

Knebworth Neighbourhood Plan Group
C/o Knebworth Parish Council
Knebworth Village Hall
Park Lane
Knebworth
Herts SG3 6PD

Our Ref:

Your Ref:

7th May 2020 (by email)

email: clerk@knebworthpc.org.uk

Dear Knebworth Neighbourhood Plan Group,

Knebworth Neighbourhood Plan- Pre-Submission Draft March 2020

Thank you for consulting us on this Neighbourhood Plan (NP). CPRE Hertfordshire supports the production of Neighbourhood Plans and congratulates the Parish, the Neighbourhood Planning Group, Knebworth Parish Council and participating residents on its production. The plan's broad scope and policies and the extent of the work involved are duly noted.

The strengths of the plan include:

- Aspiration for the future quality of the village
- Extensive detailed policies - 111 pages
- Listing local assets of community value
- The Action Planning list as a reference for continuing positive planning work
- The establishment of a place-making group

CPRE Herts makes the following positive suggestions for inclusion either as additional objectives, in policy wording or supported within the proposed Action Plan.

Development Strategy

**Policy KBDS01 Retention of Separation Between Settlements
(and also Built Environment Policies KBBE6, KBBE7 and KBBE8)**

The loss of large areas of Green Belt countryside at sites KB1, 2 and 4 is an objection for CPRE Herts while it is noted that the Neighbourhood Plan is being produced to align with the, as yet, unadopted North Herts DC Local Plan which is still subject to Examination. CPRE Herts has objected to North Herts DC's approach and justification for releasing land in the Green Belt in the Local Plan. Clearly there is a key question of prematurity.

Policy KBDS02 Density of Housing Development

The CPRE (in partnership with others) published a recent [National Housing Design Audit](#) that highlighted poor rural design and in part a problem with numerical approaches to low density. [Design review](#) and design coding proved the best means to deliver better quality. The [Living with Beauty report](#) advocates a tighter ground floorplan; proportionally smaller units may generate greater village

CPRE is working nationally and locally for a beautiful and living countryside

President: Sir Simon Bowes Lyon, KCVO
Chairman: Richard Bullen

CPRE Hertfordshire is a Charitable Incorporated Organisation

Registered Charity 1162419

character (eg 50dph) than a standard 'low density' pattern of detached suburban housing (30dph). Low density is not a determinant of good design and can frustrate it. Better use of density can also reduce the land take of sites and loss of valuable countryside.

Local Economy

Policy KBLE4 Community businesses and KBLE5 Home working

The supportive policies are noted. The quality of places can be enriched by mix of uses, so this is supported if buildings are planned to be flexible with future adaptability for a range of uses designed into them. Economics may mean there may be an initial period when residential use is the only viable option.

Built Environment

Policies KBBE5 Masterplanning & Placemaking (and also Policy KBEF1 Biodiversity & Policy KBEF2 Environmental Pollution)

Street tree planting is an acknowledged government objective and should be included as part of the work to strengthen green infrastructure /greening of the village. It also helps mitigate pollution and support wildlife.

Policy KBBE5 Masterplanning & Placemaking

Public space design should be considered with the opportunity for local events that enhance the village. For instance, if streets are occasionally closed to traffic, this can support a local events strategy and encourage people to walk, cycle and enjoy the village without traffic noise and pollution.

Traffic, Transport & Parking

Policies KBT1, KBT2, KBT3, KBT4 and KBT5

One of the obvious problems for the village is how both the East-Coast Mainline railway and Stevenage – London Road B197 divide and frustrate the ease of movement across the village. The plan identifies the need to address the three pinch points beneath and over the railway line and includes an idea to extend an underpass at Knebworth Station. To overcome these barriers the place-making group will be a good forum, thinking 'outside the box', to develop long term ideas to then be addressed with the relative planning, highways and transport bodies

Car dependency – the allocated new housing areas are not only far too large and encroaching the countryside, but likely by location to be car dependent. It is crucial that these new developments should hit sustainable travel targets and support an overall shift in travel in the village.

Policy KBT1 Sustainable Modes of Travel and Objective M.

Public footpaths – these can be extended to encourage local enjoyment of the countryside and walking. It appears that better links south east of the village towards Datchworth are needed.

Other suggestions

- **To reprioritise the design of the public highway;** to raise the quality of key village spaces, not least the High Street and Railway Station approach, to boost the local economy and reduce traffic speeds. This may be long term broader work of the place-making team and may need to secure S106 or other funding for specialist consultancy work by a recognised urban design / transport consultancy.
- **To reduce car use and overall traffic levels;** A sustainable travel group might be set up to continually drive and monitor progress for the whole village, not just for new areas. With the climate crisis the objective of modal shift will be an integral objective of all plan,. See [Decarbonising Transport March 2020](#) – Dept of Transport. Relying on technology alone (e.g. electric cars), won't address the climate emergency or realise the other benefits (environmental, safety, amenity, air quality, health, etc) of a modal shift to sustainable travel.

Measures might include an expanded role for electric cycle use, cargo bikes for freight, electric or hydrogen public transport, local electric car pools. Road space reallocation or filtered 'quietway' routes as part of a network for walking and cycling. Aspirations for improved public transport, local shuttle routes, or quasi taxi services.

Useful Reference documents:

- To improve design standards the reference to [Building for Life 12](#) is helpful. Another more recent publication that could be referenced is the [Place Alliance Report UCL The Ladder of Place Quality 2019](#). This is evidence-based research on what delivers good quality.
- *Manual for Streets* has already been referenced in the plan. A further good reference for the design of rural streets and village centres is [Traffic in Villages – a toolkit for communities](#). While produced for Dorset, the principles apply more widely.

CPRE Hertfordshire hopes that the above suggestions are of ongoing assistance.

Yours sincerely,

Tim Hagyard
Planning Manager

Website addresses for reports/links:

CPRE National Housing Design Audit

https://www.cpre.org.uk/wp-content/uploads/2020/03/Place-Alliance-A-Housing-Design-Audit-for-England_2020.pdf

Design Review <https://www.designcouncil.org.uk/what-we-do/built-environment/design-review>



Living with Beauty <https://www.gov.uk/government/publications/living-with-beauty-report-of-the-building-better-building-beautiful-commission>

Decarbonising Transport

<https://www.gov.uk/government/publications/creating-the-transport-decarbonisation-plan>

Building for Life 12

<https://www.designcouncil.org.uk/resources/guide/building-life-12-third-edition>

The Ladder of Place Quality

<http://placealliance.org.uk/research/place-value/>

Traffic in Villages Toolkit

<http://hamilton-baillie.co.uk/wp-content/uploads/2017/12/hamilton-baillie-traffic-in-villages.pdf>