



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 0JQ	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" value="X"/>

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.

We believe that Letchworth Hall Hotel should be removed from the Green Belt. We have set out our reasoning in detail in the *Green Belt Assessment* which accompanies this representation. This includes an analysis of our proposals in the context of national policy for Green Belts, consideration of a suitable alternative Green Belt boundary and evidence relating to the exceptional circumstances required to justify this land's removal from the Green Belt. This representation is also accompanied by a report by SQW setting out the *Economic Case* for allowing extensions to the Hotel.

In brief, we believe that it is necessary to remove this site from the Green Belt for the following reasons:

- The need for the Hotel to expand, to meet the pressing demand for new bedroom and conference centre accommodation. The SQW report shows



that an extended Hotel could make a very valuable contribution towards the local economy by:

- Generating around £633,000 additional GDV per annum, which would lead to increased spending with local suppliers;
 - Providing 14 full-time equivalent and permanent jobs, which would primarily go to people living locally;
 - Generating a further 81 job years, and a further £2.4 million GVA, during the construction phase;
 - Helping to bring business to the Town and District, which would otherwise be lost to competing hotels outside the District;
 - Providing accommodation to support local tourism, which is clearly differentiated from the only alternative within the District, of town centre budget hotels;
 - Providing a venue for the use of local people and businesses, for both business and leisure.
- There is a good prospect that the site will accommodate further development within the Local Plan period, as it has done in the recent past, due to the need for the Hotel to continue to grow to meet business needs and respond to demand. As such, it is logical to remove the site from the Green Belt, to help enable sustainable development.
 - The site does not make any notable contribution towards the purposes of Green Belt land, and it is not 'open' in character.
 - The site's outer boundaries are far more suitable as a new location for the edge of the Green Belt, because they are far more defensible, and they represent the true point at which the urban area meets the open land beyond.
 - There are no realistic and available sites within the District which the Hotel could relocate to, meaning that if these proposals are not permitted, the economic benefits they could provide would not otherwise be available.
 - National planning policy indicates a need to review Green Belt boundaries in order to ensure the openness and permanence of the Green Belt, and also to meet the requirement for sustainable development. To remove the site from the Green Belt is therefore logical, and good planning.

The Local Plan's failure to remove this land from the Green Belt is unsound because it serves no Green Belt function, and also because the retention of Green Belt within the site is unnecessarily restrictive, and would potentially prevent the realisation of significant economic benefits. The proposed Green Belt boundary is also now illogical and less defensible than that proposed in the accompanying Green Belt Assessment.



The Local Plan's proposed approach is inconsistent with national policy, which seeks to ensure that Green Belts are reviewed to accommodate the long-term need for sustainable development.

The Local Plan as drafted is therefore not effective, as it proposes an unsuitable Green Belt designation on this land, and misses the opportunity for significant and tangible economic benefits for the local economy and local people.

(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, to remove Letchworth Hall Hotel from the Green Belt, in accordance with the proposals in our *Green Belt Assessment* and on the accompanying drawing .

(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:

NORTH HERTFORDSHIRE
DISTRICT COUNCIL



We believe that it is necessary for us to participate in the examination-in-public in order to be able to fully explain the need to remove Letchworth Hall Hotel from the Green Belt, and the current inconsistencies with national policy for Green Belts. We also wish to explain the significant economic benefits which a modest extension to Letchworth Hall Hotel would provide, and the way in which this would be enabled by removing the site from the Green Belt.

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

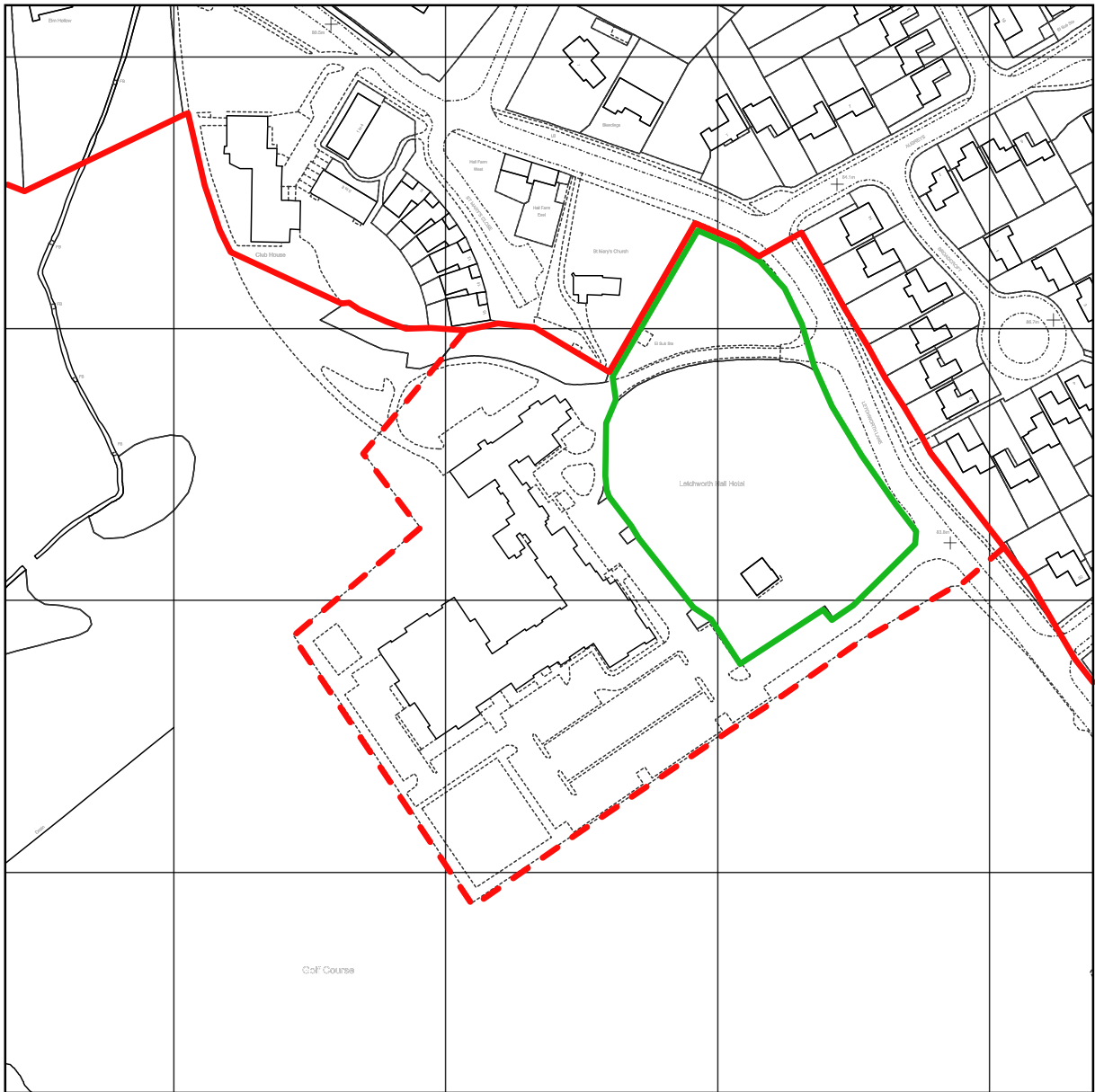
No, I do not wish to be notified

10. Signature:

Tim Waller

Date:

28/11/2016



Current Green Belt Boundary



Proposed Green Belt Boundary



Proposed Urban Open Land

Proposed Green Belt Boundary

Letchworth Hall Hotel



Drg:201/001
Scale:1:2,500
Date: Nov 2016

