



PLANNING STATEMENT

3-5 NEWELLS,
LETCHWORTH
GARDEN CITY,
HERTFORDSHIRE, SG6
2PH

Client: Settle Group

Job no: MB018

Revision: 03

Date: 28th June 2024

Status: FINAL



Project title: 3-5 Newells, Letchworth Garden City

Report title: Planning Statement

Issue No	Version/ Details	Date Issued	Author	Reviewed by	Approved by
001	Draft	22/04/24	EN	ND	ND
002	Final	23/04/24	EN	ND	ND
003	Final	28/06/24	EN	ND	ND



CONTENTS

1	INTRODUCTION	1
1.1	BACKGROUND TO PROPOSALS	1
1.2	APPLICATION DOCUMENTS	1
1.3	PURPOSE AND STRUCTURE OF THE PLANNING STATEMENT	2
2	THE SITE AND SURROUNDING CONTEXT	3
3	PLANNING HISTORY	5
4	PRE-APPLICATION DISCUSSIONS	6
5	THE PROPOSED DEVELOPMENT	7
6	PLANNING POLICY	8
6.1	NORTH HERTFORDSHIRE LOCAL PLAN	8
6.2	NATIONAL PLANNING POLICY FRAMEWORK	8
7	PLANNING ASSESSMENT	10
7.1	PRINCIPLE OF DEVELOPMENT	10
7.2	AFFORDABLE HOUSING AND HOUSING MIX	11
7.3	RESIDENTIAL AMENITY	12
7.4	DESIGN	13
7.5	TRANSPORT	15
7.6	TREES AND HEDGES	16
7.7	ECOLOGY AND BIODIVERSITY	16
7.8	FLOOD RISK AND DRAINAGE	17
7.9	CONTAMINATION	18
7.10	ENERGY AND SUSTAINABILITY	18
7.11	ARCHAEOLOGY	20
7.12	PLANNING OBLIGATIONS	20
8	CONCLUSION	21



1 INTRODUCTION

This Planning Statement has been prepared by Sustainable Planning Design Studio ('SPD Studio') on behalf of settle group ('the Applicant'), in support of a Full Planning Application submitted to North Hertfordshire Council ('NHC') to redevelop the site at 3-5 Newells, Letchworth Garden City, Hertfordshire, SG6 2PH ('the Site').

The proposed description of development is as follows:

'Application for full planning permission for the demolition of the existing dwellings and garages, and the construction of a 3 storey building comprising 15 dwellings with associated access, landscaping and parking.'

The full detail of the proposed development is set out within Section 5 of this Planning Statement and within the Design & Access Statement prepared by SPD Studio, but in summary the proposed development comprises:

- Demolition of the 3no. existing dwellings (Use Class C3) on site;
- The erection of a new 3 storey building comprising:
 - 15 affordable residential units (Use Class C3) with private amenity space in the following mix:
 - 9 x 1 bed/2 person units
 - 6 x 2 bed/4 person units
- 496sqm of communal amenity space
- 26no. Car parking spaces (including 5 visitor spaces)
- 15no. Cycle parking spaces
- Rooftop solar panels

1.1 BACKGROUND TO PROPOSALS

Settle group are a local Housing Association committed to providing good quality, sustainable homes, working in partnership with residents and striving to increase the supply of affordable housing in the areas they work in. They provide services to 23,000 residents in over 10,000 homes across Hertfordshire, Bedfordshire, Buckinghamshire and South Cambridgeshire. Settle group are driven by their purpose to help people who are struggling to find somewhere to live. They help residents find a comfortable home, so that they can live the life they chose.

This planning application is submitted following positive pre-application engagement with NHC officers. The proposal will demolish the existing poor quality vacant homes and garages on site to deliver a fully affordable scheme that exhibits high quality sustainable design, attractive landscaping and ecological and biodiversity benefits. The intention is for the proposed building to be net zero-carbon once in use.

1.2 APPLICATION DOCUMENTS

This planning statement should be read in conjunction with the following drawings and reports submitted as part of the application, to address the full range of material planning considerations:



- Covering Letter - Prepared by SPD Studio;
- Planning Application Form - Prepared by SPD Studio;
- Planning Statement - Prepared by SPD Studio;
- Design and Access Statement - Prepared by SPD Studio;
- Application Drawings Pack - Prepared by SPD Studio;
- Flood Risk Statement - Prepared by SPD Studio;
- Landscaping Proposals (including specification and management plan) - Prepared by Open Spaces;
- Preliminary Ecology Assessment - Prepared by Open Spaces;
- BNG Calculations and Report - Prepared by Open Spaces;
- Arboricultural Impact Assessment - Prepared by Open Spaces;
- Phase I/II Geo-Environmental Assessment - Prepared by GEMCO; and
- Archaeological Desk Based Assessment - Prepared by Wardell Armstrong.

1.3 PURPOSE AND STRUCTURE OF THE PLANNING STATEMENT

The purpose of this Planning Statement is to provide a justification in 'town planning' terms for the proposed development; to assess the scheme against the Development Plan and draw on other material considerations to support the case for the proposed development. This Statement is set out as follows:

- Section 2 sets out an overview of the site, including a description and consideration of its wider context;
- Section 3 describes the planning history pertinent to the proposal;
- Section 4 describes the detail of the proposed development;
- Section 5 sets out the planning policy framework against which the proposed development should be assessed;
- Section 6 assesses the acceptability of the proposed development against the Development Plan and other material considerations;
- Section 7 concludes the Statement and makes clear the reasons why the scheme should be approved in line with National Planning Policy Framework, the Development Plan and other material considerations.



2 THE SITE AND SURROUNDING CONTEXT

The application site is situated within the Jackmans Estate, completed in 1973, within Letchworth Garden City. The site is currently occupied by three terraced two-storey dwellings with front and rear gardens, alongside associated parking, garages and grassland. The site has a total area of 0.19 hectares as outlined in red in Figure 1 below.



Figure 1: Site Location Plan

The existing dwellings include gabled roofs, cladding to the upper storey and render to the ground floor, and varying porch alterations.

The site is accessed by pedestrian pavements from Pryor Way and Newells, as well as by vehicle via Newells, which leads off of Pryor Way into the current parking provision. The current parking provision within this portion of the site consists of 20 small flat-roof terraced garages with impermeable surfacing separating the two rows of garages. Aerial photography confirms that this parking forecourt is also used for vehicular access to the allotments adjacent to the north of the site. Further east of the site is open green land, with a landscape screen abutting the boundary treatments of No. 3 Newells and two trees in the northeastern corner of the site.

The two smaller parcels that form part of the application site: to the west, currently consists of part paving slabs and part low level hedging that is partly overgrown, and to the east the land is currently covered in grass and a linking pavement. Both of these parcels adjoin the local carriageway.



Surrounding land uses to the west, south and east are similar residential dwellings with associated parking. The surrounding built form context is inconsistent, with a mixture of single-storey, two-storey (with pitched roof) and four-storey accommodations (flat roof) arranged as a mix of single dwellinghouses and apartment blocks, all within view from the application site. The Woolgrove Allotments are located directly north of the site, with Wolgrove School further beyond to the northwest.

The main area of the application site's north, east and south boundaries are constricted by existing pedestrian pavements, with a mature landscape screen consisting of hedging and trees to the north, which allow free movement around the site and a natural screen for the allotment use further to the north. The site's western boundary is shared with the adjacent residential dwelling No. 6 Newells, which is partially screened by the garage block. The site levels reflect this, where the site slightly slopes downward from east to west, starting from the bend in Pryor Way.

There are no protected trees within or directly surrounding the site, nor are there any nearby Listed Building, nor is the site within a Conservation Area. The site is located wholly within Flood Zone 1 and therefore has a low probability of flooding from rivers and the sea.

The site is in close proximity to bus stops which link the site to Stevenage and the broader area along both Pryor Way and Redburn Way, and walkable access to schools, further public transport options, supermarkets, and shops.



3 PLANNING HISTORY

There is only one application concerning the application site, at no. 4 Newells.

- 18/03318/FP - Demolition of single storey rear extension, erection of replacement single storey rear extension and entrance porch to facilitate conversion of 3 bedroom dwelling into 2no. 1 Bedroom self-contained units. Approved 14th February 2019.



4 PRE-APPLICATION DISCUSSIONS

The applicant has engaged with NHC through two pre-application discussions. The initial pre-application request (Ref. 21/00481/PRE) was submitted for the following description of development:

'Erection of three storey building to provide 15 affordable dwellings comprising of 6 no. 1-bedroom and 9 no. 2-bedroom apartments with associated external works, landscaping and car parking.'

The main concerns raised by NHC were in relation to the scale, height and design of the proposed building, and that the limited parking provision would not meet local policy requirements.

A second pre-application meeting was held on site on 12th October 2023 (ref. 23/02186/PRE) which sought to overcome the initial concerns raised by officers through an amended design.

The proposal was met with a positive response from NHC officers who considered that the amended scheme largely overcame the concerns raised under the previous pre-app. Officers did suggest that further thought be given to the relationship and subsequent impact between the proposed parking area and No.6 Newells, and how these impacts could be mitigated through design. The under provision of parking was also raised again however it was agreed that further information, in terms of parking spaces and car ownership in the area, could be provided to justify a slight under provision.

The proposal subject of this application has been informed by this advice. The proposed housing mix has been amended to include more 1-bed units and as a result there is no longer an under provision in parking.



5 THE PROPOSED DEVELOPMENT

This application seeks Full Planning Permission for the demolition of the existing dwellings and redevelopment of the site to provide a 15no. residential units (Use Class C3). The proposed description of development is as follows:

'Application for full planning permission for the demolition of the existing dwellings and garages, and the construction of a 3 storey building comprising 15 dwellings with associated access, landscaping and parking.'

Specifically, the proposed comprehensive redevelopment of the Site comprises:

- Demolition of the 3no. existing dwellings (Use Class C3) on site;
- The erection of a new 3 storey building comprising:
 - 15 affordable residential units (Use Class C3) with private amenity space in the following mix:
 - 9 x 1 bed/2 person units
 - 6 x 2 bed/4 person units
- 496sqm of communal amenity space
- 26no. Car parking spaces (including 1no. disabled parking space and 5no. visitor spaces)
- 15no. Cycle parking spaces
- Rooftop PV Panels



6 PLANNING POLICY

The following section provides a summary of the planning policy context relevant to the consideration of this application.

6.1 NORTH HERTFORDSHIRE LOCAL PLAN

The key role of the planning system is to regulate the development and use of land in the public interest. At the heart of the planning framework are Statutory Development Plans, which seek to guide the decision-making process. In accordance with Section 38(6) of the Planning and Compulsory Act (2004), planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise.

The North Hertfordshire Local Plan 2011-2031 was adopted on Tuesday 8 November 2022 and is the relevant development plan for assessing this planning application. The key policies relevant to this proposal are highlighted below:

- Policy SP1 Sustainable Development in North Hertfordshire
- Policy SP2 Settlement Hierarchy and Spatial Distribution
- Policy SP7 Infrastructure requirements and developer contributions
- Policy SP8 Housing
- Policy SP9 Design and Sustainability
- Policy SP10 Healthy Communities;
- Policy T2 Parking
- Policy D1 Sustainable Design
- Policy D3 Protecting living conditions
- Policy D4 Air Quality;
- Policy NE4 Biodiversity and geological sites
- Policy NE8 Sustainable Drainage Systems;
- Policy NE12 Renewable and low carbon energy development.

The following Supplementary Planning Documents (SPDs) are also considered relevant to this proposal:

- Vehicle Parking at New Developments SPD (November 2011)
- Design SPD (July 2011)
- Developer Contributions Supplementary Planning Document (January 2023)

6.2 NATIONAL PLANNING POLICY FRAMEWORK

The Government published an updated National Planning Policy Framework (NPPF) in December 2023. The NPPF sets the framework for the preparation of development plans and is a material consideration in planning decisions.

The NPPF sets out the purpose of the planning system is to contribute to the achievement of sustainable development taking account of economic, social and environmental objectives – all of which should be considered interdependent and therefore need to be pursued in mutually-supportive ways.



So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development. For decision-taking this means 'approving development proposals that accord with an up-to-date Development Plan without delay' (Paragraph 11).

The chapters of the NPPF which are considered particularly pertinent in the determination of this Full Planning Application include:

- Chapter 2 - Achieving sustainable development;
- Chapter 5 - Delivering a sufficient supply of homes;
- Chapter 8 - Promoting safe and healthy communities;
- Chapter 9 - Promoting sustainable transport;
- Chapter 11 - Making effective use of land;
- Chapter 12 - Achieving well-designed places; and
- Chapter 14 - Meeting the challenge of climate change, flooding and coastal change.



7 PLANNING ASSESSMENT

This section of the statement assesses the proposal against the relevant development plan and identifies other material consideration of weight, where appropriate. The key matters to consider are as follows:

- Principle of Development
- Affordable Housing & Housing Mix
- Residential Amenity
- Design
- Highways
- Trees & Hedges
- Biodiversity & Ecology
- Flood Risk and Drainage
- Contamination and ground conditions
- Sustainability and Energy
- Archaeology
- Planning Obligations

7.1 PRINCIPLE OF DEVELOPMENT

The purpose of the planning system is to achieve sustainable development, with the NPPF identifying three overarching objectives of the planning system in achieving sustainable development; an economic objective; a social objective; and an environmental objective.

At the heart of the NPPF is a presumption in favour of sustainable development so that sustainable development is pursued in a positive way. In this context, paragraph 11 of the NPPF requires Local Planning Authorities to approve without delay development proposals that accord with an up-to-date development plan. Where the development plan is absent, silent or out-of-date, the default position is for permission to be granted, unless any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

The delivery of a sufficient supply of homes to meet local needs is key to meeting the economic, social, and environmental objectives of sustainable development. Consequently, the NPPF promotes the effective and efficient use of under-utilised land and buildings to meet the need for new homes and other strategic uses (paragraph 123 and 124). At the local level, Policy SP8 of the North Herts Local Plan supports housing growth across the district and recognises that housing allocations will be supplemented by smaller 'windfall' sites within settlement boundaries.

The existing dwellings to be demolished are currently vacant. The applicant has scoped the upgrading of these buildings, to increase their EPC level to an acceptable level for future occupants and limit their bills for heating, however this work was found to be unviable, and redevelopment the preferred approach.

Given the existing use of the site is already residential the principle of development is considered acceptable. The proposed redevelopment of the site represents a significant uplift in unit numbers,



contributing towards meeting the housing needs of the local community through efficient use of a highly sustainable previously developed site. The proposal is therefore considered acceptable and in line with the requirements of the North Herts Local Plan and NPPF.

7.2 AFFORDABLE HOUSING AND HOUSING MIX

Under paragraph 63 of the NPPF, planning policies should ensure that the size, type and tenure of housing needed for different groups in the community is assessed and provided for. Paragraph 66 requires that all major developments for housing should include at least 10% affordable housing.

Local Plan Policy SP8 requires 33% of all homes over the plan period to be delivered as affordable housing, with targets to deliver up to 40% where viable. Policy HS2 sets a target for proposals between 15-24 dwellings to provide 35% affordable housing on site. In terms of size, type and tenure of affordable housing, the expectation is for 65% to be provided as affordable or social rent and 35% as other form(s) of affordable housing. The mix should serve to meet the needs identified by relevant local authority housing register data, Neighbourhood Plans and any settlement- or parish-level surveys or assessments.

The Stevenage and North Hertfordshire SHMA Update Part II (November 2023) sets out the following identified need for market and affordable housing:

		Stevenage	North Hertfordshire	TOTAL
MARKET HOUSING				
Flat	1 bedroom	510	340	850
	2+ bedrooms	290	410	700
House	2 bedrooms	340	320	660
	3 bedrooms	1,760	2,140	3,900
	4 bedrooms	200	1,020	1,220
	5+ bedrooms	10	320	310
Total Market Housing		3,100	4,600	7,600
AFFORDABLE HOUSING				
Flat	1 bedroom	80	330	410
	2+ bedrooms	170	330	500
House	2 bedrooms	580	810	1,380
	3 bedrooms	1,070	1,420	2,490
	4+ bedrooms	270	300	570
Total Affordable Housing		2,200	3,200	5,400
TOTAL		5,200	7,700	12,900

Figure 2: Extract from Stevenage and North Hertfordshire SHMA Update Part II (2023) - Housing mix of objectively assessed need for market and affordable housing

Settle Group is a registered provider of affordable housing and the proposal will comprise 100% affordable housing in the following unit mix:

- 9 x 1 bed/2 person units
- 6 x 2 bed/4 person units.

The SHMA identifies an equal need for 1 and 2+ bedroom flats therefore the proposal will serve to meet some of this demand.



The applicant's current housing stock comprises approximately 50% 3-bedroom houses, and demand for smaller properties is high across the district. NHC's housing register currently contains 1464 applicants registered with a need for a 1-bedroom property and 631 applicants for a 2-bedroom property. This translates to an average wait time of 2.5 years for a 1- or 2-bedroom property for those with the highest need, likely even longer for those with a lower need. It can therefore be concluded that there is an acute need for the 1- and 2-bedroom units proposed as part of this application.

At the current stage, settle is unable to commit to a definitive tenure as this is subject to further viability assessment. Should they be able to secure appropriate grant funding the intention is to deliver all the units as social rent. Alternatively, the proposed units will be shared ownership, an affordable housing type which is also in demand across North Herts, particularly for 1-bed flats. The SHMA Update Part II (November 2023) breaks down the need for different types of affordable housing:

North Herts		Unable to afford Social Rent without housing benefit support	Able to afford Social Rent, but not market rent	Affordable Home Ownership	Total Affordable Housing	Total Market Housing	Total Housing
Flats	1 bedroom	162	26	145	333	336	669
	2+ bedrooms	188	48	96	332	408	740
Houses	1-2 bedrooms	422	108	277	807	319	1,126
	3 bedrooms	1,036	252	131	1,418	2,142	3,560
	4 bedrooms	199	38	-	237	1,021	1,259
	5+ bedrooms	51	10	-	61	319	380
DWELLINGS		2,058	481	650	3,188	4,546	7,734

Figure 2: Extract from Stevenage and North Hertfordshire SHMA Update Part II (2023) - Overall need for market and affordable Dwellings (including social and affordable renting) by property size and type

Given the single core of the proposed building the units will all be a single affordable tenure. The Applicant has engaged with NHC's Housing Officer who has provided initial support for this approach. We welcome further discussion with NHC on this to determine an appropriate mechanism to secure the delivery of affordable housing.

As such, it is considered the proposal will meet an identified local housing need in North Herts and will exceed the local and national policy requirement for affordable housing and should therefore be supported.

7.3 RESIDENTIAL AMENITY

Paragraph 135 of the NPPF states that planning decisions should ensure that developments '*create places that are safe, inclusive and accessible which promote health and well-being, with a high standard of amenity for existing and future users*'.

Local Plan Policy D1 expects all residential schemes to meet or exceed the nationally described space standards and optional water efficiency standards. The North Herts Design Guide requires that dwellings provide adequate internal space that can be used efficiently by the occupants. Room sizes should be able to accommodate furniture and modern technology associated with today's



living standards. Proposals should be designed for that rooms benefit from adequate natural lighting and ventilation to minimise the need for artificial lighting, or heating/cooling.

The proposals have therefore been designed to ensure full compliance with the requirements of the Nationally Described Space Standards. Each of the proposed residential units are also provided with private outdoor amenity space in the form of a balcony. The minimum requirements of Part M4(2) (Building Regulations) has been achieved across the development, including a lift, to ensure the development can be adapted in the future as required.

The proposal also includes communal amenity space for the benefit of future residents. The proposed communal amenity space is delivered in the form of a landscaped garden, located in the northwest corner of the site. The communal space will be accessible to all residents and has been sensitively designed and landscaped to create a tranquil green environment for future residents, whilst also delivering a substantial biodiversity net gain. Residents will also benefit from high quality landscaped areas around the proposed building, creating an attractive environment. Further detail is provided within the Design and Access Statement prepared by SPD Studio and landscaping proposals prepared by Open Spaces.

All units are dual or triple aspect to maximise sunlight and daylight into rooms and allow for natural ventilation. The proposed development is not located near to any notable external noise sources. As per the advice in NHC's pre-application response, an acoustic fence is included on the submitted landscaping plans along the boundary of the site with no.6 Newells, to minimise the potential for noise disturbance from car movements. There is over 14m between the proposed building and the existing dwellings to the west, and no windows on the elevation of the closest residential dwelling (no.6 Newells), affording all current and future residents with a sufficient level of privacy.

Consequently, the proposal is considered to provide excellent levels of amenity for future residents and will not lead to any detrimental impact on neighbouring occupants or the natural environment, in line with the requirements of the NPPF and local planning policies and guidance.

7.4 DESIGN

Section 12 of the NPPF stresses the fundamental importance of high-quality, beautiful design in the pursuit of delivering sustainable development. The NPPF sets out a clear rationale for high quality design, reinforcing that "good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities".

Local Plan Policy SP9 sets out that the Council considers good design to be a key aspect of sustainable development and will support new development where it is well designed and located and responds positively to its local context. Policy D1 expands on this, setting out that planning permission will be granted for developments that take all reasonable steps to

- i. create or enhance public realm;
- ii. incorporate Sustainable Drainage Systems (SuDS);
- iii. reduce energy consumption and waste;
- iv. retain existing vegetation and propose appropriate new planting;
- v. maximise accessibility, legibility and physical and social connectivity both internally and with neighbouring areas;
- vi. future proof for changes in technology and lifestyle;



- vii. design-out opportunities for crime and anti-social behaviour; and
- viii. minimise the visual impact of street furniture and parking provision.

Further guidance is set out in the North Herts Design SPD which covers key principles for delivering high quality development. Urban design is key to making places that are successful both, socially and economically, good to live in and attractive to visit.

This submission is supported by a Design and Access Statement, prepared by SPD Studio, which provides an analysis of the key design features of the proposal, as well as the evolution of the design and layout following pre-application advice. The statement also provides an overview of the local context and an assessment of the constraints and opportunities of the site, and how the proposal has sought to respond to this.

The sites form part of a wider housing development, some of which is owned by settle group, alongside private freeholders and leaseholders. There is a mixed pattern of development and age of dwellings. The existing dwellings on site are a mirror of the adjacent dwellings, with the other properties having a slightly different design and fenestration. All properties within the surrounding context are generously placed in their setting, with large grass areas separating the public footpaths from the dwellings. There is a mix of heights across the estate, ranging between two and four storeys.

A design-led approach has been adopted to optimise the site's development potential. In consideration of the site's context and setting, the proposal seeks to ensure the best use of a previously developed site in order to optimise the delivery of high-quality affordable homes.

The proposed design largely aligns with the pre-application scheme which was met with support from NHC's officers. The building has been designed to provide a high-quality and attractive frontage to Newells, enhancing the existing street scene. Retaining the trees along the site's boundary, and the trees to the south of the parking has also helped to reduce the visual dominance of the proposed building. This, combined with the proposed landscaping, will help to blend the development in with its surrounding context.

The proposed material palette has been updated following pre-application discussions to upgrade and enhance the appearance of the building. The chosen materials are considered to compliment the local vernacular and will be robust and hard-wearing, maintaining a high-quality appearance over time. The proposed entrance is highlighted with a full brick façade to frame and activate the building's entrance and provide a distinctive feature to aid way-finding.

Whilst the current properties on site are only two storeys, there are a range of heights across the wider estate. There is a suitable distance between the neighbouring two storey properties to accommodate the successful height transition up to three storeys.

The proposal is therefore considered to be in compliance with policies SP9 and D1 of the North Herts Local Plan, the North Herts Design Guide, Chapter 12 of the NPPF and the NPPG. For further information regarding the design of the proposed development, please refer to the accompanying Design and Access Statement, prepared by SPD Studio.



7.5 TRANSPORT

The NPPF requires development proposals to take appropriate opportunities to promote sustainable transport, provide safe and suitable access for all users; and ensure any significant impact on existing transport networks can be acceptably mitigated. Paragraph 115 of the NPPF states that development proposals should only be refused on highways grounds where they are assessed to have an unacceptable impact on highway safety or the cumulative impact on the road network would be severe.

Local Plan Policy SP6 promotes the use of sustainable transport modes insofar as reasonable and practicable. This policy encourages development in sustainable locations with good access to key services and facilities. In addition, all proposals are expected to meet the parking standards set out in the Local Plan and relevant supplementary advice.

The proposal reuses the existing vehicle access arrangement to the site. A tracking drawing has been prepared by SPD Studio and submitted in support of this application to demonstrate how refuse trucks would be able to access the site.

The existing garages on site, except one, will be demolished and a car parking area delivered in this space. The applicant has been unable to purchase one of the existing garages on site, despite numerous attempts to contact the registered owner. Therefore, this garage remains in situ as part of the proposals, as per the submitted plans. Additional parking spaces will be provided on street, adjacent to the proposed building for ease of access by residents.

As the proposed housing mix has been changed since pre-application to include more 1-bed units there is no longer an under provision in parking. Each of the proposed residential units will be provided with unallocated car parking in line with the requirements of the Local Plan:

- 1 bed unit – 1 space
 - 2 bed unit – 2 spaces
- Total = 21 spaces

There are also 5 visitor parking spaces included as part of the development. This provision is in excess of the 4 spaces required under the Local Plan and echoed in the pre-application response.

15no. cycle parking spaces will be provided in a secure internal storage room on the ground floor of the proposed building, in line with the requirements of the Local Plan.

The site is considered highly sustainable. It is located just over 100m from the closest bus stop on Pryor Way which provides a route towards Stevenage and Letchworth Garden City town centre including the railway station. The site is also within walkable distance to schools, further public transport options, supermarkets, and shops.

The proposed access is not dissimilar to the existing arrangement and is therefore not considered to give rise to any detrimental impact on the highway or the safety of road users or pedestrians. Overall, the proposals are considered suitable for road users ranging from future residents to service



vehicles, with sufficient car and cycle also parking provided. As such, the proposal is considered to be compliant with Local Plan Policy SP6, Chapter 9 of the NPPF and the NPPG.

7.6 TREES AND HEDGES

Paragraph 136 of the NPPF recognises the important contribution of trees to the character and quality of urban environments, and their role in helping to mitigate and adapt to climate change.

The supporting text of Policy D1 of the North Herts Local Plan sets out that existing vegetation should influence the layout and design of development. Developments are required to demonstrate how existing habitats such as trees and hedgerows will be retained, safeguarded and managed during and after development, including the provision of buffers where required.

An Arboricultural Impact Assessment and Tree Protection Plan, prepared by Open Spaces, has been submitted as part of this application. In order to facilitate the submitted layout, four trees are proposed for removal on site and pruning to four other trees. There is also an incursion into the RPA of on tree due to the proposed access driveway/parking arrangement however the submitted AIA sets out appropriate methodology for above ground build techniques to ensure this tree is protected.

Whilst the design and layout has sought to retain existing trees as far as possible, it is a constrained site where the intention has been to maximise affordable housing. Unfortunately, this has resulted in the loss of a small number of trees. New trees are proposed under the submitted landscaping drawings to mitigate against this loss. The delivery of 15 high-quality affordable units is considered to outweigh the loss of these trees.

On balance, the proposal is considered acceptable and includes a suitably robust assessment of the impact on existing trees on site, in compliance with Policy D1 of the North Herts Local Plan and Chapter 12 of the NPPF.

7.7 ECOLOGY AND BIODIVERSITY

The NPPF requires that decisions contribute to and enhance the natural environment by minimising impacts on and providing net gains for biodiversity (Paragraph 180). Local Plan Policy NE4 sets out that all development should deliver measurable net gains for biodiversity.

The requirement to deliver 10% Biodiversity Net Gain is now mandatory in England under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). This means that a development will result in more or better-quality natural habitat than was previously existing on site.

A Preliminary Ecological Appraisal has been prepared by Open Spaces and submitted in support of this application. The report sets out that the site is not designated as important for nature conservation at an international, national, regional or local level. The site itself and the habitats found on-site are common and widespread throughout the UK, and the habitats are of limited ecological value. Habitats for protected species were evaluated for their likelihood of providing shelter,



roosting, foraging, basking and nesting habitat. It is concluded that the likelihood of protected species is negligible, and no further investigation is needed.

The assessment provides a number of recommendations including the provision of bird boxes and bat roosting opportunities and the inclusion of native tree and wildlife friendly species within any landscaping to enhance the site and the provide value for wildlife. We expect suitable ecological mitigation measures can be secured by way of condition, as required.

The submitted landscaping proposals, produced by Open Spaces set out a significant level of proposed vegetation site, including a range of trees, hedges and incidental planting, creating an attractive environment for residents to enjoy.

The application is also accompanied by a biodiversity net gain calculation, prepared by Open Spaces. This confirms that there will be 37.44% uplift in biodiversity on site, greatly exceeding the minimum 10% requirement. The site will be retained in settle's ownership, ensuring commitment to the 30 year maintenance period.

Overall, the redevelopment of the site is considered to represent an excellent opportunity to enhance the ecology and biodiversity of the site. Indeed, as demonstrated through the Ecological Impact Assessment, the site is currently of limited ecological or biodiversity value, whilst the proposals for the comprehensive redevelopment of the site will generate opportunities for additional ecological and biodiversity measures, including within the proposed extensive landscaping. The proposal is therefore considered to be acceptable in line with the requirements of Local Plan Policy NE4 and Chapter 15 of the NPPF.

7.8 FLOOD RISK AND DRAINAGE

The NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (paragraph 165). Additionally, developments which are required to pass the Exceptions Test (as set out in the NPPF and associated Technical Guidance) will need to address flood resilient design and emergency planning.

This is echoed in Local Plan Policy SP11 which sets out that NHC take a risk based approach to development and flood risk, directing development to areas at lowest risk in accordance with the NPPF, and ensuring the previous of Sustainable Drainage Systems (SuDS) and other appropriate measures. Policy NE7 states that planning permission will be granted for development located outside of medium and high-risk flood areas (flood zone 2 and 3) and other areas affected by other sources of flooding where possible.

The supporting Flood Risk Statement, produced by SPD Studio, details that the site is located wholly within Flood Zone 1 and at a low risk of fluvial/ surface water flooding. Firstly, applying the Flood Zone classification to the proposed development, Flood Zone 1, in correlation with paragraph 027 of the NPPF's Planning Practice Guidance (Flood risk and coastal change) the proposal meets the requirements of the Sequential Test, which requires potential developments to prioritise land located within areas of low flood risk in the first instance.

In respect of surface water drainage, the report concludes that the site will discharge at a similar rate to the existing conditions of 1l/s for a 1:100 year storm plus 40% climate change. The surface water drainage strategy for the development will adopt appropriate forms of sustainable drainage



systems to comply with the requirements of the NPPF, North Hertfordshire District Council SFRA and Schedule 3 to ensure that post-development surface water flood volumes are managed on-site in a sustainable manner.

Attenuation will be provided within the application site in order to manage the calculated peak run-off volumes required during rainfall events up to and including the 1:100-year + 40% climate change allowance in accordance with the Environment Agency's peak rainfall allowance guidance for sites within the Upper and Bedford Ouse Management Catchment.

In summary, the proposal is considered to be compliant with policies SP11 and NE7 of the Local Plan, Chapter 14 of the NPPF and the NPPG, resulting in a development that is suitably located, resilient and safe.

7.9 CONTAMINATION

Paragraph 189 of the NPPF seeks to ensure a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination, seeking mitigation including land remediation if contamination is found.

Local policy NE11 sets out that planning permission will be granted on site with contaminated land provided that a suitable risk assessment is submitted as part of the application, and appropriate mechanisms are in place to investigate, characterise the risks and remediate the contamination to remove the risks, or reduce the risk to an acceptable level. The site must also be suitable for use taking account of ground conditions, groundwater vulnerability and pollution arising from previous land use and land remediation in reference to relevant guidance.

As the site is brownfield, a Phase I/II Geoenvironmental Assessment has been prepared by GEMCO and submitted in support of this application. The report sets out that the site appears to have previously comprised agricultural land which was redeveloped to residential in the early 1970's and is generally unchanged from this time to present. A detailed site investigation and assessment is set out in the report, concluding that based on the site investigation observations, laboratory results and risk assessments, the site is considered suitable for the proposed development subject to a number of recommendations. Further testing is recommended post demolition to further assess the contamination identified (with an emphasis on asbestos) and potential for additional contamination in areas previously inaccessible, followed by a remediation method statement detailing how the contamination should be appropriately remediated. It is expected that these items could be conditioned as part of any future consent.

As such, the proposal is considered compliant with policy NE11 of the Local Plan, Chapter 15 of the NPPF and the NPPG.

7.10 ENERGY AND SUSTAINABILITY

Chapter 14 of the NPPF focuses on ways to meet the challenge of climate changes, flooding and coastal change. Paragraph 157 states that the planning system should support the transition to a low carbon future, shaping places *'in ways that contribute to radical reductions in greenhouse gas emissions...encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.'*



Paragraph 159 sets out that new developments should seek to reduce greenhouse gas emissions, such as through its location, orientation and design. Paragraph 160 requires that proposals seek to increase the use and supply of renewable and low carbon energy and heat and provide a positive strategy for energy from these sources. Proposals should identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems, and for collocating potential heat customers and suppliers.

Local Plan Policy SP11 echoes the requirement of the NPPF and advises that it will seek to meet the challenges of climate change by supporting proposals for renewable and low carbon energy development in appropriate locations. Policy D1 requires proposals to take all reasonable steps to reduce energy consumption and waste.

Sustainable principles have been evaluated at each stage of the design process to ensure the proposal has been designed and will be constructed to make the fullest contribution to climate change mitigation and adaptation. Therefore, minimising overheating, reducing flood risk, improving water efficiency, and protecting and enhancing green infrastructure, have been key considerations in the design process of the development.

SPD Studio seek energy reductions to meet current building regulations. Our first priority is a fabric-first approach, with high performance thermal insulation to significantly reduce the heating energy demand with increased air tightness in the building envelope.

Passive solar design takes advantage of natural light and heat from the sun and uses air movement for ventilation. This reduces or negates the need for artificial lighting, heating, cooling or ventilation. It can be achieved with no additional cost to a development and can result in considerable living cost savings and significant impact on energy efficiency. The layout and orientation of dwellings and windows to habitable rooms have been designed to achieve adequate levels of natural daylight, maximising the controlled use of passive solar and thermal energy. All dwellings are double or triple aspect, benefiting from highly effective natural ventilation and cooling of the building fabric within summer seasons.

In addition to this, 15 of the parking spaces will be provided with EV charging points, and 15no. cycle parking spaces are proposed on site. In addition, a 37.44% biodiversity net gain would be provided within the application site through additional landscaping and ecological upgrades. Solar panels are to be provided on the roof of the building and the intention is for the building to be zero carbon once in use.

In summary, the proposal has been designed to ensure sustainability is at the heart of development, utilising both fabricated and natural resources to assist North Herts Council in its sustainable development goals. The intention is for the proposal to be a net zero carbon building once in use. The proposal is fully compliant with sustainability policies SP11 and D1 of the North Herts Local Plan and Chapter 14 of the NPPF.



7.11 ARCHAEOLOGY

Paragraph 200 of the NPPF sets out that where development involves a site which includes, or has the potential to include, heritage assets with archaeological interest, developers are required to submit an appropriate desk-based assessment.

This is echoed in Local Plan Policy HE4 sets out that proposals affecting heritage assets with archaeological interest will be granted provided that applications are accompanied by an appropriate desk-based assessment and, where justified, an archaeological field evaluation. It must be demonstrated, if discovered, how archaeological remains will be preserved and incorporated into the layout of that development.

This application is accompanied by an Archaeological Desk Based Assessment prepared by Wardell Armstrong. The site is judged to have a low potential for prehistoric, Anglo-Saxon, medieval, post-medieval and early modern archaeology. It has a moderate potential for Romano-British remains given its proximity to previous findspots of pottery c.175m to the east and c.250m to the north-west of the Site. The course of the Roman road from Baldock to Rush Green also lies c.480m to the east of the Site. The assessment concludes that there is no evidence to indicate that remains are present on site and is not anticipated that any further work would be required at this stage.

As such, the proposal is considered compliant with the requirements of Local Plan Policy HE4 and Chapter 16 of the NPPF.

7.12 PLANNING OBLIGATIONS

As part of the proposal, due to the deliverables proposed, the applicant is open to discuss necessary and reasonable financial obligations with North Hertfordshire Council required for the proposed development, that meet the statutory tests indicated in Regulation 122 of the Community Infrastructure Levy Regulations 2010 during the lifetime of this application. As such, it is envisaged the following may be sought through preparation of a S106 agreement:

On- site deliverables:

- Affordable housing provision
- Biodiversity Net Gain



8 CONCLUSION

This planning statement has been prepared by SPD Studio on behalf of settle group in support of an application for Full Planning Permission for the *'demolition of the existing dwellings and garages, and the construction of a 3 storey building comprising 15 dwellings with associated access, landscaping and parking,'* at 3-5 Newells, Letchworth Garden City, Hertfordshire, SG6 2PH.

The proposal would redevelop an underutilised site in a sustainable location to deliver an uplift in residential units, within a new high-quality and well-designed building, improving the overall appearance of the site. The proposal will deliver 15 fully affordable units that will meet an identified local need. The proposed building has been designed to achieve net zero carbon once in operation. The Development Plan, together with national policy, strongly advocates for the intensification of sites to achieve the most efficient and effective use of land.

The proposed development has been designed to respond to the existing context and will not result in any detrimental impacts on neighbouring properties, the highway network or the natural environment. The height and massing of the proposed building sits comfortably within the surrounding built context and will be a similar height to the buildings in the surrounding area.

The proposed development is therefore considered to be acceptable in planning terms; acceptable in the context of all relevant policy and material considerations; and would make a helpful contribution to the housing needs of the local and wider area. Paragraph 11 of the NPPF confirms that in the presumption in favour of sustainable development, applications that accord with the development plan are to be approved without delay.



SPDSTUDIO
SUSTAINABLE . PLANNING . DESIGN

