



LOCAL PLAN PUBLICATION STAGE REPRESENTATION FORM

**North Hertfordshire Proposed Submission Local Plan**

Please return this form to North Hertfordshire District Council either by email to : [local.plans@north-herts.gov.uk](mailto:local.plans@north-herts.gov.uk) or by post to: Strategic Planning and Projects Group, NHDC, PO Box 480, M33 0DE

The deadline for receipt of representations is **30 November 2016**. Late representations will not be considered.

*This form has two parts-*

**Part A** – Personal Details

**Part B** – Your Representation(s). Please fill in a separate sheet for each representation you wish to make.

**Part A**

**1. Personal Details**

**2. Agent Details**

*\*If an agent is appointed, please complete only the Title, Name and organisation boxes below but complete the full contact details the agent in 2.*

Title	Mr	
First Name	David	
Last Name	Ames	
Job Title <i>(Where relevant)</i>	Head of Strategic Planning	
Organisation <i>(Where relevant)</i>	Letchworth GC Heritage Foundation	
Address Line 1	Foundation House	
Line 2	Icknield Way	
Line3	Letchworth Garden City	
Line 4	Herts	
Post Code	SG6 3JA	
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Email Address <i>(Where relevant)</i>	david.ames@letchworth.com	

**Part B - Please use a separate sheet for each representation**

It is recommended that you read the Guidance Notes provided for an explanation of the terms used in this form.

**Name or Organisation: Letchworth Garden City Heritage Foundation**

3. To which part of the Local Plan does this representation relate?

Paragraph(s)  Policy  Site

4. Do you Consider the Local Plan is:

- (Please tick as appropriate)
- i) Legally Compliant      Yes  No
  - ii) Sound      Yes  No

If No, which of the Soundness tests does it fail?

- Positively prepared
- Justified
- Effective
- Consistent with National Policy

- iii) Complies with the Duty to co-operate      Yes  No

5. Please give details of why you consider the Local Plan not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

We support the aspirations of the District Council to provide additional housing in Letchworth Garden City.

We believe that the information incorporated in the Council's assessments particularly of objectively assessed need are sound and robust and we strongly believe that additional housing is required in North Hertfordshire as a whole and Letchworth in particular.

In our representations to Policy SP15 we have confirmed that we support the inclusion of Site LG1 and support the opportunity to provide additional housing in a high quality environment, which reflects a modern interpretation of Garden City Design Principles.

This is on the basis that the development should be of a high quality and integrated with the remainder of the town. Furthermore, any impacts particularly those relating to transport should be addressed as part of a community led master planning process.

On the other sites under our control, we will work with the District Council to ensure that these



developments provide high quality homes across tenures.

**LG3 Land East of Kristiansand Way and Talbot Way**

This land is under the freehold ownership of the Heritage Foundation.

We welcome that the adjoining allotment land, which was originally part of the allocation, is no longer included following our own representations.

We have no objection to the various criteria included in the LG3 allocation and look forward to working with the Council to secure high quality development on this large site.

**LG4 Land North of Former Norton School, Norton Road**

The Heritage Foundation owns the freehold of this land, but there are previous agreements in place with the County Council who will be bringing forward this development as lessees. We therefore have no objection to this development.

**LG5 Land at Birds Hill**

This land is under the Heritage Foundation's freehold, but there are various leasehold interests on this site. Most of these tenancies are ending during the plan period, which will enable us to take a master plan approach to the delivery of this site through phases.

We will seek an opportunity to bring forward Vantage Point, which sits at the eastern section of the site, as an important local former industrial building in isolation, so that we can secure its long term future. We would welcome the recognition of this within the accompanying text for the policy.

As part of the development of this site, we will be reviewing opportunities for mixed use (residential and employment) should there be a requirement for Class B1 a/b to meet local employment needs.

Otherwise we support the allocation of this site.

**LG8 Pixmore Centre, Pixmore Avenue**

This land is under our freehold control there are long ground leases in place. These ground lessees are promoting this development, but will require our approval as freeholders.

We would like to see the relocation of existing businesses as part of this development within Letchworth as part of any development of this site and would be keen to support these discussions.

**LG13 Glebe Road Industrial Estate**

We support the development of this site, which is under our freehold ownership with no encumbrances.

In discussions with the local authority we have found that this will be suitable for nine rather than ten homes.



**LG14 Site at Icknield Way**

This land is under our freehold control there are long ground leases in place. These ground lessees are promoting this development, but will require our approval as freeholders.

We support this allocation on land, which is under our freehold interest with no encumbrances.

**LG16 Foundation House**

This land is under our freehold ownership and is presently occupied by us for our head office. The development of this site will be linked to the Heritage Foundation finding alternative office facilities within Letchworth Garden City.

We support this allocation.

**LG15 Garages in Icknield Way**

This land is under our freehold ownership, but subject to long ground lease interests.

We raise no objection to the development of this site.

**LG18 Former Depot in Icknield Way**

We have for some time hoped that this site would come forward for development. It is under our freehold interest, but held on a long ground lease to North Herts District Council.

We have no objection to this allocation.

**LG6, LG9, LG10 and LG17**

Each of the sites are outside the Heritage Foundation's freehold and therefore we have no legal interest in them. However, we have no objection to these allocations.

*(Continue on a separate sheet if necessary)*

6. Please set out what modification (s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to soundness. *(NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination).* You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

*(Continue on a separate sheet if necessary)*

**Please note** your representation should cover concisely all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

**No**, I do not wish to participate at the oral examination.

**Yes**, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

As we have an ownership interest on sites LG3, LG4, LG5, LG8, LG13, LG14, LG16 and LG15, we feel that we should be part of any discussion the development of these parcels of land.

**Please note** the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

9. Do you wish to be notified when the Local Plan is submitted?

**Yes**, I do wish to be notified

**No**, I do not wish to be notified

10. Signature:

David Ames

Date:

29<sup>th</sup> Nov 2016