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**Our ref:** 15485/01/JF/DD/18242662v2

**Your ref:**

Dear Mr Berkeley

## **North Hertfordshire District Council: Schedule of Further Matters, Issues and Questions**

On behalf of our client, Letchworth Garden City Heritage Foundation (LGCHF), please find below their written statement in response to the Schedule of Further Matters, Issues and Questions (dated January 2020) issued by yourself.

LGCHF is committed to play its part in fulfilling the aims and objectives of the Local Plan, particularly through the development of Sites LG1 and LG3. We outline below further work undertaken by LGCHF in the intervening period since the last Examination sessions.

### **LG1 – Land north of Letchworth**

- Two phases of community consultation have been undertaken and the results reported.
- A Housing Needs survey completed, which will inform the scheme.
- Discussions with the County Council in its capacity as the Highway Authority have been advanced.
- Traffic modelling has been undertaken.
- A further traffic survey has been undertaken in response to community consultation responses.
- An application to the County Council for Sustainable Travel Towns designation, which will link into a sustainable travel plan for the proposed development.
- An international design competition, undertaken with RIBA, called 'Re-imagining the Garden City' has been completed, which utilised site LG1. Over 80 RIBA practices entered and 4 were shortlisted. Each of the 4 shortlisted entries were the subject of a public consultation, which informed the final decision. The winning entry has now been appointed to support the Board develop a vision, initial master plan and Development Brief for Site LG1.

### **LG3 - Land east of Kristiansand Way and Talbot Way**

- An initial master plan is complete.

- Community consultation has been undertaken.
- A highways solution has been developed to ensure successful access can be provided to the site.
- A detailed archaeological survey has been undertaken, and an agreed solution endorsed with the County Council.
- The scope of an outline planning application has been agreed with North Hertfordshire District Council.
- A master planner instructed who is completing an initial plan that will form the basis of an outline planning application to be submitted once there is certainty in the Local Plan process.

The above activities represent a significant commitment of time and resources, in order that LGCHF is in the optimum position to progress matters once the Plan is adopted. We provide some more detailed comments on the questions outlined by the Inspector below.

### **Matter 21 – the objective assessment of housing need (‘the OAN’)**

LGCHF has reviewed the ‘alternative OAN figures’ developed by the Council and the Council’s approach to OAN and considers it is demonstrably robust to inform valid housing delivery decisions. In our opinion the variances in OAN resulting from the different OAN methodologies are not sufficient to constitute a ‘meaningful change’ in housing delivery requirements.

Regardless of whether this change constitutes “a meaningful change in the housing situation”, LGCHF remains committed to delivering housing to meet the OAN through the development of Sites LG1 and LG3.

### **Matter 22.1 – the overall supply of land for housing**

In respect of the proposal to undertake an early review of the Local Plan, LGCHF considers this to be a robust approach to ensure the overall housing requirement can be delivered over the plan period. “The Council’s housing land supply and delivery calculations within Letchworth are correct.”

In response to 22.1 (b), LGCHF consider the Council’s approach regarding the selection of land for housing is the most appropriate way forward for delivering additional housing as it would draw upon the sequentially preferable qualities of the identified sources and the associated infrastructure. LGCHF previously submitted a Local Housing Study (representation ref. 009861) undertaken in 2016 by Lichfields on its behalf. This clearly demonstrates that there is a need for additional housing in Letchworth and that without future housing growth, Letchworth would likely see negative social and economic impacts, including the potential loss of local businesses/services and a declining economy. The delivery of housing will generate local investment, support existing jobs and create new ones, boost spending in the local economy, and help to fund local services and infrastructure through the payment of planning contributions.

We wish to highlight the Local Housing Study again to emphasise the importance of the delivery of new homes to the future of Letchworth. LGCHF is committed to play its part in fulfilling the aims and objectives of the Local Plan, particularly through the development of Site LG1.

### **Matter 22.2 – five-year housing land supply**

LGCHF supports, and remains committed to, the delivery of approximately 900 new homes on Site LG1, as well as Site LG3 and other smaller sites included in the Local Plan. We are also working to provide new housing in the town centre in line with the aspirations of the Local Plan and the allocation for at least 50 new homes in the town centre.

LGCHF has agreed a delivery phasing schedule with NHDC in respect of LG1 to demonstrate how the site could deliver its allocation of 900 homes over the plan period to inform five-year housing land supply. This is laid out in the table below.

Year ending	No. of units	Action
2020	-	
2021	-	Submission of Outline planning application
2022	-	Grant of Outline planning permission
2023	-	Grant of Phase 1 Reserved Matters planning permission
2024	-	Start on site
2025	100	
2026	100	
2027	100	
2028	100	
2029	100	
2030	100	
2031	100	
After 2031	200	

### **Matter 23.2 – the Green Belt Review Update (GBRU) work and the site selection process**

LGCHF concurs with the Council’s position that proportionate consideration has been given to potential harms and benefits to the Green Belt and supports the approach taken by NHDC whereby there are no cases that the Council is proposing for development that it considers to be of limited benefit on a site that would lead to substantial harm to the Green Belt.

Whilst it is acknowledged that the GBRU alters the evidential basis on which the hearing sessions for a small number of sites were held, LGCHF note that the majority of objections related to the underlying principle of land being released from the Green Belt as opposed to the assessment of the scale of harm to the Green Belt identified by the Council, or with reference to the original Green Belt Review for individual sites.

As such LGCHF considers that the re-grading of some of these sites to ‘significant’ does not substantially alter the cases already put to the examination by many objectors and as such does not render the plan unsound. The approach taken by The Council is reasonable, robust and consistent with national planning policy.

## **Matter 27 – the optional national technical standards for water efficiency and the nationally described internal space standards for dwellings**

LGCHF supports the inclusion of national technical standards. There are a number of developments across North Hertfordshire that have been undertaken outside of these standards, which have contributed to poor quality schemes.

With the amount of housing planned in North Hertfordshire in the plan period, it is essential that this is of a good quality and meets today's challenges.

The Council has signed up to the Climate Emergency and the inclusion of standards regarding water efficiency link well into this. North Hertfordshire does face challenges (along with the whole of the region) regarding the use of scarce water resources and the inclusion of these standards reflects this.

In terms of minimum space standards, these are essential to provide appropriate accommodation. As we are all aware, the UK has a poor record in terms of the size of modern housing and in our view these standards should be a minimum. Smaller accommodation creates poor quality living conditions and is bad for the well-being of residents.

On land owned by LGCHF, we have our own standards for new housing, which require water efficiency measures, energy efficiency beyond Building Regulations and require compliance with the Government's minimum internal space standards.

If these are set out early in the planning process (which would be the case if included in the Local Plan), this will not impact on scheme deliverability as there is certainty that such requirements should be incorporated in development proposals at an early stage, rather than seeking to apply these later on in the planning process, after the agreement of land disposals etc.

### **Summary**

LGCHF supports the wider aims and aspirations included in the North Herts Local Plan. Of particular relevance is that it stands by the major land allocations our land holdings (LG1 and LG3) and has invested heavily in supporting these to come forward expediently, including considerable work since the last examination sessions.

This latest round of the public examination is of some frustration to LGCHF as our work supports the Council's position that additional housing is necessary and the delays in the Local Plan process have exacerbated the already significant issue concerning housing land supply.

We are satisfied with the Council's approach towards Objectively Assessed Need and its Green Belt Review and believe that, in addition to the significant need for local housing and also to support the local economy, there are no technical planning reasons why the Plan should not now proceed.

We therefore hope that the Plan can be adopted in the very near future and we trust that these representations are helpful informing the examination.

If we can be of assistance in relation to the above, please do not hesitate to contact us.

Yours sincerely

**James Fennell**  
Chief Executive