

Transition Town Letchworth Submission for Matter 31, 19th January 2021

Matter 31 – the main modifications put forward by the Council relating to Policy SP9: Design and Sustainability and in relation to the strategic housing site policies (Policies SP14 to SP19 inclusive) The Council now considers that the aforementioned policies are not sound in relation to design, place- making and master-planning. It has put forward a number of main modifications to rectify matters. These are set out in document ED216, which can be found on the examination webpage. They are shown in bold red text within ED216, and the prefix ‘FM’ is used to identify them – this is to avoid confusion with main modifications that have already been consulted on and are also shown within ED216 to provide a complete picture of the changes proposed by the Council. I am examining the Local Plan as it was originally submitted. I will, therefore, only recommend main modifications to the originally submitted plan where they are necessary to rectify soundness problems.

31.1 Are the main modifications proposed in relation to Policy SP9 and its supporting paragraphs (FM001, FM002 and FM003) necessary for soundness? Are they justified, effective and consistent with national policy?

Transition Town Letchworth consider that the modification of SP9 is justified. In Letchworth we are concerned that a number of sites included in the draft local plan which have already received planning permission are failing to meet the sustainability ambitions described in the local plan and its supporting documents. For example:

- cycle network connectivity could have been improved in Letchworth had beneficial cycle network links been incorporated in plans for site LG9.
- safety concerns relating to a non-overlooked connecting path and the provision of a beneficial cycle link between the Jackmans estate to the town centre could have been addressed on site LG6.
- more new homes could have been delivered on the highly sustainable Gernon Road development (LG20) if less of the site had been devoted solely to the provision of car parking spaces.

We are therefore supportive of any amendment that could help the council ensure its sustainability ambitions can be better delivered.

In terms of effectiveness, paragraph 4.xxx in FM002 suggests some criteria that may dictate whether a site will require a masterplan. This paragraph ends with the statement “**Generally, a threshold of 100 dwellings will apply**”. We think it would be more effective if the council can identify all sites that they consider will need a masterplan. In Letchworth, we would expect this to include sites LG1, LG3, LG5, LG6, LG8, LG9, LG19, LG20 and LG21.

TTL would suggest the council remove the suggested threshold of ‘100 dwellings’ requiring a masterplan, as there are likely to be many smaller sites where a masterplan may help ensure the delivery of significant sustainability benefits for residents of the new estate and surrounding developments.

We especially want to see masterplans for any sites which:

- involve more than one landowner, (site LG6 demonstrates why a masterplan could have been beneficial on a site for 35 homes but which involved 3 landowners).
- are in a highly sustainable transport location (where the site can be planned to discourage car ownership).
- the site has the potential to provide path and cycle network connectivity which can bring benefit to those living on surrounding estates.

- are owned by either NHDC or HCC, as these are the sites where zero carbon houses could be commissioned, and we would like the councils choices in this regard to be visible to the electorate.

31.3 Are the main modifications proposed in relation to Policy SP15: Site LG1 (FM005) necessary for soundness? Are they justified, effective and consistent with national policy?

We are keen to see this new development integrating well with, and bringing benefits to, the neighbouring Grange Estate which it will enclose on its NW corner. Some of the services which are being listed as required 'on site' may be more effectively delivered within the Grange estate (e.g. the requirement for a 2FE primary school on site could alternatively be delivered by expanding the adjacent Stonehill school to 3FE). Given that FM005 is making some significant changes to this section of the local plan we would suggest that removal of the words 'on site' in SP15c will allow more flexibility in masterplanning whilst still delivering the extra education places needed. We note that SP15f is less rigid, allowing, for example, the possibility of a GP surgery being located next to the pharmacy on the Grange estate, a solution which will bring benefit to both future residents of LG1 and the Grange estate in a central location.