MATTER 10 - HOUSING ALLOCATIONS AND SETTLEMENT BOUNDARIES: LETCHWORTH GARDEN CITY

STATEMENT ON BEHALF OF LETCHWORTH GARDEN CITY HERITAGE FOUNDATION

INTRODUCTION

- 1. Letchworth Garden City Heritage Foundation is a Community Benefit Society, which owns the freehold of the Letchworth Garden City Estate. It is successor to First Garden City Limited and the Letchworth Garden City Corporation and is subject to the Letchworth Garden City Heritage Foundation Act 1995. We apply a basic principle of reinvesting surplus generated from a primarily commercial property portfolio back into the local community, by way of a series of charitable services and grant related activity. Our charitable commitments are set out in the 1995 Act.
- 2. In our written representations to the Submission Plan, we highlighted the process which led to our Board of Trustees supporting the allocation of the housing sites under our control for inclusion in the Local Plan process.
- 3. By way of introduction, our support for these housing sites, in particular LG1, followed a robust examination of the socio economic conditions in Letchworth Garden City and housing need, both provided as background papers to our previous written submissions, and an understanding of the site specific circumstances of land under our control. The Trustees also took into consideration the founding principles on which Letchworth Garden City was created and the need to ensure that there is a long term sustainable future for the benefit of the local community, including residents and business.
- 4. With respect to site allocation LG1, we have not yet commenced the process leading to the appointment of a development partner and the land has not been marketed. It is our intention to find an appropriate partner who shares our values and can work with us to secure the delivery of this land and for the Foundation to retain a long term interest from initial inception through to completion of the development and its subsequent stewardship. In accordance with this, the Board of Trustees have agreed a series of core principles and values with respect to the site. This is included as part of Planning Summary Statement at **Appendix A**.
- 5. This written statement will respond to the Inspector's Issue 10.11 in relation to the site allocations within the Heritage Foundation ownership, namely LG1, LG3, LG4, LG5, LG8, LG13, LG14, LG15, LG16 and LG18. In addition, it will provide a short response to Issue 10.14 regarding LG1 and LG3.
- 6. The proposed site allocations will be of significant importance in meeting the local housing need and demand within Letchworth and North Hertfordshire more widely. The Heritage Foundation is the main landowner within Letchworth and has a crucial role in the development of the town as set out above. It is therefore essential for the Heritage Foundation to participate in the discussions at the Hearing to assist in formulating the final version of the site allocations. We

therefore respectfully request that the Heritage Foundation is heard at the session on Matter 10, currently scheduled for 5 February 2018.

Issue 10.11(a): Availability

- 7. We confirm that the sites identified above as within the Heritage Foundation's ownership are available for the proposed use set out in the site allocations to come forward during the plan period. Given that we are the freehold interest on the majority of sites our approval will be required for the release of land for development.
- 8. Specifically in relation to LG5, the land is entirely on the Heritage Foundation's freehold and held on a series of leases. Land assembly is considered achievable within the plan period, but due to the different component leases and other constraints, this will be towards the end of this period, which does differ from the Council's Housing Trajectory, as indicated in our statement with respect to Matter 6 (Deliverability).

Issue 10.11(b): Access

- 9. We consider that site allocation LG1 represents a deliverable strategic location for new housing in line with the Council's housing trajectory incorporated within its supporting papers. It has therefore been subject to some initial assessments regarding vehicle and pedestrian access to the site.
- 10. In summary, we have held an initial meeting with the Highway Authority and District Council to discuss options and instructed Steer Davies Gleave (SDG) to review the access options for the site and ensure that safe and secure access can be provided for the development. This develops the work undertaken by Cottee Transport Planning in 2013, where there was a detailed analysis of the surrounding area including traffic counts and capacity studies and where options for access were considered. SDG has taken this work forward, undertaken its own analysis and has recommended access solutions which replicate one of the options put forward as part of the Heritage Foundation's Community Consultation in 2013, which examined views on whether additional housing is required and if the site now referred to as LG1 is suitable. This demonstrates that safe and appropriate access for vehicles and pedestrians can be provided. This would be subject of further detailed analysis, modelling and discussion with the Highway Authority, and community engagement as a scheme emerges. Furthermore we will be encouraging non-car transport with a comprehensive cycle strategy. Work on this has already commenced and we will work in partnership with the bus operators. A summary from SDG is included in the document at Appendix A.
- 11. In addition, an initial review of access arrangements for site allocation LG3 has been undertaken by SDG. Based on this assessment, it is considered that access can be achieved from Flint Road to the south of the site. A summary of this assessment is provided at **Appendix B**. We will be undertaking further studies to assist with supporting the design and implementation of the development of this site, including further assessment of site access options.

12. In relation to the other sites in the Heritage Foundation ownership, from our knowledge of those sites we consider that safe and appropriate vehicle and pedestrian access can be provided and these sites will be subject to highways assessments to inform the approach as schemes emerge. The site allocations would be delivered in accordance with Policy T1, which requires development to not adversely impact upon highway safety and for suitable Transport Statements/Assessments and/or Travel Plans to be provided as appropriate.

Issue 10.11(c): Deliverability

- 13. It is our strongly held opinion that each of the sites under the Heritage Foundation's control (Para 5) can be brought forward for development and there is certainty over their deliverability having had regard to the provision of necessary infrastructure and services, and environmental and other constraints. We support the allocation of these sites under our control and will work with partners and the local community to ensure the high quality implementation of these developments.
- 14. The SHLAA (2016 Update) provides an assessment of site constraints on the site allocations, with archaeology, Green Belt, potential contamination, flood and position adjacent to a conservation area identified as relevant to the Heritage Foundation site allocations. It concludes that development on all the Heritage Foundation sites would be achievable.
- 15. Additional assessments have been undertaken on the sites as follows.

Site allocation LG1

- 16. At **Appendix A**, we provide a Planning Summary Statement, which includes initial discussions with key stakeholders and technical reports in support of the deliverability of this site for a series of disciplines, which are summarised below.
- 17. Ricardo has been instructed to prepare an ecology review of the site. A desktop analysis and a series of on-site surveys to understand current activity and attributes has been undertaken and further surveys will be completed in 2018. From the initial work, Ricardo has concluded that ecology should not prohibit development taking place, subject to appropriate mitigation.
- 18. An initial review of the site was undertaken in 2013 with regards to hydrology and flooding and this concluded that there were no issues prohibiting development. This has been revisited by Ricardo in light of changes to legislation and further detailed information being available. It is their view that flooding and hydrology related issues should not prohibit the development of the site, subject to a detailed and careful master planning process.
- 19. An initial Archaeological Assessment was undertaken by Archaeological Solutions. The desktop analysis showed that there was only low to moderate likelihood of archaeological interest for pre-historic, Roman, Saxon, medieval and post medieval eras. Preliminary discussions with the County Council's Archaeological officer and a Geophysical Survey will be undertaken as a scheme emerges.

- 20. With respect to surface water and foul water management, Anglian Water has confirmed that the nearby water treatment plant has sufficient capacity to accommodate the needs of this development. A SUDS approach has also been discussed with Anglian Water.
- 21. We have also undertaken an initial utilities assessment. This supports the view that a development of the site can be implemented.
- 22. Policy SP15 requires on site provision of new primary school accommodation. We support the additional school provision linked to this development. We have met with Hertfordshire County Council's Education Team which confirmed that they would be seeking a two form entry school including an on-site nursery, which would accommodate 420 pupils in total.
- 23. We have had initial discussions with the two main housing associations in Letchworth Garden City, North Hertfordshire Homes and Howard Cottage. Both of these associations have confirmed that they are supportive of the development of this land and the opportunity of providing affordable housing should this development proceed
- 24. An integral part of the design process will be community engagement with the local community and in particular, those who live close to the site. An initial Communications Plan has been prepared which sets out our approach. We have instructed Soundings to undertake this community consultation exercise on our behalf, which we are keen to ensure does not create any conflict with the engagement linked to the statutory Local Plan process. We will therefore be commencing some initial engagement in Spring/early Summer 2018 so that there is no conflict with the Local Plan Public Examination. This will be part of a longer term process of engagement with the community and stakeholders through to the completion of the development.
- 25. Overall, we have a strong desire to deliver this development in accordance with the Council's housing trajectory and Policies SP15 and HG1, and Garden City Principles. The additional assessments and discussions undertaken demonstrate that having regard to the provision of necessary infrastructure and services, and any environmental or other constraints, site allocation LG1 would be deliverable.

Site allocation LG3

26. Having regard to the site constraints, a detailed Archaeological Assessment as required by the site allocation will be undertaken in 2018. Notwithstanding this, it is considered that the site would be deliverable from an archaeological perspective.

Issue 10.14: Green Belt

27. The Local Plan is supported by the Council's Green Belt Review (2016; document ref. CG1) which assesses each relevant site allocation against the first

four purposes of the Green Belt as set out in the NPPF (para. 80) and concludes that LG1 and LG3 make a moderate contribution to the Green Belt. In addition, the Housing and Green Belt Background Paper (document ref. HOU1) concludes that without any use of Green Belt sites, there would be significant housing shortfalls both within North Hertfordshire District and across the wider housing market areas which it lies within (para. 4.35), and goes on to state that all the proposed local housing allocation sites make at least a moderate contribution to Green Belt purposes; however "they make a substantial contribution towards the Council's ability to meet its housing requirements in full." This position is supported by the Heritage Foundation in relation to sites LG1 and LG3.

- 28. The decision to support additional housing was based on a strong evidential base and the decision to support development in the Green Belt followed a very detailed assessment process led by the Board of Trustees. Of the alternatives, LG1 is considered the most appropriate in planning terms. In selecting the land to the north of Letchworth (LG1) and land east of Kristiansand Way and Talbot Way (LG3), a sequential site analysis was undertaken which considered issues such as merging with surrounding settlements, the impact on the Green Belt and compliance with Garden City principles.
- 29. The Heritage Foundation considers the proposed site allocations to form a natural extension to Letchworth with LG1 bounded by existing development on two sides and LG3 bounded on three, and a separation between the sites and nearby settlements will be maintained. It is considered that the site allocation wordings will secure appropriate mitigation to reduce the harm to the Green Belt. The sites will make a valuable contribution to meeting the housing demand in Letchworth and the district and as such the Heritage Foundation strongly supports the allocations.

Conclusion

- 30. Overall, the site allocations under the Heritage Foundation ownership are considered to be sound in accordance with the requirements of NPPF para. 182.
- 31. The support for the allocation of land under the Heritage Foundation's control and LG1 in particular has followed a detailed review supported by community engagement and has the full support of the Board of Trustees.
- 32. We have demonstrated that these sites are deliverable and have commenced working with partners to ensure that the Trustees' principles are met. This will include working with key stakeholders and extensive engagement with the local community.
- 33. In particular, the allocations are positively prepared and will make a valuable contribution to meeting the objectively assessed housing need within North Hertfordshire and Letchworth; they are justified having been based on a proportionate evidence base; and effective and deliverable over the plan period.

APPENDIX A - PLANNING SUMMARY STATEMENT - LG1

APPENDIX B - HIGHWAY REVIEW - LG3

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То	Letchworth Heritage Foundation (LHF)		
Cc			
From	Steer Davies Gleave		
Date	October 2017		
Project	Land to the East Letchworth Garden City	Project No.	23045801

Local Plan Site Allocation-Transport Statement

Introduction

- Steer Davies Gleave has been commissioned by Letchworth Heritage Foundation (LHF) to provide transport planning and highways advice for the proposed development of the Land to the East of Letchworth Garden City, North Hertfordshire.
- This note provides an overview of transport considerations pertinent to the promotion of the principle of development on the eastern edge of Letchworth to provide an as-yet unspecified number of residential dwellings. The note has been prepared by Steer Davies Gleave following review of a range of transport studies pertinent to the site and our experience of working on other sites within Letchworth Garden City since 2016.

Baseline Conditions

Location

 The identified land is bound by Norton Hall Farm to the north, residential developments of Talbot Way/Kristiansand Way to the west, Blackhorse Road / Flint Road employment and industrial area to the sough and open farmland to the east. The sites location is shown in Appendix A.

Existing Use

4. The western part of the site is currently occupied by allotments and the eastern side by open fields.

Existing Mode Share

5. 2011 Journey to Work Census data for Letchworth Garden City provides an indication of existing mode share for work based trips within Letchworth as set out in Table 1. It would be expected that trips for all purposes may have a higher proportion of non-car trips as many day-to-day activities such as school and shopping trips are shorter. However, clearly the proposed development to the north of Letchworth Garden City is likely to uplift the number of trips made within Letchworth by all modes of travel, particularly increasing demand on the road network.

Table 1: Existing Peak Hour Mode Share – Letchworth Garden City

Mode	Mode Split (%)
Car driver	70%
Car passenger	6%
Motorcycle	1%
Bus	4%
Train	6%

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Taxi	0%
Bicycle	3%
On foot	10%
Total	100%

6. Table 1 illustrates that car dependency is high and that appropriate highway capacity is required to withstand uplift in vehicle trips. However, initiatives being promoted locally and at a strategic level are delivering a shift towards sustainable transport modes. To minimise the impact of the proposals the development will be brought forward along with specific initiatives and investment to develop additional bus services and to encourage pedestrian and cycle movement in and around Letchworth Garden City as a whole.

Local Highway Network

- The site is situated on the eastern edge of Letchworth Garden City but is well located for making use of
 existing local facilities and has good opportunity for access by the most sustainable modes of travel from
 a range of different locations.
- The site is located adjacent to Norton Road which runs along the north side of the site and is the northern arterial route out of Letchworth leading to Stotfold, the A505 and junction 10 of the A1(M).
- 9. Green Lane is located to the west of the site and runs north-south connecting the north east and south east of Letchworth providing access over the railway line. Green Lane connects to Norton Road to the north and to the Baldock Road (B656) to the south. Talbot Way and Kristiansand Way are directly accessed from Green Lane and the residential developments within these roads immediately border the site to the west.
- Green Lane is the only route to the east of Letchworth town centre that crosses the railway. A
 supermarket and various retail units are also located on Baldock Road which is indirectly accessed from
 Green Lane. As a result Green Lane is subject to relatively high traffic flows.
- Blackhorse Road is located to the south of the site and is also accessed via Green Lane. Blackhorse Road
 is a cul-de-sac primarily providing access to the employment and industrial land located to the east of
 Letchworth north of the railway.
- 12. Flint Road is a cul-de-sac accessed via Blackhorse Road providing access to employment and industrial land immediately to the south of the site. Flint Road serves as the primary access to the allotments that currently occupy the western section of the site with a single track paved vehicular route accessed from the very north of the cul-de-sac.

Public Transport

- Letchworth Garden City benefits from good connections to the local bus and rail network. Services and facilities are explored in detail below.
- 14. Letchworth Garden City is well connected to the national rail network. Letchworth Garden City rail station is located within the centre of the Garden City, approximately 2.2km (27 minutes' walk) south of the proposed development. Letchworth Garden City is served by the Great Northern rail line, with direct connections to Stevenage, Hertford, Finsbury Park and London Kings Cross to the south, and Baldock and Cambridge to the North.
- 15. Table 2 outlines the key rail services by frequency per hour.

Table 2: Route and Frequency of Rail services at Letchworth Garden City - AM Peak Period (08:00 - 09:00)

Route	Peak hour Frequency (08:00 – 09:00)
Royston – Letchworth Garden City – London Kings Cross	1
Cambridge – Letchworth Garden City – London Kings Cross	3
London King's Cross – Letchworth Garden City - Cambridge	2
Kings Lynn – Letchworth Garden City – London Kings Cross	2
Total	8

- 16. On average, eight trains serve Letchworth Garden City per hour based on AM peak hour analysis (08:00 09:00). A site visit was undertaken on Tuesday 6 December 2016 and high-level rail service frequency counts were undertaken. Between 07:30 and 08:30 AM, a maximum of five services were available until 08:00. There was no recommencement of services until 08:27. This illustrates that within the peak hour (08:00 09:00), the majority of services occur after 08:27.
- Twelve bus services are available within Letchworth Garden City, operated by bus company Intalink as shown in Table 3.

Table 3: Day Bus Services by Frequency per Hour – AM Peak Period (08:00 – 09:00)

Bus Route Number	Route	Frequency per hour
53	Letchworth – Lordship Estate (circular)	3
55	Letchworth – Stevenage	3
90	Royston/Ashwell – Letchworth*	1
91	Royston/Ashwell – Letchworth	2
95	Biggleswade – Letchworth**	1
96	Letchworth – Arlesley/Stotfold – Letchworth	2
96A	Letchworth – Arlesley/Stotfold – Letchworth*	2
97	Arlesley/Stotfold/Baldock – Letchworth – Hitchin*	2
98	Arlesley/Stotfold/Baldock – Letchworth – Hitchin	1
386	Bishop's Stortfold – Letchworth – Stevenage*	1
787	Cambridge – Letchworth – Heathrow Airport	1
W7	Shefford – Letchworth/Baldock***	1
Total		22

^{*}Does not operate during the AM peak period (08:00 - 09:00).

- 18. Bus routes 96 (southbound) and 96A (northbound) run along Green Lane and Norton providing two buses in each direction per hour within a reasonably close proximity of the site. The overwhelming majority of the site is located within 400m of either Green Lane of Norton Road and therefore reasonably accessible to bus services.
- 19. The Hertfordshire Local Plan states that it will:

^{**} Tuesdays and Fridays only

^{***} Fridays only

"Encourage existing car users to change to cycling, walking, passenger transport and car sharing to reduce the proportion of journeys made by car."

20. To this end, the development is well situated to benefit from the existing bus services with a direct bus link already connecting within close proximity of the development to key attractions within Letchworth, such as the train station and town centre. Opportunities may also exist to either expand existing routes or connect with newly created bus routes to help deliver the policy objectives of HCC.

Sustainable Access

Walking

- 21. The site is well located to make use of existing footways alongside roads within the vicinity of the development providing pedestrian access to local facilities. Letchworth Garden City centre is approximately 2.2km south (less than 30 minutes walk) with access to a number of retail stores and local amenities.
- 22. For leisure based trips, Letchworth Garden City benefits from The Greenway for sustainable activity. The Greenway is a 21.8km circular route which borders the Letchworth, providing access to the countryside without straying too far from the town. The Greenway was developed in 2003 following £1million funding from the Letchworth Heritage Foundation.
- 23. The Greenway currently connects to the south-east boundary of the proposed development site. Permissive public footpaths are also located within the site (adjacent to the existing allotments) along the northern boundary of the site connecting to Green Lane through the Talbot Way housing development and along the eastern boundary of the site connecting to the Greenway. A core principle of the development will be to maintain the existing footpaths within the site and establishing new footpaths providing improved connections into The Greenway.
- 24. Norton Common is located one kilometre to the west of the development site connecting via footpaths on the public highway. Avenue Park is also connected to the site approximately 1km to the south of the site via The Greenway. Both areas are suitable for recreational and leisure activity.

Cycling

- 25. The local roads within the immediate vicinity of the proposed development site are suitable for cycling.
- 26. National Cycle Route 12 (NCN 12) currently connects through Letchworth Garden City. The total route is 121 miles in length and will extend from Enfield Lock to Spalding when fully complete (the section between Enfield Lock and Hadley Wood is currently under development).
- 27. Section 1 of the route (the Great North Way) is between Enfield Lock and Letchworth. It currently commences at Hadley Wood and follows predominantly non-traffic routes northbound through Hatfield and Welwyn Garden City, and minor roads through Stevenage. The route between Stevenage and Letchworth is traffic-free, and some sections of the route join with the Hertfordshire Way cycle route.
- 28. At Letchworth, the route connects from the south, intersecting the east-west A505, continuing northbound towards either Letchworth Garden City rail station (west spur) or Baldock (east spur) with the spurs merging north of Letchworth to the west of Radwell. The east spur travels to east of Letchworth and the west of Baldock on primarily traffic free routes. The route extends northwards along Baldock Lane via Prior Way Allotments, Woolgrove School and Avenue Park connecting with the Greenway to the east of the proposed development site. The NCN 12 currently runs along Blackhorse Road to the immediate south of the development site and intersects with the permissive pedestrian routes that currently run through and alongside the boundary of the development site. Further north of

the site NCN 12 runs along Norton Road connecting with the western spur which runs through the centre of Letchworth to the west of Radwell village.

- 29. Beyond Letchworth, the route continues northbound to St. Neots.
- The 21.8km Greenway route described above, comprising the circumference of Letchworth Garden City and the southern border of the proposed development, is also suitable for cycling.

Proposed Access

- 31. The development can be anticipated to come forward in a manner that provides suitable access which maximises connectivity to and from the site whilst minimising the impact on the existing infrastructure and environment. Whilst it is accepted that vehicle travel will form a central part of the modal share within the development, its location and ability to make use of existing facilities will enable access strategies to be developed for all modes, including sustainable options such as walking and cycling.
- 32. It is reasonable to assume that a holistic approach to access will be adopted which caters for construction vehicles during construction and residential access once the development is complete.
- Proposals for access to this site were previously assessed (Access Options, September 2013, Cottee) considering a range of different means for access to the site, including:
 - Option 1: via Flint Road (from the south of the site);
 - Option 2: via Hartlington Place/Talbot Way (from the west of the site)
 - Option 3: via a potential development site within the Blackhorse Road industrial estate (from the south of the site);
 - · Option 4: via Kristiansand Way (from the west of the site); and
 - Option 5: via Norton Hill Farm (from the north of the site)
- 34. The 2013 assessment concluded that access via Flint Road or a potential development site within Blackhorse Road industrial estate (Option 1 or Option 3) would be feasible to serve residential traffic associated with full development of the site subject to capacity testing on local junctions.
- The assumptions against which these conclusions were made in 2013 have been reviewed by Steer Davies Gleave and are believed to remain valid.
- 36. Access via Flint Road (Option 1) is considered to be the most suitable, with traffic capacity of Flint Road and Blackhorse Road being reasonably low given the employment and industrial uses primarily served by these routes. Flint Road already serves as the vehicular access to the allotments located on the development site. Whilst access via Flint Road would result in the mixing of residential and employment/industrial traffic, subject to wider improvements to the immediate local highway network that would be necessary associated with any development of this site the distribution of residential traffic through these roads may form as a catalyst for improving streetscape, activity and natural surveillance on these routes. Furthermore, since the production of the original assessment in 2013 the Madden Gardens development has been constructed and occupied demonstrating that Blackhorse Road is suitable for the accommodating both residential and employment/industrial use traffic.
- 37. Any future residential development access from Flint Road would require detailed traffic modelling and capacity testing with a focus on the junction between Blackhorse Road and Green Lane. This is currently a sufficient to provide the option to create a signalised junction that would improve efficiency of operation if it were to be required in the future (subject to detailed capacity testing once a scheme is fully defined).
- 38. Whilst vehicular access via Talbot Way, Norton Hall Farm and Kristiansand Way are not considered to be feasible there are ample opportunities for pedestrian and cyclist connections between the development

site and these existing routes. These connections would deliver significant benefits in terms of pedestrian/cyclist connectivity and permeability within the area and in particular improve access to The Greenway which is located to the southeast of the development site. These additional pedestrian and cyclist connections will provide routes only available for cyclists and pedestrians to encourage these most sustainable and healthy modes of travel in alignment with HCC policy.

39. LHF have established relationships that will ensure they will work collaboratively with HCC and NHDC in the design of the access solution and wider Transport Strategy for the site to minimise impact, maximise benefits and provide mitigation measures when deemed necessary. This work will be supported by a detailed traffic modelling exercise to assess highway impact alongside a review of opportunities and constraints surrounding non-car modes.

Integration

- 40. Integration of the site with the wider area will be achieved through creating permeable links connecting the existing town to the proposed development. Sustainable modes, such as walking and cycling, will be promoted to help encourage permeability and integration. Hard design measures, such as quiet-ways (suitable for cycling) and street lighting, will be implemented alongside soft behavioural change measures to promote sustainable transport.
- 41. As part of any future planning submission a Transport Strategy for the site will be developed to encompass the wider area with particular attention paid to how initiatives promoted for the scheme can influence other elements of Letchworth with wider benefits such as improved public transport, pedestrian access, cycling facilities alongside enhanced access to/from the town centres and areas of employment.
- 42. Alongside the site-specific cycling improvements, exploration will take place of how to improve the overall cycling experience within Letchworth. The extensive cycle parking facilities at the train station, shown in Figure 1, are an illustration of how to promote sustainable transport. As part of this project there will be an exploration of how best to deliver a step-change in the numbers of individuals choosing to make trips in a sustainable manner. An example of this could be the introduction of cycle lanes on suitable sections of Icknield Way which would improve the quality and safety of cycling facilities between the development site and Letchworth Garden City centre.

Figure 1: Cycle parking at Letchworth Train Station





Design

43. The streetscape design will seek to be a contemporary evolution of the Garden City principles, whilst still being firmly rooted in the vision outlined by Ebenezer Howard at the end of the 19th Century. Further design work and consideration will be necessary should this site allocation be approved for the Local Plan.

Engagement

44. LHF intend to discuss access and transport issues associated with the site in detail with the wider local community as part of the community engagement strategy. This engagement will shape any future planning submission should this allocation be supported in the Local Plan.

Cumulative Impact

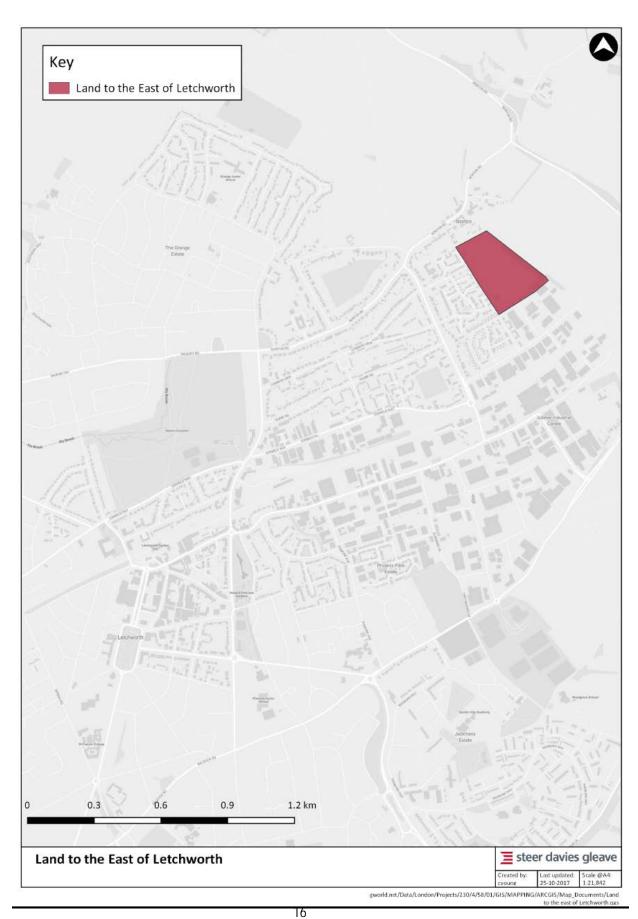
45. The anticipated scale of the development is such its impact on the wider highway network will be relatively modest. Traffic routing to and from other major development being considered for to the north of Letchworth will have limited interaction with traffic arising from this site at key junctions.

Summary and Conclusions

- 46. Residential development on the Land to the East of Letchworth Garden City provides an excellent opportunity for bringing forward much needed housing development in a sustainable manner. The site is situated in a location which enables connections with the local highway network and can make use of existing facilities that minimise the need for travel and reliance on the car. It is reasonable to anticipate that the development will facilitate the use of sustainable modes of transport in accordance with paragraph 30 of the National Planning Policy Framework (NPPF).
- 47. The site benefits from good accessibility by road, public transport services and sustainable transport modes:
 - Letchworth Garden City rail station is located within 1.9km of the development site with rail services to London Kings Cross, Stevenage and Cambridge.
 - Twelve daily bus services operate within Letchworth Garden City. Bus services 96/96A serve Green
 Lane and Norton Road, located to the north and south of the proposed development site with the
 majority of the site within 400m of these routes.
 - The Greenway is a walking and cycling route which comprises a 21.8km route around the circumference of Letchworth Garden City and the site provides the ability to improve existing and establish further connections into The Greenway.

- Roads within the site vicinity are suitable for cycling. National Cycle Route 12 'the Great North Way'
 connects through Letchworth Garden City Baldock and runs to the immediate south and east of the
 proposed development site.
- 48. Highway access can be formed through connections to the existing cul-de-sac of Flint Road providing a connection to Blackhorse Road and Green Lane serving as a linkage towards to town centre and local facilities and more directly beyond to the Principal Highway Network.
- 49. Enhanced pedestrian and cycling connections are desirable and considered to be feasible. These connections would provide facilities to encourage the most sustainable and healthy forms of travel. Such facilities would also benefit existing residents with improved connections through the site to The Greenway and NCN 12.
- 50. A thorough Transport Assessment will be prepared and further analysis provided in support of the planning applications in due course. The analysis to date provides comfort that the opportunities for sustainable transport modes will be taken up to reduce the need for major transport infrastructure and that safe and suitable access to the site can be achieved for all users.
- Any necessary improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development.
- 52. Paragraph 32 on NPPF states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. On this basis, there appears no reasonable grounds for transport objections to the development to emerge.

APPENDIX A – DEVELOPMENT SITE



LIST OF APPENDICES

- A PLANNING SUMMARY STATEMENT LG1
- **B STEER DAVIES GLEAVE HIGHWAYS SUMMARY LG3**