

Pentangle Design Group

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FAO: Gareth Leech

Dear Sir / Madam,

**Pre Application Advice : Proposed 9 no.3 bedroom dwellings following demolition of industrial unit and relocation of access onto Glebe Road
Glebe Road Industrial Site, Letchworth Garden City, Hertfordshire,**

I refer to your request for pre-application advice regarding the aforementioned site; I am writing to you following an assessment of the supporting documents submitted and a site visit.

I would emphasise that this document does not constitute a formal determination and is without prejudice to any subsequent planning application.

The following assessment is based upon the following submitted details:

- Application form
- Design Statement
- Plans – streetscene/elevations/floor plans
- Arial View
- Ecology appraisal

For your information the relevant government guidance and policies from the development plan are as follows:

North Hertfordshire Local Plan 2011 - 2031 (Adopted)

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 T1 Assessment of Transport Matters

Policy T2 Parking

Policy D1 Sustainable Design

Policy D3 Protecting living conditions

Policy NE4 Biodiversity and geological sites

Policy HE1 Designated heritage assets

National Planning Policy Framework (generally and specifically).

Section 2 – Achieving sustainable development

Section 5 – Delivering a sufficient supply of homes

Section 8 - Promoting healthy communities

Section 9 - Promoting sustainable transport

Section 11 – Making effective use of land

Section 12 – Requiring good design.

SPDs and Other:

Vehicle Parking at New Developments SPD - November 2011

Design SPD - July 2011

Sustainability SPD 2024

Site history

18/03247/FP Erection of 9 x 3 bedroom dwellings following demolition of existing industrial buildings, with all associated landscaping and ancillary works, including creation of new highway and pedestrian access.

WITHDRAWN TO OVERCOME ENVIRONMENTAL HEALTH OBJECTION

Site

Glebe Road Industrial site is disused industrial site with vacant warehouse building on the southern side of Glebe Road in Letchworth. The site is on the edge of a residential area, with other industrial uses on the rear boundary and western boundary. Access into the existing site is via an access road located to the west of the site, close to the junction of Glebe Road with Norton Way. The ground levels change considerably from the highway and drops down to the rear of the site. The neighbouring residential Property (No.11 Glebe Road is on higher ground then the existing warehouse with a substantial retaining wall and hedge row on the boundary.

The site is allocated in the Local Plan as LG13.

Proposal

Pre-application advice is sought for a residential development of 9 terraced dwellings with associated parking, landscaping and ancillary works.

Principle of Development

The site is allocated for housing within the recently adopted Local Plan under Policy LG13, which gives a dwelling estimate of 10 homes. Therefore, a scheme of 9 dwellings as submitted is considered wholly acceptable in principle, as long as the scheme reflects the criteria set out under Policy LG13:

- **Ensure appropriate residential amenity for any properties adjoining employment area;**
- **Sensitive design and / or lower density housing where site affects the Letchworth Conservation Area;**
- **Archaeological survey to be completed prior to development.**

- **Preliminary Risk Assessment to investigate and provide adequate mitigation measures/remediation for contamination from previous land uses**
- **Address potential surface water flood risk through SUDs or other appropriate solution; and**
- **Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery.**

Layout and Design

Design is central to good planning. The achievement of high quality, sustainable design is required by Government guidance. Planning policies should promote high quality, inclusive design in layouts and buildings in terms of function and impact. Design which does not make the most of opportunities to improve the character and quality of an area should be refused. Policy SP9 (Design and Sustainability) considers that good design is a key aspect of sustainable development and that proposals will be supported if the development is well designed and located and responds positively to its local context.

With regards to the submitted plans. The site is in an important location as a gateway into the main vista of Glebe Road. The proposed alignment of the dwelling houses in a row are better located than the previous scheme withdrawn in 2018 reducing the potential impacts on neighbouring properties. The dwellinghouses have been set back into the plot with parking allocated at the front. Care should be given to the balance of hard landscaping and soft landscaping.

The scale and massing of the proposed dwellinghouse at 3 storeys is not in keeping with the surrounding two storey dwellinghouses in Glebe Road. I appreciate that the ground level changes here will reduce the impact of the height however, I have reservations on the inclusion of Juliette balconies on the second floor front elevation which will be extremely visible in the street scene regardless of the changes to ground levels. This in my opinion unbalances the fenestration and creates a busy elevation, a small modest window on the front at second floor may be better placed in the context of other residential properties on Glebe Road. The proposed windows should also reflect the conservation area, the windows could be uPVC but with external glazing bars, equal site lines and flush casements replicating the details found on many early Garden City homes. The front door should be a traditional Letchworth style wooden door and the rear elevation could benefit from French doors which reflect the casement width and proportions of the windows incorporated in the development.

In terms of building materials, in the context of Glebe Road, each terrace is predominantly symmetrical with chimneys which reinforce this symmetry. Many of the homes have no porches with simple canopies whilst building materials are predominantly rough cast render painted white or cream.

I also note that the gable ends are a feature of the houses on Glebe Road however these are two storey dwellinghouses with the windows incorporated in the gable with some small dormer windows in the roof space. The proportions proposed in the previous scheme in 2018 (see image below) has been designed with Letchworth design principles and in my opinion would be a better fit given it is within the Letchworth Conservation area.

Submitted scheme:

Amenity of Future Occupiers/Neighbours

The layout of the scheme exemplifies that all dwellings will have access to suitably sized private amenity space. The orientation of the dwellings would see them all benefit from acceptable levels of daylight/sunlight. The dwellings should be designed to meet or exceed the Nationally Described Space Standards.

Local Plan policy D3 Protecting Living Conditions states that:

“Planning permission will be granted for development proposals which do not cause unacceptable harm to living conditions. Where.....the living conditions of an existing development would be affected by a proposed use, the Council will consider whether there are mitigation measures that can be taken to mitigate the harm to an acceptable level. If the Council is not satisfied that mitigation proposals would address the identified harm, development proposals will not be permitted.”

The location of the proposed dwelling house closest to the boundary with no.11, care should be given to the height, I question whether three storeys in this location is appropriate. Also care to the placement of windows and doors on flanks that could cause overlooking and loss of privacy to the neighbouring property is recommended. I would advise that windows on this elevation are avoided or obscure glazed and non-opening. Care should also be given in regards the ground level changes between plot 1 and No 11 Glebe Road.

Access, Parking and Highways

Local Plan Policy T1 Assessment of transport matters states that planning permission will be granted provided that:

“a) Development would not lead to highway safety problems or cause unacceptable impacts upon the highway network”.

Policy T2 states that planning permission will be granted provided that:

“a) Parking for residential development is provided in accordance with the minimum standards set out in Appendix 4 of this Plan”.

Hertfordshire County Council would be consulted on any formal planning application as a statutory consultee. They would assess the impact of the proposals on the local road network and assess the acceptability of the access.

The proposal looks to use an existing access point onto Glebe Road. The Highway Authority have not been consulted on this application, so I would advise that the proposed access is discussed with Hertfordshire Highways through their formal pre-application service to establish its credibility in highway terms.

The dwellings will need to provide suitable levels of parking for future occupiers and their visitors, in accordance with the details set out in Appendix 4 of the Local Plan. Moreover, the scheme will need to provide suitable levels of cycle parking in accordance with the aforementioned guidance. These should be demonstrated on any future proposed plans.

Landscaping

Within this area of Letchworth, importance of landscaping particularly open spaces, hedges and trees which enclose front gardens and provide a consistent front boundary should be taken into account. Small trees are placed along Glebe Road along with trees within rear gardens.

The indicative layout plan shows the extent of amenity area provision as well as retained/proposed landscaping. On the whole, the broad details of landscaping appear reasonable, showing the existing tree belt and hedgerows retained where possible. A comprehensive landscaping scheme would be welcomed in any subsequent application and would feed into BNG. Also all boundary treatments should be submitted as part of any future planning application.

Biodiversity and Ecology

Any future planning application should be supported by an ecological appraisal. This would indicate any protected species interest on the site. Should such an interest be found it may be necessary to undertake further surveys to determine the level of use. The results of these surveys and details of proposed mitigation would need to accompany an application.

There is now a mandatory requirement to deliver 10% Biodiversity Net Gain as such a completed Statutory Metric calculation will need to be provided. This should be informed by the biodiversity baseline as determined in the ecological appraisal. It is apparent that some of the vegetation/hedgerow on the western boundary have been removed. Where this is the case a metric calculation will need to be based on pre-degradation taken as 30th January 2020.

In addition to 10% BNG in habitat terms it is also recommended that opportunities for species enhancements are also considered such as the inclusion of integrated bat, bird and bee bricks and hedgehog holes in fences supporting species integration and connectivity.

Environmental Health

Land Contamination: On the basis of the industrial nature of the historical land use and the vulnerability of the proposed use to the presence of contaminated ground the applicant should submit a combined Phase I and II Environmental Report as part of the submission.

Noise: The proposed dwellings are to be located in an area partially surrounded by existing industrial or commercial units which have associated noise sources that could impact adversely on the amenity of prospective occupiers of the dwellings. Some of these units are very close to the development site. A noise assessment should be submitted with any future planning application and should demonstrate any mitigation measures to be implemented.

Environment Agency

The Environment Agency wish to be consulted on all applications within Letchworth Industrial Estates regarding contamination and ground water. You may wish to seek advice from them whether or not they require any surveys or documents in support of the application

Flooding and drainage

In accordance with policy NE8 of the Local Plan you should include a sustainable drainage solution as part of the development. This should aim to mimic the natural drainage patterns and processes as far as possible.

In order for the Lead Local Flood Authority to advise the relevant local planning authority that the site is not increasing flood risk to the site and elsewhere and can provide appropriate sustainable drainage techniques, the following information is required as a minimum as part of the surface water drainage assessment;

1. A drainage strategy which includes a commitment to providing appropriate SuDS in line with the non-statutory national standards, industry best practice and HCC Guidance for SuDS.
2. Drainage plan including location of all the drainage features.
3. Where infiltration is proposed, evidence of ground conditions/ underlying geology and permeability including BRE Digest 365 compliant infiltration tests should be provided.
4. Detailed calculations of existing/proposed surface water storage volumes and flows with Initial post development calculations and/or modelling in relation to surface water are to be carried out for all rainfall events up to and including the 1 in 100 year including an allowance for climate change.
5. Evidence that if the applicant is proposing to discharge to the local sewer network, they have confirmation from the relevant water company that they have the capacity to take the proposed volumes and run-off rates.

Waste

The bin collection point should be a maximum pull distance for the crews of 15m, in accordance with BS5906:2005. A direct path should be installed from the bin collection point to the kerbside – via the amenity space. If not, the residents would have to present their bins on the kerbside on collection day which wouldn't be ideal.

Separate internal storage provision for waste should be provided in kitchen areas to support the recycling of different waste streams to support the National Planning Policy for Waste's requirements to support driving waste up the waste hierarchy.

The surface to the collection point should be uninterrupted, level with no gravel or similar covering, and have a width to enable the easy passage of wheeled bins. For two-wheeled bins this should be 1 metre wide (including doorways), with a maximum gradient of 1:12.

Storage areas should be conveniently located with easy access for residents - residents should not have to take their waste and recycling more than 30metres to a bin storage area, or take their waste receptacles more than 25metres to a collection point, (usually kerbside) in accordance with Building Regulations Approved Document H Guidance.

Consideration should be given to parking arrangements alongside or opposite the access to individual streets. If car parking is likely in the vicinity of junctions then parking restrictions may be required to ensure access is not inhibited.

Further advice on waste provision for developments is available on our website:
<http://www.north-herts.gov.uk/home/planning/waste-and-recycling-provision>

Archaeology

The proposed development site is in an Archaeological Area (Area of Archaeological Significance) identified in the Local Plan. As such Hertfordshire Historic Environment Team would be consulted as part of a submitted planning application. I would advise surveys to be carried out prior to submission where possible.

Climate Change Emergency

On 21 May 2019, the Council passed a Climate Emergency motion which pledged to do everything within the Council's power achieve zero carbon emissions in North Hertfordshire by 2030. As one of the first councils to pass this motion, NHDC is leading the way on climate action. This declaration asserted the Council's commitment toward Climate Action beyond current government targets and international agreements. Climate action has been a long-term corporate priority area for the Council, and has been pursued through our objective to Prosper and Protect North Hertfordshire:

This objective informs our commitments to:

- ☐ Green space provision.
- ☐ Representing the Climate Change interests of North Hertfordshire residents on county and regional plans, policies and aspirations.
- ☐ Supporting initiatives that increase the energy efficiency of residents' homes, reduce resource waste, and increase our sustainability for the longer term.
- ☐ Protecting our physical heritage.
- ☐ Finding environmentally sustainable solutions to the challenges

The Council's Sustainability SPD has also recently been adopted. The SPD has been prepared to support policy SP1 (Sustainable Development in North Hertfordshire), policy D1 (Sustainable Design) and other relevant policies in the adopted Local Plan.

[Sustainability Supplementary Planning Document | North Herts Council](#)

Along with the inclusion of EV charging points which are now a requirement on all new dwellings, other mitigation should be considered in order to make a positive contribution to the mitigation of the climate emergency. This might be achieved through layout and design of the proposed dwellings, materials and consultation methods maximising solar gain where possible. This would be seen as a positive attribute of any scheme alongside the inclusion of renewable energy technology, for example solar panels, ground heat source or air heat source pump units.

PV panels could be provided on the rear roof elevation which are south facing and therefore can benefit from the movement of the sun through the day.

A detailed Energy Assessment will be required in any subsequent planning application, identifying which sustainable measures will be incorporated into the scheme and subsequently conditioned.

Formal Planning application

If this proposal were to proceed to the application stage, please ensure that you have referred to our validation check list to ensure that all the needed information and documents are submitted for consideration. Our validation checklist can be found on this link:

[Submit a planning application | North Herts Council \(north-herts.gov.uk\)](https://www.north-herts.gov.uk)

Conclusion

In conclusion, the principle of development of this site is supported. As discussed above minor amendments to the design, namely the height, roof form, fenestration and removal of Juliette balconies should be considered.

Any subsequent planning application should be supported by a robust and comprehensive Design and Access Statement, Planning Statement, Landscaping Plan/Details, Bio-diversity Net Gain Statement, and an Energy Statement. Consultation with the Highway Authority is encouraged to ensure the two proposed access points are acceptable in highways terms. Any advice given by Council Officers for pre-application enquiries does not constitute formal response or decision of the Council with regards to future planning permission or consents.

Kind regards

Melissa Tyler

Senior Planning Officer

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