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Dear Mr Berkeley

North Herts District Council – Further Modifications – Master planning principles (SP9 & 14-19)

Thank you for inviting comments on the latest modification provided by the Council.

General Comments

The Heritage Foundation supports the principle of taking a master planned approach to the planning and development of major strategic sites, of which we have an interest in Site LG1 covered by Policy SP15. We particularly welcome the inclusion of core place making principles in Policy SP9.

It is our intention to follow the approach advocated by the modifications for LG1 in Policy SP15 and look forward to working with the Council.

We do however have some reservations on which we would like some reassurance.

We would not support any significant delay in the preparation, submission and determination of schemes arising from these changes, but seek to ensure that it is a useful and positive exercise that creates certainty in the planning process. The situation regarding the Council's lack of a five year housing supply is well documented and has been discussed at length, but in the case of Letchworth Garden City and I would suggest other locations, this lack of delivery over many years is causing a number of social and economic issues to communities and individuals. A delay to delivery of needed affordable and private housing would in our view be counterproductive, harmful to our communities and economy and would question the integrity of housing trajectories that inform this Plan.

The proposed housing in the Plan is required to be delivered expeditiously whilst embracing the place making principles included in the modifications and we are concerned that if these changes cause substantial delay to the pre-application process, which is already particularly long with this Authority, this will have a negative impact.

Therefore, there is a need for the local authority to make a commitment in terms of resourcing and its overall approach which should be proactive, for these modifications to add value rather than delay and frustration to this process. This is essential in order that the aspiration to 'de-risk and add certainty' can be met.

Threshold

As indicated above, we support the approach of agreeing master planning principles prior to submission for the major strategic sites and the place making criteria included in Policy SP9. We are however concerned to see the inclusion of a threshold of 'generally' 100 units and are of the view that the requirement for a strategic master plan to be agreed prior to submission should be solely restricted to strategic sites.

This threshold would incorporate a large number of sites allocated for housing and in our view is unnecessary, potentially adding delay to these deliverable sites, which the Council is relying upon in the initial years after adoption before strategic sites come forward. It is reasonable for the Council to seek compliance with design criteria set out in the modified SP9 wording, but to ask applicants to go back to agreeing a strategic master plan pre-submission for sites of this size is unreasonable and unnecessary, other than for the most complex sites. It also places a question mark as to how the Council can resource such a large number of master planning discussions, without causing substantial delay.

An example is site LG3, where an application is being prepared for an outline submission for circa 120 homes so that it can be determined once the Plan is adopted. The proposed illustrative layout accompanying the outline application complies with the criteria in the modified Policy SP9, including the master planning principles. To unravel this for a site of this size in order to go through a master planning principles pre-application process, would in our view be unnecessary, particularly as this has not been requested in the pre-application discussions with Officers. It does also raise the question as to whether the Council can refuse an application for a non-strategic housing site that complies with the criteria in SP9, but has not prepared a master planning principles document pre-application with the Council. We hope that in these cases the Council will take a proactive approach.

We therefore respectfully suggest that the, '*Generally, a threshold of 100 dwellings will apply*' should be deleted from this policy and the master planning provisions only apply to strategic sites (Policy SP14-19). All major development schemes should be tested against the principles set out in Policy SP9, which can be considered through a pre-application exercise if this process is felt appropriate by the applicant. Alternatively, the Council may wish to identify the complex sites in the Communities section of the Plan that would require this type of approach of prior agreement of master planning principles. An example in Letchworth could be the Arena (LG21), but not LG3.

This we believe will allow the core values in SP9 to be entrenched in the design and evolution of all major developments and resources allocated to the most significant sites, particularly those covered by SP14-19, whilst not delaying other sites coming forward, essential to the Council's trajectory.

We trust that our comments are helpful and can be taken into consideration.

Please do contact me if you have any queries.

Yours sincerely

David Ames
Executive Director – Stewardship & Development