



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	
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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.

This land is owned by the Letchworth Garden City Heritage Foundation and there are no ownership encumbrances to its development.

The Heritage Foundation is successor to First Garden City Limited, which developed the world's First Garden City, based on the principles of Ebenezer Howard.

We own the freehold of the Letchworth Garden City Estate, which is 5,500 acres and operates in accordance with the Letchworth Garden City Heritage Foundation Act 1995. We are a community benefit society, as defined by the Co-operative and Community Benefit Societies Act 2014.

We currently seek to apply Howard's principles in the way that we manage the Letchworth Estate and at the core of this is a stewardship and community governance model, which ensures that local people are at the heart of the decision making process. This includes a Board of Trustees, selected from our Governors, which are either elected locally, appointed or nominated by local



groups. There are 30 Governors, who choose 7 of the Trustees from their own number, with the remaining two Trustees being the Governors nominated by the District and County Councils.

As a self-funded charity, an endowment income is generated by way of a surplus from a predominantly commercial portfolio, based in Letchworth and to a lesser degree other investments. This surplus is reinvested by way of our charitable commitments, set out in the Act of Parliament. These are: environment and heritage, education and learning, recreation and leisure, health and well-being, locally based charities and charitable activities.

In practice, this means that we run charitable services, such as the Ernest Gardiner Treatment Centre (free of charge medical facility outside of the NHS), Broadway Cinema and Theatre, Standalone Farm (a family farm attraction), museum services, trees and landscaping, a management scheme to preserve the character and quality of residential areas, studio and art gallery and a programme of grants for local people and organisations.

Surplus generated from this or any other development will be reinvested in line with our charitable commitments.

With respect to the site to the north of Letchworth (LG1), we would not be willing to release Green Belt land for development, in the absence of a clear demonstration of need or if suitable alternative sites were available. On this basis, our Trustees have been satisfied with the available information and support this allocation.

To assist in making this decision, in 2013 we undertook a detailed review of the socio economic status of Letchworth in partnership with Nathaniel Lichfield & Partners. This found that should there be no additional housing within Letchworth, the population would begin to fall, along with the number of local jobs and the average age of the local population would continue to rise above the UK norm. It also found that additional housing is required to maintain the population, provide local jobs and underpin the future economic sustainability of the town.

We undertook a detailed review of potential alternative sites, in consultation with the Council's Planning Policy team. This included consideration of all existing brownfield sites, which may be suitable for re-development.

We concluded that in order to provide housing to meet the identified need, the greater proportion of the employment area should be retained to meet the long term employment requirements of the town, the aspirations for job creation in the Local Plan and to protect the sustainability of our local economy. The residential development of large swathes of employment land, would in our view significantly conflict with Garden City principles, which seeks a sustainable local economy and to provide employment opportunities for local people in locations easily accessible to them locally.

We also rejected the option to relax our own policies regarding infill development within the early phases of the Garden City, where lower density areas could have been redeveloped to provide more housing. We felt that this would harm the underlying essential character of the Garden City, destroying much of the town's heritage.

This led to the consideration of potential locations for growth, including at the edge of the urban area, whilst reflecting the aspiration to protect the identity of adjoining settlements by preventing co-joining with Baldock and Hitchin and protecting the identity of the existing villages.

This resulted in the identification of this strategic site, to meet a stated need for additional housing in Letchworth.



This information was published as part of a community discussion exercise in 2013, where the greater proportion of respondents agreed with the need for additional housing. Concerns were expressed about the loss of Green Belt land and countryside, the potential to harm Garden City principles and biodiversity, inadequate infrastructure, (in particular transport), schools and GP services and the impact on the amenity of nearby properties. There were also a large number of comments, which conditionally supported the provision of additional housing. All of these comments were made publically available on our web site.

These comments were carefully considered along with the different options for providing new housing, a series of technical reports and Garden City principles. It was agreed that land to the north of Letchworth can be considered by the Council to make a contribution to the significant amount of new housing required to be provided within North Hertfordshire. This was on the basis that should the Council determine that this site is an appropriate location for development, it would be of benefit to the town as a whole, protect our population and the vibrancy and sustainability of our economic base, in line with Garden City principles.

The Trustees have therefore now confirmed their support for this allocation.

The allocation of this site is crucial to meeting the requirements of Policy SP1 in particular c)i) which seeks to deliver an appropriate mix of homes, jobs and facilities, along with the provisions of the NPPF, particularly paras 47 and 50, ensuring that there is sufficient housing to meet the objectively assessed need for market and affordable housing. This is a key site referred to in para 47, 'critical to the delivery of the housing strategy over the plan period.'

The scale of the site creates an opportunity to meet need identified for North Herts, and Letchworth Garden City in particular. Attached are three reports prepared by Nathaniel Lichfield and Partners (NLP), which assess the socio economic conditions in Letchworth Garden City and local housing requirements.

The implications of zero housing growth for the town during the Plan Period would be a reduction of approximately 2,000 people in the population of the town in the plan period. This would lead to a reduction of 1,897 working age people and it is estimated that local jobs would reduce by 1,690. This in our view would lead to issues regarding the long term sustainability of the town as a place for people to live and work, with a thriving local economy, a key element of Garden City Principles.

To ensure that the town continues to thrive and the local employment base can continue to develop, we believe that the additional amount of housing sought in the Local Plan is required to ensure a growing workforce and to secure commercial investment into the town.

Therefore, there is an economic case for additional housing to ensure that the original model of Letchworth Garden City as a thriving place where people can live and work, can be maintained.

In terms of local affordability, of the towns in North Hertfordshire, Letchworth now has the greatest affordability gap between average prices and average salaries. Letchworth has seen the smallest increase in overall dwelling stock of the towns in North Hertfordshire since 2001 and in our discussions with local property professionals we have found that there is particular demand for two and three bed housing suitable and affordable for families. Anecdotally young households are moving further north to areas such as Biggleswade, where comparable housing is significantly less expensive than in Letchworth Garden City. This means that many people who have been brought up or schooled in Letchworth cannot afford to continue to reside in the town.

Entry level housing prices in some parts of Letchworth have increased by over 60% in the last 10



years and entry level terraced housing at almost £200,000, is well in excess of national and regional averages. This has exacerbated the affordability gap leading to greater demand in the rental market with lower quarter rents in North Hertfordshire increasing by 24% between 2011 and 2016.

With Letchworth having 19.7% residents over 65 (compared to 18.2% in North Hertfordshire as a whole) there is a need to provide housing suited to these particular needs of these age groups. However, a lack of supply leads to many examples of long term residents not being able to find alternative premises within Letchworth to downsize. This means that many family homes are unavailable due to the owner not being able to find a good quality alternative. This will increase as over the next 25 years the population of older people is projected to increase by around one third.

The District has a reasonable level of self-containment, with around half of all households who move to/from the District also originating/moving there. North Hertfordshire has the strongest migratory relationships with Central Bedfordshire and Greater London, as well as nearby areas such as Stevenage and St Albans.

Within Letchworth, around half of households that move into the town also originated within North Hertfordshire (including elsewhere in Letchworth), and of those who originated within Letchworth, over half remained in the District (including elsewhere in Letchworth). Households in Letchworth are generally less likely to move altogether when compared to other towns in North Hertfordshire (with the exception of Baldock), however households are more likely to be local to the area. This reflects the District-level migration analysis, which shows, compared to neighbouring areas, a smaller proportion of in-migrants to North Hertfordshire are 'long-distance'.

Across North Hertfordshire District, the majority of net migration has been internal (from the rest of the UK) rather than overseas. The latest population projections indicate this pattern will continue in the future, with the District seeing little to no change from net international migration.

Of those who do move out, this is mainly single persons under the age of 65. Most households who move out of the area move to Central Bedfordshire. This corresponds with interviews undertaken with local estate agents, who stated that most people who move out of Letchworth do so due to affordability issues, moving to cheaper areas in Bedfordshire.

Letchworth has three wards in the top 20% most deprived in England and there is evidence of overcrowding of the existing housing stock. For example, by 2011 overcrowding across all households increased from 5.9% in Letchworth in 2001 to 6.4% in Letchworth in 2011. This equates to 893 overcrowded households. In particular this can be seen in families where the rate of overcrowding has increased from 7.4% in 2001 to 9.1% in 2011.

Furthermore, 102 families in Letchworth still live in one bedroom dwellings, which further emphasises overcrowding of this particular and important group.

In 2001 there were 82 concealed families in Letchworth Garden City and by 2011 this had grown to 135.

The Council as of April 2016 had 1,858 households on its housing register and the growing trend is reflected by the fact that this represented that had grown to 1,976 households by June 2016.

Overall, this information presents a high level picture of housing need to meet existing community requirements. In our view, this helps support the need for provision of new housing, both private and affordable, in Letchworth Garden City.



There has been some concern expressed that this will lead to people from outside of Letchworth purchasing the properties that are developed. We have shown that there is a good level of self-containment and a need for more housing. However, clearly, some of the housing will be purchased by non-residents, which will assist in supporting the local economy. It should however be remembered that Letchworth Garden City was developed to enable people to move into better living conditions from outside, but by having a greater understanding of the precise local housing need through discussions with the local authority, housing associations and private sector providers, along with our own information and the opportunity to support local people through different tenures, we are able to ensure that housing sites under our ownership will be geared towards providing for the needs of the local community.

In supporting this allocation, the Trustees have carefully considered Garden City Principles, and have stipulated that any development must have regard to these Principles and therefore support (a)(i) of this policy. We believe that the failure to apply Howard's social city model over the long term, where a series of Garden Cities would be developed to address housing need, has in part led to the inadequate supply of new homes across tenures, in North Hertfordshire and Letchworth, manifesting itself in some of the issues we have described. Howard's Social City Model, led to a series of Garden Cities to be developed once the model population (Howard stated this to be 32,000) had been met. These Garden Cities would be linked via rail links, with protected belts of land around each of them to be used for agriculture. This unfortunately was never undertaken.

In order to meet this need, there is a requirement to identify a strategic site that can be carefully planned to meet the unique opportunity of delivering a development that is a modern interpretation of Garden City principles, in terms of its design, the extent of community engagement and also applying the unique reinvestment model, where surplus is reinvested back into the community through our charitable commitments.

In reviewing appropriate sites to meet the identified needs, there is a requirement to continue to provide sufficient employment floorspace to meet existing and emerging needs, to ensure that Letchworth can remain a vibrant place to live and work, in line with original principles. It is evident that sufficient land does not exist on small or windfall sites and the only way that the level of housing required can be achieved is by way of a strategic site, which can be planned at scale and incorporate needed local facilities.

We believe that the land identified in this policy is the most appropriate option that would not lead to co-joining with either Baldock or Hitchin or the loss of the integrity of the village of Willian, which is a Conservation Area. The LG1 site is in our view the best way to achieve the required level of housing in a sustainable and planned manner.

The development of LG1 will lead to an encroachment into the agricultural land, leading to the development of 40 hectares of a total commercial farmland around Letchworth of 906 hectares. However, a belt of open land (mainly agricultural) will be retained, with the closest distance between the proposed allocation and the Heritage Foundation's estate boundary, being 350m to the west (as is presently the case) and to the north the closest separation being 490m and as such the integrity of a belt of open land around the town is retained.

The criteria attached to Policy LG1 is supported, in particular the requirement to follow and implement Garden City Principles, which is an essential component of the Board of Trustees decision to support the allocation of this site.

It is considered that the key to the successful development of this site will be a modern interpretation of these principles to ensure that an innovative approach is taken, founded on those early values, to ensure that the development achieves the aspiration of creating a great



place that the town can be proud of.

It is agreed that vehicular access will be an essential determinant of the impact of this development on the local community, therefore this will be an early consideration should this site come forward and we have already engaged highways consultants to review options as to how to best achieve this.

The Heritage Foundation supports the provision of additional school facilities associated with the proposed development and would welcome the opportunity to work with the County Council to deliver this directly or by way of contributions. Initial discussions have taken place with the County Council in this regard.

We support the need to consider the impact of development on local heritage assets as well as biodiversity, which will form a key component of the brief for a future master plan.

We also support the provision of additional community facilities and self-build opportunities for local people and investigating various tenures all of which will form part of this development.

The development will be accompanied by a comprehensive green infrastructure approach, which will include sustainable urban drainage systems and water courses as a way of dealing with surface water, as well as creating an attractive landscape.

An important component of the development will be the approach to structural planting. This will be achieved by referring back to the original master plan of Letchworth Garden City and the importance placed on structural landscaping. This will therefore form a key component of any master plan for this site. Furthermore, incorporating strong defensible edges by way of a landscaped solution will be part of any master plan. Therefore, these aspirations are supported.

The Greenway will play an essential part in any development of this site and there are opportunities to create attractive and useful landscapes around the existing Greenway route as well as a diversion to ensure access to the countryside is maintained. It is therefore likely that the existing route will be retained as well as a further addition as part of any master plan.

We emphasise that the decision of the Trustees was not taken lightly, but in the absence of proposals for a new Garden City nearby in line with Howard's Social City Model, we believe that in order to protect the long term sustainable model for Letchworth and to continue to provide an adequate supply of good quality homes, the additional homes included on site LG1 and the smaller sites is essential and has our full support.

The development will be led by a set of core principles including being subject to controls by the Heritage Foundation, who will work with an appropriate partner who can help bring this vision into reality and shares our values. We will retain the freehold of the site and ensure that there is a long term stewardship model through the Scheme of Management. Working with partners, homes for local people will be provided, through various tenures, as part of this development.

It will be our aspiration that the development of this site will integrate with the remainder of the town and in particular the adjoining Grange Estate. We will endeavour to ensure that the town as a whole benefits from this development and in particular local residents who are most affected.

The master planning process will incorporate significant community engagement throughout. This in particular will ensure an early examination of vehicular access and transportation issues.

Therefore in conclusion, we support the allocation of this site for housing. We believe that there

**NORTH HERTFORDSHIRE
DISTRICT COUNCIL**



is a robust case for additional housing to meet objectively assessed need in North Hertfordshire and to help address specific requirements in Letchworth Garden City. We are of the view that the strategic site is necessary to meet these requirements and the best location is site LG1.

This presents an opportunity for us to work with partners to meet our vision for a modern Garden City development, which integrates with the town and will benefit the Letchworth as a whole, whilst creating a place the town can be proud of.

(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.

(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 sole landowner of this site, which is proposed to be allocated for housing. We intend to retain a leading role in its design and implementation from early master planning to completion and will then apply our management scheme to the completed development. We have a significant contribution to make in any discussion about modern Garden City Principles and also our core values and principles which should be applied to this site. We have also undertaken significant background research and community engagement as part of our decision to support this allocation. As such, we believe that we should be part of any oral examination to discuss the merits of the allocation.

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: Date:

Supporting Documents:

**Nathaniel Lichfield & Partners:
Economic Assessment of Growth Options 2013
Economic Assessment of Growth Options Update 2016
Local Housing Study**