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Planning Department
North Hertfordshire District Council
PO Box 10613
Nottingham
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Dear Sirs

DETAILED PLANNING APPLICATION FOR EXTERNAL ALTERATIONS COMPRISING THE ADDITION OF LOUVRES

RADCLIFFE HOUSE, TILEHOUSE STREET, HITCHIN, SG5 2DW

GVA is instructed by Reassure UK Services Ltd ("Reassure") to submit a detailed planning application for external alterations comprising the addition of louvres, in respect of Radcliffe House in Hitchin.

The application submission comprises:

- this cover letter;
- application form and ownership certificates;
- Site Location Plan (drawing reference 17-286-00-25 Rev B);
- Existing Elevation Plan (drawing reference 17-286-00-16 Rev C);
- Proposed Elevation Plan (drawing reference 17-286-00-22 Rev D);
- Existing Elevation Plan (drawing reference 17-286-00-16.1 Rev C);
- Proposed Elevation Plan (drawing reference 17-286-00-22.1 Rev D);
- Existing and Proposed Site Plan (drawing reference 17-286-00-20 Rev C);
- Existing Roof Plan (drawing reference 17-286-00-21 Rev B); and
- Proposed Roof Plan (drawing reference 17-286-00-23 Rev C).

Payment in the amount of £234 in respect of the planning application fee has been sent by cheque under separate cover.

A design and access statement, proportionate to the proposals, is required as part of this planning application. Please accept this letter and the detail below as fulfilling this requirement.

Site and Surroundings

The site comprises Radcliffe House, located on Old Charlton Road in Hitchin. To the north of the building are residential uses, with the town centre beyond that. To the east is Priory Park and beyond that The Priory, a Grade I listed building. To the south is a further office building known as Keyes House and to the west, beyond Old Charlton Road, are further residential uses.

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The site comprises a red brick, four storey office building with additional basement car park. The visitor entrance to the site is accessed via a long driveway from Tilehouse Street, with a service and staff entrance available from Old Charlton Road.

Historic England's 'Register of Buildings of Special Architectural or Historic Interest' shows that Radcliffe House is not statutorily listed. We also understand that the building is not locally listed. However the LPA's Conservation Area Map for Hitchin shows that the building is located within Hitchin Conservation Area.

The Proposals

The proposals comprise external alterations to Radcliffe House, which arise as a result of the need to provide improved ventilation for the building. Currently the building has no mechanical ventilation and therefore ventilation is only available through the opening of windows. The proposals aim to improve ventilation within the building in order to improve the working environment within.

The works proposed comprise:

- 36 louvres measuring 0.2 metres by 0.8 metres to be located on the elevations of the building. Louvres to be of a red brick colour to match the existing red brick walls of the building and to be located above and below existing windows on the building;
- 4 louvres measuring 0.2 metres by 0.3 metres, to be located on the northern and southern elevations and to be of red brick colour to match the existing red brick walls of the building;
- 8 louvres measuring 1.2 metres by 0.5 metres to be located on the roof of the building and to be of slate grey colour to match the existing grey roof tiles.

The louvres will be manufactured from aluminium and are powder coated in the relevant colour dependent on their location on the building (please refer to the Proposed Elevation Plans for reference).

For clarity no other external works are proposed such as cabling or ducting. No changes to the site layout or vehicular access are proposed and the proposals do not result in any loss or addition of floorspace above that of the existing property.

The Development Plan and Other Material Considerations

S38(6) of the Planning and Compulsory Purchase Act 2004, states that planning applications must be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

The Development Plan

The Development Plan for Hitchin comprises 'saved policies' from the North Hertfordshire District Local Plan No.2 with Alterations, adopted in 1996. The associated Proposals Map shows that the site is located within Hitchin town centre and is designated for employment use under Policy 36. Specifically, under Policy 37 the site is designated for business use comprising Use Class B1 (offices). Both policies primarily relate to preventing the loss of existing employment uses on site or promoting development of the site for employment, and are therefore of limited relevance to the proposals here.

Having regard to nature of the proposals, we consider that the other 'saved' policies within the Plan are not of relevance and therefore the proposals should be assessed against the National Planning Policy Framework.

The National Planning Policy Framework

The National Planning Policy Framework ("NPPF") was published on 27 March 2012 and sets out the Government's guidance on town planning matters. Underpinning the NPPF, and described as the

'*golden thread'* running through both plan-making and decision-taking, is a presumption in favour of sustainable development with an economic, social and environmental perspective. This reflects the Government's desire for the planning system to positively and proactively support sustainable economic growth rather than act as an impediment to it.

Paragraph 14 states that, for decision taking, the presumption in favour of sustainable development means that proposals which accord with the Development Plan should be approved without delay. Paragraph 14 goes on to say that where the plan is absent, silent or where relevant policies are out-of-date, permission should also be granted, unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the Framework taken as a whole, or specific policies in the Framework suggest development should be restricted.

Paragraph 215 of the NPPF considers the weight to be given to existing Development Plan policies and establishes that this will depend on the degree of consistency with the NPPF, i.e. where policies are inconsistent with the Framework the weight to be afforded to them will be reduced.

Paragraphs 56 to 66 seek to promote good design within new development. Paragraph 60 is relevant and states:

> *"Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness."*

In respect of development within a conservation area, paragraphs 126 to 141 seek to ensure that development conserves and enhances any designated conservation areas or heritage assets. We note that The Priory is a designated heritage asset, however it is located some 100m away from Radcliffe House and the alterations proposed are only minor. We return to this matter later.

North Hertfordshire Design SPD

The North Hertfordshire Design Supplementary Planning Document (SPD) was published in July 2011. It provides general design guidance for development proposals within the District. However the SPD primarily relates to design considerations that are relevant to new build development and we therefore consider that is of limited relevance to these proposals.

Local Plan 2011 - 2031

The LPA is currently preparing its new Local Plan 2011 – 2031. Once adopted, it will replace the remaining saved elements of the 1996 Local Plan in its entirety. The Plan is now substantially progressed, with the Proposed Submission version of the Plan submitted for examination in June 2017. Hearing sessions ended in April 2018, however a date for adoption is not currently known. The Plan therefore has limited weight at the current time.

The Proposed Submission version of the Plan includes a Proposals Map which shows that Radcliffe House continues to be allocated as part of employment area HE4 and part of allocation HB4 'land adjacent to Priory Park'. Allocation HB4 designates parts of employment areas which should be utilised for business uses only, defined as uses being within Use Class B1, and which includes offices. However, as per the current Local Plan designation, the draft employment policies relate primarily to types of uses that are appropriate within employment areas and preventing the loss of employment sites. We therefore consider they are of limited relevance to the proposals.

Hitchin Conservation Area: Character Statement

The building is located within the Hitchin Conservation Area and therefore regard has been had to the 'Hitchin Conservation Area: Character Statement', published in July 2011. The building is located within Character Area 7 and the associated map for the area shows important features and views within the area. Having regard to the nature of the proposals, the only nearby feature of relevance is

view 10, which is the view from the east of the building looking north towards the town centre. However, we note that i) the view is looking away from the building and ii) only 2 additional louvres are proposed on the eastern elevation of the building, facing the park, with 1 louvre hidden from view within the park by other buildings. Therefore we consider that there will be no impact on either Priory Park or view 10. Further consideration is given to heritage matters below.

Assessment

In assessing the proposals, we firstly note that the works proposed comprise only minor external alterations to the elevations of the buildings. It is proposed to add 40 louvres to the walls of the building, in a colour that is similar in nature to the existing red brick colour, and 8 louvres to the roof, of a colour to match the existing slate grey tiles.

It is important to note that no material changes are proposed to the site layout or vehicular accesses to the property. As such, no floorspace is created and there are no technical or environmental implications to consider in evaluating the proposals. We therefore consider that assessment of the proposals is likely to be considered in respect of design and heritage matters only.

The starting point for the determination of any planning application is the Development Plan. As set out above, the Development Plan for the site comprises 'saved policies' from the North Hertfordshire District Local Plan No.2 with Alterations. However we set out earlier that the saved policies are of minimal relevance to the proposals and therefore consider that any decision would be assessed against the NPPF.

Paragraph 60 of the NPPF seeks to ensure that development is of good design but that decisions do not seek to require development to conform to certain forms or styles. The building is not statutorily or locally listed and is of a modern brick design. The proposals are for minor alterations comprising modern materials and colours that are sympathetic to the existing design of the building.

The development is located within a conservation area, however it is not a designated or locally listed heritage asset and it is not recognised within the Conservation Area Character Statement as making any specific contribution to the conservation area. We therefore consider that, given the minor nature of the works and that they are in keeping with the design of the building, there will be no impact on the setting of the conservation area. We also consider that there will be no impact on the setting of the Grade I listed building The Priory, given that only 2 additional louvres are proposed on the eastern elevation of the building.

We therefore consider that the proposals comply with paragraph 60 and paragraphs 126 to 141 of the NPPF.

Conclusions

Paragraph 14 of the NPPF states that, for decision taking, the presumption in favour of sustainable development means that proposals which accord with the Development Plan should be approved without delay. We have set out above that the proposals are compliant with the development plan and the NPPF and that there are no technical or environmental matters that preclude a positive decision. We would therefore respectfully request that the proposals are approved in due course.

We trust that the above is sufficient to enable validation of the application in the first instance. Meanwhile, should you have any queries in respect of the application, please contact Gemma Hiden of this office on 01216098093 or email gemma.hiden@gva.co.uk.

Yours sincerely



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For and on behalf of GVA Grimley Limited