



12th July 2018

Mr S Ellis
Head of Planning Control
Planning Department
North Herts District Council
Gernon Road
Letchworth Garden City
Herts
SG6 3JF

Dear Simon

**Proposed Residential Development – Highover Farm, Cambridge Road, Hitchin
(LPA Ref: 18/01154/OP)**

I refer to the above planning application and thank you for consulting us.

As you are aware, the site is on the edge of the Letchworth Garden City Estate and is part of an important gate way into the Garden City. It is also the first of the major strategic sites included in the Local Plan that impact on Letchworth to come forward.

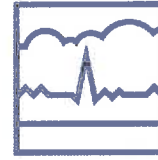
During the Local Plan consultation process, we confirmed in our representations that we raised no objection to the allocation, but made the following request for a revision to the text accompanying the policy, where it makes reference to the need for 'definitive, defensible boundaries':

This should form part of the required masterplan and include lower density development on the east and north east sections of the site, with a strong landscape buffer on these boundaries to protect the setting of Letchworth, the world's first Garden City

In response to the current planning application, we reported this to our Board of Trustees earlier this week and can confirm the following comments, which we request that you take into consideration when determining this application.

We have no objection to the principle of the residential development of this site, but have some comments on parts of the submission, accepting that this is presently in outline form.

In previous representations to the Local Plan, we highlighted the need for a strong buffer on the eastern and northern boundary of the site and Policy HTC1 highlights the need to 'maintain appropriate visual and physical separation between Hitchin and Letchworth Garden City'. The application includes an indicative layout and a Design & Access Statement. We are of the strong view that this layout does not create a buffer sought in Policy HTC1 and request that the separation of new



dwellings to the eastern boundary of the site should be enhanced, along with an improved environmental and landscaped corridor, which will act as a more effective buffer. This will assist in protecting an important gateway into the Garden City and views from Letchworth, particularly when the topography of Letchworth compared to the application site is considered.

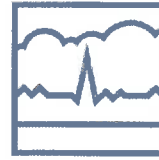
We therefore submit that there should be greater analysis of this relationship than is presently included in the submission material and a more comprehensive approach to this important landscape and ecological buffer.

The application is accompanied by a Transport Assessment, which highlights existing traffic flow issues along Cambridge Road, as well as a series of junctions that will be affected by the proposed development.

The recommendations of this report highlights the access design and impact on the immediate vicinity of the application site. We are however of the view that the application has not placed sufficient emphasis on the impact on the wider highway network, including strategic junctions (such as the A1(M) and local junctions, links to Willian and Stotfold). This includes the Cambridge Road/Stotfold Road roundabout that has serious issues of congestion during the peak flow, which will no doubt be exacerbated as a result of this development, as well as and other local junctions such as the Bedford Road/Arlesley New Road/Stotfold Road/Wilbury Hills Road roundabout.

AECOM has undertaken a strategic transport modelling exercise as part of this application, which highlights existing junctions that suffer from congestion and will be made worse by this development. We are of the view that the development should contribute to improvements arising from the cumulative impact of all of the Local Plan sites on the wider highway network and several junctions in particular. In these circumstances, we would expect the development to either deliver improvements to the highway network or make a contribution along with other developers as part of pooled approach to Section 106 contributions.

The application does not appear to commit to wider public transport and cycle routes improvement, essential to encourage a modal shift as sought by the County Council's Local Transport Plan, other than a minor alteration to bus route and possible improvements, which is reliant on the bus company. The Travel Plan also largely relies on existing provision. We are therefore of the view that there has not been sufficient recognition to wider improvements required to encourage alternative modes of transport within the surrounding context, secured through a Section 106 agreement. This could again be part of a pooled approach leading to the County Council being able to implement a range of improvements, such as those included in the Heritage Foundation's Cycling Strategy, which is currently subject to community consultation.



We feel that the Travel Plan does not display an innovative approach and are of the view that there are opportunities to encourage non car modes of transport through smart technologies and other initiatives, which may reduce car usage further.

Overall, the Trustees are of the view that these wider impacts should be considered in a more cumulative and strategic manner, along with the other major development sites included in the Local Plan. A Community Infrastructure Levy would support this approach, as this or pooled contributions administered fairly across all of the development sites by the local authorities would enable the inevitable wider impacts arising from this and other developments be mitigated.

As indicated in the application documents, there is significant heritage and in particular archaeological interest. In this heritage assessment we are of the view that there should be greater emphasis on the impact on Letchworth Garden City, which is of international importance.

As part of this analysis there is a recognition of the hillfort to the north east of the application site, however we believe that despite setting the development from the northern boundary, the development could still have an impact on the setting of this important heritage asset and request that further consideration is given to this. This is particularly as the hillfort has recently received HLF funding for improvement to this area and its setting along with a significant interpretation and education programme.

Policy HS2 of the new Local Plan relates to affordable housing, which for a development of this size requires 40% provision. The application documents do not make any commitment to this level of affordable housing, which for a green field site with few constraints is felt should be policy compliant. There is a clear need for a range of affordable housing types and tenures and we believe that 40% must be provided on this site and would expect a formal commitment from the applicant.

The application includes a new school and community facilities, which could benefit Letchworth residents. There should however be a commitment in a Section 106 agreement that the delivery of this local infrastructure along with the open space should be provided in advance or concurrently with the new development.

Please do contact me if you have any queries.

Yours sincerely

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