



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.

As with Policy ETC 1, we strongly support the protection of the employment areas designated in the Submission Plan. However, we object to the restriction in designated locations in Letchworth (LB1, LB2, LB3 and LB4) for Class B1 use only.

When reviewing the background papers it is evident that there is not sufficient up to date justification for this policy. The Council’s Employment Background Paper September 2016, does not include sufficient support for the approach of restricting uses to within Class B1 in this policy. Furthermore, the 2013 Regeneris North Hertfordshire Employment Land Review does not support this approach.

This report indicates at pg 29, para 3.15 that ‘employment growth in the B1 category continues to decline’.

Pg 44 para 4.2 states that office take ‘remains notably down on pre-recession level.’ and para 4.17 states ‘that the trend in office take up in the District has been falling over the period studied’. When examining the industrial estates in Letchworth, with the exception of Spirella (which in our view should be retained for office use) the report does not recommend a B1 use only restriction. In pages 94 to 104 of the Regeneris report, it concludes that there is a ‘modest demand for B1

NORTH HERTFORDSHIRE DISTRICT COUNCIL



floorspace and land in North Hertfordshire' (para 7.45).

In addition, para 8.5 states that 'forecasts suggest that there will be low demand for B1 floorspace and land.....In our view between 2.3ha and 3.7 ha will be required up to 2031.' It then goes on to indicate that 5.5 ha of land is in the pipeline and existing sites with 9.2 ha having the potential for re-development of 0.6 ha is suitable for B1 use only. This concludes that 'our quantitative assessment suggests that there will be sufficient supply of B1 land to meet future demand'.

On pages 112-114 it recognises that there is vacant office floorspace and that there is a surplus of employment land. When reviewing each of the industrial areas, the report does not recommend that there should be a restriction on Class B1. It also recognises that the greatest demand is for Class B8 floorspace.

Considering the current situation, as the largest landlords in Letchworth Garden City, the situation is that the B1 a (office) market continues to be difficult. Presently in the Heritage Foundation's portfolio alone, there is in excess of 180,000 sq ft of vacant employment floorspace – see background paper 'Office Void Summary'.

On this basis, we are of the view that this policy does not meet the requirements of para 21 of the NPPF, which seeks to avoid business being 'over-burdened' by the requirements of planning policy.

In conclusion, it is considered that the local market remains challenging. The Council's own background reports provide no justification for a restrictive policy requiring Class B1 uses.

The local market is such that although Class B1 b (light industrial) uses perform relatively well, the Class B1 a (office) is particularly weak, with a surplus of supply and vacant office space.

In a difficult market, it is considered that a restrictive policy such as this, could prejudice investment and jobs and as such should be re-worded. Furthermore, the policy should be positively worded.

(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.

Recommended policy change to **ETC1** – delete a)

Replace with:

“Within those parts of the Employment Areas designated for business use, there is a presumption in favour of development for Use Class B1. Alternative ‘B’ Class uses will be considered, if it is demonstrated that they will have a positive impact on local employment and the local economy and will not be harmful to the amenities of any local residents or the environment of existing business operations.”

(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:

As we have an ownership interest on these sites, if there is any discussion about these sites, we feel that we should be part of this.

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

Yes, I do wish to be notified

No, I do not wish to be notified

10. Signature:

David Ames

Date:

29th Nov 2016

BACKGROUND PAPER – LGCHF – OFFICE VOIDS