

# Planning Statement

Planning Application

**Demolition of existing hotel and erection of 9 dwellings with  
associated works**

**Firs Hotel, Bedford Road, Hitchin SG5 2TY**

DLA Ref: 2025/482

January 2026

**CONTENTS**

1.0 INTRODUCTION ..... 1

2.0 SITE & CONTEXT ANALYSIS ..... 2

3.0 RELEVANT PLANNING HISTORY ..... 4

4.0 POLICY CONTEXT ..... 6

5.0 DESCRIPTION OF DEVELOPMENT ..... 8

6.0 PRE-APPLICATION ENQUIRY ..... 9

7.0 PLANNING CONSIDERATIONS..... 11

8.0 CONCLUSIONS ..... 23

## 1.0 INTRODUCTION

### 1.1.0 Background

1.1.1 This report relates to a planning application for the demolition of existing hotel and erection of 9 dwellings with associated works at Firs Hotel, Bedford Road, Hitchin SG5 2TY.

### 1.2.0 Scope

1.2.1 This document comprises an overarching Planning Report. Sections 2 to 4 consider the physical, economic, social and historical context of the site, identifying the relevant local, regional and national planning policy framework; Section 5 sets out the details of the proposal; and Section 6 details the consultations undertaken prior to the submission of the application. All these sections inform the evaluation of the proposal in Section 7 against the identified planning policy framework. The overall conclusions are set out in Section 8 and which are summarised below at paragraph 1.3.0.

### 1.3.0 Summary

- The principle of the development is acceptable, particularly given the lack of a 5-year housing land supply and which means that the Council's housing policies are out of date.
- The proposed development is considered to address concerns raised in the pre-application and presents a high-quality development that improves and preserves the character and appearance of the area.
- The size and siting of the buildings would ensure that there is no detrimental impact on the residential amenity of neighbouring occupiers. A good standard of living will be provided to future occupiers.
- The proposal will have an acceptable impact on highway safety with acceptable car parking provision.
- The proposal will have an acceptable impact on the environment.

## 2.0 SITE & CONTEXT ANALYSIS

### 2.1.0 Location

- 2.1.1 The Site is located in the settlement of Hitchin on the west side of Bedford Road. Hitchin town centre lies approximately 800m to the south-east.



Figure 1: Location of the application site

### 2.2.0 Application Site

- 2.2.1 This 0.16 ha Site contains an existing two-storey, detached 27-room hotel fronting on to the Bedford Road. There is an existing entrance to the north side of the building providing access to a rear parking court for 22 vehicles. Most of the Site is laid to hardstanding with pockets of soft landscaping to the front and rear of the building and along the boundaries.

### 2.3.0 Context

- 2.3.1 The site is situated in a predominantly residential setting with housing directly to the south and west. There is a petrol station and garage to the north. A footpath (Hitchin 020) runs along the western boundary, providing pedestrian connectivity through the nearby housing estates.

### 2.4.0 Proposals Map Notation

- 2.4.1 The proposals map for the North Hertfordshire Local Plan 2011 – 2031 shows the site within the defined settlement boundary of Hitchin and with no other designation.

**2.5.0 Local Services & Accessibility**

- 2.5.1 The proposed development is around 800m from Hitchin Town Centre, equivalent to a walk of around 10 minutes (or a cycle ride of less than 4 minutes). Hitchin Town Centre offers a broad range of employment, retail, health, educational, and leisure facilities.
- 2.5.2 The site is readily accessible by bus, with the closest stops located less than 100m from the site. This lists four services accessible at these stops with hourly-or-better frequencies (the Numbers 9A, 9B, 74 and 81), plus two additional services (Numbers 9D and 89).
- 2.5.3 The site is located within approximately one mile of Hitchin Railway Station (equivalent to a walk of about 20 minutes or a cycle of around 6 minutes). Hitchin Station allows access to frequent direct services to a wide range of regional destinations and London. On average, over 12 trains per hour serve the station, with additional peak-hour services on some routes.

## 3.0 RELEVANT PLANNING HISTORY

### 3.1.0 Application Site

3.1.1 The relevant history of the application site is summarised in Figure 3.1.0 below.

| LPA Ref    | Proposal                                                                                                                                                                   | Outcome               |
|------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|
| 87/01211/1 | Erection of two storey and first floor rear extension to provide additional bedroom accommodation. (Revised by plans received 16/10/87)                                    | Approved – 26/11/1987 |
| 86/01785/1 | Erection of single storey side extension                                                                                                                                   | Approved – 02/12/1986 |
| 82/00549/1 | Change of use of ground and first floors from hotel to offices                                                                                                             | Approved – 30/04/1982 |
| 79/02035/1 | Erection of two storey and single storey rear extensions to provide 7 bedrooms, dining room, kitchen and 3 bedroom flat and additional parking spaces                      | Refused – 25/02/1980  |
| 79/01136/1 | Erection of two-storey and single storey rear extensions to provide seven additional bedrooms, dining room, kitchen managers flat, together with additional parking spaces | Refused – 11/07/1979  |
| 78/01090/1 | Conversion of existing hotel into six self-contained flats, construction of access road and car parking area                                                               | Approved – 09/11/1978 |

### 3.2.0 Other Relevant Sites

3.2.1 9 Bedford Road, Hitchin – LPA Ref: 23/01492/FP – Change of use of care home to 16 residential apartments (C3 use). In respect of parking provision, the Committee Report found there to be a significant shortfall of 60%, although it was considered acceptable in light of the site's sustainable location:

*“Local Plan Policy T2 indicates that parking for non-residential development is provided having regard to the standards set out at appendix 4 of the Local Plan. Variations from these standards will only be considered where applicants can demonstrate that the accessibility, type, scale, mix and use of the development; the availability of and opportunities for public transport; local car ownership levels and on-street conditions justify such variations. The minimum parking standard for this development is 18 spaces plus 12 visitor parking spaces, a total of 30 spaces. The minimum cycle parking standard is 16 secure spaces, and 19 are proposed. Therefore, whilst the proposal exceeds the minimum standard for secure cycle*

*parking, there is a significant shortfall of 18 car parking spaces. However, such a shortfall may be acceptable under the provisions of Local Plan Policy T2.*

*Whilst there would be an under provision of off-street car parking, the applicant has set out a case for lower parking provision in this case in the submitted Planning, Design, Access & Heritage Statement, which states “the site is located in a highly sustainable location adjacent to Hitchin town centre, with a plethora of key facilities, amenities and public transport services available within close walking distance of the site... It is considered that this highly sustainable location, being so close to all the everyday amenities and facilities in Hitchin town centre, including train station, can justify the reduced parking provision in this case. Moreover, being for flatted development and not for general family sized housing, the need for a vehicle by occupiers is likely to be considerably minimised, with excellent commuter links by train and bus, accessed very close to the site.*

*Officers agree with the applicant that the site benefits from access to public transport links and a wide range of amenities including a supermarket and leisure centre. The Highway Authority also agree that the amount of parking proposed is acceptable in this highly sustainable location. Therefore, whilst there would be an under provision of car parking on site, access to a car is not necessary to meet the day-to-day needs of future occupiers. It is considered that parking provision below the parking standard set out in the Local Plan is acceptable in this edge of town centre location as an exception to adopted minimum parking standards.”*

- 3.2.2     1 Pirton Road, Hitchin – LPA Ref: 23/01446/FP – Residential development comprising of 9 flats (1 x 1-bed and 8 x 2-bed). In this case, the Council concluded that the 41% shortfall in parking provision was considered acceptable due to the location of the site being a short walk or cycle away from the town centre.

## 4.0 POLICY CONTEXT

### 4.1.0 National Policy / Guidance

4.1.1 The National Planning Policy Framework (NPPF) 2024, sets out the Government's planning policies for England. The following sections are considered directly relevant:

- Section 2: Achieving Sustainable Development
- Section 5: Delivering a sufficient supply of homes
- Section 8: Promoting healthy and safe communities
- Section 9: Promoting sustainable transport
- Section 11: Making effective use of land
- Section 12: Achieving well designed places
- Section 15: Conserving and enhancing the natural environment

4.1.2 The National Planning Policy Guidance contains detailed guidance on the application of the NPPF. Account is also taken of the National Design Guide - Planning practice guidance for beautiful, enduring and successful places, which aims to illustrate how well-designed places that are beautiful, healthy, greener, enduring and successful can be achieved in practice.

### 4.2.0 Development Plan

4.2.1 Of relevance to this application are the North Hertfordshire Local Plan 2011-2031 (November 2022)

| Policy No. | Title                                            |
|------------|--------------------------------------------------|
| SP1        | Sustainable development in North Hertfordshire   |
| SP2        | Settlement Hierarchy and Spatial Distribution    |
| SP6        | Sustainable Transport                            |
| SP8        | Housing                                          |
| SP9        | Design and Sustainability                        |
| SP11       | Natural resources and sustainability             |
| SP12       | Green infrastructure, landscape and biodiversity |
| D1         | Sustainable design                               |
| D3         | Protecting living conditions                     |
| T1         | Assessment of transport matters                  |
| T2         | Parking                                          |
| HS2        | Affordable Housing                               |
| HS3        | Housing Mix                                      |
| NE2        | Landscape                                        |
| NE4        | Biodiversity and geological sites                |

#### 4.3.0 **Supplementary Planning Guidance / Documents**

4.3.1 The following LPA guidance is relevant to the application proposal:

- Vehicle Parking at New Development Supplementary Planning Document (September 2011)
- Design Supplementary Planning Document (July 2011)
- Sustainability SPD 2024

## 5.0 DESCRIPTION OF DEVELOPMENT

- 5.1.0 The proposed development comprises the demolition of the existing hotel building and erection of nine, three-bedroom townhouses with private off-street car parking, a shared private access road, private rear gardens and associated landscaping.
- 5.1.1 The proposed dwellings are arranged in two blocks, both parallel to the highway and around a central 'shared surface' courtyard, accessible from both the existing Bedford Road access and a new connection from Firs Close. The rear proposed housing block will continue the existing row established by Nos 4-9 Firs Close. The front block will reflect the siting of existing buildings that front Bedford Road. Each unit will have two allocated parking spaces.
- 5.1.2 Each property will have an enclosed rear garden area with cycle storage. Plots 6 to 9 will have rear gates on to the shared parking area and Plots 1 to 5 will have gates for pedestrian access on to Footpath 020. Private and shared bin stores are provided in an accessible location for refused collection.
- 5.1.3 Internally, the proposed dwellings will be split across three floors with a large open-plan kitchen and study on the ground floor, a lounge and bedroom on the first floor, and two further bedrooms on the upper floors. All dwellings have been designed to comply with NDSS and Part M4(1) of the Building Regulations.
- 5.1.4 The overall appearance of the new buildings is of a contemporary architectural typology with modern brickwork detailing and contemporary wooden cladding to the first and second floors. All proposed dwellings are three-storey in height.
- 5.1.5 Some existing landscaping will need to be removed to facilitate the development. However, a LMP has been submitted to illustrate new areas of planting which results in a BNG uplift of circa 500%.

## 6.0 PRE-APPLICATION ENQUIRY

6.1.0 A pre-application written response for the erection of 10 dwellings was received on 23<sup>rd</sup> January 2025. The response has been summarised in the table below.

| Planning Consideration                 | Written Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Principle of Development               | <ul style="list-style-type: none"> <li>The site lies within the built-up area of Hitchin where residential development is generally supported within the settlement boundary under Policy SP2 of the Local Plan. The site is therefore considered acceptable in principle.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Design                                 | <ul style="list-style-type: none"> <li>The layout of the site could be readdressed to create a better street scene for Bedford Road and Firs Close.</li> <li>The site would benefit from access through to Firs Close to create a more open flowing street scene.</li> <li>The front row of dwellings at Firs Close to be a visually harmful addition to the street scene that should not be replicated.</li> <li>Creation of an active frontage onto Bedford Road.</li> <li>Do not consider 3 storey dwellings to be inappropriate within this location.</li> <li>The dwellings are narrow in appearance, a reduction in the number of the dwellings could provide better internal and garden amenity space for the occupants.</li> <li>Should consider cladding at the first and second floor level on the front and rear elevations to enforce a positive relationship with Firs Close.</li> <li>Bin layout should not replicate Firs Close.</li> <li>A comprehensive landscaping scheme would be welcomed in any subsequent application, or these details could be reserved via condition.</li> </ul> |
| Amenity of Future Occupiers/Neighbours | <ul style="list-style-type: none"> <li>The garden spaces of Unit 6 and 7 are less than ideal however given the garden sizes of Firs Close, less weight is given to this objection.</li> <li>There may be some considerate harm to the eastern neighbours of No. 91 – 97 Symmonds Road which are set back by approximately 15m. Given the scale of the proposed dwellings and harm in terms of overbearing, overshadowing or loss of privacy is likely to be significant.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

|                              |                                                                                                                                                                                                                                                                                                                                                                                                          |
|------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                              | <ul style="list-style-type: none"> <li>• There would also be a significant loss of privacy to the proposed front row of dwellings which would back onto Firs Close and would be heavily overlooked.</li> <li>• Noise ingress from the road and commercial properties to the north should also be considered.</li> </ul>                                                                                  |
| Access, Parking and Highways | <ul style="list-style-type: none"> <li>• 10 parking spaces with no visitor spaces would be a significant under delivery that would fail to comply with Policy T2.</li> <li>• Suggested that the number of dwellings is reduced to allow for the provision of visitor parking spaces.</li> <li>• Sufficient information would need to be submitted as to why a reduction should be considered.</li> </ul> |

## 7.0 **PLANNING CONSIDERATIONS**

Based on the analysis set out in Sections 2 to 5, I consider that the application proposal raises the following issues, which I will consider in turn below:

1. Principle
2. Design, Character & Appearance
3. Residential Amenity
4. Movement
5. Environment

### 7.1.0 Issue No 1: Principle

7.1.1 The issue of principle rests on a consideration of a single factor:

- Provision of Housing

7.1.2 This factor is considered below in the context of the presumption in favour of sustainable development which is at the heart of the NPPF as detailed at paragraph 10 thereof. In support of this, paragraph 8 of the Framework states that achieving sustainable development means that the planning system has ‘*three overarching objectives*’ – economic, social and environmental - which are ‘*interdependent and need to be pursued in mutually supportive ways.*’ Notwithstanding this, paragraph 9 notes that they are not criteria against which every decision can or should be judged. It continues as follows:

*“Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.”*

### 7.1.3 Provision of Housing

7.1.4 The site lies within the built-up area of Hitchin where residential development is generally supported within the settlement boundary under Policy SP2 of the Local Plan. The site is therefore considered acceptable in principle. This was also confirmed in the pre-application written response by the Council (24/02321/PRE)

7.1.5 The NPPF makes it clear that the Government’s objective is to significantly boost the supply of homes with a sufficient amount and variety of land to come forward where it is needed. Paragraph 73 of the NPPF stipulates that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built relatively quickly.

7.1.6 To this end, account is taken of the acknowledged and significant shortfall of housing land in the district. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.

7.1.7 In the event that an LPA cannot demonstrate a 5-year supply, NPPF paragraph 11 states that the development plan is considered to be out of date. In such circumstances it requires that

the presumption in favour of sustainable development be applied, and permission granted unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.*

7.1.8 It is currently accepted by the Council that they cannot demonstrate a five-year housing land supply. The Council's Five-Year Housing Land Supply Update (November 2025) identifies a supply of only 2.66 years against the adopted housing requirement, including the relevant 5% buffer. It is thus the case that the planning balance shifts in favour of the grant of permission for residential development, with permission to be refused only if any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. There would be no such adverse impacts on this occasion as is demonstrated elsewhere in this Statement.

7.1.9 In addition, the site is within a highly sustainable location and has excellent access to shops, services and employment opportunities. Bus stops near to the site provide frequent and comprehensive services and Hitchin railway station is within easy walking distance. The site therefore provides an appropriate location for new housing.

7.1.10 Conclusions

To conclude, the Council accepts that it cannot demonstrate a 5-year housing land supply, which is a material consideration that carries significant weight. In these circumstances paragraph 11d of the NPPF is engaged and which states that planning permission should be granted unless "*any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole*". It is therefore considered that the principle of the development is acceptable, particularly given the lack of a 5-year housing land supply and which means that the Council's housing policies are out of date. Accordingly, the proposal is considered to constitute a sustainable form of development in accordance with the three dimensions set out in the NPPF. Subject to other matters below it is not considered that there are any adverse impacts which would 'significantly and demonstrably' outweigh these benefits.

## 7.2.0 Issue No 2: Design, Character & Appearance

### 7.2.1 Policy Context

Paragraph 131 of the NPPF advises that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. 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. Likewise, paragraph 135 of the NPPF seeks to ensure that developments function well and add to the overall quality of the area; are visually attractive; sympathetic to local character and history; and establish or maintain a strong sense of place.

7.2.2 With regard to the Development Plan, NHLP Policy D1 (Sustainable Design) states that planning permission will be granted for development proposals that: respond positively to the sites local context; create or enhance the public realm; retain existing vegetation and propose appropriate new planting; maximise accessibility, legibility and physical and social connectivity; and minimise the visual impact of street furniture and parking provision. Policy SP9 (Design and Sustainability) further considers that new development will be supported where it is well designed and located and responds positively to its local context.

### 7.2.3 Evaluation

Existing development in the surrounding area is varied in respect of character, appearance, design and ages. Development to the south of the Site beyond Firs Close is characterised by more compact, traditional semi-detached and terraced housing. There are also examples of more recent development infill developments on Firs Close and Chestnut Court, including three-storey housing and flat blocks.

7.2.4 The proposals provide an excellent opportunity to replace the existing premises – that hold no architectural merit worthy of retention – with a high quality development. The poor design quality of the existing frontage exacerbates this situation, together with the uninteresting and plain nature of the tarmacked parking areas to the front that extends 9m back from the highway.

7.2.5 The proposed development offers a significant improvement to the overall appearance, through the removal of an expanse of largely unrelieved hard standing. This will be replaced by an active residential frontage (to Bedford Road) with managed and planted defensible spaces, addressing concerns raised in the pre-application with regards to the orientation of the development. The rear proposed housing block will continue the existing row established by Nos 4-9 Firs Close.

- 7.2.6 The proposed development will mirror the three-storey heights of existing dwellings on Firs Close and Chestnut Court. As advised by the Council, the number of dwellings has been reduced (from ten to nine) resulting in wider development plots that benefit from larger internal and garden amenity spaces. It should be noted that the majority of proposed dwellings will have wider plots than the neighbouring dwellings on Firs Close.
- 7.2.7 Furthermore, the proposed layout creates a new access from Firs Close through the proposed development, offering a highways betterment for both existing residents and larger vehicles such as refuse (see Transport Technical Note) . Enclosed bin stores have been incorporated across the Site to avoid visual harm to the street scene. This is aided by the submission of a detailed hard and soft landscaping plan.
- 7.2.8 The proposed elevations would adopt a contemporary appearance which is considered acceptable given the variation in the street scene in terms of design and appearance. It was advised in the pre-application that cladding could be incorporated alongside brickwork on the first and second floor levels (to the front and rear elevations). The proposed elevations include vertical timber cladding, which breaks-up the elevations and defines each individual plot. It also better reflects the appearance of the dwellings in Firs Close that were constructed in both brick and hanging tiles. A more detailed analysis of materials and appearance has been presented in the DAS by Seabrook Architects.
- 7.2.9 Conclusion
- Overall, the proposed development is considered to address concerns raised in the pre-application and presents a high-quality development that improves and preserves the character and appearance of the area in accordance with the provisions of the NPPF and Policies D1 and SP9 of the Local Plan.

### 7.3.0 Issue No 3: Residential Amenity

#### 7.3.1 Policy Context

Paragraph 135 (f) of the NPPF promotes development with a high standard of amenity for existing and future users. NHLP Policy D3 (Protecting living conditions) states that planning permission will be granted for development proposals which do not cause unacceptable harm to living conditions.

#### 7.3.2 The Design SPD notes that planting can be used to create privacy, and provides the following relevant guidance regarding private spaces:

*“Internal Space – dwellings...should provide adequate internal space that can be used efficiently by the occupants.*

*External space – private dwellings should have adequate private space to meet the needs of the occupants. The Council encourages a mix of garden sizes. Houses should have gardens which meet the needs of the occupants outdoor living requirements such as children’s play, patio for entertaining, lawn/shrub area for leisure and recreation, recycling bins and storage facilities.”*

#### 7.3.3 Assessment

#### 7.3.4 *Impact on Existing Residents*

The siting and the scale of the proposed building has been carefully considered in order to create acceptable relationships with neighbouring buildings and land uses. In all instances, it is considered that a wholly satisfactory level of environment will be achieved for existing residents for the following reasons:

- The height of the proposed buildings ensure that they are reflective of existing heights and do not create an overbearing relationship with neighbouring properties on Firs Close.
- There will be an improvement in outlook and visual amenity for existing properties on Firs Close. Nos. 8 and 9 have a particularly poor relationship with the side elevation of the existing hotel due to the presence of built development and overlooking windows that are hard up against the boundary. The removal of the hotel will result in a less enclosed and more spacious feel.
- Concerns were raised in the pre-application response with regards to the separation between the proposed rear housing block and the existing dwellings on Symmonds

Road. In response, the proposed development has increased the separation distance to 18-23m which reflects the distances already established by the existing row of houses on Firs Close (Nos. 4-9). This is a dense urban environment wherein some degree of overlooking between dwellings is considered unavoidable, but this does not amount to a situation where the amenities of future neighbouring occupiers will be unduly harmed.

#### 7.3.5 *Impact on Future Residents*

In all instances, it is considered that a wholly satisfactory level of environment will be achieved for existing for the following reasons:

- All proposed dwellings have been designed to meet the nationally described space standards.
- The orientation of the dwellings and amenity areas would see them all benefit from acceptable levels of daylight/sunlight.
- All dwellings have rear gardens with the frontage plots benefiting from an area of defensible space to Bedford Road. It is accepted that the gardens are on the smaller side, however they are still reflective of character of development on Firs Close and the modern housing developments to the west. Paragraphs 2.5.0 and 2.6.0 demonstrate that the development will have good access to a range of different types of formal and informal outdoor space all within a short walking distance.
- The Noise Impact Assessment prepared by Parker Jones Acoustics finds that subject to mitigation measures, the proposed development is considered capable of achieving an acceptable internal and external acoustic environment, consistent with the intent of BS 8233:2014, the Professional Practice Guidance on Planning and Noise (2017), and the Acoustics, Ventilation and Overheating Guide (2020).

#### 7.3.6 Conclusions

The size and siting of buildings would ensure that there is no detrimental impact on the residential amenity of neighbouring occupiers. A good standard of living will be provided to future occupiers. It is acknowledged that the development is of a high density with smaller sized gardens, but this reflects the NPPF's aim of making efficient use of sites within the urban area as well as maximising the delivery of housing on brownfield sites.

#### 7.4.0 Issue No 4: Movement

7.4.1 In the context of Section 9 of the NPPF, consideration is given in turn to the following factors:

- Accessibility;
- Highways Safety and Capacity; and
- Parking

#### 7.4.2 Accessibility

NPPF Paragraph 110 states thus:

*“The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”*

7.4.3 In the above context, the proposal will clearly utilise a site in an accessible location. With regard to local services, as set out in detail in Section 2.5.0 above, the site has good and safe access to local shops, services, places of employment and schools, all of which are well within an acceptable walking and cycling distance. In addition, the site is located within short walking distance of the nearest bus stops, which provide frequent services to the centre of Hitchin and the surrounding towns.

#### 7.4.4 Highways Safety and Capacity

NPPF paragraph 116 states that Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

7.4.5 In the above respects, the Transport Technical Note by HAS offers the following key conclusions, such that the proposal is considered acceptable in these respects:

- No significant pre-existing collision concerns are identified.
- The existing 2.4m x 47m visibility splays at the access would be retained.
- Incorporating two access points within the design allows all dwellings within the site to be easily accessed by a Fire Tender, Ambulance or other emergency vehicle.
- The proposal would result in a slight drop in overall vehicle movements (from 68 per day to 63 per day). The impact on trip generation is therefore negligible.

7.4.6 With reference to Paragraph 116 of the NPPF, there are no reasonable grounds to state that the proposal would give rise to severe detrimental impacts to the capacity or the public highway network, nor that it could give rise to unacceptable safety impacts.

7.4.7 Parking

In considering the quantity of parking spaces required by both residential and non-residential development, NPPF paragraph 112 states that policies should take into account:

*“a) the accessibility of the development;*

*b) the type, mix and use of development;*

*c) the availability of and opportunities for public transport;*

*d) local car ownership levels; and*

*e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.”*

7.4.8 Policy T2 of the Local Plan indicates that parking residential development is provided having regard to the standards set out at Appendix 4 of the Local Plan. Appendix 4 requires a minimum of 2 vehicle parking spaces per dwelling with 2 or more bedrooms. In addition, it requires visitor parking spaces based on the 0.25 and 0.75 per dwelling metric. The proposal is therefore expected to provide 18 allocated spaces and between 2.25 and 6.75 visitor spaces – a minimum 21 parking spaces.

7.4.9 It should be noted that Policy T2 goes on to say that variations from these standards will only be considered where applicants can demonstrate that the accessibility, type, scale, mix and use of the development; the availability of and opportunities for public transport; local car ownership levels and on-street conditions justify such variations.

7.4.10 The proposal will provide a total of allocated 18 car parking spaces (excluding one servicing space), which equates to a shortfall of 14%. However, the site is in a highly accessible location and future occupiers will have excellent access to a wide range of shops, services, and employment opportunities as well as good access to public transport links. Secure cycle storage is also provided for each dwelling, further encouraging sustainable modes of transport. In these circumstances future occupiers will not be reliant on the private motor car for travel.

7.4.11 The Planning History section of this Statement highlights that the Council have adopted a flexible approach in the application of parking standards. For example, an application for 16 dwellings at 9 Bedford Road was approved with a 60% car parking shortfall; this site is located approximately only 350m from Firs Hotel in a comparably accessible location. As this

application offers a higher quantum of car parking relative to above standards, there should be no objection in this regard.

7.4.12 The supporting Transport Technical Note also finds that :

*“The existing Firs Hotel has 27 bedrooms, but only 22 car parking spaces (with a small area to the front of the hotel potentially able to accommodate a couple of staff vehicles). on this basis, if the hotel was brought back into use; it is foreseeable that demand for parking at the site could reasonably exceed supply. On a regular basis, especially noting that the hotel also features a restaurant that could open to non-resident diners. As such, redevelopment of the site would arguably decrease the likelihood of on-street parking in the vicinity.”*

7.4.13 Conclusion

There is scope for use of sustainable modes of travel from the site; it will not have an unacceptable impact on highway safety; the residual cumulative impacts on the road network will be negligible; and appropriate levels of car and cycle parking will be provided taking account of the location of the Site and nature of the proposal. In these circumstances the proposal complies with Section 9 of the NPPF.

## 7.5.0 Issue No 5: Environment

### 7.5.1 Ecology

Paragraph 193 (a) of the NPPF states that if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused. It further states that development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

7.5.2 The supporting PEA prepared by Brown & Co found that adjacent features have the potential to support nesting birds. As such, it is recommended that clearance/management of any onsite vegetation higher than 300 mm should take place outside of the core nesting bird season (March-August inclusive). The report has also recommended the Biodiversity Enhancements:

- Artificial bird boxes affixed to buildings or mature trees
- Artificial bat boxes affixed to buildings, mature trees, or to be pole mounted.
- Features to support invertebrates

7.5.3 The onsite habitat change will result in a habitat unit uplift of 591.02% and a hedgerow uplift of 11.84%. Thus, the project would exceed the minimum 10% Biodiversity Net Gain requirement.

### 7.5.4 Trees

Arbol Euro Consulting Ltd have prepared an Arboricultural Impact Assessment in support of this planning application. The proposals require the removal of H1, H2, SG1, T3 and T4. Additionally, to facilitate the installation of the temporary scaffolding some tipping-back of the T2 branch encroachment may be required. There would be an overall T2 RPA gain (with removing the hotel & tarmac strip running alongside T2) that equates to a notional 18.9m<sup>2</sup>.

### 7.5.5 Energy

An Energy and Sustainability Statement prepared by EPS Group finds that the proposed dwellings will achieve a total minimum reduction in regulated CO<sub>2</sub> emissions of **72.14%** in comparison to Approved Document L1 2021 of the Building Regulations.

#### 7.5.6 Flood Risk

The supporting FRA prepared by SNR ENG Ltd identifies an overland flow route crossing the western part of the site during the 1 in 100-year and 1 in 1000-year events. The proposed surface water drainage strategy will incorporate attenuation for at least the 1 in 100- year plus 40% climate change event and will limit discharge rates such that peak run-off does not exceed existing conditions and is likely to be reduced. The development will therefore provide a betterment to existing surface water runoff from the previously developed site.

7.5.7 The PPG clarifies (Paragraph: 027 Reference ID: 7-027-20220825) that in applying paragraph 175 of the NPPF a proportionate approach should be taken. Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied.

7.5.8 Subject to a detailed drainage design in accordance with the principles set out in supporting FRA, it is concluded that:

- The proposed development can be made safe for its lifetime with respect to flood risk;
- It will not increase flood risk elsewhere; and
- Opportunities will be taken to manage and, where practicable, reduce surface water flood risk compared with the existing situation.

7.5.9 The proposals are therefore considered acceptable in flood risk and drainage terms in accordance with Paragraph 175 of the NPPF.

## 8.0 CONCLUSIONS

### 8.1.0 Background

8.1.1 This report relates to a planning application for the demolition of existing hotel and erection of 9 dwellings with associated works at Firs Hotel, Bedford Road, Hitchin SG5 2TY. The proposal is promoted in the following circumstances:

- The principle of the development is acceptable, particularly given the lack of a 5-year housing land supply and which means that the Council's housing policies are out of date. Accordingly, the proposal is considered to constitute a sustainable form of development in accordance with the three dimensions set out in the NPPF. There are no adverse impacts which would 'significantly and demonstrably' outweigh the benefits of the scheme.
- The proposed development is considered to address concerns raised in the pre-application and presents a high-quality development that improves and preserves the character and appearance of the area in accordance with the provisions of the NPPF and Policies D1 and SP9 of the Local Plan.
- The size and siting of buildings would ensure that there is no detrimental impact on the residential amenity of neighbouring occupiers. A good standard of living will be provided to future occupiers. It is acknowledged that the development is of a high density with smaller sized gardens, but this reflects the NPPF's aim of making efficient use of sites within the urban area as well as maximising the delivery of housing on brownfield sites.
- There is scope for use of sustainable modes of travel from the site; it will not have an unacceptable impact on highway safety; the residual cumulative impacts on the road network will be negligible; and appropriate levels of car and cycle parking will be provided taking account of the location of the Site and nature of the proposal. In these circumstances the proposal complies with Section 9 of the NPPF.
- The proposed development will have no adverse impact on ecology or trees subject to the recommendations of the supporting reports. In terms of BNG, the onsite habitat change will result in a habitat unit uplift of 591.02% and a hedgerow uplift of 11.84%. Thus, the project is considered to achieve a minimum of 10% Biodiversity Net Gain.
- The proposed dwellings will achieve a total minimum reduction in regulated CO2 emissions of 72.14% in comparison to Approved Document L1 2021 of the Building Regulations.

- The proposals are considered acceptable in flood risk and drainage terms in accordance with Paragraph 175 of the NPPF.

DLA | Heritage

DLA | Strategic

DLA | Commercial

DLA | Residential

DLA | Leisure

DLA | *Solutions*