since they represent "the development of several hundred hectares of green belt land".

Transport

Yet a good deal of brownfield land is available elsewhere in Tandridge. The NPPF also demands that development should only take place where the need to travel will be minimised and sustainable modes – like walking, cycling and public transport - maximised. But the Council's own documents show that residents of a garden village at either site would depend heavily on their cars.

It admits that traffic will sharply increase – by some calculations the amount on the already crowded A22 could almost double – and says that there would have to be investment in "road infrastructure". But either widening the road (involving knocking down properties) or building a by-pass would be massively expensive – and controversial.

The Council makes much of South Godstone having a railway station but this is on a little-used branch line that no longer carries direct trains to London. Nearly 40 times as many passengers use an already crowded direct line that goes through Oxted, and there is little if any extra capacity for trains on either route due to congestion at East Croydon.

The increased traffic would in turn flout two other elements of the core principles – supporting "the transition to a low-carbon future" and "reducing pollution". Air pollution levels on the A22 already appear too high, and the Council has admitted that there is "no agreed or readily apparent way" to prevent development in Tandridge breaching critical pollution levels on the nearby Ashdown Forest.

Other Constraints

The NPPF also lay down that development should be directed away from areas at the highest flood risk and towards "land of lesser environmental value". Yet the Blindley Heath and South Godstone sites are both particularly prone to flooding and have important wildlife sites; the former has a site of special scientific interest, the latter a site of nature conservation interest. South Godstone also has important "heritage assets", which should be conserved under the NPPF's principles.

Yet another of the core principles lays down that development must deliver "sufficient facility and services to meet local needs", but Blindley Heath has "poor" and "very poor" access to educational and health facilities, and Godstone fares little better: there is no evidence that these will improve.

Community Opposition

Finally, the *NPPF* demands that local authorities create a "shared vision" of development, and that garden settlements should be considered by councils "working with the support of their communities". That has emphatically not happened. There is widespread opposition, though the Council has refused a freedom of information request to disclose the proportion of responses to a consultation that were for or against the plans.

No consultation was carried out into the principle of building a garden village, only on where it should be sited. And even that was flawed: the Blindley Heath site was almost doubled in size at the last moment, but the information provided was confined to the original half of it.

This is also relevant to the Government's requirement in its prospectus *Locally-Led Garden Villages, Towns and Cities* that Councils should set out "how the local community is being, or will be, engaged at an early stage, and strategies for community involvement to help ensure local support".

Conclusions

But this is only one place where Tandridge breaches the prospectus' Eligibility Criteria, which also demand maximising the use of brownfield land and "protecting the green belt".

They lay down that garden villages should be delivered by "a diverse range of house builders, including small and medium sized firms". Instead, Tandridge plans to hand over the chosen village to a single construction company, thus denying competition and, presumably, keeping house prices high. And the prospectus adds that they should be "self-sustaining places, not dormitory suburbs"; yet with little employment a dormitory is what Tandridge would have.

Finally the prospectus demands, as Lord Taylor recommended, that a garden village should be "a discrete settlement, and not an extension of an existing town or village". Yet the Blindley Heath and South Godstone sites would both massively extend an existing village, and the Redhill one would be near another one. Taylor proposed garden villages precisely to get away from building on to existing settlements; Tandridge's plans could hardly flout his recommendations more comprehensively.

The nation badly needs more homes - but it does not need more big, expensive, houses sprawling across the green belt. It needs sustainable, denser development on brownfield land, near employment and good public transport – all of which are elements of Smart Growth.



The nation needs more homes, but not big, expensive, green belt homes [Tandridge Lane Action Group]

A Smart Growth Alternative

Projections of the number of new homes that need building by central government or the devolved administrations have fluctuated wildly. Sometimes they are based on projections of the number of households likely to form but this is a circular argument, wholly dependent on the size of the existing and future housing stock and how far it is adapted to need. Then again, "housing need" is often taken solely to mean "demand for market housing" and market housing here can mean just owner-occupied, or owner-occupied and privately rented.

Despite this shaky foundation, however, planning policy in England (and the devolved administrations to some extent) has been distorted to secure a huge increase in release of residential building land (mostly greenfield) since the recommendations of the Treasury's Barker Reviews in the early 2000s. While this has not resulted in a substantial increase in building, thanks to the national economic situation and the commercial needs of major builders which prioritize the securing of planning consent over actual building, it has resulted in a vast flood of consents for low-density housing on greenfield sites. This blights the land and undermines urban regeneration.

Yet a breakdown of the Government's own household projections reveals that the real need is not for family homes but homes for the over-65s and single-person households. The number of multi-person households headed by 25-34-year-olds is actually expected to decrease. What we need to build is housing for the elderly, for single people and those in real need who cannot afford to buy or rent privately.

In our report last year we proposed a very different set of planning policies which would enable social and market needs to be met, without destroying our environment or our ability to provide food. The need for change remains as urgent as ever.

Regional policy is urgently needed. The ever-growing imbalance between the economically successful parts of the UK and those that are struggling shows we need to direct new economic activity away from those areas that are doing well to those that are not. And, coupled with that, we need to abandon the "one-size-fits-all" approach to forcing unrealistic housing numbers on local authorities, most urgently for places that don't need it.

House building need should be genuinely objectively assessed. People are becoming aware that commercial appetite for development makes up a substantial amount of the process and that requirements on deliverability and viability militate against brownfield development.

Brownfield-first policies for housing and employment need to be reimposed. Given the relative commercial costs of building on brownfield and greenfield, the absence of a brownfield-first policy is, effectively, a greenfield-first policy. And there is much more brownfield land of all types than those with a vested interest like to suggest; robust research for CPRE²⁴ suggests capacity for one million homes in England alone.

House building densities need to rise. Garden city principles have squandered our scarce building land for a century now. Higher densities such as those traditionally used in cities, towns

and villages need not involve high-rise but they do facilitate provision of amenities, town centres, active travel, public transport and community. Very low-densities don't.

Transit-oriented development should be the norm for major developments, not the exception. Major development should only be contemplated where it is situated on major public transport networks, usually rail-based. This needs more than simply locating them beside, or near, a single railway station. The public transport should be in place well before the development is completed.

Public investment should be switched from supporting sprawl into sustainable development. Spending should be diverted from the costly infrastructure needed for greenfield development and the road building programme into urban regeneration and sustainable transport, particularly urban rail.

Smart Growth UK

Smart Growth UK is an informal coalition of organisations and individuals who support the Smart Growth approach to planning, transport and regeneration.

The organisations supporting the coalition adopted a set of principles in 2013 to guide future work:-

- Urban areas work best when they are compact, with densities appropriate to local circumstances but generally significantly higher than low-density suburbia and avoiding high-rise. In addition to higher density, layouts are needed that prioritize walking, cycling and public transport so that they become the norm.
- We need to reduce our dependence on private motor vehicles by improving public transport, rail-based where possible, and concentrating development in urban areas.
- We should protect the countryside, farmland, natural beauty, open space, soil and biodiversity, avoiding urban sprawl and out-of-town development.
- We should protect and promote local distinctiveness and character and our heritage, respecting and making best use of historic buildings, street forms and settlement patterns.
- We should prioritize regeneration in urban areas and regions where it is needed, emphasising brownfield-first and promoting town centres with a healthy mix of facilities.
- Civic involvement and local economic activity improve the health of communities.



Conclusions



Protecting the countryside from development is a repeated theme [Hands Off Wivenhoe]

The organisations who have contributed to this report are not necessarily supporters of the Smart Growth approach, yet they are united by their opposition to the garden communities being imposed on them and by their commitment to sustainable development. But it is surprising how often the central concerns of Smart Growth are cited by the groups. Protecting the countryside from development, brownfield-first policies, transit-oriented (rather than cardependent) development and the need to make best use of existing infrastructure and to provide new infrastructure where it's needed are constantly recurring themes.

The Government's garden communities programme is an expensive way of creating the wrong sort of development in the wrong places. Equally inappropriate is the trend towards promoting many other large greenfield developments as "garden villages", presumably in the hope adding these words will sprinkle on them the supposed moral and intellectual magic dust of garden cities and the rural idyll of villages. But most are just garden suburbs, being built in the wrong places purely for commercial gain.

The groups represented here are calling for an urgent rethink, not just of the individual developments they oppose, but of the whole garden communities programme and the planning policies that underlie it. And while this may appear radical, many of the policies that are needed in their place have been available and used for a very long time. We need to rediscover them.

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