



Land at Talbot Way, Letchworth Garden City

Planning Statement

Boyer

Prepared on behalf of Barratt David Wilson (North Thames) | November 25

REPORT CONTROL

Project:	Land at Talbot Way, Letchworth Garden City
Client:	Barratt David Wilson (North Thames)
Reference:	Click to add ref number.
Document and revision number	Document No. IMS-F-18, Revision 3
File Origin:	Click to add file location.
Primary Author	JD
Checked By:	JB

Issue	Date	Status	Checked by
01	11/09/2025	Draft	BP
02	29/10/2025	Final Draft	JB
03	03/11/2025	Final	JB

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APPENDICES

Appendix 1 – Pre-App Response (25/01233/PRE)

1. INTRODUCTION

- 1.1 This Planning Statement ('the Statement') has been prepared on behalf of Barratt David Wilson Homes (North Thames) ('the Applicant') to support a Reserved Matters (RM) Application for the erection of 120 homes (40% affordable) on Land at Talbot Way ('the Site').
- 1.2 This application is submitted pursuant to the grant of Outline Planning Permission (OPP) for this scale of development in April 2025 by North Herts District Council (ref. 21/00504/OP).
- 1.3 The OPP included details of the means of access from Flint Road and therefore this RM application seeks approval of the detailed layout, scale, appearance and landscaping of the proposed development.
- 1.4 In addition, this application seeks to discharge the following conditions attached to the OPP:
- Condition 2 - Appearance Layout Scale Landscaping;
 - Conditions 3, 4, 5, 6, 7 – Flood Risk and Drainage;
 - Conditions 9, 10, 20 - Access & Movement Resident & visitor parking strategies (car and cycle);
 - Condition 13 – Open Space and Landscaping;
 - Conditions 14, 15 – Biodiversity and Ecology;
 - Condition 16 – Urban Design (general);
 - Condition 18 – Noise;
 - Condition 19 – Sustainability; and
 - Conditions 22 – Waste Strategy.
- 1.5 This application is supported by several technical reports in addition to this Statement. These are outlined below:

Report Title	Prepared By:
Design & Access Statement	HTA Design LLP
Rural Edge Design Code	HTA Design LLP
House Type and Apartment Drawings	HTA Design LLP
Rural Edge Design Code	HTA Design LLP
Photo Book	HTA Design LLP
Site Drawings	HTA Design LLP
Drainage Technical Note, Drainage Strategy and Level Strategy	Ardent Consulting Engineers

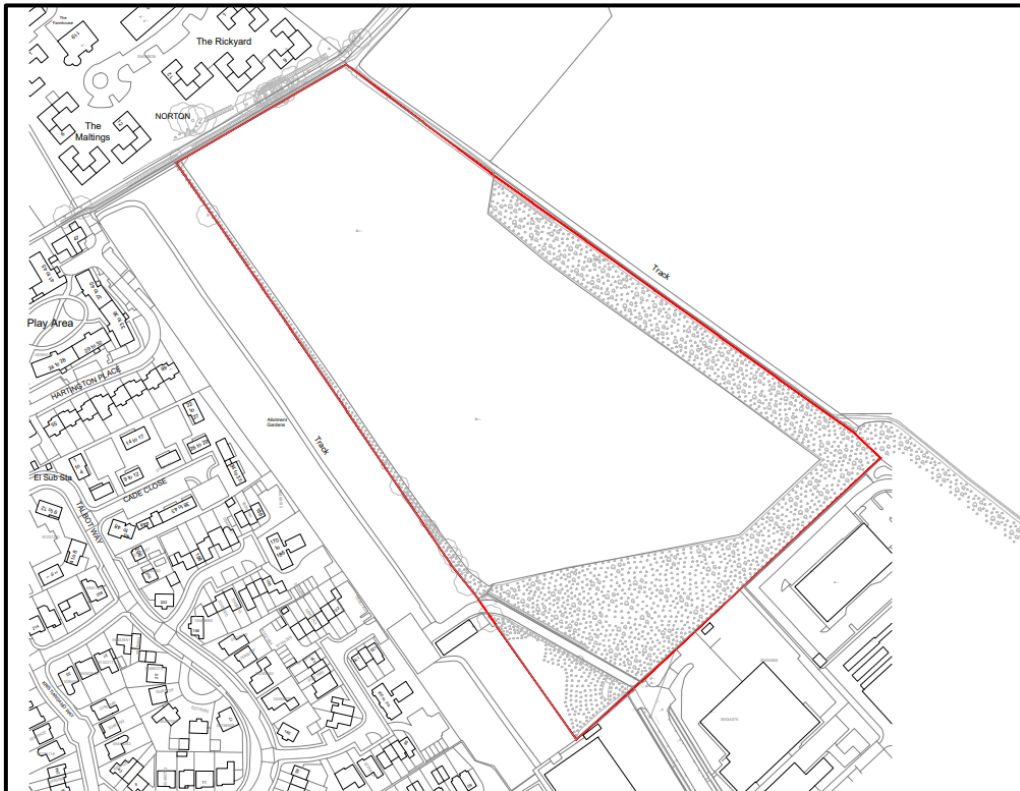
Report Title	Prepared By:
Transport Technical Note, Proposed Site Access, and Proposed Footway Improvements	Ardent Consulting Engineers
Landscape Masterplan and Detailed Landscape Proposals	Pegasus Group
Noise Assessment	Ardent Consulting Engineers
Preliminary Ecological Appraisal, Biodiversity Net Gain Assessment: Design Stage, Habitat Management and Monitoring Plan, and Biodiversity Enhancement Strategy	CSA Environmental
Energy and Sustainability Statement	Turley
Arboricultural Reports	The Environment Partnership (TEP) Ltd

- 1.6 This Statement considers the planning merits of the proposal having regard to the relevant planning policy and other material considerations. The Statement demonstrates why the proposals are acceptable in policy terms and why planning permission should be granted without delay.

2. SITE AND SURROUNDING CONTEXT

- 2.1 The Site is located at Talbot Way and is approximately 5.5ha and is rectangular in shape, tapering at its northern end (see Figure 1 below).

Figure 1 – Existing Site Plan



- 2.2 There are several residential properties to the north and beyond allotment gardens to the west. There is an industrial estate to the south and there are open fields within the Green Belt to the east, where there is a henge and ancient orchard.
- 2.3 There are no public footpaths crossing the Site. However, there is a public footpath that runs beyond the northern boundary of the Site (Footpath 26). There is also an existing footpath running along the eastern boundary of the site. Both of these footpaths link the Site to the Greenway.
- 2.4 In terms of transport accessibility, the Site is located approximately 1.3 miles (approximately a 28- minute walk) to Baldock Train Station, which provides routes into Letchworth Garden City as well as key London Terminals. In addition, the Site is in close proximity to bus stops on Norton Road and Green Lane.
- 2.5 The Site is located within Flood Zone 1 which has the lowest probability of flooding in any given year. There is however a small path in the northeast corner of the site at high risk of surface

water flooding. The Site is allocated for housing in the North Hertfordshire Local Plan 2011-2031 and is referred to in this Plan as LG3.

- 2.6 Norton Conservation Area is located immediately to the north of the application Site beyond Public Footpath. The closest listed buildings to the application site are Nos 90 and 92 Norton Road (List Entry Number: 1101999), about 130m to the north-west. 6 Church Lane is about 150m to the north of the site (List Entry Number: 1102025).

3. PLANNING AND ENGAGEMENT BACKGROUND

Outline Planning Application

3.1 OPP (ref: 21/00504/OP) was granted on 3rd April 2025 comprising the following parameters:

- Up to 120 homes;
- 40% affordable dwellings;
- Retention of existing allotments;
- Vehicular access via Flint Road;
- Comprehensive landscaping scheme; and
- Strategic Masterplan Document.

3.2 This application was supported by a host of technical reports, including a Strategic Masterplan Document (2022), which established a clear site vision and defined key placemaking principles. These principles have informed and guided the design development of the Reserved Matters proposals, providing a clear design framework. These are summarised below:

- **Context-led** - a design that responds to the landscape and built character of its setting, treading lightly by making best use of what is already on and around the site.
- **Forward-looking** - a design which optimises sustainability and provides an exemplar for future development on the rural fringe.
- **Stitched-in** - a design which enhances existing sustainable connections and has an internal structure to support links to this network.
- **Interactive and sociable** - a design which supports social interaction and community building.

3.3 Condition 16 attached to the OPP sets out that prior to or concurrent with the submission of any reserved matters application “a *Design Code for the rural edge lane and adjacent block design as indicated on Figure 35 shall be submitted to and approved in writing by the Local Planning authority to build upon the submitted Masterplan Framework. The Design Code shall include details of the following Cross sections and long sections for:*

- Building line;
- Building typologies and heights;
- Setbacks and gardens;
- Spaces between buildings;
- Building alignment;

- Architectural principles and materials palette;
- Boundary treatments;
- Parking typologies and design;
- Parcel edge landscaping;
- Sustainable urban drainage details;
- Carriageway and shared surfacing treatment/design;
- Details of intersections with secondary streets;
- Location and species of plot and street tree planting/landscaping;
- Peripheral edge planting;
- New woodland planting; and
- Lighting design.”

Engagement

3.4 Paragraph 39 of the National Planning Policy Framework (NPPF) (2024) states that:

“Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.”

3.5 Details of the pre-application consultation and community involvement which the Applicant has undertaken prior to the submission of the planning application are set out below.

3.6 The project team have been developing the proposals following the grant of OPP in April 2025. There have been various pre-application discussions with the Council and County Council over a period of five months, as well as engagement with local residents, communities, businesses and the Letchworth Heritage Foundation. A timeline of the key milestones is summarised below.

- Meeting with Letchworth Garden City Heritage Foundation – 19th May 2025;
- Pre-application meeting with Hertfordshire County Council (LLFA) – 21st May 2025;
- Attendance at Letchworth Annual Town Hall – 25th June 2025;
- Pre-application meeting with Hertfordshire County Council (highways) – 9th July 2025;
- Pre-application meeting with North Herts District Council (NHDC) – 10th July 2025;
- Pre-application discussion meeting with Planning Officer – 24th July 2025;

- Design meeting with Letchworth Garden City Heritage Foundation – 5th August 2025;
- Meeting with Housing Officer – 6th August 2025;
- Follow-on pre-application discussions with NHDC officers – 21st August 2025; and
- Meeting with Letchworth Garden City Heritage Foundation – 15th September 2025.

3.7 These discussions with the Council, County Council, Heritage Foundation as well as members of the public and businesses played a vital part in the development of the proposals. We have summarised below the outcomes of each meeting.

North Herts District Council

- 3.8 The Council raised no objection in principle to the proposed street arrangement, which aligns with the Outline Masterplan. However, further design development was required to embed the Letchworth Garden City Principles (Appendix 5 of the Local Plan) and other key features referenced in the Masterplan. The design team have worked hard to incorporate the Letchworth Garden City Principles into the masterplan. An assessment of this is set out in Section 6.
- 3.9 In greater detail, the Officers considered the proposed material palette and architectural detailing to be robust and relevant to Letchworth Garden City homes. However, further refinement was encouraged to ensure authenticity in all design features, improved dwelling designs on corner junctions, and more effective integration of garages and parking strategies. The landscape and play strategies were broadly supported, though greater clarity is needed on age-specific provision and the development of 'Green Streets' as legible, visually connected corridors through the Site.
- 3.10 Officers raised concerns regarding street layout with one road and multiple dead ends, and excessive vehicular dominance. The reinstatement of a loop road and a simplified east-west Green Street structure were strongly recommended.
- 3.11 Furthermore, Officers stated that there seemed to be a lack of amenity space around apartment blocks that is easily accessible and advised that the design should incorporate community garden space.
- 3.12 Officers also noted that additional attention was required to ensure adequate garden sizes for the houses, explore innovative amenity solutions (e.g. car-port terraces), and improve access to cycle parking and bin storage in line with the Parking SPD.
- 3.13 On the 21st August, an additional meeting with NHDC officers was held to discuss outstanding matters including the requirement for a loop road, the design code and other S106 matters.
- 3.14 Overall, since the pre-application and subsequent meetings, the team has worked positively to address comments from NHDC with targeted amendments made to address the concerns raised. A detailed assessment of how the proposed scheme responds to the pre application feedback is provided in **Appendix 1** of this Statement.

- 3.15 On 6th August, the Applicant met with the Housing Officer to discuss whether a change to the affordable housing mix would be accepted. A response to this was received on 28th August and stated that the Affordable Housing mix should be adjusted to comply with policy requirement for the 65% rented and 35% intermediate tenure. The Officer also outlined that all 4-bedroom affordable homes must be delivered as social rent. In addition, the Officer noted that the clustering of affordable housing within a single part of the site is contrary to policy objectives for creating mixed and balanced communities. In direct response, the updated design has been revised to address these issues, ensuring that both the affordable housing mix and its spatial distribution are policy compliant.
- 3.16 On the 3rd October, it was confirmed with the Case Officer and Housing Supply Officer that the proposed housing mix and affordable housing mix subject to a Deed of Variation (DoV) to the Section 106 agreement associated with the OPP. The terms of the DoV are currently being agreed between the relevant parties.

Highways (Hertfordshire County Council)

- 3.17 A meeting took place on 9th July with Hertfordshire County Council (HCC) along with representatives from NHDC to discuss the proposed highways layout within the Site. The discussions focused on Junction Spacing and Junction Radii; Traffic Calming Measures; Parking; Access and Off-Site Works; Site Layout; and Road Adoption.
- 3.18 Taking each of these topics in turn, we have set out a summary of discussions and agreement below.

Junction Spacing and Junction Radii

- 3.19 It was agreed that there would be flexibility on the junction spacing due to the road not being for adoption with justification required. It was agreed that 4m radii would be shown on the proposed junctions which will not have refuse vehicles entering the junction.

Traffic Calming Features

- 3.20 HCC requested that raised tables to be considered as part of the layout and also stated that the kerb built into the layout should be signed appropriately. HCC stated that continuous crossings at the junctions should be considered favourably by the Local Highways Authority.

Parking

- 3.21 HCC confirmed they did not have any problems with the number of visitor parking spaces provided.
- 3.22 NHDC requested that one electric charging point per dwelling to be provided.
- 3.23 HCC requested that visibility splays were not to be located through parking spaces, as there was a potential to provide traffic calming measures which would reduce vehicle speeds and reduce the required splay.

Access and Off-Site Works

- 3.24 HCC agreed that tactile and dropped kerbed crossings should be incorporated into the layout in suitable locations.
- 3.25 HCC agreed that the offsite works have time and will not hold back the application.
- 3.26 HCC stated that the bus stops should be provided before the construction of the Site Commences.

Site Layout

- 3.27 The layout of the scheme was considered to follow the principles set out in the Hertfordshire Highway Design Guide and therefore HCC did not have any comments on the layout.

Road Adoption

- 3.28 HCC confirmed that they would not adopt the internal roads as it does not serve as a bus route.

Local Lead Flood Authority (LLFA) (HCC)

- 3.29 HCC agreed that infiltration should not be pursued if unviable and supported a gravity-fed solution instead. HCC requested that the Drainage Statement should explain why infiltration is not viable and follow the drainage design hierarchy.
- 3.30 It was agreed that the Applicant team would re-consult with Anglian Water to reconfirm the 8l/s discharge at a later stage.
- 3.31 Due to site constraints (landscaping / tree buffers / ecology) this limited the amount of SuDS that could be included on the Site.
- 3.32 HCC found the proposed drainage strategy acceptable and emphasised that clear justification was essential for the changes from Outline to Reserved Matters.
- 3.33 HCC confirmed that Condition 3 of the OPP allows connection to Anglian Water's existing asset-limited to 8l/s provided it can be clearly demonstrated that infiltration is not viable.
- 3.34 It was confirmed that the proposed drainage strategy would remain compliant with CIRIA SuDS treatment indices, which addresses the requirements set out within the planning condition.
- 3.35 HCC and the Applicant team agreed to proceed with the default value as set out in the outline strategy. Drainage calculations will also use Cv=1.0 to as a sensitivity test to assess the impact on modelling and determine flood mitigation measures if necessary.

Letchworth Heritage Foundation

- 3.36 The Applicant has engaged with the Letchworth Heritage Foundation on a regular basis to keep them updated on progress and to share design development
- 3.37 On 25th June 2025, the Applicant team attended Letchworth Annual Town Hall, an event that brings together local residents, local businesses, members of the community as well as the Heritage Foundation. Information in form of plans and a design booklet was provided for the

attendees to review and comment. The feedback received was positive, some residents did however query the impact of new residential on local infrastructure such as doctor surgery and dentist.

Summary

- 3.38 The Applicant has undertaken extensive pre-application consultation and will continue to engage with NHDC, HCC, the Heritage Foundation as well as members of the public.

4. PROPOSED DEVELOPMENT

4.1 The proposals seek RM permission for a residential development comprising 120 residential units (40% affordable housing), including the detailed appearance, landscaping, layout and scale in line with the OPP (ref. 21/00504/OP) and the design principles within the LGCHF LG3 Design Framework.

4.2 The proposed housing mix is set out in **Table 1** below:

Table 1 – Proposed Housing Mix

Size	Market	Affordable	Total
1-bed apartment	5	12	17
2-bed apartment	4	8	12
2-bed house	0	9	9
3-bed house	38	15	53
4-bed house	20	4	24
5-bed detached	5	0	5
	<u>72 (60%)</u>	<u>48 (40%)</u>	<u>120 (100%)</u>

4.3 The proposed layout includes a combination of houses and apartments, with pedestrian access on to Footpath 26 and the permissive path that runs along the eastern boundary of the site. These will also facilitate links to the Greenway.

4.4 As approved under the OPP, the proposed development will be served by a new vehicular access via Flint Road. The vehicular access to the Site will be shared with the allotment site to the west with a new spur from the existing access road, for the new housing scheme.

4.5 The development will provide a total of 222 resident parking spaces in the form of driveways or allocated parking bays in addition to 40 garages. Additionally, 30 visitor parking spaces are provided, distributed throughout the Site. This equates to an overall provision of 252 spaces (2.1 spaces per unit).

4.6 Cycle parking will be provided within garages or a secure garden shed in the case of houses and secure cycle parking in cycle stores in the case of the apartments. All 93 houses will be provided with secure cycle parking in garages or sheds, and all 27 apartments will be provided with secure cycle parking in cycle stores. The cycle storage facilities will be of sufficient size to accommodate the required level of cycle parking provision. In addition, there will be 4 no.

visitor cycle parking spaces outside the front entrance of each apartment block, and 2 no. cycle stands will be located within both the Gateway and Village Greens (4 no. in total).

- 4.7 Boundary treatments such as hedgerows and trees with a mix of native woodland planting will form part of the Green Infrastructure for the Site which, will also incorporate areas of open space, such as the Gateway and Village Greens. In terms of play, a formally equipped play area measuring approximately 700m² is proposed within the Village Green and additional opportunities for informal doorstep play and play trails are included within the Gateway Green and retained woodland.
- 4.8 There will be a comprehensive landscaping scheme as part of the detailed development proposals, which will include structural tree planting, as well as clusters of trees and groups of planting throughout the development.
- 4.9 The proposal includes SUDs provision for surface water drainage that includes a range of measures and will lead to a net gain in biodiversity, through the landscaping proposals, habitat and wetland creation.
- 4.10 Further information on the design rationale that has informed the scheme is set out within the accompanying Design & Access Statement, alongside which this Statement should be read.

5. PLANNING POLICY CONTEXT

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2 The statutory Development Plan for NHDC comprises of the North Hertfordshire Local Plan 2011-2031 (2022).
- 5.3 The policies considered most relevant to the proposed development are set out below:
- SP1: Sustainable Development in North Hertfordshire;
 - SP5: Countryside and Green Belt;
 - SP6: Sustainable Transport;
 - SP8: Housing;
 - SP9: Design and Sustainability;
 - SP12: Green Infrastructure, landscape and biodiversity;
 - T1: Assessment of Transport Matters;
 - T2: Parking;
 - D1: Sustainable Design;
 - D3: Protecting Living Conditions;
 - HS1: Local Housing Allocation
 - HS2: Affordable Housing;
 - HS3: Housing Mix;
 - HS5: Accessible and Adaptable Housing;
 - HE1: Designated Heritage Assets;
 - NE1: Landscape;
 - NE4: Biodiversity and geological sites;
 - NE5: New and Improved Public Open Space;
 - NE7: Reducing the Flood Risk;
 - NE8: Sustainable Drainage Systems;
 - NE10: Water Framework Directive and Wastewater Infrastructure;
 - NE11: Contaminated Land; and

- Local Plan Appendix 5: Letchworth Garden City Design Principles.

5.4 Under Policy HS1, Site LG3 is allocated for the provision of an estimated 120 homes.

Site Allocation LG3

5.5 Policy LG3 sets out the following site-specific policy criteria:

- Structural planting to reinforce Green Belt boundary along the north-eastern perimeter of the Site;
- Appropriate mitigation measures for noise associated with motorway and/or adjoining employment are to potentially include orientation of living spaces;
- Reprovision of allotments if access to the Site is from the west. Reprovision prior to commencement of development, within the vicinity of the Site and the same or better quality;
- Proposals to be informed by a site-specific landscape assessment;
- Retention of Public Right of Way Letchworth Garden City 026 and diversion if necessary;
- Sensitive design and/or lower density housing where the Site affects setting of the Norton Conservation Area and nearby Grade II Listed Buildings on Church Lane and Norton Road; and
- Archaeological survey to be completed prior to development.

Appendix 5 – Letchworth Garden City Design Principles

5.6 The Letchworth Garden City Design Principles are summarised below.

1. For development proposals in Letchworth, their overall layout and design should, as far as practicable, reflect 'Garden City' layout and design principles, which relates to open residential development, characteristically low density and generously landscaped with mature trees and hedges set amongst individual houses.
2. The broadest overall effect is that of the vista which has been exemplified by the broad tree-lined streets.
3. The principle of closure in terms of breaking down streets into sequence by means of closing the view at key points, particularly at road junctions. The use of informal design approach should not be at the expense of purposeful design of space framed by buildings.
4. Within the street picture, accents should be created by variations in the building line.
5. Group design in order to give identity to the various road within the Garden City.

National Planning Policy Framework (December 2024)

- 5.7 The National Planning Policy Framework (NPPF) was updated in December 2024 and sets out the Government's planning policies for England and how these are expected to be applied. It forms part of the overall framework of national planning policy and is a material consideration in decisions on planning applications.
- 5.8 The NPPF (2024) aims to achieve sustainable development with Paragraph 8 stating that there are three dimensions to sustainable development: economic, social and environmental.
- 5.9 Paragraph 11 states that LPAs should apply a presumption in favour of sustainable development which means that, where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, permission should be granted unless any adverse impact of doing so would significantly outweigh the benefits. Footnote 7 states that this presumption does not apply in certain areas including within the Green Belt (except in circumstances where the site is considered to constitute Grey Belt
- 5.10 In respect to housing, Paragraph 61 sets out that to support the Government's objective of significantly boosting the supply of homes; it is important that a sufficient amount and variety of land can come forward where it is needed. Paragraph 64 states where a need for affordable housing is identified, planning policies should specify the type of affordable housing required and expect it to be met on-site.
- 5.11 Chapter 8 seeks to promote healthy and safe communities and Paragraph 96 highlights the importance of promoting social interaction, including through mixed-use developments and for street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods. It also seeks to enable and support healthy lifestyles, for example through the provision of safe and accessible green infrastructure.
- 5.12 Chapter 9, entitled 'Promoting Sustainable Transport', highlights that transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places (Para 109). Paragraph 110 emphasises the need for significant developments to be situated within sustainable locations, through limiting the need to travel and offering a genuine choice of transport.
- 5.13 Paragraph 115 requires sustainable transport modes to be prioritised; safe and suitable access for all users; the design of streets, parking areas, other transport elements and the content of associated standards to reflects current national guidance; and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.
- 5.14 Chapter 11 seeks to make effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Paragraph 125(a) encourages multiple benefits from both urban and rural land, including through mixed-use schemes and taking opportunities to achieve net environmental

gains, such as development that would enable new habitat creation or improve access to the countryside.

- 5.15 Paragraph 131 sets out that the creation of high-quality buildings and places is fundamental, and 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. Paragraph 135 states that planning decisions should ensure developments will function well and add to the overall quality of the area; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; are sympathetic to local character and history; establish or maintain a strong sense of place; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development; and create places that are safe, inclusive and accessible and which promote health and well-being.
- 5.16 Paragraph 136 emphasises the importance of trees in making an important contribution to the character and quality of urban environments and also helping to mitigate and adapt to climate change. It encourages opportunities to incorporate trees elsewhere in developments and that existing trees are retained wherever possible.
- 5.17 Chapter 14 seeks to meet the challenge of climate change, flooding and coastal change. Paragraph 170 directs development away from areas at highest risk of flooding (existing or future). Paragraph 173 advises that a sequential risk-based approach should be taken in areas known to be at risk now or in the future from any form of flooding. Paragraph 174 clarifies that the aim of the sequential approach is to steer new development to areas with the lowest risk of flooding from any source, and development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.
- 5.18 Paragraph 181 states that LPAs should ensure that flood risk is not increased elsewhere. It clarifies that development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that within the site, the most vulnerable development is located in areas of lowest flood risk; the development is appropriately flood resistant and resilient; it incorporates sustainable drainage systems; any residual risk can be safely managed; and safe access and escape routes are included where appropriate, as part of an agreed emergency plan.
- 5.19 Chapter 15 is concerned with conserving and enhancing the natural environment. Paragraph 187 advises that decisions should contribute to and enhance the natural and local environment, including through minimising impacts on and providing net gains for biodiversity, and establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species.
- 5.20 Chapter 16 relates to conserving and enhancing the historic environment and Paragraph 207 confirms that applicants are required to describe the significance of any heritage assets affected by development, including any contribution made by their setting. Paragraph 212 advises that great weight should be given to the asset's conservation, and the more important the asset, the greater the weight should be.

6. PLANNING ASSESSMENT

- 6.1 This chapter assesses the development proposals against the relevant Development Plan policy and other material considerations. The key issues to be considered in the determination of the application are as set out and assessed below.

Principle of Development

- 6.2 The principle of development at the Site has already been established by the Council's grant of OPP (Ref: 21/00504/OP). This confirms that the Site can accommodate up to 120 dwellings with associated vehicular accesses onto Flint Road.
- 6.3 On the above basis, the principle of residential development at the Site has been firmly established.
- 6.4 The approved description of development restricts development for up to 120 homes. As such, this application provides details of the layout, scale, appearance, and landscaping for 120 homes on the Site.

Design and Layout

- 6.5 Condition 1 of the OPP states that no development shall commence until details of the siting, design and external appearance of the development, the means of access thereto and the landscaping of the Site have been submitted and approved by the Council.
- 6.6 The accompanying Design and Access Statement along with the Design Code for the Rural Edge, prepared by HTA Design LLP, sets out in further detail how the scheme aligns with the design principles and parameters set out in the LG3 Design Framework Document provided by the Letchworth Garden City Heritage Foundation (LGCHF). This section demonstrates how this has been achieved.

Siting

- 6.7 The proposed layout closely matches the layout within the approved Parameter Plan within the approved OPP. The layout continues to be designed to provide a clear and simple street hierarchy which is well integrated with development blocks and green spaces which create permeability and legibility. The proposed development provides 120 homes arranged around a main Avenue, which acts as the primary street, leading up to the Village Green. The east and west routes will continue to act as secondary streets or garden streets which will be landscaped to provide green links.
- 6.8 Other general principles of the Site remain as per the OPP with the Village Green to the north, Gateway Green at the entrance to the Site and a rural edge to the west. The development continues to integrate the woodland and Green Belt beyond. The existing woodland will be retained.
- 6.9 Regarding density, the development of 120 residential dwellings is proposed which equates to 22 units per hectare, supported by SuDs features, open space, landscaping and play space.

- 6.10 Condition 16 of the OPP requires a Design Code to be submitted in relation to the 'Rural Edge Lane and Adjacent Block Design'. In terms of layout for this part of the Site, the Rural Edge Lane will be staggered and gently curved at each junction, with subtle outward projections. Corner-turning units will be positioned at either end to prevent a standardised, radiused layout. Frontage alignments will incorporate slight variations from the orthogonal to avoid creating awkward, wedge-shaped spaces. Additionally, driveway gaps between buildings will be varied, generally ranging from 4.0 to 6.7 metres, with only a minimal number extending to 9.0 metres. At the ends of building runs, gaps will be sufficient to accommodate rear gardens of up to 11 metres in depth.
- 6.11 Please refer to the Design & Access Statement, Design Code and accompanying drawings for more information.

Design and External Appearance

- 6.12 The proposal has been sensitively designed and has sought to respond to the constraints / opportunities on the Site. The accompanying Design & Access Statement prepared by HTA sets out in further detail how the scheme aligns with the design principles and indicative parameters set out in the LG3 Design Framework Document provided by the Letchworth Garden City Heritage Foundation (LGCHF). This summarises how this has been achieved.
- 6.13 The proposed layout closely matches the layout within the approved parameter plan within the OPP, arranged around a main avenue and green open spaces, with the existing native woodland and additional native woodland running along the boundaries of the Site. This can be visualised in the accompanying proposed parameter plan prepared by HTA.
- 6.14 In terms of height, the proposed buildings will be in accordance with the approved parameter plan, with the residential development on higher ground to the northern part of the Site up to a maximum of 2.5 storeys in height and the residential development on the lower ground, towards the south of the Site, primarily 2 storeys, with some 3-3.5 storey buildings.
- 6.15 Regarding the residential units these have been devised into 4 building character areas, presented in the accompanying Photo Book prepared by HTA and, are also shown in Figure 2 below. These include:
- Gateway Green;
 - Avenue;
 - Allotment Boundary; and
 - Woodland Boundary.

Figure 2 – Building Character Areas



- 6.16 The material choices and decoration of architectural elements on each building, such as porches, window surrounds, and bay windows, are determined by which character area they are in, as well as their position in relation to the key frontages and vistas. These character areas are inspired by the rich architectural context within Letchworth which demonstrates the Context Led approach encouraged within the LG3 Design Framework Document. Further details on the key characteristics of each building character area are provided in the accompanying Design & Access Statement.
- 6.17 The accompanying Design Code sets out the detailed design and appearance principles for the Rural Edge Lane, with particular emphasis on its relationship to the Woodland Edge and the experience of approaching Letchworth Garden City from the surrounding countryside. It addresses key aspects including, typologies and heights, setbacks and boundary treatments, architectural character and materials, parking and drainage strategies, street design, and landscaping. Please refer to the Design Code document for further on these specific elements.

Landscaping

- 6.18 To support the application, a Landscaping Masterplan and detailed landscape proposals have been prepared by Pegasus Group.
- 6.19 Boundary treatments such as proposed hedgerows with trees and new mixed native woodland planting alongside retained hedgerow and woodland will form part of the green infrastructure for the Site. It will also incorporate areas of open space, including the Gateway and Village Greens.
- 6.20 In terms of play provision, a formally equipped play area measuring approximately 700m² is proposed within the Village Green and additional opportunities for informal doorstep plan and play trails are included within the Gateway Green and retained woodland.

- 6.21 SuDS features are also integral to the landscaping strategy for the proposed development. Specifically, within the Village Green, a typically dry attenuation basin has been carefully designed to accommodate an equipped play space within its western extents, with species-rich meadow planting in the eastern basin, framed by trees and mixed shrubs. In the South-East Corner, another typically dry attenuation basin will feature species-rich meadow and mixed native planting adjacent to inlets, outlets, and the low-flow channel. Other SuDS features including swales and rain gardens will also be distributed throughout the Site. Further detail is provided within the accompanying Landscaping Masterplan, detailed proposals, Design & Access statement, and Design Code.

Housing Mix

- 6.22 Policy HS3 'Housing Mix' outlines that permission for new homes will be granted where proposals deliver a suitable mix of house types and sizes, informed by local housing targets, the latest evidence of need, site accessibility, and recent housing supply. Developments must also achieve a density, scale, and character that are appropriate to their location and surroundings.
- 6.23 The proposed development provides a range of dwelling sizes from 1- and 2-bedroom apartments, to 2, 3, 4, 5-bedroom homes. The housing mix of the proposed development is summarised below.

Table 2 – Proposed Housing Mix

Size	Market	Affordable	Total	SHMA
1-bed apartment	5	12	<u>17 (14%)</u>	<u>669 (9%)</u>
2-bed apartment	4	8	<u>12 (10%)</u>	<u>740 (10%)</u>
2-bed house	0	9	<u>9 (8%)</u>	<u>1,126 (15%)</u>
3-bed house	38	15	<u>53 (44%)</u>	<u>3,560 (46%)</u>
4-bed house	20	4	<u>24 (20%)</u>	<u>1,259 (16%)</u>
5-bed detached	5	0	<u>5 (4%)</u>	<u>380 (5%)</u>
	72 (60%)	48 (40%)	<u>120 (100%)</u>	<u>7,734</u>

- 6.24 The above housing mix is therefore broadly in line with the mix set out in the SHMA (November 2023), the main differences being less 1-bed apartments and 4-bed houses and more 3-bed houses.

Affordable Housing

- 6.25 The scheme will provide 40% affordable housing in the form of 28 homes and 20 apartments in accordance with the requirements of Policy SP8 and the S106 agreement for the OPP. The affordable homes will be integrated throughout the Site.
- 6.26 In accordance with the S106 agreement and part b of Policy HS2 within the Local Plan the affordable housing will be delivered with the tenure split of 65% rented and 35% intermediate rented.
- 6.27 In addition to the above, the following will be provided:
- 6 M(4)3 apartments (4 affordable), totalling 5% of all units delivered (120); and
 - All affordable houses (28) and 63 private houses; totalling 91 houses will be delivered as M(4)2.
- 6.28 Further details relating to the provision of affordable housing within the development are set out in the Design and Access Statement which accompanies this RM application.

Residential Amenity

- 6.29 The proposal has been designed to respect the amenity of existing residential homes and to ensure the residential amenity of future residents is respected.
- 6.30 The proposals include strategic planting with trees added throughout the Site alongside the enhancement of existing trees and hedgerows within and around the perimeter of the Site to give a soft feel and green edges to the development.
- 6.31 All homes will have front and rear gardens or in the case of the apartments, private balconies. Furthermore, all homes comply with the Nationally Described Space Standards (NDSS).
- 6.32 Please refer to the Design and Access Statement for further information.

Flooding / Drainage

- 6.33 Policy NE8 (Sustainable Drainage Systems) states planning permission will be granted provided that
- a) The most appropriate sustainable drainage solution is used taking into account technical, viability and design issues to reduce the risk of surface water flooding, enhance biodiversity, water quality and provide amenity benefits;
 - b) It aims to mimic the natural drainage patterns and processes as far as possible; and
 - c) Drainage solutions follow the SuDS hierarchy.
- 6.34 Furthermore, there are several conditions that relate to flood risk management and drainage, including conditions 3, 4, 5, 6, and 7.
- 6.35 To support this application, a Drainage Strategy and Drainage Statement has been prepared by Ardent Consulting Engineers.

- 6.36 The approved outline strategy utilising an infiltration method for managing surface water runoff has been deemed unviable. Instead, in accordance with the drainage hierarchy, the revised strategy will discharge surface water into existing Anglian Water sewers adjacent to the site
- 6.37 The proposed drainage network is divided into three catchments, with attenuation provided by two detention basins and an offline cellular tank. Surface water will be conveyed via swales, pipework, and bioretention features, before being released at a restricted rate of 8.0 l/s. The system is designed to accommodate a 1-in-100-year storm event plus 40% climate change allowance, with an additional 300 mm freeboard to manage exceedance.
- 6.38 Water quality treatment follows the CIRIA C753 SuDS Manual, with the Simple Index Approach confirming adequate pollution mitigation.
- 6.39 Exceedance flows will be directed away from buildings toward non-habited areas and lower site points, simulating existing flow paths to avoid increasing flood risk.
- 6.40 Foul water will be conveyed via sewers to the existing Anglian Water network south of the site, at a peak design rate of 5.6 l/s (based on 4,000 litres per dwelling per day). This approach has been agreed with Anglian Water and aligns with the OPP.
- 6.41 On the above basis, the proposed flood risk management and drainage strategy comply with policy NE8 and fulfil the requirements of conditions 3, 4, 5, 6, and 7.

Highways, Transport

- 6.42 Policy T1 of the Local Plan planning permission will be granted where developments avoid highway safety issues and do not cause unacceptable impacts on highways network. It further sets out that the proposals should provide safe, direct and convenient routes for pedestrians and cyclists.
- 6.43 Policy SP6 of the Local Plan encourages all development proposals to deliver accessibility improvements and promote the use of sustainable transport modes insofar as reasonable and practical.
- 6.44 To support the application, Highway's Layout, Refuse and Fire Tender Swept Path Analysis, and a Draft Construction Traffic Management Plan have been prepared by Ardent Consulting Engineers.
- 6.45 This application provides the details of the internal roads as well as details of car and cycle parking.
- 6.46 Access to the development will be from Flint Road to the south. This is in line with the approved access that formed part of the OPP.
- 6.47 The Highways Layout submitted as part of this RM application, comprises a structured street hierarchy with a primary street forming the main avenue, curving gently to enhance the streetscape and terminating at the northern end. Secondary streets will branch off the main avenue and will be connected through T-junctions to improve pedestrian safety, reinforce road hierarchy, and create opportunity for special corners to enhance townscape character. A rural

edge lane along the eastern boundary softens the transition to the woodland and greenbelt, featuring looser building alignments, dense planting, and a shared surface.

- 6.48 Pedestrian and Cycle Networks will provide safe and pleasant routes between destinations across the site, including a Woodland Walk along the Countryside edge.
- 6.49 A full swept path analysis of the proposed layout for refuse and fire tender vehicles has also been undertaken which demonstrates that these vehicles will be able to access, circulate and egress the site.
- 6.50 Given the above, the proposed access arrangements, street hierarchy, and sustainable transport measures are in full accordance with policies T1 and SP6 of the Local Plan.

Car Parking and Cycle Parking

- 6.51 Policy T2 of the Local Plan outlines that Parking for residential development is provided in accordance with the minimum standards set out in Appendix 4 of the Local Plan. These standards are set out below:

Table 3 – Residential Parking Standards

Class Use C3	Car Parking Standard	Minimum Cycle Parking Standard
1 bedroom	1 space per dwelling minimum	1 secure covered space per dwelling. None if garage or secure area provided within curtilage of dwelling.
2-3 bedrooms	2 spaces per dwelling minimum	

Table 4 – Visitor Parking Standards

Class Use C3	Car Parking Standard	Minimum Cycle Parking Standard
Visitor / unallocated	Between 0.25 and 0.75 spaces per dwelling (rounded up to nearest whole number) with the higher standard being applied where there are no garages in the schemes and the lower standard applied where every dwelling in the scheme is to be provided with a garage.	For above C3 general housing - if no garage or secure area is provided within curtilage of dwelling then 1 covered and secure space per dwelling in a communal area for visitors For C3 retirement developments - 1 covered and secure visitor space per 3 units.

- 6.52 In compliance with the above standards, the development will provide a total of 222 residents parking spaces in the form of driveways or allocated parking bays in addition to 40 garages. Additionally, 30 visitor parking spaces are provided, distributed throughout the Site to accommodate ad hoc demand and ensure no adverse impact on local roads. This equates to an overall provision of 252 spaces (2.1 spaces per unit).

Cycle parking will be provided within garages or a secure garden shed in the case of houses and secure cycle parking in cycle stores in the case of the apartments. In accordance with the standards set out in Appendix 4 of the Local Plan all 93 houses will be provided with secure cycle parking in garages or sheds, and all 27 apartments will be provided with secure cycle parking in cycle stores. The cycle storage facilities will be of sufficient size to accommodate the required level of cycle parking provision. In addition, there will be 4 no. visitor cycle parking spaces outside the front entrance of each apartment block, and 2 no. cycle stands will be located within both the Gateway and Village Greens (4 no. in total).

To satisfy the requirements of the Condition 10 of the OPP (ref: 21/00504/OP), a plan has been prepared by Ardent Consulting Engineers which details engineering designs and construction of the highway improvement works to Flint Road and Blackhorse Road. This includes pedestrian dropped kerbs and tactile paving at side roads along the route and widening of the existing footway to 2 metres.

Ecology / Biodiversity

- 6.53 Policy SP12 outlines biodiversity networks, including wildlife corridors, ancient woodlands, wetlands, river habitats, and geological sites, will be conserved and enhanced to achieve measurable net gains.
- 6.54 Policy NE4 further states that all development should deliver measurable net gains for biodiversity and geodiversity, contribute to ecological networks and the water environment, and/or restore degraded or isolated habitats where possible.
- 6.55 Furthermore, the OPP included a number of conditions relating to ecology and biodiversity including conditions 14, 15 and 23.
- 6.56 To support this application, CSA environmental have undertaken a Preliminary Ecological Appraisal of the Site, which involved the completion of a desk study and a field study in May 2025, including a UK Habitat Classification Survey. The appraisal confirms that there are no identified overriding constraints to development of the Site and sets out ecological enhancement measures which are included within the scheme. This includes
- Sustainable Drainage Systems (SuDS) features designed to include a combination of periodically wet and dry habitats on ecological interest, including grasslands.
 - A range of native plants and those of wildlife importance have been included within the landscaping scheme to provide foraging opportunities for birds, invertebrates and bats
 - The following are proposed to be integrated within new dwellings (as shown on the Biodiversity Enhancement Strategy accompanying this Statement):

- 40 bat boxes (Sergovia Build-In Woodstone Boxes)
 - 40 bird boxes (Swift S-bricks)
 - Provision of hedgehog gaps in new fencing to promote habitat connectivity across and within the Site
- 6.57 Alongside the appraisal, as required by Condition 14, a Biodiversity Net Gain Assessment prepared by CSA Environmental accompanies this Statement. It sets out that a net gain of biodiversity is predicted for the proposed development of 2.17 Habitat Units (15.07%). This is subject to measures set out in the accompanying Habitat Management & Monitoring Plan (HMMP) which is also submitted as part of the application.
- 6.58 In light of the above, the proposals accord with policy NE4 and satisfy the requirements of Conditions 14, 15, and 23.

Heritage

- 6.59 A Heritage Assessment was submitted as part of the outline application. The assessment was based on Historic England's 'Conservation Principles Policies and Guidance for the Sustainable Management of the Historic Environment', Historic England Advice Note 12 – 'Statement of Heritage Significance' and advice contained within the National Planning Policy Framework.
- 6.60 The assessment considered the significance of the existing heritage asset, which included the Norton Conservation Area and Listed Buildings within the vicinity of the Site. The assessment also included archaeology. It is considered that the proposed development will not have any further impact on the conclusions set out within the heritage assessment.
- 6.61 Norton Conservation Area is located immediately to the north of the Site beyond Public Footpath 026. Norton has Saxon origins and is mentioned in the Domesday Book of 1086. There are 11 Grade II Listed Buildings within the Conservation Area, mostly clustered around the Grade II Listed St Nicholas Church, reflecting the original settlement. The closest Listed Building to the Site are Nos 90 and 92 Norton Road, about 130m to the north-west. 6 Church Lane is about 150m to the north of the Site. The wider setting of the Conservation Area includes the adjoining residential areas of Letchworth which merge with Norton to the south and west.
- 6.62 The Conservation Area was designated in 1969 and the boundaries amended in 1979. A Conservation Area review took place in 2020, and the Conservation Area Character Assessment includes a Statement of Special Interest which confirms that the historic core has remained largely intact with historic cottages, thick mature tree coverage and narrow country lanes.
- 6.63 Several key views were identified within the Norton Conservation Area in the Character Statement, none of which include the Site. There is limited intervisibility between the Site and Listed Buildings within the Conservation Area. Whilst the Site is within the setting of the Conservation Area, there are trees and shrubs to the north of the Site that limit intervisibility. These trees and shrubs will be retained as part of the RM application. Buildings built in the

1980s within the Conservation Area also screen views of Listed Buildings. The top of St Nicholas Church tower can be glimpsed from the northern end of the Site above buildings and through trees in winter. The Site slopes downwards from the north which also limits intervisibility of a large portion of the Site with the designated heritage assets.

- 6.64 There is no known historical relationship between the Site and designated heritage assets. The Strategic Masterplan submitted as part of the outline application, identified open space in the form of a park and landscaping on the higher ground to the north of the Site which continues to come forward as part of this RM application. This open space helps to minimise the impact of the proposed development upon the setting of the Conservation Area and the Listed Buildings within its historic core.
- 6.65 A geophysical survey and trial trenching was undertaken as the Site is located within an area of very high archaeological potential as it is adjacent to a field within which there is a Neolithic henge at Norton Bury, late Bronze Age/Early Iron age features were discovered at Cade Close to the west, and Saxon/Medieval remains were found at green Lane / Kristiansand Way to the southwest.
- 6.66 The evaluation submitted as part of the outline application identified archaeological assets of relatively low density, but potentially very high significance, divided roughly into three zones.
- 6.67 As stated within the committee report for the outline application, the development is likely to have an impact on heritage assets of archaeological interest, and a condition has been included in relation to this. Condition 8 states:

“A. No demolition/development shall take place/commence until an Archaeological Written Scheme of Investigation has been submitted to and approved by the Local Planning Authority in writing. The scheme shall include an assessment of archaeological significance and research questions; and

- 1. The programme and methodology of site investigation and recording.*
- 2. The programme for post investigation assessment.*
- 3. Provision to be made for analysis of the site investigation and recording.*
- 4. Provision to be made for publication and dissemination of the analysis and records of the site investigation.*
- 5. Provision to be made for archive deposition of the analysis and records of the site investigation.*
- 6. Nomination of a competent person or persons/organisation to undertake the works set out within the Archaeological Written Scheme of Investigation.*

B. The demolition/development shall take place/commence in accordance with the programme of archaeological works set out in the Written Scheme of Investigation approved under condition (A).

C. The development shall not be occupied/used until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written scheme of Investigation approved under condition (A) and the provision made for analysis and publication where appropriate.”

- 6.68 Paragraph 202 of the NPPF (2024) and NHDC Local Plan Policy HE1 require less than substantial harm to the significance of heritage assets to be weighed against the public benefits of the proposal. This harm should be afforded great weight.
- 6.69 It is considered that the proposed development would result in less than substantial harm to the significance of designated heritage assets. The proposed layout would minimise the impact of the proposed development on the setting of Norton Conservation Area and nearby Listed Buildings. The effect upon archaeology would be adequately addressed by the condition imposed. It is considered that the benefits of 120 residential dwellings which include landscaping and open space would outweigh the harm identified.
- 6.70 It is noted that there would be harm upon the character and appearance of the area through the residential development of a greenfield site, the principle of which was agreed at outline stage. It is however considered that there would not be a significant harm to the character and appearance of the area.

Sustainability

- 6.71 To discharge the requirements of Condition 19 of the OPP, and to ensure compliance with Local Plan Policies SP9 and D1, an Energy and Sustainability Statement prepared by Turley has been submitted in support of this RM application.
- 6.72 The Statement sets out key measures incorporated into the proposed development which ensure the development is energy efficient and minimises carbon emissions.
- 6.73 These include optimising passive design and fabric performance in line with the energy hierarchy to reduce energy demand; delivering all-electric homes supported by on-site renewable energy technologies such as Solar PV and Air Source Heat Pumps to meet Future Homes Standard targets; and minimising embodied carbon through the use of sustainable construction methods and low-impact materials.
- 6.74 The scheme also promotes healthy placemaking through the provision of extensive open space, active travel routes, play areas and high-quality landscaping; and homes designed to create healthy living environments
- 6.75 The proposals also enhance biodiversity with measures to protect on-site ecology and deliver a biodiversity net gain of approximately 15.07%.
- 6.76 A sustainable transport strategy is incorporated into the proposals which will reduce reliance on private vehicles via improved walking and cycling infrastructure, secure cycle storage and EV charging provision.

- 6.77 Water conservation is addressed through efficient fittings targeting a consumption rate of 110 litres per person per day, and surface water will be managed through a robust drainage strategy incorporating SuDS features such as attenuation basins, swales and bioretention systems designed to accommodate climate change allowances and deliver ecological and amenity benefits.

Noise

- 6.78 Condition 18 of the OPP is related to noise. The condition outlines that no development can begin until a noise mitigation scheme, based on the January 2021 Spectrum Acoustic Consultants assessment submitted as part of the outline application, is approved in writing by the Local Planning Authority. This is to ensure the protection of residential amenity of future occupants in accordance with the aims of policy D3 the Local Plan.
- 6.79 On the above basis, a Noise Assessment prepared by Ardent Consulting Engineers has been submitted alongside this statement. The assessment demonstrates that the Site is suitable for development subject to the report's recommendations and confirms that the proposals comply with the requirements of condition 18. As such, the proposals are therefore in adherence with policy D3.

7. SUMMARY AND CONCLUSIONS

- 7.1 This planning application to which this Statement relates is submitted on behalf of Barratt David Wilson Homes (North Thames) and seeks RM approval for a residential development comprising 120 residential units (40% affordable housing) including the detailed appearance, landscaping, layout and scale in line with the OPP (ref. 21/00504/OP). The outline permission was for:

“Residential development comprising of up to 120 dwellings with vehicular access via Flint Road (all matters reserved except means of access.)”

- 7.2 In addition, this application seeks to discharge the following conditions attached to the Outline planning application:

- Condition 2 - Appearance Layout Scale Landscaping;
- Conditions 3, 4, 5, 6, 7 – Flood Risk and Drainage;
- Conditions 9, 10, 20 - Access & Movement Resident & visitor parking strategies (car and cycle);
- Condition 13 – Open Space and Landscaping;
- Conditions 14, 15 – Biodiversity and Ecology;
- Condition 16 – Urban Design (general);
- Condition 18 – Noise;
- Condition 19 – Sustainability; and
- Conditions 22 – Waste Strategy.

- 7.3 The application Site forms part of LG3 site allocation under policy HS1 within the Council's Local Plan. The allocation is for approximately 120 homes and is subject to site-specific criteria, including structural planting to reinforce the Green Belt boundary, noise mitigation measures, re-provision of allotments if access to the site is to the west, a site-specific landscape assessment, retention or diversion of Public Right of Way Letchworth Garden City 026, and sensitive design where the Site affects the setting of the Norton Conservation Area and nearby listed buildings.

- 7.4 This Outline application was supported by a host of technical reports, including a Strategic Masterplan Document (2022), which established a clear site vision and defined key placemaking principles. These principles have informed and guided the design development of the Reserved Matters proposals, providing a clear design framework.

- 7.5 The proposal has been through extensive pre-application discussions with the Council, which has informed the detailed proposal submitted. The result is a scheme that delivers a high-quality architectural approach to the Site & its surroundings, which will preserve & enhance the

landscaped setting, whilst also ensuring the development responds positively to its surrounding context.

- 7.6 As required by Condition 16 of the outline application, the proposals for the Rural Edge Lane have been developed in accordance with the accompanying Design Code, which sets detailed design and appearance principles, with particular emphasis on its relationship to the Woodland Edge and the experience of approaching Letchworth Garden City from the surrounding countryside.
- 7.7 We consider that the proposed development would accord with the development plan and would deliver several significant benefits, most notably new market & affordable housing, and as such we request the Council to grant planning permission without delay.

APPENDIX 1. PRE-APP RESPONSE (25/01233/PRE)

	Pre-App Comment	Response
1	Principle of development confirmed under planning permission 21/00504/OP.	Noted
2	No scaled layout or elevation drawings have been provided at this stage.	To be prepared and submitted as part of the Reserved Matters Application.
3	Materiality and building detailing – the illustrative material choices as well as the architectural detailing element appear to be robust and relevant to Letchworth Garden City homes. The palette is good and represents a modern interpretation of the original arts and crafts homes.	Noted
4	Design features – such as cat slide roofs -should be authentic features and not appear as cosmetic 'add-ons'.	Details will be provided as part of the reserved matters application.
5	It would be desirable to have devise pairs of dwelling types to be applied at corner junctions to create emphasis and rhythm throughout the site. These should be dual aspect and include suitably interesting design features as focal points, such as porches and bay windows.	Barratt's standard corner turner house types are all dual aspect. We have made specific enhancements to increase interest and visual appeal in these locations.
6	Garages set back into the plots dominate the rear gardens. These should be pulled forward to avoid rear aspects being dominated by buildings.	The number of garages has been reduced.
7	The planting palette is strong and reflective of what we want to see on the site. The outline masterplan referenced 'Green Streets' and this concept is included I the preliminary material although it would be good to see these principles developed enhanced into the design.	Noted.
8	The general approach to play and amenity space is welcome. It would be useful if supporting documents accompanying the formal reserved matters application includes a detailed explanation of the site wide play strategy to understand how different ages are catered for across the site and what areas are equipped and wat are landscape / natural led play features.	A detailed explanation along with a strategy will be provided as part of the Reserved Matters application.
9	The illustrative masterplan had a continuous edge lane on the north-east side; the illustrative design document breaks this up, leaving just one loop and multiple dead ends. This will entail a lot of land being wasted on hammerheads, all of which will need to be large enough for a 12m long waste collection vehicle to turn around. These are undesirable from an urban design perspective also.	We have looked into this and unfortunately a continuous loop road comes with many disadvantages, including a dilution of the aspiration for green edges, unnecessary

	Pre-App Comment	Response
		additional vehicle movement on the Rural Edge Lane and the Village Green and a more urban appearance in these locations, the impact on amenity from noise and emissions pollution for the allotment users on the west and walkers on the east edge. It also creates awkward inefficient development parcels and reduces developable areas overall, and the increase in road length means increased embodied carbon as well as costs.
10	NHC waste services have indicated that, in general, they are not supportive of servicing cul-de-sacs because of the time they take to serve; they prefer connected loop roads. Whilst cul-de-sacs do feature in the garden city, these need to be balanced with optimizing the site layout and other technical considerations.	As discussed in the pre-application meeting with HCC and NHC being in attendance, this is not a requirement stated in the Hertfordshire Highway Design Guide which the site layout has been designed to consider. There is a loop road within the site layout with the remaining site having cul-de-sac formation which provides a balance as requested by NHC.
11	The reinstatement of the loop road is essential.	As above.
12	The illustrative layout includes the concept [of 'Green Streets'] although there is a lack of visual connectivity between the ends of the streets either side of the primary road (east to west) and the ability to stand at one end of a street and see landscaping or the countryside at the other end. The creation of a simpler linear / grid Green Street plan from east-west rather than the staggered arrangement currently proposed would be preferable.	We have looked into aligning the green streets in the current layout. Unfortunately, this creates an incongruously small sized parcel, and we would lose a key vista stopper at the head of the Gateway Green. It is also worth noting that the outline application framework document shows joggled routes with buildings forming vista-stoppers and that in the current design there are views outwards to green spaces

	Pre-App Comment	Response
		on each green street – either the existing woodland on the Rural Edge Lane, or the mature hedgerow on the allotment boundary.
13	The site is designed for the car with large drives often mirrored creating large areas of hard standing between built fabric breaking up continuous verges, pushed back garages into rear amenity spaces and lots of space given over to highways (double roads and private drives). We would prefer a scheme that seeks alternative solutions to parking and street setting out.	It is likely that the peak times for resident visitor parking are different to workers - weekends and evenings - hence the risk of overlapping is perhaps less of a concern - we have looked into this and could move 2 or 3 spaces back down to the southern end of the avenue from Gateway Green. Visitor Parking on green streets is coordinated with other uses so the impact of greenery, planters and doorstep play is maximised. Visitor Parking on Avenue verges is minimised and coordinated with crossovers and raised tables to maximise the amount of verge and opportunities for tree planting.
14	Amenity Space (Apartment Blocks) – there seems to be a lack of high-quality green space around the blocks that is easily accessible (not accessed by crossing the main spine road) as required as part of the LG3 policy and Garden City Principles within the Local Plan. Shared community gardens are identified in the Outline Masterplan document and are an integral feature of the Garden City design. You should consider either incorporating community garden space or relocating the blocks immediately adjoining the proposed open space. The design and function of any amenity space should reflect the needs of the apartment block occupiers.	Apartments have been designed to be more family friendly. All apartments have access to their own outdoor space by way of a balcony. In our experience, communal gardens do not get used as much as private balconies. The apartments are located adjacent to Gateway Green. The road will not be a dominant feature; we have increased permeability across this road.

	Pre-App Comment	Response
		The southern two blocks front on to woodland including the 6m buffer zone which is open green space with additional green space around the setting of each block.
15	Amenity Space (houses) – no specific information on garden sizes has been provided. The general principle should be that each garden area should be commensurate with the house size i.e. the larger the house the larger the amenity space.	Details of garden spaces will be provided as part of the Reserved Matters application.
16	It would be desirable for all properties to have access to public open space.	All properties have access to public open space in the form of Gateway Green and Village Green.
17	As part of the consultation process for the emerging District Design Code, there was general support for the potential use of car-port roofs as private amenity spaces/terraces, providing an efficient use of an otherwise wasted space. You should give consideration to the inclusion of this type of amenity space where appropriate.	Noted.
18	Cycle parking and bin storage – where this is proposed to be provided in back gardens, access from the street must be direct and minimally obstructed. This is currently not the case for some of the terraced dwellings adjacent to the allotment edge.	All dwellings will have rear accessible cycle parking provision within a secure area. The terrace houses referred to have access which will remain accessible, and which will allow for the storage of bikes to the rear.
19	Passageways between walls or fences should be at least 1.5m wide. Right-angled bends should be avoided, including to pass through a gate. Where sharp bends are unavoidable, the inner side should be chamfered to increase the width available for maneuvering a bike or bins. Gates should have at least 1m clear opening space. The long passageways shown for accessing mid-terrace dwellings are not acceptable because they do not comply with the Parking SPD requirements.	The industry standard is 1m, we will however look into whether 1.5m would be possible and will include chamfer into the scheme to increase the width available for maneuvering bikes or bins.

	Pre-App Comment	Response
20	The site entrance character could be enhanced by mirroring a smaller area of open space on the western side of the junction immediately in front of the apartment block. This could be achieved by reorientating the 'L' shaped block. The building should include approximately designed and prominent feature(s) along its frontage to articulate the importance of this block to the entrance to the site.	The proposed Gateway Green is significantly larger than at outline stage, however, swinging the road through it will reduce the usable space on the east side. The apartment footprints have been reduced slightly, and it will provide verges / planters. CGI's will be submitted as part of the Reserved Matters application.
21	Following the Gateway Green POS, movement north along the main access would create a generous width of landscaping as per Principle 2 of the LGCDP. LGCDP Principles 4 and 5 talk about the use of space and landscaping to close the view at street junctions and variations in the building lines. This is partially evident in the preliminary layout. However, this could be improved with the inclusion of focal trees either side of all the junctions (within adequate planting space) and the 'setting back' of buildings at junctions.	The proposals will include focal tree planting at junctions, subject to avoiding conflict with forward visibility splays.
22	Principle 3 of the LGCDP refers to the vista, which is presented through broad tree-lined swathes. There is an opportunity to create a vista from the main tree-lined street into the northern Village Green POS. At present, the formal play area is in the vista. However, a more creative arrangement should be explored and could comprise focal trees along the southern edge of the POS following the line of those in the main street through the open space framing either a piece of public art or other prominent feature. More specific information relating to all the POSs is set out below.	This comment will be addressed through the design development of Village Green.
23	On the western edge of the site, where Footpath 026 enters the site, the properties are side facing onto the PRoW. The relationship between these properties and the neighbouring PRoW needs to be considered in the interest of passive surveillance and visual amenity. It would be preferable for houses to be dual aspect with some overlooking onto the PRoW. This will also inform a less formal arrangement of dwellings in the corner of the site.	As set out before, Barratt's standard corner turner house types are all dual aspect. Specific enhancements have been made to increase interest and visual appeal in these locations.
24	A Landscape and Visual Impact Assessment (LVIA) was submitted as part of the Outline Application. There is a significant drop in land levels from the north to the south. Footpath 026 along the north-western site boundary was identified as a notable visual receptor. There are also views from nearby Footpath 024 where the roofline and views through gaps in the vegetation will need to be considered.	Sections will be provided as part of the Reserved Matters application.

	Pre-App Comment	Response
	Supporting documentation in the form of sections should illustrate the likely impacts from these receptors and more generally, levels throughout the site.	
25	The Outline Masterplan included details / areas of the different open space typologies that the site was envisaged to deliver. It would be helpful to understand in future documentation whether the reserved matters scheme meets these targets. In relation to SuDS basins across the site, these need to be multifunctional. Also, they should include planting to provide visual interest, as well as provide biodiversity and a physical buffer. The inclusion of raingardens and swales across the site is welcome. However, the inclusion of these features along the Rural Edge Lane on the north-eastern edge of the SuDS should also be explored given they would contribute further to the surface water, biodiversity, and visual amenity of the rural edge.	An open space strategy will be submitted as part of the Reserved Matters application which will outline how the different open space typologies have been realised on site. The proposed SuDS basin within the Village Green will be multi-functional and this will be explored within the design development for the southern basin. The SuDS feature on the northern edge will incorporate play space. The playspace will be designed in a way that gently slopes towards the main basin which will help with drainage.
26	Gateway Green – this provides a good area of POS at the site entrance. This is a multi-functional POS and more thought should be given how this can be enhanced as the main recreation area for residents living in the apartment blocks. Enhancements should include additional benches and at least one picnic/dining bench and table. Additional trees to provide shade all seating areas is also recommended.	Benches will be incorporated into the design of Gateway Green with the addition of a picnic bench. The provision of additional trees will be explored.
27	Village Green (north) – we note that the 'Open Space: Village Green' and the play area is situated on the high ground, adjacent to Footpath 026 and the Conservation Area. The western parcel is now proposed to comprise a SuDS basin. This is undesirable not only because it occupies the highest elevation part of the site but more importantly it also occupies a large area of the primary open space for the residents. When approaching from the south, the northern green space has lost its sense of being a destination - the end of the spine road turns into two private drives without a continuation of footway into the greenspace - leaving pedestrians having to turn the corner to seek an ongoing route. The Outline Masterplan showed a more direct continuation of footway through this greenspace. Further thought as to how this greenspace is encountered by foot/bike especially with children in mind is needed. From the northern approach, the	The footways along both sides of the spine road to the north of the site will have dropped kerb tactile paved crossings to access the footway along the southwest of the north green space to access footway 26 to the north. Whilst the outline application showed an additional connection to the footway 26 in the northeastern corner, there is a SuDs basin proposed in the northeastern area and a

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	movement to and from this area appears to be very rigid. Desire access points would naturally occur in the corners of the green, notably from the two access points of the PRow, from the Woodland Edge corner and where the proposed footpath links to the site from the west (as set out in your original pre-application document). We would therefore advise that additional access points the paths through the space are rearranged to align with natural desire lines. This is particularly important in this instance as swales are proposed around the edge of the POS, which restricts natural movement from outside the POS. As the primary POS for the site, it would also benefit from the inclusion of additional benches and at least one picnic/dining bench and table. Additional trees to provide shade all seating areas is also recommended.	footpath connection in this area would therefore be difficult to construct. The one connection to all existing footway 26 is considered to be appropriate for all residents to access sufficiently. The design development for Village Green will consider reinstating the two design lines in conjunction with the basin design. The Village Green will contain seating and play, and we would argue that it does form a destination, and the design development will consider how this can be made more visually significant.
28	Village Green (south) - Potentially, this POS could be used as a quiet sitting space with some benches to the top of the basin. There should be some sort of pedestrian access to the area which is currently prohibited by proposed hedge.	Comments noted and this will be explored within design development.
29	Green Street / Allotment Edge – this illustrative design works well in principle with obvious green features linking together and giving the impression of a 'green street.'	Noted
30	Green Street / Rural Edge Lane – this illustrative design does not include as much public green space as the Green Street to the allotment edge. Trees here are set back (less prominent) within gardens and there is an absence of linking linear green areas. You should also explore the possibility of trees either side of junction to frame entrance to the street.	As part of the Reserved Matters application, we will submit details of the planting and the margin between the carriageway and existing trees. The houses will have hedge front gardens, and we will be providing additional trees in clusters at the end of each Green Street. There is no opportunity for additional space, however there will be a high quality of planting in this location.
31	Planting and SuDS – a mixture of semi mature, and mature trees should be proposed across the scheme to give an immediate visual impact. It will be useful to include informal woodland play photos within the Hard Landscape palette.	Details of play and landscaping will come forward as part of the reserved matters application.

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32	Trees - a large area (0.12ha) of G2 (Category B) is being removed to facilitate the development access. The replacement trees should be at least a 1:1 replacement, however, considering the large reduction in tree canopy we advise that substantially more trees are proposed. Your supporting arboricultural / landscape report should set out both the number of removed and new trees. The pedestrian routes through the woodland should be low intervention and should seek to minimise tree root impacts.	Arboricultural / landscape report will be submitted as part of the reserved matters application.
33	Hedgerows – the use of hedgerows across the site is welcome. The existing hedgerow on the allotment boundaries should be enhanced to retain separation and provide some natural screening for existing residents.	Noted.
34	Orchard - there are opportunities to propose an orchard, as was highlighted within the Outline Masterplan document. It was suggested that this is located in the north-west corner on the higher elevation ground and between the proposed development and PRow. As set out below, this provides also is likely to provide some biodiversity benefits and was proposed as part of the original BNG proposals for the site (see BNG and Ecology section below).	An orchard is not included as part of the proposed development. Ecologically speaking, orchards do not actually score better than 'neutral grassland' in BNG. We will be providing neutral grassland with some scattered fruit trees (not formally an orchard) to address these comments. CSA to speak to Liz Anderson separately.
35	Earthworks – these will be required to facilitate the scheme owed to the 13m difference across the site. It is recommended that existing material is utilised on site as cut and fill or to form the public areas and basins. This should be set out in the Waste Strategy for the site.	Noted.
36	Sectional drawings - these should be submitted to demonstrate the levels changed across the scheme and indicate if any retaining walls are required between back-to-back gardens. This is to ensure that the retaining walls are appropriate between gardens and to avoid overbearing boundary fences or walls	Sectional drawings will be provided as part of the Reserved Matters application.
37	Although the outline application did not identify any specific heritage impacts from the proposal, your formal application should consider and explain whether there are any impacts arising now on the setting of the Norton Conservation Area and any statutorily listed buildings located within it.	Heritage will be included as part of the planning statement.
38	Whilst we understand you have engaged in separate pre-app discussions with the HCC Highways; there is a need to balance the minimal functional highway design requirements with the inclusion of Garden City elements in the site layout. It is not necessarily the case that the local planning authority will accept the design solutions as agreed between your highway consultants and HCC Highways.	There is a difference in advice between HCC and NHC regarding the street design considering road layouts and cul-de-sacs. Whilst agreement is sought from both HCC

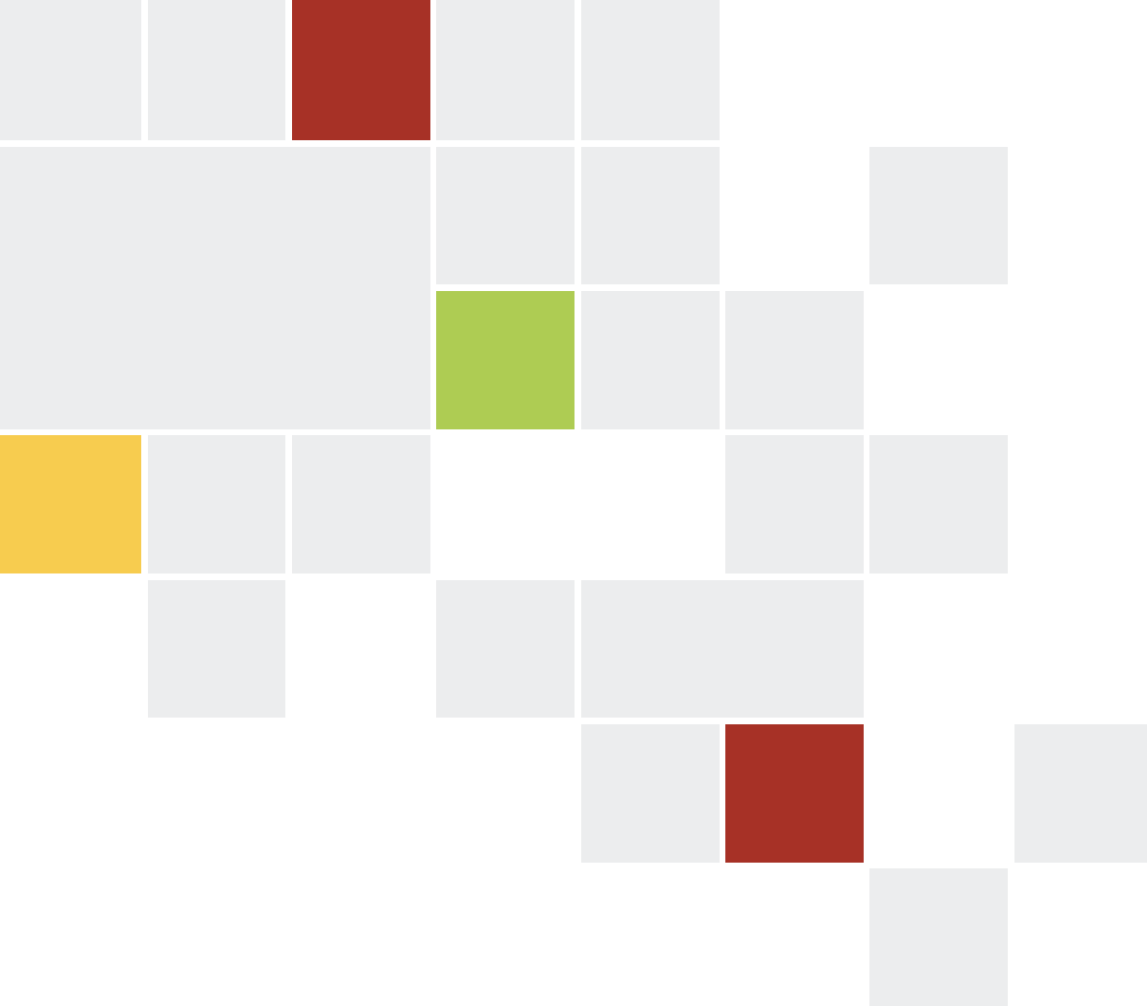
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		and NHC this is difficult when the layout has been designed to HCC standards and NHC have a different opinion to HCC design guidance. To conclude, the scheme has been designed in line with HCC's current highway design guidance, which is the current standard approach and is therefore considered sufficient.
39	Access road (adjoining Flint Way) – in terms of the Place-and-Movement classification, we believe the access road would count as P2/M2/L2 (Local Access), which requires a 6m road width, though with HCC agreement we are happy that this is reduced to 5.5m as proposed. Through the woodland between the end of Flint Road and the first junction within the development, the road has no frontage, so a footway on the west side alone is considered appropriate to minimise hard surfacing and tree loss and reduce the spread of lighting required. Visitor parking in the woodland is undesirable from an ecology, tree impact and distance from the built-up area. It is recommended that visitor parking be distributed evenly through the development. It is recommended that off-road provision for cycling should run southwards from the allotment spur-road junction, with a 3m-wide shared-use path on the west side, tying in with a widening of the footway (to 3m) on the west side of Flint Road (allowing people cycling to avoid interacting with HGV and other industrial estate traffic). See the 'S106 Matters' below for further comments on the off-site improvement works. North of the allotment spur-road junction, the footway would be 2m and cycling would be on-road. The allotment access road will remain a shared-use road with no footway. A raised table across the end of the allotment spur road would provide a continuous at-grade footway, reinforce pedestrian priority (as given in the Highway Code) and keep traffic speeds slow. See HCC Standard Drawings for guidance on how to design this: Standard drawings Hertfordshire County Council Car parking - there is a visitor parking strategy however this needs to be considered alongside a resident's car parking strategy setting out how much provided on-plot, how much off-plot and in what formats. Where optimal (quality and quantity) cycle parking solutions are provided, visitor car parking standards can in principle be relaxed. We would like to see one visitor parking space close to the vehicular entrance allocated for club car use.	Visitor parking will be distributed across the Site. A plan will be provided as part of the Reserved Matters application to show the location of the visitor parking. The off-site footway provision on Flinch Way was agreed with HCC within the outline application. A raised table at the allotment junction can be considered within the site layout design.

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40	Cycle parking - there needs to be a cycle parking strategy for the site, covering provision of secure and convenient storage for residents and readily accessible parking for visitors. The emerging District Design Code will in general not accept cycle parking in garden sheds, especially in this location, where cycling is a realistic mode of daily transport.	The cycle storage will be in the rear gardens which are accessible. There are safety concerns with having the cycle storage located to the front. In addition to this, there is not a lot of space at the front of the terraces and therefore, if located here, it would look cluttered and may cause access issues.
41	Visitor cycle parking should be provided at all play areas and dispersed around the site at appropriate locations (as for visitor car parking).	Details of visitor cycle parking will be provided as part of the Reserved Matters application.
42	Bin storage and collection - conditions 22 and 24 of the outline permission deal with waste matters. There needs to be a strategy for bin storage, waste collection and bin collection points.	Noted.
43	The Council's Housing Supply Officer has commented on the proposals. I note your question about the provision of 9 additional affordable units, and I will provide feedback on this to you separately. Your attention is drawn to the need to ensure that affordable units are tenure blind and units are spread out across the site. No information on this matter appears to have been provided with your supporting documentation and we would welcome the opportunity to discuss this matter further.	Discussions on going with Housing Officer regarding changes to the mix. Awaiting a response.
44	Reserved matters application should be supported by updated surveys (BNG/Ecology)	Updated surveys will be submitted as part of the Reserved Matters application.
45	From and BNG perspective, the proposed planting palette has a good mix of native species. However, it is noted that no fruit trees are listed. The Biodiversity Metric provided with the outline application listed traditional productive orchards (i.e. not an ornamental orchard) as a habitat type. It is unclear how you intend to approach the delivery of the BNG as required by condition 14 of the outline permission and this should be considered and discussed further if the BNG delivery is to vary from that set out in the outline condition.	CSA to speak to Liz Anderson directly.
46	During our site visit, it was noted that a considerable amount of ash in the southern plantation. Your supporting arboricultural report should explain how this matter will be approached given the potential	Noted.

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	for ash die and an alternative plan to manage the woodland in this situation. For the avoidance of doubt, our preference is to see existing established trees retained where possible and practicable	
47	Regarding site layout, LP policy NE4 requires a minimum 12 m buffer from habitats. In relation to the allotment edge boundary, we noted during our site visit that this currently is an existing 4ft high green mesh fence with considerable scrub growth through / round it. We do not strictly consider this boundary to include a 'hedge' and therefore we are not overly concerned about a buffer along this boundary. However, further consideration should be given to including an appropriate boundary treatment along this edge that respects particular area of non-scrub planting. Across the whole site, we would recommend that all boundary treatments allow for movement of hedgehogs. The precise types of boundary treatments could usefully be set out in any formal documentation on a plan.	Boundary specification is to be included as part of the Reserved Matters application.
48	Condition 15 of the original planning permission requires 40 integrated swift boxes and 40 integrated bat boxes across the site. The location of these requires careful consideration. Bat boxes should be along commutable corridors and bird boxes need to avoid southern facades and allow adequate flight space for access. We would recommend that the location of these are indicated on a plan similar to the way the PV has been shown.	Bird and Bat Boxes will be shown on a plan which will be submitted as part of the Reserved Matters application.
49	In relation to the SUDs proposed to the Village Green (north), there is concern that this will have an adverse impact on the potential to deliver the BNG units needed by the outline permission. As previously stated, SUDS can – and should – be multi-functional, but as there is a prescriptive BNG metric calculation to adhere you will need to be cautious over how much habitat are trying to include into what appears to be a smaller amount of space than was originally envisaged.	Noted.
50	In relation to the Footpath Improvement Works required as part of the outline application, the design of this should minimise ecological and tree impacts. In particular, whilst it is noted that the preliminary plan for these improvements do not include lighting, for it to be used as an active travel route for residents it should probably be lit. This potentially would create some harm to the ecological elements adjacent to footpath and would require further consideration. This could potentially be avoided if an alternative route from the PRoW through Hartington Place immediately north-west of the allotments can be found. This is considered further below under S106 matters.	Noted.
51	Sustainability details are secured via condition 19 of the outline permission. The council's adopted 'Sustainability' SPD - https://www.north-herts.gov.uk/sustainability-supplementary-planning-document - sets out nine 'Themes' which should be addressed in the statement relating to this condition. As some Themes cross over into some of the reserved matters, it will be important that these are considered as	The report will be drafted in accordance with the structure of the SPD.

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	part of the design process. Any supporting Planning Statement accompanying the RM application should set out how these matters have been considered in general terms. However, your Sustainability Statement (condition 19) should set out in precise terms the target for each Theme. In general terms, the inclusion of solar panels is welcome, and your statement should set out these proposals in more detail. North Herts District is within a water stressed location. In addition to on-site renewable energy creation, it is recommended that above Building Regs standards (i.e. either Silver or Gold) for water efficiency are prioritised for the site.	We are committed to building to the Future Home Standard (FHS), however, in advance of its implementation.
52	Conditions 3, 4, 5, 6 and 7 deal with surface and foul water drainage issues. The above sections of this response set out concerns about the proposed SuDS feature in the northern POS. It is assumed that the inclusion of this is due to further work being undertaken around flood risk across the site. If the flood risk strategy has altered from the outline application, it would be useful to understand the reasons for this so the matter can be considered further. As part of the RM design process, you should consider these matters carefully to optimise sustainable drainage strategy for the site whilst balancing the other needs and land uses for the development.	Noted
53	Highways improvements (off site) - the S106 secures £618,570 (index-linked) for a range of sustainable transport measures, primarily to improve cycling routes to Letchworth town centre. This includes works on Flint Road, Blackhorse Road, and footpath Letchworth 026, which are to be delivered by your client with the notional cost being deducted from the financial contribution. The specific schemes set out in the S106, to upgrade Footpath 026 to a bridleway and remove vegetation, and to widen the footway on the west side of Flint Road and along some of Blackhorse Road are not in retrospect considered entirely appropriate. Before your client invests time and money in working up more detailed plans for off-site measures, the district council would like to work with HCC and, if willing, your client to review the plans secured in the S106 and consider potential variations and alternatives.	Noted
54	Although the Footpath Improvement Works are defined in the S106 by reference to a plan, agreement requires the Owner to submit the scheme for approval. This implies that it will not be identical to the plan in the S106. Therefore, the district council does not expect the approved plan to require a Deed of Variation. Similarly, the Flint Road and Blackhorse Road Improvement Works are defined in the S106 by reference to an annotated concept plan, and the Owner must submit a scheme for approval. Therefore, we do not expect the approved plan to require a Deed of Variation.	Noted.
55	Options to explore within the scope of the HCC Sustainable Transport fund include creating an active travel access through the allotment site to Hartington Place and/or Kristiansand Way. This would	Noted.

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	provide an optimal route for residents to Letchworth town centre. This is considered further below under other matters.	
56	There are concerns that the footway improvements to the north of the site are not optimal from a connectivity perspective. It is also unclear whether there is agreement with the adjacent school or relevant governing body to deliver the gated connection from PRoW 026. It is understood that the LHF are the landowners of the allotments although the district council has a lease on the land. The LPA are keen to secure the delivery explore potential pedestrian links through the allotment car park and also either through or linking to existing build up area to the west from PRoW 026 into Hartington Place.	Noted.
57	It is understood that LHF will retain some control / responsibility over the land post completion – management of open space, woodland, and BNG. It would be useful if you could provide clarification on the proposed management of the different open and public spaces across the site which may inform our further responses to site wide design matters	Private management company will manage the open space.



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