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10th April 2024

Dear Paul,

Development of Swangleys Green, off Watton Road, Knebworth

RE: 23/01552/OP - Outline planning permission for up to 200 dwellings (including affordable housing), structural planting and landscaping, informal public open space and children's play area, surface water flood mitigation, vehicular access point and associated ancillary works. All matters reserved except for means of access.

I write regarding the above application and in follow up to our meeting that was held at the Council offices in December 23. In line with our discussions, the main content of this response aims will draw together all outstanding points in relation to the site masterplan.

However, as the application was originally submitted in July 2023, it has triggered a wide range of comments from statutory and non-statutory consultees. Many of the bodies consulted either raise no objection (subject to conditions) or have responded with general comments. Some consultees do however raise points of objection.

To aid in the determination of the proposals, **Appendix 1** to this letter provides a summary of all consultation responses received to date, along with commentary from the applicant responding to points raised. Two bodies not included in the Appendix 1 schedule are Affinity Water and HCC (as the Lead Local Flood Authority). This is because a separate flood risk and drainage response was submitted to the Council in March 24 and is subject to re-consultation with those bodies.

Appendix 2 provides a standalone Technical Note prepared by Stirling Maynard that responds to the consultation response provided by Active Travel England.

Appendix 3 provides a set of amended and access plans, as well as plans extracted from the Framework Masterplan document including the Illustrative Masterplan.



Access Drawings

Proposed access plans have been amended and submitted for reconsideration – please see Appendix 3. The two revised access plans are to supersede previously submitted access drawings, as set out below.

Drawing Title	Drawing Ref.	Superseded Plan Ref.
Proposed Simple Priority T Junction Watton Road	17033-04-10 D	10733-04-10 C
Pedestrian and Cyclist Provision on Swangleys Lane	0301 P05	0301 P04

In addition, a worked-up technical sketch for a pedestrian/cycle gateway between the western edge of the site and Watton Road is provided, demonstrating how this gateway could be accommodated in this section of the site. This drawing is entitled ‘Watton Road & Bell Close Junction Active Travel Sketch Layout’.

Drawing ‘Old Lane P22042-SMCE-ZZ-XX-DR-H-0303-P02’, which was included in our original submission, should no longer be considered as part of our proposals because, in line with our discussions, the turning heads shown on that plan have been omitted from our updated material.

Framework Masterplan Drawings

The extracted Framework Masterplan drawings are to allow officers to consider their inclusion in a design code condition imposed on any planning permission granted.

As described in the submitted Framework Masterplan and Design and Access Statement, a considerable amount of effort has gone in to preparing proposals that would be sympathetic to Knebworth and capable of delivering a high-quality development. Whilst the proposals are in outline, the submitted Planning Statement describes how they comply with Policy SP9 of the Local Plan, detailing the history of engagement undertaken by the applicant, through pre-application stage, one previous planning application (now withdrawn) and through the independent design review panel process.

In response to past engagement, the applicant has reacted positively to requests for amendments by the Council and by consultees, including Hertfordshire County Highway Authority. Consequently, the application proposals have morphed considerably since our first (and now withdrawn) planning application and more detail on this can be found in our policy response to SP9 in the Planning Statement, the Design and Access Statement and the Framework Masterplan document.

It is understood that to capture the design essence of the site and ensure the outline proposals are suitably reflected in material submitted at reserved matters stage, officers’ preference is for certain plans from the Framework Masterplan to be extracted and referenced in a design code condition. These plans are:

- Land Use Framework Plan

- Access & Movement Framework Plan
- Green Infrastructure Framework Plan
- Urban Design Framework Plan

During our meeting we discussed further potential amendments that should be made to the proposals, and these are reflected in the plans contained at Appendix 3.

(i) Land Use Framework Plan

Details on the Land Use Framework Plan have been simplified, with the previous indicative internal road layout of each residential use parcel removed and replaced with arrows indicating potential access points. The northern parcel has been re-shaped adjacent to the Affinity Water site. However, view corridors through this parcel have not been included as there are easements for below-ground pipework that will need to be factored into future reserved matters submissions to ensure the most efficient use of land. Also removed are the focal point indents that were previously shown on the Land Use Framework Plan.

Whilst we discussed buffering from the rear gardens of the site to the existing properties on St Martin's Road, this amendment has not been included. This point was covered by the Design Review Panel response (paragraph 1.7) who felt it may be more appropriate for homes to back onto the edge so that gardens back onto gardens. For similar reasons, a residential parcel in the southern part of the site has been taken up to a garage block on the Haygarth. Buffering has also not been included adjacent to Swangleys Farm as suitable noise mitigation to farmyard activity can be achieved without this. However, and where appropriate for ecological reasons, sufficient buffering is shown on the plan.

(ii) Access & Movement Framework Plan

This plan has also been simplified, with secondary and tertiary lanes removed from the residential use parcels and replaced with potential access points. The plan has been amended to differentiate between main vehicular access points and pedestrian/cycle access as well as active travel routes and leisure routes.

In illustrating proposed leisure routes, we have retained the route through the site's eastern greenway as we consider this greatly aids site permeability. We have however omitted previously shown turning heads on Old Lane, as per officers' request.

(iii) Green Infrastructure Framework Plan

The base plan has been updated to reflect the Land Use Framework Plan and Access & Movement Framework Plan. The plan has been amended to include all existing retained vegetation (plus root protection areas) as well as vegetation to be removed. As will be noted, only two small sections of hedge along Old Lane are proposed to be removed to facilitate construction of the site's primary street and to enable a pedestrian/cycle connection point adjacent to the western boundary of the site with Old Lane. We note that Hertfordshire's Ecology Advisor has issued their consultation response confirming the hedge along Old Lane does not qualify as 'important' under the Hedgerow Regulations.

Linked to the above, we touched upon the positioning of the LEAP on the south-west of the site adjacent to Haygarth. As set out in the submitted Ecological Appraisal, whilst a Hertfordshire Ecological Network Mapping Project desktop study found this area had the *potential* to be classified as a habitat of importance under the NERC Act 2006, survey work found the area to be dominated by bramble and of low ecological value. These findings have been corroborated by Hertfordshire County's Ecology Advisor, who considers the proposals would not have an adverse impact on biodiversity and would meet current expectations of law and policy. For these reasons we have retained the LEAP in its previously proposed position adjacent to Haygarth.

(iv) Urban Design Framework Plan

This plan has also been simplified, with the base plan updated in line with other extracted Framework plans, including re-shaping of residential parcels where necessary. View corridors and vistas are indicated on the plan, with the exception of a view corridor bisecting through the northerly residential parcel for the reasons previously stated. Internal development parcel road layouts and focal points have been removed. However, the location of important edges, marker buildings and primary and pedestrian/cycleway gateways have been retained.

Updated Application Documents

As the above amendments have resulted in some minor changes to the shape of some development parcels and the removal of features such as the Old Lane turning heads, we have duly updated the site's Illustrative Masterplan (IM). It should be understood that the IM is purely illustrative and demonstrates how the site *could* accommodate the up to 200 dwellings proposed. Given that the IM has changed, we have, for consistency, updated this in all other relevant application documentation, namely:

- Planning and Affordable Housing Statement
- Design and Access Statement
- Framework Masterplan
- Transport Assessment
- Outline Biodiversity Net Gain Report and Biodiversity Net Gain Metric
- Arboricultural Assessment

In addition, where necessary, we have duly amended references to site areas, which have changed marginally.

I trust the enclosed information is explanatory. Should you require any further assistance, or have further queries, please don't hesitate to contact me.

Yours sincerely,

Chris Ball

**Chris Ball MRTPI
Senior Planning Director**