



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 <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	
Telephone Number	01462 476007	
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 provision of affordable housing in line of the provisions of this policy.

Letchworth Garden City as a whole has in excess of 30% socially rented housing, which is approaching double the national average, which in our view is an important part of the original Garden City Model, which provided housing for workers who had been living in poor conditions.

The overall target of 40% affordable housing on large development sites is supported.

It is considered that in assessing affordable housing provision there should be detailed consideration of local circumstances and the local needs of the community and town as a whole. This can be part of a discussion with the Council and key stakeholders, to ensure that the correct type of housing is provided, across tenures and needs.

In determining this provision of affordable housing, we recommend that the definition of affordable housing is broadened and clarification whether low cost market housing for local people can be included (which we would welcome).



This definition should incorporate the recognition of Community Land Trust and co-operative housing models as a way of delivering homes for local people, meeting local needs, as part of affordable provision on new development sites. This is because these models provide an excellent opportunity to provide housing entry to a range of local people, whilst protecting the criteria for occupation/ownership in perpetuity. This would utilise models promoted by groups such as Shelter and the Community Land Trust Network, where occupation criteria can include local people and income and ensure that future ownership can be retained for people that meet these criteria.

Such models also create opportunities for self-build (in accordance with local and national policy) for local people, providing an alternative, which not only leads to new affordable homes, but also enhances local skills.

In support of this policy it is essential that the Council provide up to date information on the type of affordable housing in its Monitoring Reports and Strategic Housing Market Assessment for each of the main settlement areas, so that landowners and developers can have a clear understanding of the type of provision that should be made in their development schemes. This will assist in creating certainty and supporting the delivery of these needed homes.

In accordance with para 173-177 of the NPPF, policies should ensure that planning obligations do not place such restrictions that development does not proceed on the grounds of viability.

(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.

The following is sought:

Additional paragraph (after 8.10):

'The Council will support proposals for community land trust and co-operative housing, subject to restrictions and controls concerning occupation as part of affordable provision contained within this policy.'

Addition to policy:

'The provision of affordable housing will be assessed on a site by site basis and will be subject to robust viability evidence'

(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 wish to ensure that appropriate affordable housing is provided to meet local needs. As the main landowner in Letchworth Garden City we would wish to be part of any oral examination and discussion about how this may be best 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?

Yes, I do wish to be notified

No, I do not wish to be notified

10. Signature:

Date: