



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	<input type="text"/>	Mr
First Name	<input type="text"/>	Tim
Last Name	<input type="text"/>	Waller
Job Title <i>(Where relevant)</i>	<input type="text"/>	<input type="text"/>
Organisation <i>(Where relevant)</i>	Fairview Hotels & Healthcare Ltd	Waller Planning
Address Line 1	Kanta House	Suite C
Line 2	Victoria Road	19-25 Salisbury Square
Line3	South Ruislip	Old Hatfield
Line 4	<input type="text"/>	<input type="text"/>
Post Code	Middlesex	AL9 5BT
Telephone Number	HA4 OJQ	07813 547159
Email Address <i>(Where relevant)</i>	<input type="text"/>	tim@wallerplanning.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: Fairview Hotels & Healthcare Ltd

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	<input type="text" value="X"/>	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" value="X"/>
Effective	<input type="text" value="X"/>
Consistent with National Policy	<input type="text"/>

iii) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>
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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.

Policy ETC8 and its supporting text are based on an assumption that hotel accommodation should be provided only for the purpose of serving the tourist industry. No account has been taken of the other functions which hotels may perform, such as providing facilities and accommodation for residential conferences. We believe that this is odd, given that the Mercure Letchworth Hall Hotel (LHH) is located within the District. This is a highly successful hotel, which has recently been awarded 4 Star status, and which has for many years been performing to a high level. It is now one of only two hotels in Hertfordshire which have been awarded 4 Star status, and which also has dedicated conference facilities, and its status means that it is currently turning away a significant amount of conference business, due to limitations in the capacity of its existing built form.

This representation is accompanied by the following reports, which further explain the



issues mentioned in this representation, and which should be read alongside our comments here:

- *Green Belt Assessment* by Waller Planning;
- *Economic Impact of Proposed Extension to Mercure Letchworth Hall Hotel* by SQW

These reports explain the role that LHH plays in the local economy, drawing trade in to the District from a wide catchment which includes London, Cambridge and international trade. They also explain the need for additional accommodation, including new bedrooms and an extension to the hospitality accommodation, in order to meet the demand for conference facilities, alongside the Hotel's more limited role in providing visitor accommodation.

The SQW report details the economic benefits which LHH already brings to the District, and compares the effect of a modest 30 bedroom extension to LHH with the provision of a new 105 bedroom budget hotel within one of the District's town centres. This shows that whilst the extension to LHH would provide an increase in GDV of £633,000 per annum, and 14 FTE jobs, the budget hotel option would produce an increased GDV of only £192,000 per annum, and a net increase of 9 FTE jobs. The reason for the poor performance of the budget hotel option is simply that this element of the hotel market is already well catered for with existing and emerging provision. In comparison, the extension to LHH provides a further benefit which the District does not already have, and serves a far larger catchment. LHH is also unique, in that it is the only facility within the District which is able to provide this benefit.

The evidence base for the Local Plan has failed to identify the need and opportunity for new conference facilities and associated accommodation, or the economic benefits this can bring. Increased economic activity will have many local benefits, including employment for local people, and increased spending with local businesses who supply LHH.

As drafted, the Local Plan is unsound because it fails to identify this opportunity and make allowance for its provision. This means that it has not been positively prepared, in view of the potential for economic development.

Policy ETC8 is not justified because it has not considered the needs of all of the District's existing hotels, and its proposals are therefore flawed. It only permits new hotel accommodation within town centres, or further out where justified by a sequential test. Our *Green Belt Assessment* explains that hotels such as LHH cannot be provided in town centres because they require spacious surroundings, and a high quality environment, which LHH's current site provides, but which could not be provided in a new build development in a town centre.

(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 Local Plan should be amended, either through a change to Policy ETC8, or the provision of a new policy, to recognise the benefits that this type of accommodation can bring, and also to specifically identify the need to provide further accommodation at LHH.

Policy ETC8 should also be amended to confirm LHH as an exception to the town-centre-first approach otherwise advocated for new hotel accommodation.

(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 believe that it is necessary for us to participate in the examination-in-public in order to be able to fully explain the economic benefits which an extension to Letchworth Hall Hotel would provide, and the ways in which these can be differentiated from the far more limited benefits envisaged by Policy ETC8. We also wish to discuss the need for a Policy in the Local Plan which would enable the provision of further accommodation at the Hotel.

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: