



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 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 (Where relevant)	Head of Strategic Planning	
Organisation (Where relevant)	Letchworth GC Heritage Foundation	
Address Line 1	Foundation House	
Line 2	Icknield Way	
Line3	Letchworth Garden City	
Line 4	Herts	
Post Code	SG6 3JA	
Telephone Number	01462 476007	
Email Address (Where relevant)	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	<input type="text" value="X"/>	No	<input type="text"/>
ii) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>

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

Positively prepared	<input type="text" value="X"/>
Justified	<input type="text" value="X"/>
Effective	<input type="text" value="X"/>
Consistent with National Policy	<input type="text" value="X"/>

iii) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>
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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 are disappointed that the policy included in the previous local plan regarding Letchworth Garden City (Policy 58 - Letchworth Garden City Design Principles) is no longer part of the proposed Local Plan. Although some of this text is included in the Design SPD, this devalues the importance of Letchworth and its unique place in the story of British Town Planning. The master plan for Letchworth Garden City is of international importance and the key core design aspects previously set out in the former Policy 58 are of significant importance when considering any new development in Letchworth. This also does not feature in the Letchworth section of the community's part of the local plan.

In our view the existing reference to Letchworth in the Design SPD does not give sufficient weight to the importance of Letchworth's heritage context and how applications in Letchworth should be considered so not to harm its significance. This can include proposals for alterations to existing buildings as well as new development.

Furthermore, the Design SPD was adopted in 2011, before the NPPF, and requires revising, including the information is regarding Letchworth, which should be completed within the next 12

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months.

When considering para 126 of the NPPF, this requires a positive strategy with respect to the historic environment, which. It is considered that the retention of the Letchworth Garden City policy would achieve, by recognising its significance as a heritage asset, which the current policy does not achieve.

It is therefore requested that a specific policy regarding Letchworth Garden City is reintroduced, similar to the current Policy 58.

(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.

An addition to the existing policy or a separate policy, which states:

"The Council will only consider the development proposals in Letchworth Garden City if they are in sympathy with its traditional buildings and if they clearly show that the garden city design principles below have been taken into account".

This should be supported by either a separate SPD or an updated Design SPD which sets out the heritage significance of Letchworth Garden City in more detail, when compared to the existing SPD.

(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:

We are the self funded charity, successor to First Garden City Limited, which owns the Letchworth GC Estate and reinvest surplus from this Estate, into the local community. One of our charitable commitments, included in the Letchworth Garden City Heritage Foundation Act 1995, is heritage and environment and we work to preserve the character and quality of the Garden City. We do however need the support of local planning policy in order to achieve this. As such we would welcome an opportunity to contribute to a discussion as to how this can be achieved.

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?

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Yes, I do wish to be notified

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No, I do not wish to be notified

10. Signature:

David Ames

Date:

29th Nov 2016