

From: "Roy Parker"
Subject: North Herts DC Matter 31 hearing on 2.2.21
Date: 6 January 2021 at 13:29:25 GMT
To: <louise@poservices.co.uk>

Simon Berkeley BA MA MRTPI
Inspector
C/O Louise St John Howe
PO Services
PO Box 10965,
Sudbury
Suffolk, CO10 3BF
6th January 2021

Dear Mr Berkeley,
Examination of North Herts DC Local Plan 2011-2031
This representation relates to Matter 31 for the hearing on 2nd
February 2021.

I again choose to make my representation on this matter in writing
as I have done so in the past on other matters. I understand that my
written representation will carry the same weight as those made
orally at a hearing session.
SP9 Design & Sustainability

In the first line of (b) I contend that "Require" should be retained
rather than being changed to "Expect" which is a dilution of the
requirements.

In the following points there should be included:

(xi) Improve and upgrade all roads surrounding the site to take
account of the added vehicle movements that the new strategic site
will generate to those adjacent roads. Where there is existing
bottlenecks or limited vision on roads adjacent to the site that can
be improved by surrendering limited bordering land for the benefit
of the community be prepared to design that into the site design.
(xii) This information should be available on the Council's planning
application website prior to a public consultation on the site.

In that part of (b) after (x) commencing "Strategic Masterplans will
be produced---) lines 4 & 5 – change "should" to "are required to"
otherwise it is too diluted a requirement.

There is a major point in this section that you will see amplified
in SP19 later in this representation. Where a strategic development
for Sites SP14 – SP19 has already submitted a planning application
which has not yet expired then they will be required to adopt these
new provisions.

In the following points there should be added:

(ix) Where the new site boundaries with existing properties in the
adjacent community the developer is required to erect adequate
fencing and green screening to ensure the privacy, security and
peaceful occupation of such existing properties.

Policy SP 19

I would firstly like to say that Bloor Homes planning application
ref: 17/00830/1 of 13th April 2017 and Crown Estates planning
application ref: 16/02014/1 of 31st August 2016 still appear to be

live with an Agreed Expiry date of 31st March 2021. Why have these planning applications been put on hold for such a long time? Surely even if the Inspector, who had misgivings about SP19 in July 2019 and must surely have more after the further hearing sessions, were to allow the East of Luton to remain in the Local Plan then both he and the Council would want to apply the proposed new rules to these sites. In this event the paragraph commencing "Where applications have already been submitted" should continue "these should be rendered expired and new applications should be made according to these new provisions"

I cannot understand why the Council did not accept the excellent and fair proposal of the Inspector in 25 (d) of his letter of 9th July 2019 which I repeat below with my proposed amendments marked in red: The Council will put forward a main modification deleting the East of Luton sites from the Local Plan. If this path is pursued, it is highly likely that, in order to be sound, the Local Plan should include a commitment to further joint working with other authorities in the Luton HMA to (1) reassess the level of Luton's unmet needs for the period 2011 – 2031 and (2) identify the most appropriate sites for meeting Luton's reassessed unmet housing need and to bring forward a development plan document allocating the most suitable sites in neighbouring authorities identified during this analysis. Just as with the Local Plan such Reassessed Requirements for Luton's unmet housing needs should be subject to public consultation and, if disputed, be referred to the Secretary of State for independent review and decision.

You will be aware that several of us have serious reservations concerning the quantum of Luton's unmet needs. I believe that your suggestion was very sensible and fair. It should be agreeable to everyone with an interest in the outcome and could match up neatly with Luton's own review in 2022. It would surely be a terrible mistake to allow East of Luton and find it was unnecessary when the opportunity exists to require a thorough review of the situation.

In this event Policy SP19 would be completely deleted.

I will send a paper copy today to you.

Yours Sincerely
Roy Parker