



## 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](mailto: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	<input type="text"/>	<input type="text" value="Miss"/>
First Name	<input type="text" value="Colin"/>	<input type="text" value="Rosanna"/>
Last Name	<input type="text" value="Campbell"/>	<input type="text" value="Metcalfe"/>
Job Title <i>(Where relevant)</i>	<input type="text"/>	<input type="text" value="Senior Planner"/>
Organisation <i>(Where relevant)</i>	<input type="text" value="Hill Residential"/>	<input type="text" value="Savills (UK) Ltd"/>
Address Line 1	<input type="text"/>	<input type="text" value="Unex House"/>
Line 2	<input type="text"/>	<input type="text" value="132-134 Hills Road"/>
Line3	<input type="text"/>	<input type="text" value="Cambridge"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="CB2 8PA"/>
Telephone Number	<input type="text"/>	<input type="text" value="01223 347235"/>
Email Address <i>(Where relevant)</i>	<input type="text"/>	<input type="text" value="rmetcalfe@savills.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:**

3. To which part of the Local Plan does this representation relate?

Paragraph(s)	<input type="text"/>	Policy	<input type="text" value="Sustainability Appraisal"/>	Site	<input type="text" value="HT5"/>
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4. Do you Consider the Local Plan is:

*(Please tick as appropriate)*

i)	Legally Compliant	Yes	<input type="text"/>	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"/>
Effective	<input type="text"/>
Consistent with National Policy	<input type="text"/>
iii) Complies with the Duty to co-operate	Yes <input type="text" value="X"/> No <input type="text"/>

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.

On behalf of our client, Hill Residential Limited, Savills (UK) Limited have been instructed to respond to general matters raised within the North Hertfordshire Proposed Submission Local Plan including responding to issues in respect of their land interests at Lucas Lane, Hitchin (allocated housing site HT5).

We concur with the positive assessment of site HT5 in the emerging Local Plan's accompanying Sustainability Appraisal (SA).

The following significant negative effects and uncertainties have been identified in relation to the site and are discussed in further detail below:

- Loss of informal open space for neighbouring housing;
- Greenfield site classified as Grade 3 agricultural land;
- The site is a major development and appears to be in a residential area;



- Distance from bus stop and train station; and
- Proximity to a designated area of archaeological interest.

Loss of informal open space

The proposed allocation and the omission site is within private ownership and there is no public access to it. It is not open space. If it has been accessed by third parties, it has been done so without the consent of the landowner and unlawfully.

The bridleway to the south of the allocation and a series of public footpaths to the north, connect the site with the countryside immediately to the west of Hitchin. The SA should be updated to remove any references to loss of any open space

Greenfield site classified as Grade 3 Agricultural Land

The Preliminary Agricultural Land Classification Maps are at a very coarse grain and are not based on field evaluation. A detailed evaluation would be likely to identify that the site is not Best & Most Versatile. The scale, nature and location of the site on the edge of a residential area mean that it is unsuitable for intensive agricultural cultivation.

Major development in a residential area

It is not considered that the development of the site will have a significant impact on the adjacent residential area or existing infrastructure. The site will be carefully designed so as to integrate with the adjacent area and, where necessary, appropriate contributions will be made to local services.

Distance from bus stop and train station

The site is located approximately 550 metres (8 minutes walk) from the nearest bus stop on Old Park Road. This is within easy walking distance of the site.

The site is also well connected to Hitchin Town Centre, railway station and other facilities by well lit 2 metres wide footways.

As noted in the SA, improving public transport provision could help towards mitigating the distance of the site from the bus stop. Where necessary, an appropriate transport contribution could be made upon the development of this scheme.

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.

In light of the above, the SA should be amended to reflect the sustainability credentials of allocated site HT5 and land adjacent to HT5.

(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:

To enable a full discussion and investigation of the suitability of Site HT5 and adjacent land for 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**, I do wish to be notified

**No**, I do not wish to be notified

10. Signature:

*R. Metcalf*

Date:

30/11/2016