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Date: 18th October 2024

Your Ref: 24/01426/FP

Our Ref: 151

Dear Ben,

**Application Reference 24/01426/FP For Redevelopment of 9 – 10 High Street, Hitchin, SG5 1BH
– Response to Conservation Officer’s Comments Dated 3rd October 2024**

We write to respond to the Conservation Officer’s comments dated 3rd October 2024, on behalf of the applicant Bellborough Ltd, for the proposed redevelopment of 9 – 10 High Street, Hitchin, SG5 1BH. It is noted that the conservation officer does not object to the Paynes Park elevation of the scheme but it is uncertain from the comments set out how far into the scheme, this same level of acceptance continues.

In summary the applicant rebuts the conservation officer’s critique on the following key points:

1. The critique fails to acknowledge that the existing building has already established a High Street to Paynes Park built form that has already eradicated historic street patterns, that creates a previously developed land descriptive and is located in a highly accessible and sustainable location within the heart of the town centre (para 2.5). In principle, the maximum utilisation of this sustainable site is a requirement for any redevelopment scheme in line with the NPPF and maximising densities in town centres (Chapter 11 paras 129, 135).
2. Clearly, as the site is located within a conservation area and is adjacent to listed buildings, the design quality/scale and the application of heritage policy analysis is a critical requirement for assessing whether the design and scale of the development is acceptable in its heritage context and preserves the setting of special architectural or historic interest and preserves or enhances the conservation area. The level of harm is required to be identified and the special regard to the effects of the scheme analysed. The conservation officer’s assessment does not conclude on what level of harm is considered to arise from his objections to the application, in order for an assessment of whether there are clear public benefits that arise to overcome the level of harm identified. The applicant’s position is that there is no harm arising to the character and appearance of the conservation area and no harm to the setting of the nearby listed buildings.
3. The conservation officer’s critic of the High Street elevation is contradictory/unclear. It does not appear to follow the careful analysis and cues used by the architects to inform its response to the new building or accept that the proposed new building, better reveals the adjacent Cock Inn (albeit that even the Historic England listed building description notes that it has been considerably altered and almost completely modernised), by setting back the elevation to give

clear views of it along the High Street, alongside a building that reflects the conservation area characteristics in this location.

4. The Paynes Park Planning Brief (February 2005) is nearly 20 years old and is a planning brief of its time. It is not listed as a policy document or supplementary planning guidance that is applicable since the adoption of the Local Plan in 2022. It has been referenced in the Heritage Statement for its context and historical context but represents a form of regeneration that is both economically, socially and in heritage terms dated and now largely superseded.

The above and following bullet points counter the conservation officer's comments and support the design approach proposed by the application scheme:

- A building that runs from High Street to Paynes Park across the site already exists. The proposed scheme adapts this to break it up and responds to the pre-application consultation feedback from the Council, by reducing the scale of the scheme and introducing more amenity and courtyard spaces. The courtyards are a clear move to add open spaces, and the varied roof forms are a direct link to the varied roof pattern of the area. Separating the buildings will not contribute to a 'sense of place', where none currently exists. Mass to the centre of the site is exactly where it should be, so that it limits external amenity impacts to neighbouring sites. It is also responding to the change in level, and moves the mass of the proposal away from the sensitive elevations fronting each street.
- With regards to the Cock Inn as a building of interest (para 2.2), the application design has been stepped back to improve visibility of that heritage asset, improving the view from public vantage points within the conservation area. This has been illustrated in the submitted DAS.
- The new elevation does not impact on any of the positive features noted in the Hitchin CA Character Assessment.
- The Paynes Park planning brief boundary splits the site, and hence should not be used unrestricted to assess the whole site. The site is within a designation that is noted as needing development in a dense area contrary to the conservation officer's concern about the scale and density of the proposed scheme. The Brief was written over 20 years ago in a more "silo" time of planning with town centres focused on leisure and shopping, ignoring the importance of residents to activate the uses and buildings in non-trading hours. Residential above town centre retail and leisure is now positively encouraged as a sustainable use of floorspace and bolstering the commercial uses below.
- The amenity and aspect of Green Hythe has been significantly improved with the stepped back building mass (shown in section), tidying the eyesore elevation, and added greenery, all while maintaining access and distance (para 5.5).
- There are points made by the conservation officer on bays and proportions which the applicant's architects do not agree with. Woolworths widened the elevation by absorbing a unit, creating an extra, wide bay and did not holistically consider the elevation they developed. To just retain these bays is not the correct approach. The proportionality is designed by considering the building as a whole, and not to retain a poor replica of the existing building.
- The conservation officer's design suggestion of a full-height recess is contrary to the Hitchin CA Character Statement asking for continuous shop frontages.
- Paragraphs 5.10/5.12 reference balconies but there are no balconies on the front elevation.
- Paragraph 5.11 extracts a section of the scheme but this doesn't represent a view from any part of the CA and will not be seen by anyone in this form. The proposed scale is specific to *the application site*, and setting a precedent is therefore unlikely to apply as each site must be considered on its merits. Applications are viewed on a case-by-case basis, and we cannot be penalised for potential applications that the Council might need to review in the future.
- Ornamentation is very typical of the conservation area and historic buildings, so it is unclear why the scheme's detailed features are highlighted as an issue (para 5.14). The Council will impose a condition requiring the discharge of materials and details and so if there are concerns

about the final finishes, a suitably worded condition could address any concerns about quality finishes. The proposed materials reflect the types of materials relevant to the site's location on the High Street. The scheme does not involve the removal of any heritage materials. All the conservation officer's precedents shown are not on the High Street or Market Place, neither do they match in scale and hence are not useful comparisons.

- The application scheme reflects the varied character and materials of the High Street which is a positive characteristic of the conservation area and indeed a good number of the nearby listed buildings. This in the applicant's view, is a positive characteristic of the conservation area and one the application scheme contributes to (para 5.16).
- The image used in the conservation officer's para 5.19 is of 3 and 4-storey buildings with dormers and a courtyard, is a reflection of the architects reintroducing of exactly this in the site, but in a modern way. It is not appropriate to propose a low-density development on this site considering its location and national policy guidance to optimise sustainable development sites.
- The applicant is rather dismayed by the conservation officer's comments dismissing the veracity of the consultation exercise (para 6.1) as it was very well attended, nearly all attendees engaged effectively and with passion about the scheme (whether for or against it) and the high attendance (in PowerHaus Consultancy's extensive experience), reflects the importance of the site to the local community. As advised in consultation guidance, it reached out to local residents (including children), Council members, the Hitchin Forum, and local businesses, including enabling those who could not attend the in person event, to view the presentation and comment for a further two weeks post the event. The conservation officer also misses the democratic point, that potentially 64% of those that attended did not express a view against the scheme and maybe supported the emerging scheme!
- The consultation exercise also resulted in significant design changes made to the scheme, particularly the High Street elevation, seeking to address the feedback received at the event.

It is considered by the applicant's design team that it has carefully analysed the site, the context, the heritage setting and justified its design approach to the site, its varied street elevations and surrounding residential amenity. The overwhelming characteristic of the High Street is its variety, particularly across the two prevailing 18th and 19th Century periods, but this is a positive attribute to be celebrated and encouraged.

Yours faithfully,

PowerHaus Consultancy

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