

NORTH HERTS COUNCIL

MEMORANDUM

To: PLANNING CONTROL AND CONSERVATION Henry Thomas	From: ENVIRONMENTAL HEALTH Alan Stone Ext 4108
	Date: 27 th April 2026
Our Ref: 6610/26	Your : 26/00393/FP Ref:
Subject: Full Planning Permission: Erection of nine dwellings following demolition of existing hotel including landscaping and widening of existing vehicular access. Firs Hotel, Bedford Road, Hitchin, Hertfordshire, SG5 2TY	

Comments:

Thank you for consulting Environmental Protection on this application.

I have reviewed the submitted information and can respond as follows:

Noise (and other nuisances):

External Noise Levels

The noise report predicts that the external noise levels will exceed the upper end of the 50-55 dB guideline range primarily due to the car wash use rather than road traffic noise. I would, therefore, expect to see some form of mitigation explored in relation to the northern boundary (i.e. an acoustic barrier to protect external amenity areas). It is my concern that if this is not offered then use of external areas will result in complaints which may lead to enforcement action. I raise an **objection** on this basis at this stage subject to receiving some proposals in this regard. Can we obtain such information, please?

Internal Noise Levels

In relation to internal noise levels, the noise report concludes that noise mitigation measures will be required to ensure that the future occupiers are protected against noise and stipulates a range of options to achieve this so that noise levels can be achieved and sufficient ventilation without the need to open windows. The NPPF (Paragraph 009 ID: 30-009-20190722) states that:

‘It can be helpful for developers to provide information to prospective purchasers or occupants about mitigation measures that have been put in place, to raise awareness and reduce the risk of post-purchase/occupancy complaints.’

I would be looking for this to happen in this instance to ensure that any buyers are aware. Should this be acceptable to the developer, then we could use a condition to secure the mitigation. I have drafted a condition to achieve this below for your consideration.

No development shall take place until a scheme for protecting the proposed dwellings from noise has been submitted to and approved in writing by the local planning authority. The scheme shall be based on the recommendations identified in the Parker Jones Acoustics report dated 11th February 2026 (Ref: Firs Hotel). None of the dwellings shall be occupied until such a scheme has been implemented in accordance with the approved details and it shall be retained in accordance with those details thereafter.

This is obviously dependent on the northern boundary mitigation proposals being acceptable.

Contaminated Land:

The Environmental Protection and Housing Team have no objections to the proposed development in relation to land contamination. However, given the location and size of the development we need to see information on land contamination. I, therefore, recommend that the following conditions are placed on any decision notice should you be minded to grant approval.

No development approved by this permission shall take place until the following has been submitted to and approved in writing by the Local Planning Authority:

- **A Preliminary Risk Assessment report documenting the ground conditions of the site with regard to potential contamination;**
- **A Generic Quantitative Risk Assessment (where shown to be necessary by the Preliminary Risk Assessment);**
- **A Detailed Quantitative Risk Assessment (where shown to be necessary by the General Quantitative Risk Assessment)**
- **A Remedial Options Appraisal and Remediation Strategy (where shown to be necessary by the Detailed Quantitative Risk Assessment).**

All such work shall be undertaken in accordance with Land Contamination Risk Management (Environment Agency, 2023) or other appropriate guidance issued by the regulatory authorities. The work shall be sufficient to ensure that measures will be taken to mitigate any risks to human health and the wider environment.

Reason: To prevent unacceptable risk to Human Health and Controlled Waters and to prevent pollution of the Environment in accordance with the aims and Paragraphs 187(f), 196 and 197 of the National Planning Policy Framework (December 2024).

Prior to any permitted dwelling being occupied a validation report shall be submitted and approved in writing by the Local Planning Authority to demonstrate the effectiveness of any agreed Remediation Strategy. Any such validation shall include responses to any unexpected contamination discovered during works.

Reason: To prevent unacceptable risk to Human Health and Controlled Waters and to prevent pollution of the Environment in accordance with the aims and Paragraphs 187(f), 196 and 197 of the National Planning Policy Framework (December 2024).

Local Air Quality:

North Herts Council have specific air quality planning guidance that can be found at <http://www.north-herts.gov.uk/home/environmental-health/pollution/air-quality/air-quality-and-planning>

Application of the guidance to a development of this scale and location defines the site as being a MINOR scale development and so the following condition is recommended to ensure that appropriate local air quality mitigation is provided.

EV Recharging Infrastructure Condition

Prior to occupation, each new dwelling shall incorporate an Electric Vehicle (EV) ready domestic charging point.

Reason: To contribute to the objective of providing a sustainable transport network and to provide the necessary infrastructure to help off-set the adverse impact of the operational phase of the development on local air quality.

Informative

1) EV Charging Point Specification:

A charging point shall be installed by an appropriately certified electrician/electrical contractor in accordance with the following specification. The necessary certification of electrical installation should be submitted as evidence of appropriate installation to meet the requirements of Part P of the most current Building Regulations.

Cable and circuitry ratings should be of adequate size to ensure a minimum continuous current demand for the vehicle of 16A and a maximum demand of 32A (which is recommended for Eco developments)

- A separate dedicated circuit protected by an RBCO should be provided from the main distribution board, to a suitably enclosed termination point within a garage or an accessible enclosed termination point for future connection to an external charge point.
- The electrical circuit shall comply with the Electrical requirements of BS7671: 2008 as well as conform to the IET code of practice on Electric Vehicle Charging Equipment installation 2012 ISBN 978-1-84919-515-7 (PDF). This includes requirements such as ensuring the Charging Equipment integral protective device shall be at least Type A RCD (required to comply with BS EN 61851 Mode 3 charging).
- If installed in a garage all conductive surfaces should be protected by supplementary protective equipotential bonding. For vehicle connecting points installed such that the vehicle can only be charged within the building, e.g. in a garage with a (non-extended) tethered lead, the PME earth may be used. For external installations the risk assessment outlined in the IET code of practice must be adopted, and may require additional earth stake or mat for the EV charging circuit. This should be installed as part of the EV ready installation to avoid significant on cost later.

- A list of authorised installers (for the Government's Electric Vehicle Homecharge Scheme) can be found at <https://www.gov.uk/government/organisations/office-for-low-emission-vehicles>
- UK Government issued legislation in 2021 to require domestic EV charge points to be smart, thus we recommend that all charge points will be capable of smart charging, as detailed in UK Gov regulations.

2) The above condition is considered relevant and reasonable for the following reasons:

- Paragraphs 170 (e), 181 of the NPPF, which refer to the effects (including cumulative effects) of pollution (including air pollution) on health, the natural environment (including air quality).
- Paragraphs 102 (d), 105 (e) and 110 (e) of the NPPF, which refer to the need to promote sustainable transport including the provision for charging plug-in and other ultra low emission vehicles.
- HCC Local Transport Plan (LTP4) 2018-2031 which includes an objective to 'preserve the character and quality of the Hertfordshire environment' and 'make journeys and their impact safer and healthier', as well as its Emissions Reduction Policy 19.
- It is consistent with the approach specified in the NHDC Air Quality Planning Guidance Document, which is referenced within the current consultation version of the Local Plan.

Regards
Alan Stone