

CONSERVATION TEAM CONSULTATION APPLICATION RESPONSE

APPLICATION REF:	26/00853/FP
CASE OFFICER:	Henry Thomas
APPLICATION SITE:	Morrisons Superstore Broadway Letchworth Garden City Hertfordshire SG6 3TS
DESCRIPTION OF WORKS:	Installation of floodlights.

RECOMMENDATION:

There is **NO OBJECTION**. The scheme will satisfy the provisions of Sections 16(2) (LBC) and /or 66(1) (FP/FPH) and/or 72(1) (both) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the aims of Section 20 of the NPPF (August 2026) and Policy HE1 of the North Hertfordshire Local Plan 2011-2031.

SUGGESTED CONDITIONS:

N/A

SHORT SUMMARY:

Impact on listed building's special character – Not applicable

Impact on character and appearance of the conservation area –

The site is located within the Letchworth Conservation Area and was first designated in December 1974 It is the World's First Garden City.

The proposal itself is located in the northwest of the Morrisons Car Park and to the northwest is Station Way and all other sides are the existing car park.

Impact on setting of heritage assets and how this affects significance –

The extract below from the submitted Heritage Asset details the study area:

There are no heritage assets within the Site.

1.5.3 The Site is located within Letchworth Conservation Area (Asset 1).

1.5.4 Within the 500m Study Area there is one Grade II Listed Building (Asset 2) and 14 Grade II Listed Buildings (Assets 3-14 & 42-43),*

1.5.5 Within the 500m Study Area there is one Grade II Register Park and Garden; Broadway, Letchworth (Asset 17). The Broadway is given a wider area within the Hertfordshire County Council HER which includes the enclosing Broadway Road.

1.5.6 There are no Scheduled Monuments, Registered Parks and Gardens, Registered Battlefields or World Heritage Sites within the Site of the 500m Study Area.

1.5.7 This HS has been produced to support two planning applications at Morrisons Letchworth; one for floodlights and one for Air/Vac units.

The only designated heritage assets which may be affected from this proposal is the Spirella Building (Grade II*) and the setting of the Letchworth Conservation Area.

From within the Morrisons car park only the upper storey of the Spirella building is visible with intervening tree coverage mitigating the impact on this view. (see plate 2 and 3 copied from Heritage Statement below)

Does the proposal occasion harm or preserve or enhance –

Copied below is the extract from the submitted Heritage Statement summarising the harm of the proposed development.

5.3 Summary of Harm

5.3.1 With the exception of the Grade II Listed Spirella Building and Letchworth Conservation Area (Asset 1) the Proposed Development has been assessed as having no impacts upon the settings or character of designated assets within the 500m Study Area and therefore there is no mitigation required.*

5.3.2 A Neutral level of impact has been predicted upon the setting of the Grade II Listed Spirella Building. Therefore no harm to the Spirella Building is predicted, as the Proposed Development would neither diminish or enhance the ability to appreciate its significance. Thus the policy tests as set out in NPPF are not invoked and no mitigation is proposed beyond that inherent to the design (i.e. proposed screening etc.)*

5.3.3 A Neutral level of impact has been predicted upon the setting of Letchworth Conservation Area (Asset 1). Therefore no harm to Letchworth Conservation Area (Asset 1) is predicted. Thus the policy tests as set out in NPPF are not invoked and no mitigation is proposed beyond that inherent to the design (i.e. proposed screening etc.)



View northwest of the Site; upper storey of Grade II* Listed Spirella Building Asset 2, Grade II* Listed Building No. 1347670) in view



View west of the Site; upper storey of Grade II* Listed Spirella Building (Asset 2, Grade II* Listed Building No. 1347670) in view

The location of the proposed floodlights within the car park of Morrisons supermarket which has a functional character commensurate with its use. The location of floodlights would not be an alien addition and therefore it would have a neutral impact on that character and therefore no harm.

The views toward the Spirealla Building and their impact are considered to be neutral and therefore no harm is attached for the reasons already stated above.

Site Context: See summary section above.

DETAILED ANALYSIS AND CONSIDERATIONS:

[Please see summary section above.](#)

HERITAGE POLICY ASSESSMENT:

Planning (Listed Building and Conservation Areas) Act 1990:

North Hertfordshire Local Plan 2011-2031:

NPPF (August 2026):

The Local Plan and NPPF

North Hertfordshire Local Plan 2011-2031 and the policies contained within it i.e., Policy HE1. The plan was adopted November 2022.

The relevant policy paragraphs of Section 20 of the August 2026 version of the NPPF are detailed as follows.

HE4: Securing the conservation of heritage assets.

- 1. Heritage assets, as an irreplaceable resource, should be conserved in a manner appropriate to their significance. To achieve this, development proposals which would affect the significance of heritage assets, including any contribution made by their setting should: a. Maintain or secure a use consistent with their conservation, taking into account the importance of maintaining the assets, the positive contribution they can make to sustainable communities including local economies, and the positive contribution they can make to local character and distinctiveness; and b. Avoid (or if that is not possible, minimise) harm to the significance of heritage assets, and instead conserve this significance.*
- 2. Any harm to, or loss of, the significance of a designated heritage asset (including from development within its setting) should have a clear and convincing justification in accordance with the policies in this chapter*

HE5: Assessing effects on heritage assets.

- 1. Development proposals affecting heritage assets should be accompanied by an assessment of the significance of the assets affected (including any contribution made by their setting) and of the potential effect of the proposal on their significance. The level of detail should be proportionate to the assets' importance and no more than is necessary to understand the potential effect of the proposal on their significance. The relevant historic environment record should be referred to in making this assessment, and appropriate expertise employed where necessary.*
- 2. Assessments of the potential effects of development proposals on the significance of heritage assets (including through effects on their setting) should identify whether proposals would be likely to: a. Have a positive effect, which is where the significance of a heritage asset would be enhanced, or better revealed; or b. Have no effect on the significance of a heritage asset; or c. Result in harm to the significance of a heritage asset, either from work affecting the asset itself or from development within its setting. The degree of harm*

should be identified: substantial harm would occur where the development proposal would seriously affect a key element of the asset's significance; or d. Cause the total loss of the significance of a heritage asset.

3. In making this assessment it is the effect on a heritage asset's significance rather than the scale of the development which should be considered.

4. Decision-makers should be satisfied that assessments accurately reflect the effects on heritage assets caused by development proposals.

5. Where a development proposal involves, or has the potential to involve, a heritage asset with archaeological interest, an appropriate desk-based assessment should be undertaken and, where necessary, a field evaluation. These should be used to help understand the asset's significance and the potential effect of the proposal on this, which should inform the design, mitigation and implementation of the development.

HE6: Proposals affecting designated heritage assets.

1. When considering the potential effect of a development proposal on the significance of a designated heritage asset, substantial weight should be given to the asset's conservation 96 (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential effect amounts to a positive effect, harm, substantial harm, or total loss of its significance.

2. Development proposals which would have a positive effect on a designated heritage asset should be supported.

3. Any harm to a designated heritage asset will be a matter of considerable importance and weight, which should be dealt with in accordance with paragraphs 4 to 6 of this policy.

4. Where a development proposal would harm the significance of a designated heritage asset the effect on the asset and its significance should be weighed against any public benefits resulting from the proposal. Important public benefits can include securing the long-term reuse of a vacant or underused listed building, and enabling energy efficiency and low carbon heating measures to be employed.

5. Where a development proposal would cause substantial harm to, or the total loss of, the significance of a designated heritage asset, consent should be refused unless it can be demonstrated that the harm is necessary to achieve substantial public benefits that outweigh the harm or loss, or if all of the following apply: a. The nature of the heritage asset would otherwise prevent all reasonable uses of the site; b. No suitable use for the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; c. Conservation by grant-funding or some form of not for profit, charitable or public ownership is not possible; and d. The harm or loss is outweighed by the benefit of bringing the asset back into use.

6. Within this context, development which would cause substantial harm to, or the total loss of, the significance of grade II listed buildings, or grade II registered parks or gardens, should be exceptional; while development which would cause substantial harm to, or the total loss of, assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional 64*

The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) – December 2017

At para 14 under the sub-heading 'Landscape Assessment and Amenity' it states that "Analysis of setting is different from landscape assessment. While landscapes include everything within them, the entirety of very extensive settings may not contribute equally to the significance of a heritage asset, if at all. **Careful analysis is therefore required to assess whether one heritage asset at a considerable distance from another, though intervisible with it – a church spire, for instance – is a major component of the setting, rather than just an incidental element within the wider landscape.**"

At para 17 it states (my emphasis in bold): "All heritage assets have significance, some of which have particular significance and are designated. The contribution made by their setting to their significance also varies. **Although many settings may be enhanced by development, not all settings have the same capacity to accommodate change without harm to the significance of the heritage asset or the ability to appreciate it.** This capacity may vary between designated assets of the same grade or of the same type or according to the nature of the change. It can also depend on the location of the asset: an elevated or overlooked location; a riverbank, coastal or island location; or a location within an extensive tract of flat land may increase

the sensitivity of the setting (i.e. the capacity of the setting to accommodate change without harm to the heritage asset's significance) or of views of the asset. This requires the implications of development affecting the setting of heritage assets to be considered on a case-by-case basis."

Relevant National Guidance i.e. Historic England:

Other relevant documents (Please specify):

CONCLUSION:

There are no objections to the proposal for the reasons stated above. The proposal is considered to have complied with HE4 to HE6 of the NPPF (August 2026) and North Hertfordshire Local Plan 2011-2031 and the policies contained within it i.e., Policy HE1. The plan was adopted November 2022.

OFFICER: Tricia Craggs

DATE: 11.9.2026