

Thursday, 17 September 2026

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Letchworth Garden City
Herts. SG6 3HZ

North Hertfordshire District Council
Council Offices
Gernon Road
Letchworth Garden City
SG6 3JF

For the attention of Henry Thomas – Planning

Dear Henry,

**Planning Applications 26/00853/FP Installation of floodlights. 26/01178/FP – Morrisons Superstore, Broadway, Letchworth Garden City, SG6 3TS
Installation of CCTV pole cameras and installation of valeting air/vac unit following removal of parking spaces**

I wish to object to the above application on the grounds of noise, residential amenity, cumulative impact, lighting and the adequacy and clarity of the submitted information. My concerns are particularly important because this proposal does not stand alone. It follows the separately approved EV charging development at the same location under application 25/00466/FP, which permitted eight EV charging bays and four Alpitronic HYC 400 charging units. The Council's own report records that the EV development is immediately adjacent to Station Way, with the closest residential dwelling approximately 5.8 metres away.

1. The valeting development is additional to the approved EV development

The approved EV scheme and the proposed valeting facilities are separate planning proposals.

The approved EV site plan identifies eight charging bays and four Alpitronic HYC 400 chargers, together with the associated substation and LV equipment. The current valeting plan expressly identifies the EV layout as being pursuant to the approved application 25/00466/FP.

The fact that the valeting facilities are being introduced within the same area therefore does not mean that their noise and other environmental effects can be considered in isolation from the already-approved EV equipment.

The Council's own planning report for the EV application records that the site is very close to residential properties on Station Way and that noise was a material consideration in that application.

2. The revised Noise Impact Assessment does not appear to assess the cumulative noise
This is my principal concern.

The revised Noise Impact Assessment for the valeting equipment assesses:

- the air station;
- the vacuum station; and
- the combined operation of the air and vacuum stations.

It does not appear to assess the simultaneous or cumulative operation of those facilities together with the already-approved EV charging equipment.

This is particularly significant because the revised assessment itself recognises the requirement to consider cumulative effects.

The combined air/vacuum assessment produces a rating level of 35 dB, compared with a background level of 34 dB, giving a difference of +1 dB.

The earlier EV assessment calculated a rating level of 32 dB, against a background level of 34 dB, giving -2 dB.

I appreciate that neither figure, considered individually, is presented by the applicant as indicating a significant adverse impact. However, that is not the same as demonstrating that the combined operation of all of the equipment now operating in this part of the site has no material effect on neighbouring residents.

I therefore ask the Council not to rely upon the two assessments as if they describe a single combined noise environment.

A cumulative assessment should consider, at a minimum:
existing background noise + EV charging equipment + proposed air equipment + proposed vacuum equipment, including any tonal, intermittent or distinctive characteristics.

3. The nearest residential property remains particularly important.

The revised noise assessment identifies 49 Station Way as the nearest noise-sensitive receptor.

This is not an abstract assessment of noise in a commercial area. The EV equipment and the proposed valeting equipment are being introduced immediately alongside existing residential properties.

The Council's previous assessment of the EV application specifically recorded that the closest dwelling is approximately 5.8 metres from the proposed development.

The proximity of the residential properties makes it particularly important that the additional source of intermittent commercial noise is properly assessed.

4. The proposed air equipment may have a tonal characteristic.

The revised noise assessment applies a +2 dB acoustic-character correction to the air station because of possible just-perceptible tonality.

This should not simply be dismissed because the resulting BS4142 numerical difference is small.

Air equipment and vacuum equipment are likely to operate intermittently, rather than as a continuous background noise source. Such intermittent or distinctive sounds can be noticeable to residents even where an averaged numerical assessment produces a relatively small difference from background noise.

I therefore ask that the Council consider the character and intermittency of the noise, as well as the numerical BS4142 result.

5. The noise survey dates from September 2024

The revised 2026 assessment relies upon the same environmental noise survey undertaken between 6 and 9 September 2024.

I would ask the Council to consider whether that survey remains sufficiently representative of the present situation.

The site has subsequently acquired and/or had installed the EV charging infrastructure, and there are now further proposals for valeting facilities, CCTV and additional lighting.

The acoustic environment is therefore not necessarily the same environment that existed when the 2024 baseline survey was undertaken.

At the very least, the applicant should explain why the 2024 baseline remains representative of the current situation.

6. The submitted plans need clarification regarding parking

There also appears to be an inconsistency between the application information and the submitted site plan.

The application describes the proposal as involving the removal of two parking spaces, whereas the submitted site plan appears to identify seven parking bays to be removed in connection with the revised layout.

The same plan shows two new valeting bays.

I ask the Council to require clarification of the actual number of parking spaces/bays to be removed before determining the application.

This is not merely a drafting matter: the planning consequences of removing two spaces are materially different from removing seven.

7. The CCTV structures should be considered as part of the whole proposal.

The proposed plan also introduces new CCTV cameras mounted approximately 2.7 metres high on 3-metre poles.

I recognise that CCTV may have legitimate operational purposes. However, the additional structures should be assessed as part of the complete development rather than treating the application as simply the installation of an air and vacuum machine.

The submitted plan shows that the application introduces new physical structures as well as new commercial equipment.

8. Lighting and cumulative residential amenity

There is also an important relationship between this application and the separate lighting proposals at the site.

The submitted valeting plan identifies existing floodlighting in the area, while a separate application, 26/00853/FP, concerns the installation of floodlights at Morrisons. That application is separately recorded by the Council's planning records.

The lighting proposals are particularly relevant because the lighting assessment specifically considers the residential property at 49 Station Way, which is also the nearest noise-sensitive receptor.

I therefore ask the Council to consider the cumulative effect upon neighbouring residents of:

- the existing/approved EV charging equipment;
- the proposed valeting equipment;
- the proposed CCTV infrastructure; and
- the associated lighting.

These matters should not be considered entirely in isolation where they affect the same residential receptors.

9. Hours of operation

The revised noise assessment proposes operation of the valeting equipment from 07:00 to 22:00 every day.

Those hours are significant because the approved EV development itself was restricted to 07:00–22:00, with the reason for that restriction expressly referring to protecting the amenity of existing residents.

The Council should therefore consider whether adding another intermittent commercial noise source operating throughout the same period creates an unacceptable cumulative impact on residential amenity.

10. Conclusion

I am not suggesting that the numerical results of the submitted noise assessment can simply be disregarded. My concern is that the assessment does not appear to demonstrate the effect of the whole installation now proposed and already approved at this part of the Morrisons site.

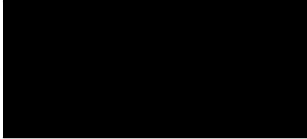
In particular, I ask the Council to require clarification and/or further assessment of:

1. the cumulative noise from the EV chargers together with the proposed air and vacuum equipment;
2. the intermittent and potentially tonal characteristics of the valeting equipment;
3. whether the September 2024 baseline survey remains representative;
4. the discrepancy between the stated removal of two parking spaces and the submitted plan appearing to show seven parking bays being removed;
5. the effect and precise purpose/location of the proposed CCTV poles;
6. the relationship between this proposal and the separate floodlighting application; and
7. the cumulative effect on 49 Station Way and the other neighbouring residential properties.

Until these matters have been properly clarified and, where necessary, assessed, I do not consider that the application has demonstrated that the proposed development would adequately protect the living conditions of neighbouring residents.

I therefore respectfully request that permission is not granted in its present form, or alternatively that determination is deferred until the above matters have been satisfactorily addressed.

Yours faithfully,

A solid black rectangular box used to redact the signature of Marlene Gray.

Marlene Gray