

Planning Statement

**Erection of new commercial buildings
(flexible B2 and B8) with access, parking,
landscaping and associated works**

Land at Pixmore Avenue, Letchworth Garden
City, Hertfordshire, SG6 1JT

On behalf of:

Ashe Construction Ltd

January 2025

Ref: 556

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1 Introduction

- 1.1 This Planning Statement supports an application by ASHE Construction Ltd (the Applicant) at Land at Pixmore Avenue, Letchworth Garden City for the erection of new commercial buildings (Flexible Class B2 and B8) with access, parking, landscaping and associated works.
- 1.2 This Planning Statement has been prepared to consider the development against the National Planning Policy Framework (NPPF), the Development Plan and all other material planning considerations. This statement should be read in conjunction with the application drawings and accompanying documents.
- 1.3 It is considered that the planning application submission provides sufficient information in order to allow North Hertfordshire District Council to properly consider the application. The report is set out as follows:
- 1.4 Section 2, Site Context and Planning History: provides a description of the site and the surrounding area in addition to setting out the relevant planning history, as well as a discussion of the pre-application advice with the Local Planning Authority.
- 1.5 Section 3, Proposed Development: provides a brief description of the proposed development, highlighting the key aspects of the scheme.
- 1.6 Section 4, Planning Policy: sets out the planning policy framework against which the planning application should be assessed.
- 1.7 Section 5, Planning Assessment: provides an analysis of the material planning considerations pertinent to the proposed development and provides a detailed justification for the development.
- 1.8 Section 6, Conclusions: summarises the reasons as to why planning permission should be granted.

2 Site Context and Planning History

- 2.1 The largely rectangular undeveloped application site is located on Pixmore Avenue, at the corner of Protea Way, within Letchworth Garden City. The site extends to around 0.26 hectares and currently comprises hardstanding, overgrown grass and scrub, as well as scattered trees.
- 2.2 The site previously included an industrial warehouse building which was cleared more than 10 years ago. The location of the site can be seen in Figure 1 below.



Figure 1: Location of the site

- 2.3 The site lies within a designated employment area, as defined within the Development Plan. The surrounding area comprises primarily of commercial and trade businesses, with residential development further to the south beyond adjoining commercial properties.
- 2.4 Whilst the adjoining buildings are primarily 2 storey commercial buildings, there are also 2 storey buildings in the vicinity including Pixmore Business Centre, which is situated to the north along Pixmore Avenue, and residential apartments located to the south. Protea Way also accommodates larger format warehouse units.
- 2.5 The site is within a highly sustainable location and approximately 700 metres walking distance to Letchworth Town Centre, which is to the west of the site. The site is also within a reasonable walking or cycling distance from all the services and facilities of Letchworth Town Centre, including Letchworth Railway Station, which has frequent services to London. There are also a number of bus stops within close proximity on Pixmore Avenue. This includes the Phoenix Park bus stop and Pixmore Centre bus stop which are within easy walking distance of the site. There are other bus stops within close proximity, including those within the town centre which provide services two locations much further afield.
- 2.6 Whilst the site is not within a conservation area, it does lie within close proximity to the Letchworth Conservation Area which is located to the west and south west of the site. This is shown in Figure 2 below. The site is also located within proximity to 2 No. Grade II listed buildings on the west side of Pixmore Avenue adjacent to the site. These listed buildings are St Edmundsbury Weaving Works and 124 Ridge Road.

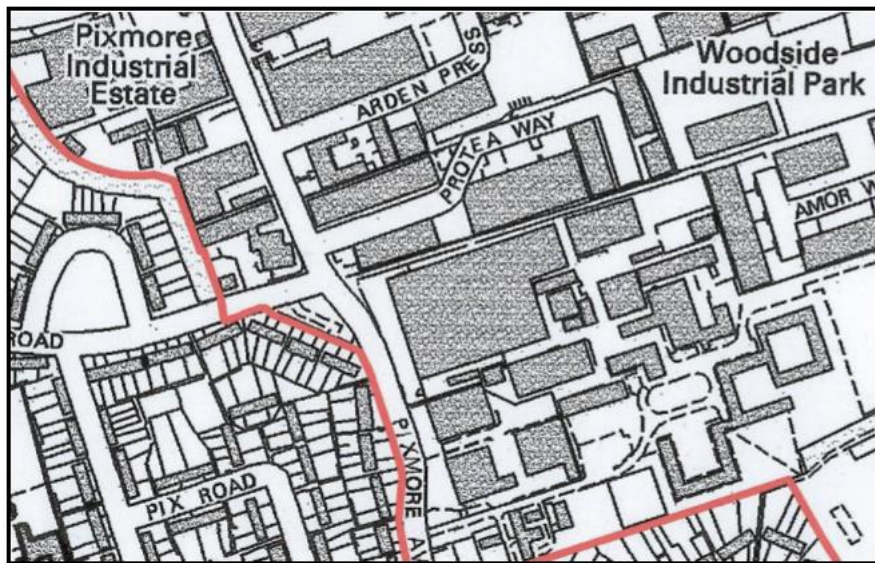


Figure 2: Letchworth Conservation Area Boundary

- 2.7 The site is within Flood Zone 1 on the Environment Agency's 'Flood Map for Planning Risk' which confirms that the land is assessed as having a less than 1 in 1,000 annual probability of river or sea flooding. The site is identified as having a very low to low risk of surface water flooding on the Environment Agency's maps.

Planning History

- 2.8 The application site has been vacant for a considerable period of time. Aerial images show a commercial unit stood on the site in 2003 with access being achieved from Pixmore Avenue. However, similar images from 2007 show that the building had been demolished by that point and the site has remained vacant ever since (please see Figure 3 below).
- 2.9 In terms of the planning history of the site, the table below provides a summary:

LPA Reference	Application Description	Decision and Date
01/01239/1	Demolition of part of building to create parking area for 19 cars, together with alterations and extension to remaining rear section, preparatory to use for warehouse purposes (as amended by plans 1351S/1 and CHQ 01.4759-02 dated 7th September 2001).	Withdrawn 2002
02/01562/1	Erection of replacement building for Class B8 purposes (1,370 square metres) with ancillary Class B2 floorspace (190 square metres), 19 car spaces, lorry turning facility and new crossover following demolition of existing building.	Approved 16.04.03

06/01562/1	Erection of two storey (B1) office building, associated car parking and ancillary works (as amended by plans received 11th October 2006).	Approved 31.10.06
20/01886/FP	Erection of homeless shelter to provide 40 bedspaces including creation of vehicular access off Pixmore Avenue, parking, landscaping and associated works (as amended by plans received 12th January 2021).	Approved 25.02.21

- 2.10 As can be detailed in the planning history, permission has been granted twice for a new building on the site. In October 2006 (reference: 06/01562/1) permission was granted for a two storey office building with a pitched roof. Most recently planning permission was granted for a three storey homeless shelter in 2021.
- 2.11 Despite the various permissions, no schemes were ever implemented, and the site remains vacant.



Figure 3: Historical Development

3 Proposed Development

- 3.1 The proposals include 2 new commercial buildings which will each accommodate 2 individual warehouse units each with first floor mezzanine offices. The units would operate flexibly within use Class B2 and B8 i.e. for employment related uses. A flexible permission will ensure that the buildings are able to meet changing market requirements and are less likely to remain vacant in the future.

Layout

- 3.2 The proposals consist of two separate blocks referred to as Block 1 and Block 2 from hereon in. Block 1 is located to the front of the site and will accommodate Units A & B. Block 2 is located to the rear of the site and accommodates Units C & D. Units are all similar in size and range from 232 - 304 sqm.
- 3.3 Block 1 is more rectangular in form and is located to the front of the site. It is rotated so that its more slender side elevation faces Pixmore Avenue and the surrounding area. This deliberate design approach has been adopted to reduce the appearance of development on the site and the perceived scale and massing of the buildings, particularly when viewed from Pixmore Avenue or the wider area. The siting of Block A is broadly similar to the previously consented scheme for the homeless shelter granted under planning application ref. 20/01886/FP. The siting of Block A is also broadly consistent with the existing building to the north.
- 3.4 Block 2 is squarer in its form and is set back to the rear of the site by 70m and is partially screened from the wider area by Block A, thus reducing its visibility from the surrounding area.
- 3.5 The units are served by 24 parking spaces including 4 No. disabled bays and 5 No. electric vehicle charging spaces. Parking is generally provided to the front of each property and there is a small area of parking located at the site entrance, as per many of the adjacent premises.
- 3.6 Vehicular and pedestrian access to the site would be taken off Pixmore Avenue. Parking, servicing, and customer access for each Block is located to the front of each unit. Sufficient space has been included within the site to accommodate delivery and servicing vehicles, ensuring all vehicles would be able to enter and exit the site in a forward gear.
- 3.7 An area of soft landscaping is proposed at the entrance to the site. Further information is provided on the landscaping drawings. The site will be enclosed by a new security fence along the northern western and southern boundary. The details of this will be secured by way of a planning condition.

Appearance

- 3.8 The proposed development would comprise warehouse type buildings with a mono pitched roof with an eaves height of 7m and 8.3m. This height is similar to other commercial properties nearby.
- 3.9 It is proposed that the buildings would be clad in grey insulated panels, with a dark grey roof, fascia and external gutters to provide a visual contrast from wider elevations. The main entrance will be more distinctive and include large areas of glazing framed in dark grey and feature brickwork panels to take cues from adjoining buildings.
- 3.10 The roof has been designed to accommodate photovoltaic panels. The precise quantum and form are unknown at present but could be added at a later date.

3.11 Further details of the proposed materials are set out in the Design and Access Statement.

4 Planning Policy

- 4.1 This section of the Planning Statement provides an overview of the relevant national and local planning policy context, which has informed the application proposals. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires all determination to be made in accordance with the Development Plan unless material consideration indicates otherwise.
- 4.2 In the context of the current planning application, the Development Plan comprises the North Hertfordshire Local Plan 2022. The National Planning Policy Framework (NPPF) 2024 and Planning Practice Guidance are material considerations. There is no Neighbourhood Plan covering the site.

National Planning Policy Framework (NPPF)

- 4.3 The updated NPPF (2024) sets out the Government's planning policies for England and how they are expected to be applied.
- 4.4 Paragraph 8 of the NPPF states that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):
- a) *“an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
 - b) *a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
 - c) *an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”*
- 4.5 At the heart of the NPPF is a presumption in favour of sustainable development. For decision taking this means that unless material considerations indicate otherwise:
- *“approving development proposals that accord with an up-to-date development plan without delay; or*
 - *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*

- *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.”*
- 4.6 Section 6 sets out the ambition to build a strong, competitive economy, with Paragraph 85 stating planning policies and decisions should help create the conditions in which businesses can invest, expand, and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 4.7 Chapter 9 of the NPPF relates to promoting sustainable transportation and 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.
- 4.8 Section 11 provides guidance on making effective use of land. Paragraph 124 states that planning policies and decisions should promote an effective use of land with Paragraph 125(c) stating that planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land. The NPPF defines ‘previously developed land’ as land which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure.
- 4.9 Section 12 of the NPPF further sets out how development should achieve well-designed places. Paragraph 135 sets out criteria that developments should meet including the assurance that development will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; developments are visually attractive; are sympathetic to local character; and establish or maintain a strong sense of place.
- 4.10 Chapter 15 of the NPPF relates to conserving and enhancing the natural environment and outlines that development proposals will be required to maintain and protect biodiversity, and wherever possible result in a measurable net gain in biodiversity.
- 4.11 Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 207 states that in determining applications, Local Planning Authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 4.12 Paragraph 212 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. Paragraph 213 goes on to note any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.
- 4.13 Paragraph 215 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

North Hertfordshire Local Plan 2022

- 4.14 The Development Plan covering the application site comprises the North Hertfordshire Local Plan 2022 (NHLP). The NHLP Policy Map, designates the application site as an 'Employment Area' as displayed in Figure 4 below.

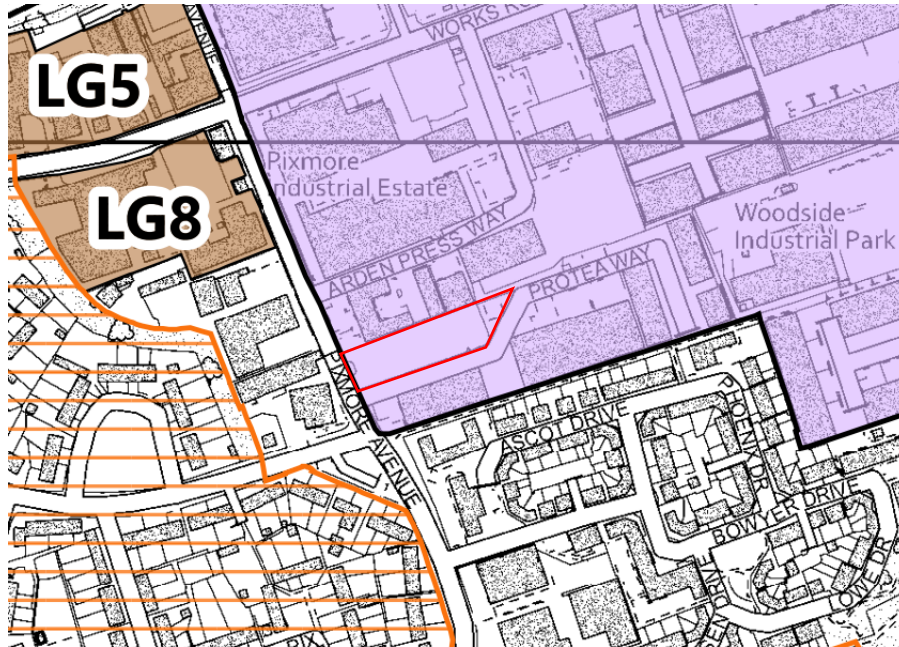


Figure 4: Proposals Map Extract

- 4.15 Policy SP1 'Sustainable development in North Herts' support the principles of sustainable development within the District.
- 4.16 Policy SP3 'Employment' states that *"The Council will proactively encourage sustainable economic growth, support new and existing businesses and seek to build on the District's strengths, location and offer"*. Within this policy the Council set out a list of objectives, including the need to safeguard Employment Areas within the District's main settlements, as shown on the Policies Map, to enhance and protect their employment potential; permit an appropriate range of offices, research and development, light industrial or B class employment uses within these areas.
- 4.17 Policy SP6 'Sustainable transport' states that the Council will deliver accessibility improvements and promote the use of sustainable transport modes insofar as reasonable and practicable.
- 4.18 Policy SP9 'Design and Sustainability' recognises that good design is a key aspect of sustainable development and support new development where it is well designed and located and responds positively to its local context.
- 4.19 Policy SP12 'Green infrastructure, landscape and biodiversity' confirms that the Council will balance growth with protecting the natural environment.
- 4.20 Policy SP13 'Historic environment' states that the Council will balance the need for growth with the proper protection and enhancement of the historic environment. When considering the impact of a

proposed development on the significance of a designated heritage asset, great weight will be given to the asset's conservation and the management of its setting.

- 4.21 Policy ETC1 'Appropriate uses in Employment Areas' confirms that within the safeguarded Employment Areas, planning permission will be granted for office, research and development, industrial processes, industrial and storage and distribution uses. In the case of Class B8, development must be easily accessible from the primary road network.
- 4.22 Policy T1 'Assessment of transport matters' confirms that planning permission will be granted provided that development would not lead to highway safety problems or cause unacceptable impacts upon the highway network. Major developments are expected to demonstrate (as far as is practicable) how i). the proposed scheme would be served by public transport; ii). safe, direct and convenient routes for pedestrians and cyclists will be provided; and iii). comprehensive integration into the existing pedestrian and cycle, public transport and road networks will be secured.
- 4.23 Policy T2 'Parking' states that planning permission will be granted provided that parking for non-residential development is provided having regard to the standards for non-residential development set out in the relevant Supplementary Planning Document.
- 4.24 Policy D1 'sustainable design' requires design to respond positively to the site's local context and be of a high-quality.
- 4.25 Policy D3 'Protecting Living Conditions' seeks to protect the amenity of neighbouring sensitive uses.
- 4.26 Policy NE8 'Sustainable Drainage Systems' requires new developments to utilise sustainable drainage systems (SuDS) to reduce the risk of surface water flooding and to follow the SuDS hierarchy for drainage solutions.
- 4.27 Policy NE2 'Landscape' states that planning permission will be granted for development proposals provided they respect the sensitivities of the relevant landscape character area; do not cause unacceptable harm to the character and appearance of the surrounding area; and are designed and located to ensure the health and future retention of important landscape features.
- 4.28 Policy NE4 'Biodiversity and geological sites' requires all development to deliver measurable net gains for biodiversity.
- 4.29 Policy NE11 'Contaminated land' confirms that planning permission for development affecting or affected by contaminated land will be granted provided that it is supported by a contaminated land assessment and appropriate mechanisms are put in place to mitigate risks.
- 4.30 Policy HE1 'Designated heritage assets' states that development proposals affecting designated heritage assets, or their setting, will be granted permission where they enable the asset to be used in a manner that secures its conservation and preserves its significance, and incorporates an appropriate palette of materials to make a positive contribution to local character or distinctiveness where appropriate.

Other Material Considerations

4.31 The Council have produced the following Supplementary Planning Documents (SPDs) which are relevant to the consideration of this application:

- Design SPD (2011).
- Vehicle Parking at New Developments (2011); and
- Sustainability SPD (2024).

5 Planning Assessment

- 5.1 Section 38(6) of the 2004 Planning & Compulsory Purchase Act explains that applications should be determined in accordance with the Development Plan, unless material considerations indicate otherwise. This section of the report seeks to address the key planning issues associated with the proposal and demonstrates its compliance with Development Plan policies.
- 5.2 The following key issues have been identified:
- a) Principle of the development;
 - b) Design and impact upon the character and appearance of the area;
 - c) Impact upon heritage assets;
 - d) Residential amenity;
 - e) Highways and parking;
 - f) Biodiversity;
 - g) Other matters.
- 5.3 We consider each of these in turn below:

Principle of the development

- 5.4 The site is within a designated Employment Area. NHLP Policy SP3 states that the Council will proactively encourage sustainable economic growth, support new and existing businesses and seek to build on the District's strengths, location and offer. The policy includes a list of objectives, including the need to *"Safeguard Employment Areas within the District's main settlements, as shown on the Policies Map, to enhance and protect their employment potential"* and *"Permit an appropriate range of offices, research and development, light industrial or B class employment uses within these areas;* and *"Ensure relevant policies of this Plan recognise the contribution of sectors other than B Class."*
- 5.5 Furthermore, NHLP Policy ETC1 'Appropriate uses in Employment Areas' confirms that within the safeguarded Employment Areas, planning permission for office, research and development, industrial processes, industrial and storage and distribution uses will be supported.
- 5.6 The proposals are for the erection of new commercial buildings within Class B2 and B8 uses and would therefore meet the requirements of NHLP Policies SP3 and ETC1 by safeguarding an existing employment area and providing an appropriate range of uses consistent with the employment land designation. The proposals are also located in close proximity to both the B656 and the A1(M) and therefore meet the criteria within Policy ETC1 which requires B8 uses to be easily accessible from the primary road network.
- 5.7 Having regard to the above, it is clear that the proposed development is fully compliant with NHLP Policies SP3 and ETC1, as well as Section 6 of the NPPF which requires significant weight to be placed on the need to support economic growth and productivity. As such, the principle of development is acceptable.

- 5.8 The proposals would also comply with Paragraph 123 of the NPPF which states that planning policies and decisions should promote an effective use of land with Paragraph 125(c) stating that planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.

Design and impact upon the character and appearance of the area

- 5.9 Policy SP9 'Design and Sustainability' recognises that good design is a key aspect of sustainable development and support new development where it is well designed and located and responds positively to its local context.
- 5.10 The proposed development seeks to redevelop a vacant brownfield site to provide a high-quality, modern, commercial scheme. The buildings have been designed to a high standard, and would respond positively to their context, and respecting neighbouring commercial properties. Notwithstanding this, we must recognise that the buildings need to 'fit for purpose' and meet the requirements of commercial operators. This approach would be consistent with the site's 'employment land' designation. In light of this, there needs to be a clear recognition that certain parameters for commercial development are broadly fixed as they are dictated by market expectations.
- 5.11 Whilst it is recognised that there are traditional Garden City residential properties to the south of the site beyond the adjoining warehouses, the site itself is surrounded by commercial buildings on all immediate boundaries and therefore sits within a commercial context where the building design, height and scale, varies significantly. The surrounding buildings to either side are broadly 2 storey in height and of limited architectural interest. It is however noted that the adjacent building located to the west of the site (St Edmundsbury Weaving Works) is a traditional Arts and Crafts style building and Grade II listed. The original setting of the listed building has been significantly altered due to the industrialisation of the surrounding area, with the presence of modern industrial structures now dominating the area to the north and east. Given this context, the proposed development is considered to be in keeping with the transformed character of the area.
- 5.12 The proposed development would consist of two separate blocks which each accommodate 2 separate units (Units A - D). Block 1 is located to the front of the site and will accommodate Units A & B, and Block 2 is located to the rear of the site and accommodates Units C & D.
- 5.13 Block 1 is rectangular in form and is located to the front of the site with its more slender side elevation fronting Pixmore Avenue. This deliberate design approach has been adopted to reduce the perceived scale and massing of the building, particularly when viewed from Pixmore Avenue and the wider area. Block A will also broadly follow the building line of the building to its north and this maintains existing building lines and will sit comfortably in the street scene. This is demonstrated in Figure 5 below.

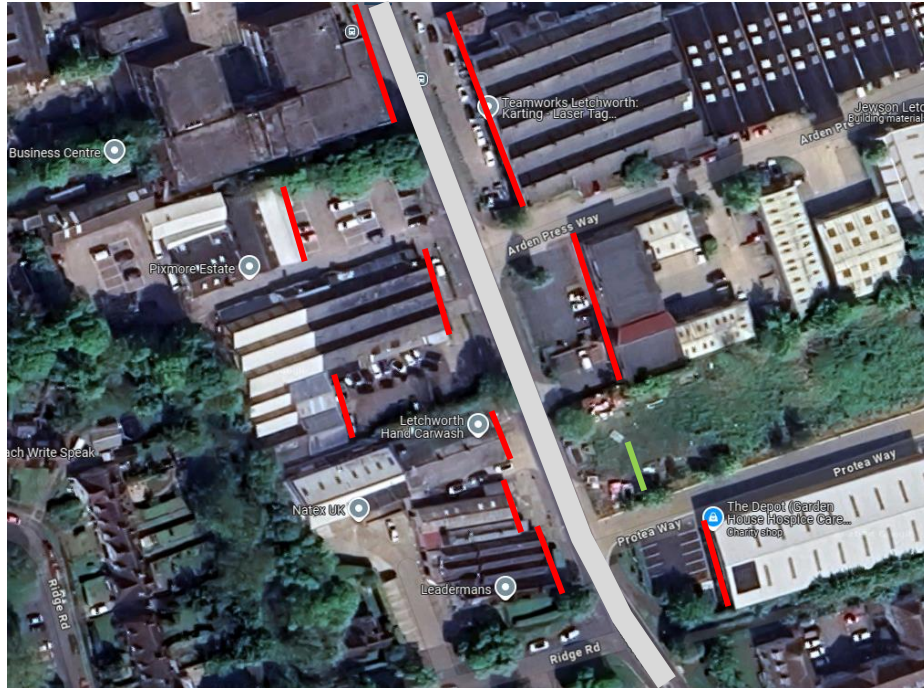


Figure 5: Building Lines

- 5.14 It is also important to note that the footprint of Block A is broadly similar to the previously consented scheme for the homeless shelter granted under planning application ref. 20/01886/FP, demonstrating that the siting has been previously considered and deemed acceptable by North Herts District Council.
- 5.15 With regard to Block 2, this is squarer in its form and set back 70m into the site. It is also partially screened by Block A, thus ensuring that its view from the surrounding area, and any perceived impact, is reduced.
- 5.16 With regard to their height, the proposed buildings are broadly similar in height, scale, and massing with surrounding commercial development. The adjoining properties located to the North and South of the application site measure approximately 8m and 8.5m in height respectively. In contrast, the mono pitched roof measures 7m to ridge height at the lowest point and 8.3m at the highest point. This is significantly lower in height to the previously consented scheme for the homeless shelter (ref. 20/01886/FP) which had a height of 9.5m.
- 5.17 Overall, it is considered that the layout, height and scale of the buildings and proportion of built form across the site reflects that of other properties in the locality. As a result, the proposals would comply with the requirements of NHLP Policies SP9 and D1.
- 5.18 It is also important to note that the site, which comprises primarily of overgrown scrubland often used for fly tipping, presently has a negative impact on the streetscene and character of the area. In contrast, the high quality scheme would result in a significant improvement to the streetscene and general appearance of the area.

- 5.19 Impact upon Heritage Assets The site is not within a conservation area, but is within proximity to the Letchworth Conservation Area, which lies to the west and south west of the site (as demonstrated by Figure 2 above). The site is also located within proximity to two Grade II listed buildings which are located to the west side of Pixmore Avenue. These listed buildings are the former St Edmundsbury Weaving (NHLE: 1174650) Works and 124 Ridge Road (NHLE: 1102829).
- 5.20 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that in considering whether to grant planning permission for development which affects a listed building or its setting, the Local Planning Authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historical interest which it possesses. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.
- 5.21 In relation to the Letchworth Conservation Area, this is located to the west and south west of the site and includes residential dwellings on Ridge Road, Pix Road, the western side of Pixmore Avenue and Ridge Avenue. Letchworth is the World's first Garden City and represents the principles of Ebenezer Howard therefore the Conservation Area is of historic and architectural interest. The Ridge Road and Pix Estate section of the Conservation Area, to the west and south west of the site, was developed between 1906 and the First World War and follows the Garden City principles and contains Garden City residential properties originally developed for the Howard Cottage Society and designed by Parker and Unwin. This part of the Conservation Area is characterised by modest terraced housing blocks set at slightly differing setbacks from the road to provide visual interest in the layout.
- 5.22 The Conservation Area, and in particular the Ridge Avenue/Pix Estate area, is characterised by residential terraced dwellings which is in stark contrast to the industrial and commercial character of the area surrounding the application site. Whilst the proposed development would introduce new development on the site, this would be seen in the context of the existing surrounding larger format commercial buildings, and remain visually separate from the Conservation Area. The proposed development would therefore preserve the special interest of the Conservation Area.
- 5.23 Considering the two Grade II listed buildings of the former St. Edmundsbury Weaving Works and 124 Ridge Road, these are located across Pixmore Avenue to the west of the site. The former St Edmundsbury Weaving works is a 1 ½ storey building in commercial use directly across the road from the site, whilst 124 Ridge Road is sited behind (to the west of) the former Weaving Works building and is a 1 ½ storey residential dwelling.
- 5.24 The Grade II listed former Weaving Works building was established in 1908 and the original company working from here produced woven textiles for private and ecclesiastical clients. The quality of the work produced from the company earned St Edmundsbury a good reputation and led to commissions from prominent institutions, including Royal residences. The small factory is designed in the Arts and Crafts style with Dutch gables used to disguise the extensive north facing roof windows used for the provision of light in the weaving process. The building later became the home of St Christopher Press Ltd. The building derives its significance from its historical and architectural interest as part of the Garden City development of Letchworth and the Arts and Crafts movement.
- 5.25 The building is set within an urban context, with the existing commercial uses sited to its north and to the other side of the Pixmore Avenue. The Grade II listed No. 124 Ridge Road is a cottage developed

in 1914, constructed with roughcast render over brick and under a plain clay tiled roof. The property was built as the residence for the manager of the St Edmundsbury Weaving Works and was listed for 'group value' alongside the adjacent and functionally linked former Weaving Works. The setting of these heritage assets is therefore one of varied urban grain at the transition between residential and commercial / industrial areas.

- 5.26 Block A will be set well back within its plot in a similar position to adjacent commercial buildings. The scale and form of the proposed building (as set out above) would be reflective of the surrounding development and will sit comfortably within the context of the listed former Weaving Works and nearby commercial / industrial development. The proposed development would not detract from the building or its setting. The listed No. 124 Ridge Road is set beyond the former Weaving Works and does not share a visual relationship with the site.
- 5.27 As such, the proposed development would preserve the significance of these nearby designated heritage assets. The proposals would also result in a number of public benefits including the creation of employment and the re-use and improvement of the site, which presently has a significant detrimental impact on this surrounding area due to ongoing issues with illegal fly tipping.
- 5.28 Similar conclusions were also reached in determining the previous planning application for the homeless shelter (ref. 20/01886/FP) which included development which was broadly similar to Block A, albeit a taller 3 storey building. When considering heritage matters for those proposals, the Officer's committee report noted:
- "In my view the proposal would not have an adverse impact on the character and appearance of the Conservation Area and would not have an adverse impact on the setting of the nearby Listed Buildings".*
- 5.29 Notwithstanding the assessment above, it is also important to note that the application site has historically always included built development and previously included a warehouse building which was positioned closer to listed buildings than the current proposals (see Figure 3 above). This was demolished approximately 20 years ago following the granting of various planning permissions for warehouse development.
- 5.30 In conclusion, the proposed warehouses development will preserve the significance of the Letchworth Conservation Area as well as the significance two nearby Grade II listed buildings to the west of the site including any contribution made by their setting. In addition, the public benefits of the proposed development, in the form of providing employment opportunities and the re-use of this vacant brownfield site, which presently detracts from the area, are considered significant and of substantial weight in the determination of this application. The proposed development therefore accords with the requirements of legislation and policy set out within the Section 16 of the NPPF and with NHLP Policies SP13 and HE1.

Residential amenity

- 5.31 NHLP Policy D3 seeks to ensure that development proposals do not cause unacceptable harm to living conditions. The proposed development would not be within close proximity to any residential property, with the nearest residential property being approximately 40 metres to the south. The

development is surrounded on all boundaries by existing warehouse and commercial development which would act as a significant barrier to site operations.

- 5.32 Notwithstanding this, a Noise Assessment was prepared by Acoustic Consultant Ltd to assess the noise impact of the development and its associated operations such as deliveries etc. This concluded that impact of the operations i.e. industrial noise would not be dominant over the residual noise climate. It also confirmed that the proposed delivery noise activities would fall within the 'No Observed Adverse Effect Level' thus ensuring no impact from site operations. In conclusion, the proposals would not cause harm to any neighbouring properties by reason of noise, loss of light, loss of privacy, and overlooking. The proposed development would comply with NHLP Policy D3. Notwithstanding these conclusions, we must also stress the proposed uses are cClass B2 and B8 and are supported by Local Plan policy given the location of the site within a designated employment area.

Highways and parking

- 5.33 The site is sustainable location and within a reasonable walking distance of numerous facilities and services. It is accessible to both pedestrians and cyclists and is also located close to bus stops that provide access to regular bus services. The town's railway station is a 15-minute walk or 4-minute bus ride from the site.
- 5.34 The layout of the proposed development has been considered and results in a safe vehicular and pedestrian access. The development is to be accessed from Pixmore Avenue via a new vehicular crossover. Existing on-street parking restrictions along this part of Pixmore Avenue, together with the largely straight road layout, ensures that appropriate visibility and inter-visibility is achieved.
- 5.35 The layout of the site has been designed to accommodate the largest delivery vehicle expected to use the site. All vehicles will also be able to manoeuvre within the site and leave in a forward gear. As a result, the proposals will provide a safe, suitable and convenient entry and exit point into the site for all users.
- 5.36 Regarding car parking, the proposals include a total of 24 No. car parking spaces including 4 No. disabled bays and 5 No. electric vehicles spaces. The Council's SPD 'Vehicle Parking Provision at New Development' sets out the parking standards for new development. For Class B2 and B8 use, a 'maximum' parking requirement of 1 space per 40 m is required. The proposals result in the provision of 24 spaces. This level of parking would meet operator requirements and not exceed the maximum parking requirements stipulated in the SPD. In relation to cycle parking, a total of 6 No. cycle parking spaces are proposed on the site. This exceeds the standards set within the SPD.
- 5.37 The supporting transport statement by Calcinotto confirms that the proposed development will generate between 13 to 20 peak hour vehicle movements, and this will have no significant impact on surrounding highway conditions.
- 5.38 In conclusion, the proposal do not raise any significant highway safety issues and will provide sufficient on-site car and cycle parking in accordance with NHLP Policies T1 and T2 and the Parking Standards SPD.

Biodiversity

- 5.39 Policy NE4 states that development proposals should appropriately protect, enhance and manage biodiversity and deliver measurable net gains for biodiversity and geodiversity. The site is within a commercial area of Letchworth and comprises overgrown scrub and a number of sporadic trees with limited ecological potential.
- 5.40 An Ecological Appraisal and Biodiversity Impact Assessment was undertaken by Cherryfield Ecology in 2024 and has been submitted in support of the application. The Ecological Survey confirmed that there were no protected species or evidence of protected species found on site. The site was considered to provide low potential for badgers and Great Crested Newt and of negligible potential for roosting bats and other protected species due to the lack of suitable habitat onsite. The report identified a need for a GCN Unlicensed Method Statement, and it is suggested that this is controlled by way of a planning condition. The report did however suggest a need for a reptile survey which was subsequently undertaken and confirmed the absence of reptiles within the site.
- 5.41 With regard to BNG, Biodiversity Impact Assessment (BIA) report has confirmed that the development at the site will result in a 100% loss of habitat at the site (-2.8 units). Due to the nature of the development and limited size of the site, it would not be possible to provide this on site. As a result, the Applicant will address the shortfall plus 10% net gain through the purchase of 3.08 off site Habitat Units.
- 5.42 In light of the above, the proposal will appropriately protect and manage biodiversity and deliver a measurable biodiversity net gain through the purchase of off-site credits. The proposed development will therefore be in compliance with Policy NE4.

Flooding & Drainage

- 5.43 The application is accompanied by a Flood Risk Assessment and Drainage Strategy undertaken by Calcinotto. This confirms that the site is within Flood Zone 1 and is at low to very low risk of flooding from all sources (surface water, rivers and sea, groundwater and reservoirs). The Hertfordshire County Council Strategic Flood Risk Assessment application also shows that the site is not at an increased risk of flooding during its lifetime.
- 5.44 The Drainage Strategy demonstrates a robust solution to the management of surface and foul water discharge from the proposed development within the application site. The design proposals have been formulated in accordance with local and national policies and are compliant with the SuDS hierarchy when accounting for the nature of the sites and its constraints.
- 5.45 Assessment of the ground conditions confirms that infiltration techniques are impractical methods for managing the surface water flows generated by the proposed site, as the Lowestoft Formation clay beneath the made ground soils is largely impermeable and a poor performing infiltration medium. Given the existing topography and ground conditions, it has been deduced that the most effective, robust and sustainable solution to manage surface water runoff is via a combination of Type C (full attenuation) permeable paving and an attenuation tank network, which ultimately discharge collected flows into the nearby existing public surface water sewer under Pixmore Avenue. Surface water runoff will be discharged at a maximum rate of 2.0L/s, controlled by an onsite surface

water pump station. Surface water flows will be pumped up to a final onsite inspection chamber before discharging via gravity into the existing public surface water sewer under Pixmore Avenue.

- 5.46 Foul water will be collected throughout the site via a network of pipework and inspection chambers and ultimately directed into a new onsite foul water pumping station. Foul water flows will be pumped up to a final onsite inspection chamber before discharging via gravity into the existing public foul water sewer under Pixmore Avenue. New chambers will need to be constructed on the existing public surface and foul water sewer to serve the proposed site under a Section 106 agreement with Anglian Water.
- 5.47 Regular maintenance and inspection of the proposed drainage is imperative to the efficiency and effectiveness of the system and if not carried out can put additional strain on the system, potentially resulting in flooding. A maintenance and management regime for the drainage components within the proposed design is provided in Appendix E of the FRA.
- 5.48 These measures will ensure appropriate surface water drainage can be secured in accordance with Policies D1, NE7, NE8 of the NHLP, and the requirements of the NPPF.

Sustainability

- 5.49 Policy SP9 'Design and Sustainability' recognises that good design is a key aspect of sustainable development and support new development where it is well designed and located and responds positively to its local context.
- 5.50 The proposed development will result in a modern highly efficient commercial buildings which have been designed to a high standard and therefore meets the policy requirements. This includes the allocation of a significant proportion of roof space to accommodate photovoltaic panels. Further information on this is expected to be secured by way of a planning condition.

Other Material Considerations

Economic Growth

- 5.51 Paragraph 85 of the NPPF requires "significant weight" to be given to "the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development".
- 5.52 The NPPF does not often direct the decision maker as to the weight which should be accorded to a particular factor. Despite this, it confirms that significant weight should be accorded to enhancing economic growth and productivity, and the re-use of previously developed land.
- 5.53 The site was previously in industrial use and is a brownfield site. Its redevelopment would accord with the above objectives. The proposed development would also help to ensure economic growth by delivering new modern and fit for purpose industrial units. The proposals would therefore also accord with these national aims, and this must be weighed in the overall planning balance.

6 Conclusions

- 6.1 This Planning Statement is submitted in support of an application for full planning permission for the erection of new commercial buildings (flexible Class B2 and B8) with access, parking, landscaping and associated works at Land at Pixmore Avenue, Letchworth Garden City.
- 6.2 The proposed development will result in a high quality employment use scheme, which is consistent with the site's employment area designation. The proposed use, scale and design are consistent with buildings and uses within the wider area and the design has been carefully considered to preserve the character and appearance of the area and would have no impact upon the setting of the nearby conservation area and designated heritage assets.
- 6.3 This Planning Statement has demonstrated compliance with the relevant policies in the NHLP, Supplementary Planning Documents and the NPPF. The proposals raise no adverse technical considerations such as transport, drainage, sustainability, and ecology etc.
- 6.4 The development would also result in economic development and the creation of jobs as supported by the NPPF and the re-use of a vacant brownfield site which currently detracts from area. The NPPF confirms that significant weight should be accorded to enhancing economic growth and productivity, the re-use of previously developed land.
- 6.5 The proposal should therefore be considered acceptable, and the Local Planning Authority are requested to grant planning permission accordingly.