



Redevelopment of Starwood House, Avenue One Letchworth

Proposed Eg (ii) (iii), B2, B8, Development

Planning Statement

On behalf of

Letchworth Investment LLP

Project Ref: 333101683/A5/JD | Date: April 2025

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1 Introduction

- 1.1 This Planning Statement has been prepared by Stantec UK Limited, on behalf of Letchworth Investment LLP (“the Applicant”) for Wrenbridge in support of a full planning application (“the Application”) at Starwood House, Avenue One Letchworth (“the Site”).
- 1.2 The Site Location Plan is included at **Appendix 1** of this statement.
- 1.3 The Description of Development as found on the application forms is described as follows:

“Erection of two buildings for Flexible Use Classes including Eg (ii) (iii), B2, B8, including servicing, parking, access, landscaping.”
- 1.4 The Site is located in a sustainable location on the eastern edge of Letchworth, and forms part of an adopted allocation (ETC1) for employment purposes. This is supported by Policy SP3 which identifies E class uses (office, research and development, industrial processes), B1 (business), B2 (industrial), and B8 (storage and distribution) as appropriate to this location.
- 1.5 The proposals present an opportunity to bring forward employment uses on an outdated and unused brownfield space, which was built bespoke for the previous occupier. Its redevelopment would help meet identified employment need and address the market demands of modern business practice and the logistics sector, creating jobs and making a significant contribution to the economy.
- 1.6 This Planning Statement provides the rationale for the Proposed Development whilst at the same time demonstrating its compliance with the adopted Development Plan and material considerations including the National Planning Policy Framework (NPPF).
- 1.7 The Proposals have been the subject of a pre-application meeting held with officers of North Herts Council on 20th January 2025, where the principle of the use and form of development was supported.
- 1.8 The remainder of the Planning Statement is structured as follows:
 - Section 2 – Application Site and Surroundings
 - Section 3 – Planning History
 - Section 4 – Application Proposals
 - Section 5 – Planning Policy Context
 - Section 6 – Assessment of Application Proposals
 - Section 7 – Conclusions

2 Application Site and Surrounding Area

The Application Site

- 2.1 The Site measures approximately 2.44 ha and is located in an established employment location known as Letchworth Business Park in east Letchworth.
- 2.2 The Site is currently accessed via Avenue One located to the west of the Site.
- 2.3 The western section of the Site comprises two adjoining industrial units, each 1-2 storeys high, with ancillary office space along the western boundary. The built form coverage of the site is circa 30% which is low for modern purposes. It was previously used by Tesco as a Data Centre and R&D facility and was built bespoke to that use in the late 1980's. Due to the previous use, the floor to ceiling heights are low and there are very few windows to the main building. The Pre-Application Feedback received from the Council confirmed the previous use to be R&D accounting for ancillary offices and the Data Centre function. Agency advice has confirmed that the site could not be re-occupied in its current form.
- 2.4 A small area along the western boundary is used for parking and access to plant located to the south of the Site.
- 2.5 The eastern portion of the Site was utilised for car parking. The northeast part of the site remains laid out with car parking spaces. The Southeast part of the site was also used for car parking but has become overgrown with grass and low level shrubs.
- 2.6 Mature trees encircle the entire Site, creating a tree-lined boulevard ambiance.
- 2.7 The Site falls within Flood Zone 1 (low probability of flooding), indicating a low probability of flooding with some areas of the Site are susceptible to low and medium risk surface water flooding as shown on the below map.

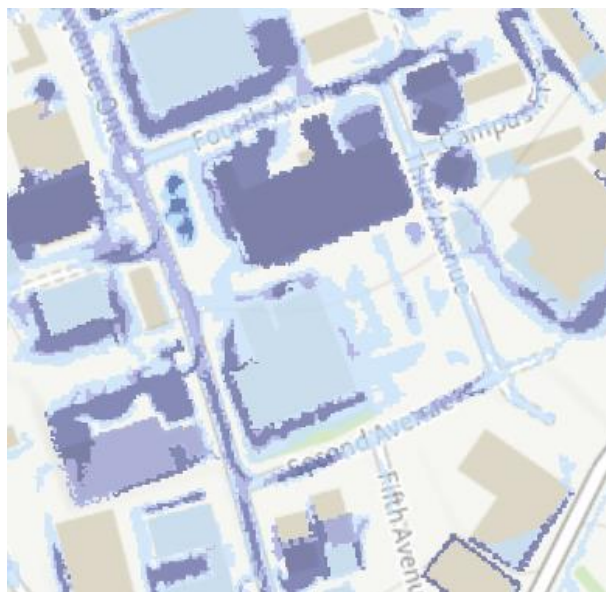


Figure 1: Environment Agency Surface Water Flooding Mapping

- 2.8 The Site is considered to be largely free of any environmental or technical constraints. There are no Listed Buildings within close proximity to the site, and the site is not in a Conservation Area. The nearest residential properties are more than 400m from the site.

The Surrounding Area

- 2.9 As the Site is located within an Employment Area, much of the surrounding context is employment with existing employment uses located to the, north, south, east and west.
- 2.10 The Site is bordered by Avenue One to the west, Second Avenue to the south and Third Avenue is located to the east of the Site with a Sainsburys store located beyond.
- 2.11 The Site benefits from excellent road connectivity, being located north of the B656, which links to the A1(M) and A505. Additionally, the Site benefits from good rail connectivity, with Letchworth Garden City Rail Station approximately 1.6 km to the west, offering regular services to London. Buses also run frequently from Third, Fourth, and Sixth Avenues surrounding the Site.

3 Planning History

- 3.1 From the available Planning History, the site appears to have been granted planning permission prior to the introduction of the Use Classes Order in 1987 and granted permission for 'business purposes'.
- 3.2 The Site was last occupied by Tesco as a R&D/IT Service Centre holding a significant amount of IT/Data Centre material/machinery, with Software Engineers and administration within the office building.
- 3.3 There is no recent planning history on site of direct relevance although historically there have been numerous applications including extensions to increase office space, parking and plant installation. Applications in the wider area indicate ongoing support for the development of B2 (general industrial) and B8 (storage or distribution) purposes (summary below):
- *Application 24/00497/FP was approved on 16 October 2024 for an extension to the main warehouse/production building and reconfiguration of existing car parking areas following the demolition of existing buildings (Works Road).*
 - *Application 23/02706/FP pending for the erection of a headquarters building for Wheatley Group Developments Ltd, including workshop, storage facilities, associated car parking, and landscaping. (Land West of Avenue One).*

Pre application meeting

- 3.4 The Proposed form of development was subject to a pre application meeting which was held with North Herts council on 20 January 2025. A written response ('the response') was issued by the case officer on 6 February (included in appendix 3).
- 3.5 The response confirms that the site is allocated in the Local Plan for employment uses and the principle of development for employment uses including Eg (ii) (iii), B2, B8 is considered acceptable.
- 3.6 The response also notes that the council accepts the previous use by Tesco was likely R&D/light industrial however the site has been vacant for a significant period. It was accepted that the building was unlikely to be capable of re-occupation due to its age and bespoke nature. The re-development for modern speculative employment units that could meet the needs of a range of tenants/occupiers was seen to be positive.
- 3.7 The pre-app response also notes the amount of floorspace proposed would make for a more efficient use of the site, given its allocation for employment uses in a sustainable location such as this close to the strategic road network and other supporting infrastructure such as public transport and other services. The proposed site coverage of circa 40.7% is entirely consistent with general industrial/logistics developments. The existing coverage is circa 30% and the redevelopment was therefore seen to make a more positive use of the site consistent with the aspirations of local policies and the NPPF.
- 3.8 The retention of mature trees along the boundary of all sides of the site was seen as a positive to the proposal, and key to retaining the Boulevard feel of the environment. The loss of overgrown/old trees and scrub/shrubs in the southwest corner was not seen to impact on the boundary aspects of the site and would enable the designated employment site to make a greater contribution to the local economy.
- 3.9 The introduction of a high-quality new entrance point, with glazing and activity in the northwest corner was welcomed and was seen to benefit the Avenue One Street scene. The height of the units was considered to be broadly consistent with recently approved developments, but

officers requested that's sections across Avenue One and through the site be added to the application package.

- 3.10 It was flagged that there was a pond located to the immediate northwest of the site boundary that should be checked for ecological value. However, it was confirmed by the officers that there was otherwise not considered to be any significant habitat value to the site. No objections to the proposals were raised by the Ecology or Tree officers.
- 3.11 Off-site provision of ecology was accepted in principle, subject to demonstrating that it would not be appropriate to meet BNG on-site, or whereby it would conflict with providing a positive economic benefit. Any off-site provision to achieve the 10% BNG required could be secured by way of a planning condition.
- 3.12 It was highlighted that the proximity of Unit 3 to the property to the north. However, was acceptable, on the basis that the unit to the north did not have any south facing windows overlooking the site. However, officers requested that a pedestrian access was provided for on the northeast corner of the site to enable employees to access the Sainsbury's to the east on foot during lunch hours.

4 Application Proposals

- 4.1 The proposed development is shown within the proposed site layout drawing reference L060-CMP-SI-ZZ-DR-A-00100 Rev PL1 included at **Appendix 2**.
- 4.2 The proposed description of development is:

“Erection of two buildings for Flexible Use Classes including Eg (ii) (iii), B2, B8, including servicing, parking, access, landscaping”.
- 4.3 The proposed development seeks unrestricted 24/7 use, which is appropriate to the location as a designated employment area.
- 4.4 Building one is located along the western boundary of the site adjacent to Avenue One. It is proposed to provide to commercial units, unit one and unit two, in a terrace form running north to south with car and HGV parking and servicing located to the east in the centre of the site, where internal activity could be screened.
- 4.5 Building two contains Unit three, the larger of the industrial units located to the north east of the site with car parking located to the north and south and HGV parking and servicing located to the south of the building / unit, again this ensures that serving activity is screened by the built form itself.
- 4.6 All units will have a maximum ridge height of 15m.
- 4.7 Ancillary office space, extending to 10-15% of the floorspace is provided in two buildings, supporting the potential for a larger office function and/or an occupier to locate a headquarters comprising office and warehouse function in one single building. This is now common practice in Industrial and Logistics and supports a broader range of jobs including technical, management operations and administrative roles consistent with modern industrial and logistic occupier requirements.
- 4.8 The northwestern corner of the site is of greatest prominence to Avenue One and will be significantly enhanced through the provision of high quality landscaping and an active high quality glazed frontage to the northwest corner of Avenue One that will extend north and east along part of the unit. This will provide activity to Avenue One, with glimpses of the property through the retained mature trees.
- 4.9 All mature trees around the edge of the site are retained, and areas of enhanced quality landscaping are provided. There will be the loss of a number of U Class and C Class trees, as well as the loss of several mature Category B trees in a sunken area to the immediate south of the existing building. Those trees are related to the previous function and are not protected. The loss is compensated for by higher quality landscaping in more prominent parts of the site and the provision of additional trees within the site itself.
- 4.10 Pursuant to the Pre-Application request of officers, a further pedestrian access is proposed in the northeast corner adjacent to Unit 3, to enable employees to access the Supermarket and shops to the east.
- 4.11 A summary of the proposal is shown below:

Unit	Warehouse Area (Sq m GIA)	Mezzanine Office Floor Area (Sq m GIA)	Total Floor area (Sq. m) GIA	Car Parking (20% active)	Cycle Parking
1	3572	438	4010	37	24
2	2089	283	2372	21	16
3	4932	615	5547	48	32
Total			11,929	106	72

- 4.12 Each unit will have its own dedicated service yard with between 3-6 docking / loading bays. A total of 14 bays across are proposed across the three units.
- 4.13 The development updates the current access from Avenue One to include a new cycle path and proposes a new pedestrian access to the north east of the site.
- 4.14 Amenity space is also proposed to the north east with benches for use by new employees.
- 4.15 The landscape strategy has been designed to providing a positive setting for the proposals while protecting and enhancing the existing tree belt which surrounds the site and continues the tree boulevard which extends along Avenue One.
- 4.16 The main aims for the landscape proposals are:
- *Where possible, retain and protect the existing trees and hedges around the boundaries of the Site to maintain a strong landscape edge;*
 - *Enhanced planting along the northern boundary and along the access routes;*
 - *Landscape surrounding the car parks and offices provides a positive feature;*
 - *Provide a high quality outdoor amenity space for users.*
- 4.17 In terms of building sustainability, Wrenbridge is committed to achieving BREEAM Excellent certification and an Energy Rating of EPC A+ with aspirations to achieve BREEAM Outstanding.
- 4.18 A separate application has been submitted to address the demolition of the building currently on Site.

5 Planning Policy Context

- 5.1 This section of the Planning Statement identifies the local and national planning policies relevant to this application.
- 5.2 In accordance with Section 38 (6) of the Planning and Compulsory Purchase Act 2004, planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.3 The Development Plan for the Site comprises the North Herts Local Plan 2011 – 2031 supplemented by the North Herts Policies Map.

The Development Plan

North Herts Local Plan 2011 - 2031

Spatial Strategy and Strategic Policies

- 5.4 Policy SP1: Sustainable development in North Hertfordshire, supports development in the district by granting planning permission where development is high quality, respects and improves surroundings and provides opportunities for healthy lifestyle choices; provides necessary infrastructure and secures any necessary mitigation measures that reduce the impact of development, including on climate change.
- 5.5 Policy SP3: Employment, supports sustainable new economic growth through new business development on designated employment land, supporting development for employment uses including light industrial and B class uses.
- 5.6 Policy SP6: Sustainable Transport encourages development in locations with sustainable transport to key services and facilities and requires assessments, plans and supporting documents to demonstrate the safety and sustainability of proposals.
- 5.7 Policy SP9: Design and Sustainability supports development that is well designed and located and responds positively to its local context.
- 5.8 Policy SP11: Natural resources and sustainability, support development that seeks to meet the challenges of climate change and flooding including the use of sustainable Drainage systems (SuDS).

Development Management Policies

- 5.9 The site is identified as within a defined Employment Area on the Local Plan Proposals Map.
- 5.10 Policy ETC1, states that the council will support development in protected employment spaces for office, research and development, industrial processes, industrial and storage and distribution uses provided Use Class B8 development is easily accessible from the primary road network.
- 5.11 Policy T1: Assessment of transport matters seeks to ensure that new development will not lead to highway safety problems or cause unacceptable impacts upon the highway network
- 5.12 Policy T2: Parking sets out parking standards for new development
- 5.13 Policy D1: Sustainable design seeks to ensure development will respond positively to the local context and consider the Design SPD.

- 5.14 Policy D4: Air quality ensures that new development takes account of the impact from the development on air quality and proposes appropriate mitigation.
- 5.15 Policy NE4: Biodiversity and geological sites supports development which appropriately protect, enhances and manages biodiversity and development proposal which also retain, safeguard, and manage existing wildlife habitats, including trees and hedgerows.
- 5.16 Policy NE7: Reducing flood risk supports development outside of flood zone 2 and 3 or where an appropriate Flood Risk Assessment FRA can demonstrate the impact of the flood zone in the development can be effectively mitigated.
- 5.17 Policy NE8: Sustainable drainage systems, requires new development to consider the most appropriate SuDS system to reduce the risk of surface water flooding, enhance biodiversity, water quality and provide amenity benefits.
- 5.18 Policy NE11: Contaminated land requires that development take account of potential contamination risk and provide a contaminated land study / contaminated land risk assessment as part of the application

Material Considerations

National Planning Policy Framework (NPPF) – December 2024

- 5.19 The revised NPPF was published in December 2024. It sets out the Government's planning policies for England and explains how these should be applied to development proposals. The NPPF is a material consideration in the determination of planning applications.
- 5.20 Paragraph 7 of the NPPF states “the purpose of the planning system is to contribute to the achievement of sustainable development”. Paragraph 8 sets out that proposals must meet the economic, social and environmental objectives set out in Paragraph 8. The three objectives are interdependent and are described as follows:
 - “a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;***
 - b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and***
 - c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”***
- 5.21 Paragraph 11 requires decision-taking to accord with an up-to-date development plan; or when there are no relevant development plan policies, or policies which are out-of-date, permission should be granted unless it is contrary to the framework or in granting permission it has a significant and demonstrable harm which outweighs the benefits when assessed against the framework.
- 5.22 Chapter 3 of the NPPF states “local planning authorities should approach decision on proposed development in a positive and creative way”.

- 5.23 Chapter 6 of the NPPF addresses the need to build a strong and competitive economy. Paragraph 85, states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 5.24 Paragraph 86 outlines important aspects for planning policies to facilitate development to meet the needs of a modern economy, including identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics.
- 5.25 Paragraph 87 further states that planning policies and decisions should recognise and address the specific locational requirements of different sectors including making provision for storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation.
- 5.26 Chapter 8 promotes healthy and safe communities which requires decisions to ensure that they achieve healthy, inclusive and safe places.
- 5.27 Chapter 9 discusses the promotion of sustainable transport. Paragraph 115 states that regarding specific applications for development should be ensure that:

“a.) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;

b.) safe and suitable access to the site can be achieved for all users;

c.) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Code and the National Model Design code; and

d.) 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.”

- 5.28 Paragraph 118 requires that “all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be addressed.”
- 5.29 Chapter 12 discusses the achievement of well-designed and beautiful places. Paragraph 131 states:

“The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.”

National Design Guide

- 5.30 The Government published the National Design Guide in October 2019. While the document is considered to address primarily design in relation to residential and mixed-use development it does consider the importance of matters such as connectivity and sustainability of developments which should be considered as part of the application.

Relevant Supplementary Planning Documents

Further guidance is also provided in Supplementary Planning Documents (SPDs) including:

- *Sustainability SPD (2024)*
- *Vehicle Parking at New Developments SPD (2011)*

Emerging National Industrial Strategy

- 5.31 Consultation in relation to the government's new industrial strategy, Invest 2035: the UK's modern industrial strategy, concluded In November 2024. The industrial strategy will be published in Spring 2025 and has the objective of long-term, sustainable, inclusive, and resilient growth, by spurring investment into all parts of the UK.

Emerging Local Plan

- 5.32 The emerging Local Plan is still in the early stages of preparation with regulation 18 public consultation scheduled for October to November 2025. Adoption of the Development Plan is scheduled for December 2027. Therefore, no weight is afforded to the emerging local plan.

6 Assessment of Application Proposals

- 6.1 The Application seeks full approval for the Proposed Development described as follows:

“Erection of two buildings for Flexible Use Classes including Eg (ii) (iii), B2, B8, including servicing, parking, access, landscaping.”

Principle of Development

- 6.2 The Written Ministerial Statement from the 30th July 2024¹ is relevant to the principle of use as a material planning consideration (see Cala Homes (South) Ltd, R (on the application of) v Secretary of State for Communities and Local Government & Anor [2011] EWCA Civ 639 (27 May 2011) (bailii.org)). The statement recognises that logistics and freight are part of the nation’s critical infrastructure and more will be done to support this sector as part of the engine of the economy.
- 6.1 The Government also released a consultation on 17th October 2024 on the UK’s modern industrial strategy² which again highlights economic growth is the number one mission of the Government, with the industrial strategy central to that mission. This also recognises that planning constraints are holding back growth, with firms requiring certainty and efficiency when applying for consent. It is therefore critical that sites such as this, allocated for the uses proposed are able to move through the planning system without delay and be brought back into regular and efficient use.
- 6.2 The National Planning Policy Framework (NPPF) updated December 2024, also highlights the importance of prioritising economic growth, and this is central to the Government’s pillars of economic policy. Industrial and logistics (paragraphs 85 and 86) are recognised as fundamental to economic prosperity and thus an ongoing supply of high quality space for B2 and B8 development is key to economic success. Paragraph 85 requires significant weight to be placed on the need to support economic growth and productivity.
- 6.3 Paragraph 86 requires planning policy to set out a clear economic vision and strategy encouraging sustainable economic growth, having regard to the national industrial strategy and any relevant Local Industrial Strategies and facilitating the needs of a modern economy including logistics. Thus there is significant emphasis placed at a national level to support the form of development proposed by this planning application in the right locations.
- 6.4 In that context, whilst the site is vacant, it was last used for employment generating purposes – R&D and a Data Centre. Whilst it was built bespoke to the previous use, it is of industrial appearance, has generated employment previously and is located within a large industrial estate in Letchworth. Re-use of previously developed brownfield land is equally advocated within the NPPF and at all stands of Planning policy, to bring under-utilised land back into beneficial use.
- 6.5 The precedent thus exists for Employment use of the site, and the proposal would bring an under-utilised (vacant) employment site, within an Industrial area, back into beneficial use. The principle of commercial development on this site is therefore already established.
- 6.6 Further, the site is allocated in an Employment Area as defined on the adopted North Herts Local Plan 2011-2031 Proposals Map and under Policy ETC1 of the Adopted North Herts Local Plan 2011 – 2031.

¹ MP Angela Rayner – Written Ministerial Statement: [Written statements - Written questions, answers and statements - UK Parliament](#)

² Invest 2035: The UK’s Modern Industrial Strategy: [Invest 2035: the UK’s modern industrial strategy - GOV.UK](#)

- 6.7 Policy SP3 encourages employment and sustainable economic growth seeking to direct it in the first instance to employment allocated land. The Use classes supported on designated employment land are B1, B2 and B8. From August 2021 the Use Class Order was amended and B1 was superseded by Use Class E. Accordingly, the adopted Local Plan also supports the principle of the uses proposed in this planning application.
- 6.8 Accordingly, in the context of Section 38(6) the principle of the uses proposed by this planning application do accord with the Development Plan – notably policies SP3 and ETC1. Thus, it follows that the application should be determined positively unless there is conflict elsewhere with the Development Plan, or there would be material considerations to account for that would suggest otherwise.

Site Usage & Proposed Development

- 6.9 The current space is an under-utilised employment space. It has been vacant for a number of years, having been previously used as a data centre & R&D facility for Tesco. The building is bespoke to its previous use and could not be readily occupied. The technology associated with Data Centres has progressed substantially since the building was constructed in the 1980's and it would be wholly obsolete for that use. The building has a lack of windows and low floor to ceiling heights, making it completely impractical for re-occupation by any of the uses permitted/supported by Policies SP3 or ETC1.
- 6.10 If it were to remain, it would continue to make no contribution to the local economy, and that is wholly contradictory to the need for re-use of under-utilised previously developed brownfield land. To bring it back into beneficial use compliant with its allocation, the existing buildings will need to be removed, with new facilities that meet the requirements of modern occupiers within the Use Classes proposed and permitted by Policy.
- 6.11 The site's previous use would have had a high energy usage and the building would compare very unfavourably to modern standards. Again, this amplifies the case for its removal and redevelopment. To ensure it is fit for purpose and aligns with the aspirations the Local Plan and it should respond to modern occupier needs and make the strongest possible contribution to the Local economy. In that context a Standard site coverage for employment uses such as those proposed in E(g)(ii); E(g)(iii); B2 and B8 is 40-45%. The proposed coverage is broadly aligned with the appropriate levels of coverage and therefore appropriate in terms of density.

Demolition

- 6.12 A separate application has been submitted for prior approval to demolish the existing unused building which has fallen into disrepair.
- 6.13 While not part of this application, there are no constraints on site which restrict the demolition and redevelopment.

Generation of Jobs

- 6.14 Based upon the proposed B2 and B8 uses, it is anticipated that the proposals would generate approximately 123-314 new full time equivalent jobs during the operational phase, accounting for the flexible use.
- 6.15 The types and mix of jobs in the B use class has improved significantly over recent years which is articulated in both the British Property Federation (BPF) publications, Levelling Up of Logistics³ and What Warehousing Where⁴.

³ BPF – Levelling Up of Logistics: [BPF - Levelling Up - The Logic of Logistics](#)

⁴ BPF - What Warehousing Where? [BPF - What Warehousing Where?](#)

- 6.16 Jobs in the logistics sector are not only essential but increasingly of higher quality which is reflected in the type of development delivered as standard by Wrenbridge, a well-established provider of logistic space.

Design and Appearance

- 6.17 This application is accompanied by a Design and Access Statement produced by CMP Architects which provides greater detail on the design rationale for the proposal and should be read in conjunction with this statement.
- 6.18 The proposed development has considered the site context including surrounding employment uses and the setting including existing tree lined boulevard along Avenue One to produce a high-quality scheme that responds well to site constraints and market requirements.
- 6.19 A typical proposal for the uses proposed require extensive service yards and thus a site coverage of between 40-50% is typical, making beneficial use of the site. That is reflected in nearby development on other sites within the industrial area, particularly more recently approved/developed. The proposal seeks to balance that against the site context, retaining key areas of quality boundary treatment, but extending the development footprint into low quality areas of previous scrub/landscape to maximise the employment use in accordance with National Policy and adopted Local Plan policies ETC1 and SP3. This delivers a higher economic benefit, with very limited environmental affect – which is fully mitigated (see later sections of this statement).
- 6.20 The buildings have then been carefully designed to bring the development up to a modern standard of use with a high level of design including high quality materials and visual variation in frontages and articulation of the façade.
- 6.21 The office content ancillary to the main use has been located to provide glazing focused on the offices with feature entrances and first floor windows. This provides activity and natural surveillance to Avenue One, which is the busiest of the roads adjoining the site in terms of vehicles and footfall. Servicing yards are located to the rear of units to avoid views into the yard from Avenue One, and to keep the noisier, more visually obtrusive elements hidden from public view.
- 6.22 The proposed building line onto Avenue One is broadly in the same position as the existing office element of Starwood House and the existing site access has been retained and adapted. A small area of hedgerow is to be removed to create an additional pedestrian access in the northeast corner of the site to facilitate employee access to local shops and amenities.
- 6.23 The building layout has been designed to maximise site efficiency, help screen service yards and add a positive frontage to boundary conditions. The height of the buildings proposed is defined by the need for 12m internal clearance – enabling internal stacking/racking of material, which is a key requirement of modern occupiers in all of the uses proposed. Meeting this requirement maximises the prospects of the units being successfully let, and the proposed heights reflect those recently permitted in North Herts and within the wider industrial estate.
- 6.24 The material palette will create a high-quality finish and contemporary appearance; large amounts of curtain wall glazing, and flat panel finish will articulate the active entrance/core and office areas of the building; half round profiled metal cladding to the warehouse areas adds texture and variation.
- 6.25 A combination of tones, textures and detailing will be arranged to create visual interest and rhythm to the building elevation. A monochromatic palette is preferred for a timeless quality and so as not to conflict with potential occupier livery.

- 6.26 The tree boundary, that surrounds the site on Avenue One, Second Avenue and Third Avenue is mature and was identified as a key strength of the site to be retained. Where appropriate it will be enhanced with additional planting, with the building behind, maintaining the Garden City Principles of Letchworth, with glimpses of a high-quality modern employment facility behind.
- 6.27 Areas of poor-quality landscaping and some trees in the southwest corner of the site have been removed to maximise the economic benefits. This was supported at Pre-App, and brings the site coverage to a level consistent with other sites within the wider industrial area. Where the areas of trees have been lost, it is mitigated through the delivery of high quality landscaping in more visually prominent areas of the site – in particular the site access on Avenue One, where additional planting will greatly enhance the appearance of the site where it is most visible.
- 6.28 High quality soft landscaping is targeted around all boundary edges. Additional pockets of soft landscaping are proposed as amenity areas for staff. Green roof cycle shelters have also been chosen to provide additional habitats and 'greening' in front of the buildings
- 6.29 The development is therefore also considered to be in accordance with Policy D1: Sustainable Design and Policy SP9: Design and Sustainability, as it responds well to the local context and promotes sustainability.

Landscape

- 6.30 The proposed landscape scheme has carefully considered the setting of the proposed units and the existing character of the Site, including the existing tree line boundary and existing boulevard style create by the tree line along Avenue One. The proposed development retains all boundary trees and maintains a visual boundary to development consistent with the principles of the Garden City, with a modern high quality building seen beyond the canopy.
- 6.31 The proposed development includes removal of 35 category B trees, 18 category C trees and partial removal of 4 category C trees to facilitate the delivery of the new units. However, this is largely within the Southwest corner, which is less visually prominent, and facilitates a more beneficial use of the site at a coverage which reflects local precedent and similar uses.
- 6.32 In response to the loss of trees, the proposed development includes central planting at the most prominent part of the site along the access road leading through the development from the north east access and to the east of units 3 extending the tree line boulevard style of Avenue One.
- 6.33 The proposals seek to implement a new native mix and tree buffer along the eastern edge of the Site and enhance the access road with an attractive tree avenue along the new proposed pedestrian and cycle route into the Site.
- 6.34 The central spine has been designed to create a strong green link, with rain gardens forming a key role in the sustainable drainage strategy.
- 6.35 A high-quality outdoor amenity space for users is also proposed, implementing timber seating and picnic tables.
- 6.36 Further landscaping details can be found in the Design and Access Statement submitted as part of this application.

Arboriculture

- 6.37 The application is supported by a Tree Schedule, Tree Constraints Plan and Arboricultural Impact Assessment (AIA), produced by Aspect Arboriculture.

- 6.38 The supporting Tree Schedule and Arboricultural Impact Assessment shows the tree cover is focussed on the boundaries and within incidental areas of soft landscape. The trees on site are of varied quality but contribute to general amenity. 5 of those surveyed were graded category U with low quality such that they would not be retained in the future regardless of any development.
- 6.39 The AIA shows that the proposed development will require removal of 35 category B trees, 18 category C trees and partial removal of 4 category C trees to facilitate the delivery of the new units.
- 6.40 All of the trees required to be removed as part of the development either in full or part, will be compensated for with the proposed landscape scheme including replacement planting.
- 6.41 The proposed development therefore complies with Policy NE4: Biodiversity and geological sites.

Highways

- 6.42 Wrenbridge has commissioned KMC to prepare a Transport Assessment and Travel Plan for the proposed development, which consider the transport impacts.

Access

- 6.43 The existing vehicular access from Avenue One is proposed to be reconfigured to serve the proposed development.
- 6.44 The reduced junction size will benefit pedestrians crossing the Site access and the Transport Assessment confirms that an articulated HGV can access and egress the Site using the revised site access even if on-street parking is present on Avenue One.
- 6.45 The pedestrian footway on the southern side of the revised access is proposed to be extended into the Site to provide pedestrian access from Avenue One.
- 6.46 A new pedestrian access is proposed via Third Avenue which will provide direct pedestrian access to the 'Sainsbury's' bus stop and local amenities located to the east of the Site.

Parking

- 6.47 The pre application response notes that the site falls within Zone 2 where between 25 – 50% of standard demand is permissible.
- 6.48 Given the mix of uses sought, the proposed parking seeks to balance the demands of potential different end users. The below sets out the proposed car parking compared to the different standards:

Use	Maximum Policy Level for Zone 2	Proposed
B2/E(g)(iii) – Industrial	60-119	106
B8 – Storage and Logistics	40-80	

- 6.49 The proposed car parking sits between the requirements of the use classes proposed. We have assumed that the policy level is a maximum limit, and therefore it is important that parking is not overprovided, and instead consideration is given to maximising opportunities to encourage modal shift instead.

- 6.50 The permission sought is for flexible uses applied across both units, which is the reason for the mixed approach. The proposals can therefore demonstrate that the proposed levels of car parking are appropriate.
- 6.51 The proposed development is therefore in accordance with Policy T2: Parking.
- 6.52 72 cycle parking spaces are proposed as part of the development which will be contained within secured, shelters and are to be split across the tree units. This is broadly consistent with the requirements of a B8 end user.

Impact of Highways Network

- 6.53 Based on traffic surveys, KMC have considered the impact of the proposed development and its associated vehicular movements on the wider highway network within the Transport Assessment. The TA indicates that the proposed development is forecast to generate a net increase of 41 and 35 two-way vehicle trips, when considered against the previous use, however when considering the net reduction in parking spaces, the TA highlights that the net trip attraction is likely to be lower.
- 6.54 Pre application discussions with Hertfordshire County Highways agreed the scope of the TA which confirms that the proposed development is not forecast to have a significant impact on the operation of the Avenue One junction, with negligible delay and/or queuing.
- 6.55 The proposals prioritise active travel and will assist in achieving wider health and wellbeing alongside working towards climate objectives and no unacceptable highway safety issues will result from the proposed development.
- 6.56 The Travel Plan proposes a continuous process for improvement requiring monitoring and review to ensure that the plan remains relevant, and the TP targets are achieved.
- 6.57 The proposed development therefore accords with Policy SP6: Sustainable Transport. The proposed development is also in accordance with Policy T1: Assessment of transport matters as it promotes development which will not cause unacceptable impact on the highway network and paragraph 116 of the NPPF.

Ecology and BNG

- 6.58 The pre-application feedback provides no objection on ecology terms however an ecological appraisal was requested. Aspect Ecology have produced an Ecological appraisal and BNG report which has been provided in support of the application.
- 6.59 The ecological appraisal concludes that no protected species were identified on site and the proposed development will have negligible ecological impact. Additional surveys are being undertaken of a pond to the immediate north of the application site to test the presence of protected species. Initial assessment identified no presence, and further surveys will be provided prior to determination of the application. Accordingly, no specific mitigation or compensation measures are required.
- 6.60 Much of the site was covered in hardstanding, some of which had become overgrown, particularly in the southeast corner. The site coverage/footprint of the actual building that exists currently is below 30%, which is significantly below standard industrial/commercial development (generally 40-50% site coverage). The site allocation for industrial and commercial uses within a wider industrial area would support a more beneficial use. Thus, extending the developable area into areas of hardstanding that had become overgrown should be supported in principle, subject to any ecological impact. This was the stance provided at Pre-App, and the assessments demonstrate the impact is negligible and can be fully mitigated.

- 6.61 To bring the previously developed areas back into use from their overgrown nature, there will be some minor loss of trees, and areas of unmanaged overgrown grassland. This does result in a minor loss (of less than 6%) of habitat value. However, there is an increase in the value of hedgerow habitat that is greater than 300%. The loss is principally due to the extent of previous development/hardstanding that has become overgrown due to lack of site management. However, as demonstrated within the supporting documents there is no loss of any protected or high value species, and the minor loss on site can be fully mitigated through off-site provision or by way of financial contribution. This minor loss needs to be balanced against the economic benefits of bringing the site back into positive beneficial use and minimising its contribution in terms of economic output and job creation – consistent with Local Plan policies SP3 and ETC1.
- 6.62 The BNG assessment shows the proposed development will deliver a percentage change of -9.44% habitat units and 315.97% hedgerow units. To achieve a 10% net gain in habitat units a total of 1.47 off-site units are required, of which units must comprise other woodland; mixed and Other neutral grassland or a higher distinctiveness.
- 6.63 The applicant is willing to provide off site contributions to meet the required 10% BNG increase through the appropriate use of a Biodiversity Net Gain Plan to be agreed post determination. This provides an appropriate balance of bringing a high quality economic form of development back into beneficial use, and ensuring national policy is met through off-site provision, where it can be directed to higher value area.

Energy and Sustainability

- 6.64 Wrenbridge have instructed sustainability consultant Eight Versa to produce a sustainability assessment for the proposed development. The report includes a relevant base build specification for the units which includes the following:
- *A commitment to BREEAM 'Excellent' as a minimum standard on all proposals.*
 - *An EPC rating of A+. The applicant is committed to exploring a range of opportunities and features to ensure any future proposal constitutes sustainable development.*
 - *Carbon Net Zero in Operation, in line with UKGBC Net Zero Carbon Buildings Framework.*
 - *Embodied carbon target <400kgCO₂/m².*
 - *At least 10% Biodiversity Net Gain (BNG) achieved through enhanced ecology, habitat creation and amenity spaces of local wildlife and communities. This may be achieved either on or off site.*
 - *PV ready roofs.*
 - *Roof lights for natural light.*
 - *95% of waste diverted from land fill during construction.*
 - *Smart metering.*
 - *EV charging spaces and infrastructure for the future.*
 - *Designed and constructed in line with WELL Building Standards principles.*
 - *Unlocking Local opportunities, including employment and skills plans and supply chain prospects.*

- *Retained and improved rights of way to improve local connectivity.*

- 6.65 Wrenbridge is also committed to deliver construction and end-user phase Employment and Skills Plans. These will be tailored to the local communities they serve and involve collaboration with local partners.
- 6.66 The proposed development is therefore considered to exceed the policies which do not set specific measurable requirements within policy.

Statement of Community Involvement

- 6.67 A Statement of Community Involvement (SCI) has been produced by Cavendish. The SCI sets out the steps that have been taken to engage with the community and stakeholders.
- 6.68 Over the public consultation period of approximately three weeks, opportunities were provided for local residents, businesses, and stakeholders to inform the proposals by responding to questions, providing feedback and engaging in discussions with the project team.
- 6.69 Both digital and in person platforms were used including:
- *Online: Feedback form on the project website.*
 - *Phone: Freephone number for inquiries and feedback.*
 - *Email: Dedicated email address for feedback and questions.*
- 6.70 Two feedback forms were submitted in response to the public consultation, and full details of these responses can be found within the accompanying SCI, however the feedback received was largely positive.
- 6.71 The applicant is committed to ongoing dialogue with the stakeholders and the local community with respect to these proposals.

Noise

- 6.72 Wrenbridge has commissioned Sharps Acoustics LLP to complete a Noise Impact Assessment for the proposed development.
- 6.73 The assessment of the potential noise impact of the proposed development concludes it will have negligible impact during the day and night and that no residential properties are likely to be impacted by the development.
- 6.74 Operational sound associated with the proposed development is unlikely to have an observable adverse effect on the identified receptors and therefore the development complies with Local and National Planning Policy requirements.
- 6.75 Future impact from fixed plant and building services can be effectively controlled through the use of appropriate planning conditions associated with the planning permission if required.
- 6.76 As such, the proposed development is not considered to have a detrimental impact on amenity as a result of noise and is therefore compliant with the policies set out in the Local Plan, including Local Plan Policy D3 and 24 hour use is acceptable.

Air Quality

- 6.77 Wrenbridge has commissioned TRC to complete an Air Quality Assessment (AQA) addressing air quality impacts associated with a proposed commercial development.

- 6.78 The Site is not located within an Air Quality Management Area (AQMA) however the proposed development has the potential to create dust during the construction period. It is expected that a package of mitigation measures can be put in place to minimise the impact of construction and controlled through an appropriate planning condition associated with any permission given.
- 6.79 In relation to Air Quality the proposed development is considered to be in accordance with the requirements of the NPPF, and relevant local Policy D4: Air quality and national planning policy and guidance regarding air quality, including DEFRA's interim PM2.5 guidance.

Flood Risk and Drainage

- 6.80 Wrenbridge has commissioned Burrows Graham to complete a Flood Risk Assessment and Drainage Strategy Report.
- 6.81 The report confirms that the site is classified as being at 'very low risk' of surface water flooding with some isolated areas of higher risk in the south western parking areas.
- 6.82 In terms of foul water, it will discharge into the existing Thames Water adopted foul water sewer within Third Avenue to the northeast of the Site via an existing connection.
- 6.83 In terms of surface water, the strategy has considered the most appropriate strategy, including ground conditions, the use of brownfield land and the SUDS hierarchy.
- 6.84 Site investigations have demonstrated that infiltration is not a viable solution for surface water drainage. As such, other methods have been considered.
- 6.85 The proposed strategy includes the use of permeable pavements for the car parking bays, Rainwater gardens, Tree pits adjacent the main access and the use of Geocellular storage.
- 6.86 The existing site is fully impermeable and currently discharges unrestricted, thus the proposed surface water strategy provides a significant reduction in the pre-development discharge rates.
- 6.87 The development has considered flood risk and proposes appropriate mitigation. The proposed development therefore accords with, Policy NE7: Reducing flood risk and Policy NE8: Sustainable drainage systems.

Lighting Strategy

- 6.88 Wrenbridge have commissioned MBA to produce a Lighting Assessment and External Lighting layout which have been provided in support of this application.
- 6.89 The proposed strategy has been carefully designed to minimise impact from lighting on the surrounding area and upon ecology including shielding of lamps, choice of appropriate luminaires and efficient lighting.

Ground Assessment

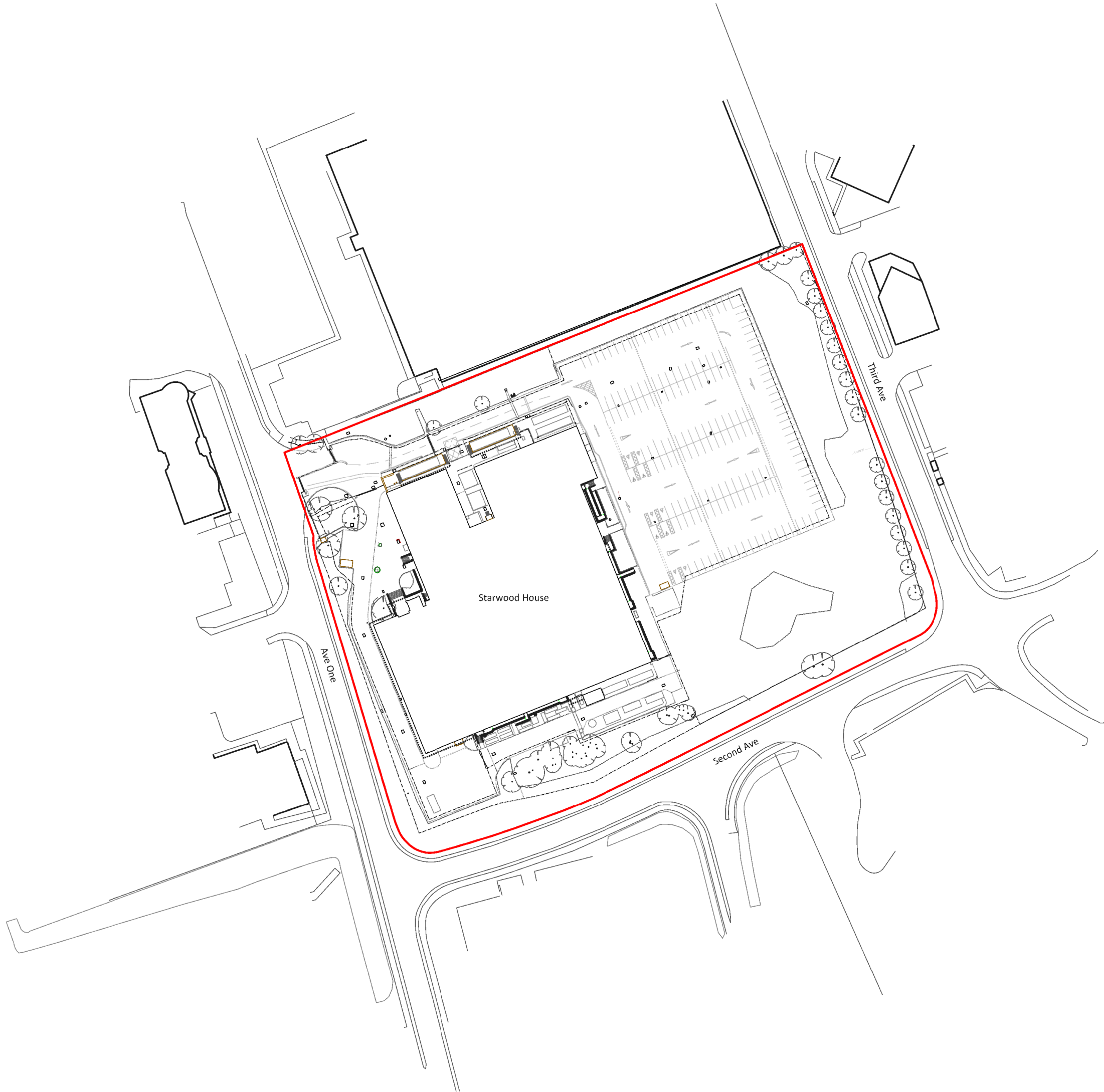
- 6.90 TRC has prepared a phase 1 and phase 2 Geo-Environmental Assessment to determine ground conditions and establish if there are any geo-environmental risks associated with the site and its proposed development.
- 6.91 The assessment concludes that no clear evidence of contamination was noted and that the materials on site are suitable for the proposed use. No further works or risk assessment has been recommended with regards to contamination.

- 6.92 As such, the development is considered to comply with Policy NE11: Contaminated Land and Policy SP11: Natural resources and sustainability by taking into account the potential impact of contamination.

7 Conclusions

- 7.1 This Planning Statement has been prepared by Stantec UK Limited on behalf Letchworth Investment LLC for Wrenbridge. It provides background information in support of application for full planning permission for the following description of development at the Site:
- “Erection of two buildings for Flexible Use Classes including Eg (ii) (iii), B2, B8, including servicing, parking, access, landscaping”.***
- 7.2 The proposed new commercial units provide a total of 11, 685 sqm (GIA) to be used for a mixture of E(g)(ii), E(g)(iii), B2 and B8 uses with 24/7 hours of operation.
- 7.3 The proposals will bring an existing under-utilised brownfield site back into beneficial use and are consistent with the adopted Local Plan, including Policy which allocates the site for employment uses.
- 7.4 Industrial and commercial uses commensurate with those proposed are already established within on the Site. The proposals will provide a significant increase in jobs by bringing the site back into use and increasing coverage in line with expectations for B2 / B8 use.
- 7.5 The proposed development will bring modern and attractive employment floorspace to the Site which has been specifically designed to address known market supply issues and demand.
- 7.6 The various technical reports submitted in support of this application demonstrate that the proposals are entirely acceptable.
- 7.7 Accordingly, there are no ‘material considerations’ that would justify the development not being approved in accordance with the Local Development Plan.
- 7.8 For the reasons set out above, the proposals are consistent with the Development Plan and accord with the principles of sustainable development, bringing social, environmental and economic benefits.
- 7.9 There is a clear presumption in favour of economic development, whilst growth is the number one objective of the current Labour Government. As such, the proposals are regarded as sustainable development, for which we consider planning permission should be granted without delay.

Appendix 1 Site Location Plan



Based on ordnance and topographical
measured survey

Ordnance Survey Licence Number:
100022432

Topographical & measured building survey
prepared by Surveys Solutions:
Drawing Number 66752BWLS-01

— Site Boundary

Rev P1: Preliminary Issue for Comment. JR - 09.12.2024

Drawing Status:
PRELIMINARY ISSUE FOR COMMENT

CMP
Architects

Client



Project
Letchworth, Ave One

Title
Location Plan

Scale	Drawn	Date
1:1250@A3	JR	09.12.2024

Dwg. No.	Revision
L060-CMP-SI-ZZ-DR-A-00003	P1

Do not scale from this drawing, use figured dimensions only. Subject to accurate site survey. All dimensions to be checked and verified for any discrepancies. All drawings to be read in conjunction with all CMP Architects and other consultants' contract documentation. Any discrepancies to be reported before any work commences. All items installed by others are to be fully site coordinated and programmed with the Contractor. All products to be installed to manufacturers recommendations.
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Appendix 2 Proposed Layout



Scale Bar - metres:
0 5 10 15 20 40

Based on ordnance and topographical measured survey.

Ordnance Survey Licence Number:
100022432

Topographical & measured building survey prepared by Terrain Surveys.
Drawing Number:
TS25-173-T-1-2D

Tree survey prepared by: Aspect Ecology.
Drawing Number: 12296 PAIA 01, 12296 TCP 01 & 12296 TS 01

- KEY**
- Application Boundary
2.67 Hectares / 6.59 Acres
 - Ownership Boundary
 - Highways Boundary
 - Proposed Security Fence
 - Retaining Wall
 - Refuse Storage
 - Active Car Charging Points
 - Passive Car Charging Points
 - Retained, Existing Trees
 - Proposed Trees

Rev PL1: Planning Issue. TB - 25.04.2025

Drawing Status:
PLANNING

CMP Architects
Client

WRENBRIDGE
Project
Avenue One, Letchworth

Title
Proposed Site Plan

Scale @ A1 / A3
1:500 / 1:1000

Drawn
TB

Date
25.04.2025

Revision
PL1

Org. No.
L060-CMP-SI-ZZ-DR-A-00100

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Appendix 3 Pre application Response

Stantec
3rd Floor
50-60 Station Road
Cambridge CB1 2JH

Our Ref: 24/02810/PRE

Contact: Tom Rea
Direct Line: 01462 474565
Email: tom.rea@north-herts.gov.uk
Date: 6 February 2025

Dear Sir/Madam

Pre Application Advice : Circa 11,282 sqm gross internal area (GIA) for flexible E(g)(iii) Light Industrial, B2 General Industrial, and B8 Storage and Distribution uses Starwood House, Avenue One, Letchworth Garden City, Hertfordshire, SG6 2HB,

Please quote the following reference: 24/02810/PRE on all correspondence.

I refer to your pre-application advice request concerning the above site submitted on 10th December 2024. I apologise for the delay in providing this advice.

It is noted that the proposals shown in the submission are for flexible Class E (g) (iii) (Light industrial use), Class B2 (General Industrial) and Class B8 (Storage & Distribution).

The submission included two options for the site – Option 1b for a single industrial unit of around 12,612 sqm and Option 2A (as revised) for three industrial units of around 11,701 sqm. From discussions it is noted that Option 2A is the preferred option.

In preparing this advice I have visited the site and consulted with various colleagues and other stakeholders. A teams meeting to discuss the pre-application submission was held on Monday 20th January 2025 at which a number of the issues set out in the covering letter submitted with the application were discussed. I provided verbal advice on the majority of the points raised.

I set out below my formal response on the proposals following the topics in the submission letter and I have included comments from consultees where possible.

The principle of the development

The Starwood House site is located within a designated Employment area in the Local Plan. Policies SP3 and ETC1 of the Local Plan safeguards and promotes a range of employment uses, including B class employment uses, in the Employment areas therefore the proposed flexible range of uses involving Class E (g) (iii) (Light industrial

use), Class B2 (General Industrial) and Class B8 (Storage & Distribution) would be appropriate uses for this location and acceptable in principle

Design and Appearance

It is acknowledged from the submission that the existing site is underused with the present built form on the site occupying less than 30% of the site's overall area and there appears to be a significant over provision of car parking for the site's former use as a building used predominantly as a research and development facility. I would agree with the view that there is an opportunity to make more efficient use of the site bearing in mind its location within a long established employment site and its close proximity to the strategic road network including the A1 (M) via junctions 9 and 10.

Option 2B – the preferred option - proposes three units with Units 1 & 2 forming a continuous built up elevation along most of the Avenue One frontage of the site. The proximity of industrial buildings to the road frontage varies across the estate however the key feature of Avenue One (and to a lesser extent Second and Third Avenue) is its well landscaped appearance comprising footpaths within soft verges and mature deciduous trees with low level planting lining practically the full length of the road from the Baldock Road junction down to Works Road. Provided this landscaped frontage is maintained – and enhanced where possible – I have no objection to new development projecting closer to the Avenue One frontage in particular.

It is acknowledged that there will be a significant increase in height rising to between 12m at eaves to around 15m at the top of the roofs and there will be a noticeable increase in scale and intensity of development as experienced from Avenue One in particular. That said, the site is relatively flat and the rise in levels especially along Avenue One and Third Avenue means that this increase in height will be mitigated by the difference between the elevated road / pavement level and the lower site level. Drawings showing this difference in site levels would be recommended.

The re-use of the existing main access for both options is supported – see highways comments below.

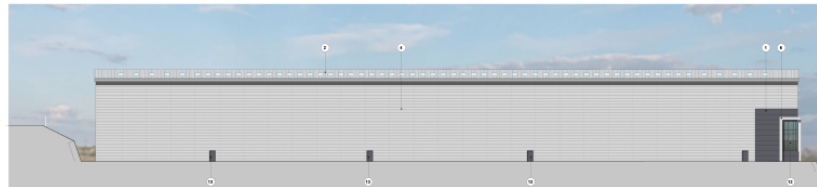
The provision of the service yards and parking behind Units 1 & 2 away from the Avenue One frontage is supported.

The Second Avenue frontage is less developed in Option 2A with Unit 3 set well back into the site. Unit 3 is larger in scale than Units 1 & 2 taken individually and has a greater width although it is sited close to the northern boundary where its mass will be seen against the equally if not larger mass of the Stapleton Tyres warehouse. The greater roof span of Unit 3 may require a different roof design to Units 1& 2 in order to keep the overall height down to around 15 metres, perhaps using a double curved roof as used at North Road, Stevenage .

With regard to height sensitivity in the area I have noted that on the nearby Autoglym site and planning 24/00497/FP, the overall height of a warehouse building was reduced to 14.6m from 16.3m at the request of officers as the building would have looked overly tall in that particular location.

In terms of the elevational treatment , the supporting letter advises that the development will be of similar appearance to the Wrenbridge scheme at North Road, Stevenage. I would have no objection to the general design shown on this development (image below) although some relief of the Avenue One frontage would be desirable given its length.

Approved North Road scheme, Stevenage



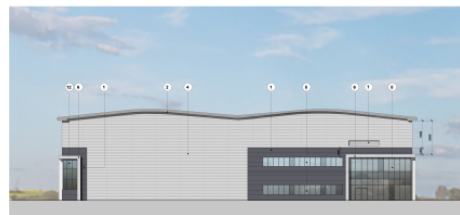
1. North Elevation



2. South Elevation



3. East Elevation



4. West Elevation

External Finishes:

1. White tiled concrete including paint
Colour: White (RAL 9010)
2. Green painted steel roofing, painted at 10 degree
Colour: Green (RAL 6005)
3. Green painted steel roofing, painted at 10 degree
Colour: Green (RAL 6005)
4. Green painted steel roofing, painted at 10 degree
Colour: Green (RAL 6005)
5. Green painted steel roofing, painted at 10 degree
Colour: Green (RAL 6005)
6. Green painted steel roofing, painted at 10 degree
Colour: Green (RAL 6005)
7. Green painted steel roofing, painted at 10 degree
Colour: Green (RAL 6005)
8. Green painted steel roofing, painted at 10 degree
Colour: Green (RAL 6005)
9. Green painted steel roofing, painted at 10 degree
Colour: Green (RAL 6005)
10. Green painted steel roofing, painted at 10 degree
Colour: Green (RAL 6005)
11. Green painted steel roofing, painted at 10 degree
Colour: Green (RAL 6005)
12. Green painted steel roofing, painted at 10 degree
Colour: Green (RAL 6005)
13. Green painted steel roofing, painted at 10 degree
Colour: Green (RAL 6005)
14. Green painted steel roofing, painted at 10 degree
Colour: Green (RAL 6005)
15. Green painted steel roofing, painted at 10 degree
Colour: Green (RAL 6005)
16. Green painted steel roofing, painted at 10 degree
Colour: Green (RAL 6005)



Section 1/10



Section 2/10

Option 1b proposes single large unit set back from the Avenue One frontage . I would have no objection in principle to this option however the introduction of a second car park access onto Third Avenue almost opposite the petrol filling station access at Sainsbury's and nearby bus stop may be an issue in highway safety terms. Existing car parking along this part of Third Avenue will need to be addressed.

In both options however I would recommend that a pedestrian access is provided to Third Avenue to facilitate easy access from the site for employees to the bus stop on Third Avenue and shopping facilities to the east including Sainsbury's and the retail park.

Landscaping and Ecology

The commitment to maintaining the band of trees around the majority of the site is welcomed however it would appear that many of the boundary trees, particularly along the Avenue One and Second Avenue frontages, may be either within highway land or land within the ownership of Letchworth Heritage Foundation. Ownership of the boundary trees needs to be clearly indicated in any forthcoming planning application to ensure that such trees are protected and maintained and in order to calculate any deficit in biodiversity through the removal of existing trees to facilitate the development.

The site will not be exempt from the need to achieve a 10% biodiversity net gain. Any planning application will need to be accompanied by a BNG report and the statutory biodiversity metric. Should there be a net deficit of biodiversity habitat then biodiversity credits can be purchased off-site through an approved habitat bank organisation. Such matters can normally be dealt with via a planning condition and subsequent discharge of a condition on presentation of a habitat certificate. Alternatively, Letchworth Heritage Foundation, as a significant local landowner may engage in partnership working as it delivers projects aimed at improving wildlife habitats.

As mentioned at the teams meeting it is noted that there exists a large attenuation pond just north of the northwest corner of the site between the Stapleton's warehouse and Avenue One. It is recommended that any ecology survey takes this area into account.

Highway matters

It is noted that the applicant company will engage with Hertfordshire County Council as the highway authority.

The re-use of the existing, established vehicular access to the site off Avenue One seems appropriate. The submitted drawings indicate that the access is to be improved. Full details of the alterations will be required and I would anticipate that the Highway Authority will require sightlines to be shown and vehicle tracking both at the access and within the site.

The proposed development will generate significant volumes of HGV movement. Whilst it is acknowledged that the highway network may have capacity to absorb this movement it has been observed that on street parking does occur on the surrounding roads in the vicinity of the site and on occasions parked commercial vehicles can cause obstruction particularly at junctions such as the Avenue One / Second Avenue junction as well as directly opposite the main site entrance – see photograph below.

It may be that the Highway Authority may wish to explore the possibility of parking restrictions at certain points around the site and seek contributions towards traffic regulation orders. On street parking is also an issue on Third Avenue especially with the in and out access points to the Sainsbury's Petrol filling station.

On street parking opposite the site entrance



Hertfordshire County Council have adopted a Developer Infrastructure Contributions with the Technical Appendix 1 dealing with Transport matters and includes their approach to transport contributions arising from new development including Travel Plans.

[Planning obligations and developer infrastructure contributions | Hertfordshire County Council](#)

Parking

The Council's adopted Vehicle Parking at New Development Supplementary Planning Document (2011) introduced so called 'Accessibility Zones' identifying locations of best accessibility by public transport. The approach applies varying degrees of parking restraint within 4 zones with a sliding scale of reductions on normal car parking standards. A link to the document is provided below.

[Vehicle Parking at new development SPD](#)

In this case the Starwood House site falls within Zone 2 where between 25 – 50% of standard demand is permissible.

The car parking standards have not been updated to reflect the changes in the Use Classes Order however the car parking provision for this site could be significantly reduced to reflect the accessibility zone approach particularly if the scheme is heavily orientated towards a B8 use.

I have consulted the Council's Transport Policy officer and I attach his comments directly below for information:

I have looked through the covering letter and plans for the Starwood House redevelopment in Letchworth, and can see no transport-related issues of significant concern. Both plan options seem reasonable to me. I would recommend with Option 2 that the applicant design in a pedestrian path (with a gate if required) towards the north-east corner of the site to enable staff to enter/exit here to gain more direct access to the bus stop on Third Avenue and the supermarket.

The parking provision tables included on the plans should include disabled bays and cycle parking (for completeness). In the TA, I would recommend the applicant provide ranged estimates for the number of staff and visitors likely to be on-site at any one time, and mode-shares of travel to site. This will provide a more accurate estimate of the number of car and cycle parking space required than the council's SPD guidance. Across Letchworth and Baldock there is a large population of potential employees within walking and cycling distance of this site, and there at least two reasonably frequent bus services that stop immediately outside the site.

Looking ahead, there are a number of LCWIP schemes in the vicinity of this development that could be progressed with S106 funding, and which would facilitate sustainable travel to work and support a reduction in parking provision well below policy maximums (as proposed).
G:\Policy and Projects\Policies and guidance\North Herts\Active Travel\North Herts LCWIP App G detailed infrastructure plans_Optimized.pdf

If you think there are any transport-related issues I've missed or have any questions, let me know.

The main issue I can see is with the embodied carbon of demolition and reconstruction. Option 1B may require a slightly larger off-site BNG offset because the additional access onto Third Avenue will require the removal of (probably) two trees.

It is assumed for Waste and Recycling that the operators of the units will adopt a private contractor arrangement for the disposal of waste and recycling.

Environmental issues

It would appear that the site could be over a Principal Aquifer within Source Protection Zone SPZ 1 . It is considered that a preliminary risk assessment (desk study, conceptual site model and initial risk assessment) will be required.

It is likely that the Environment Agency will request conditions requiring a Remediation Strategy, dealing with unsuspected contamination, foundation design including piling and informatics.

At present it is not clear whether the site is within the consultation distance of a major hazard or major accident hazard pipeline. If this is the case however the Health & Safety Executive will need to be consulted.

Hertfordshire County Council's Minerals and Waste team will be consulted on the waste management aspects of this development and it is likely that they will expect to see a Site Waste Management Plan in support of a planning application. If a SWMP is not produced at the planning stage in my experience they will ask for a planning condition and I set out below an example from a recent development in this district:

Condition: No development shall take place until a Site Waste Management Plan (SWMP) for the site has been submitted to the Local Planning Authority and approved in consultation with the Waste Planning Authority. The SWMP should aim to reduce the amount of waste produced on site and should contain information including estimated types and quantities of waste to arise from construction and waste management actions for each waste type. The development shall be carried out in accordance with the approved SWMP.

Reason: To promote the sustainable management of waste arisings and contribution towards resource efficiency, in accordance with Policy 12 of the Hertfordshire Waste Core Strategy and Development Management Policies Development Plan Document (2012).

In terms of the District Council's role with regard to environmental matters the Council's Senior Environmental Health officer has provide some brief comments with regards to noise, air quality and contamination as follows:

Noise:

The covering letter states that the site is an existing commercial site with no restrictions, and this is noted. The same letter suggests that any application will be supported by a noise assessment. I am satisfied with this approach.

Air Quality:

The covering letter also suggest that the application will be supported by an air quality assessment. This will obviously link to the travel plan proposed. Again, I am satisfied with this approach.

Contaminated Land:

As the covering letter alludes to in the 'Other Matters' section, for the re-development of an existing commercial/industrial site, we would also expect to see information on land contamination. This should be a phased investigation in accordance with BS10175+A2:2017. For land contamination, pre-commencement conditions could be used to secure this information and any subsequent action. This is required to assess any risks to human health during construction or operation but also groundwater and the wider environment

In addition to the above the Environmental Health team may require a condition to deal with asbestos, if any, during the demolition phase of the development.

Given the site area (2.6 hectares) the Lead Local Flood Authority will be a consultee and a Flood Risk Assessment will be required within which SuDS principles will need to be adopted as part of the drainage strategy for the site.

Sustainability

NHDC adopted a Sustainability Supplementary Planning Document (SPD) on 23rd September 2024. The document will be a material consideration in the determination of planning applications.

[Sustainability SPD_02SEPT24.pdf](#)

The proposal is for a Major Non-Residential development and is addressed in the SPD . The SPD sets out a range of sustainability levels – bronze, silver and gold – and sets out a checklist of documents required to achieve these sustainability levels over a number of themes ranging from achieving low carbon energy to incorporating sustainable drainage.

On ecology matters the Council's Ecologist has provided the following comments:

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'Having looked at the submitted documents and made a site visit there would be no ecological objection to the proposal. Given the site's location it is unlikely that there would be a protected species interest associated with the site but any future application should be supported by an ecological appraisal which would also serve to inform a completed Statutory Metric calculation will need to be provided in accordance with the mandatory requirement to deliver 10% Biodiversity Net Gain. It is noted that the applicant expects to rely on off-site contributions to meet this but since BNG has become mandatory it is now necessary to purchase biodiversity units from habitat banks rather than through commuted sums. A completed metric will determine the number of units required which can be purchased from a provider to enable the Biodiversity Gain condition to be discharged.'

As mentioned in the online meeting there is a nearby attenuation pond that may need to be covered in any ecological assessment of the site and its surroundings.

Power

As also discussed in the meeting I queried the electrical infrastructure at the site although it would seem that the site has sufficient capacity to accommodate the development. UK Power networks will be consulted given the scale of the development.

Planning Obligations

NHDC does not currently have an adopted CIL Charging Schedule although it does have a developer contributions Supplementary Planning Document adopted January 2023.

As stated above it is likely that Herts County Council as Highway Authority will ask for Sustainable Travel Contributions and fees towards monitoring a Travel plan – if considered necessary. The North Central Hertfordshire Growth & Transport Plan was

published 2020 as a draft consultation. It includes various visions and objectives but also a number of proposed transport improvement packages and package 11 in the document looks to improve connectivity between Letchworth and the industrial estate linking the cycle network to new routes. The Highway Authority may well refer to the Growth ~& Transport Plan in their comments

Documents required to support a full planning application.

I generally agree with the list set out in the covering letter but would add the following:

Plans

- Include cross sections to take account of levels changes from north to south and street scene drawings to compare heights with adjacent buildings such as the warehouse at Stapletons Tyres

Other documents

- Energy and sustainability assessment
- Preliminary risk assessment / Contamination report

Procedure

Given the site area and quantum of development any decision on a future planning application will be determined by the Council's Planning Control Committee which has monthly meetings.

It is likely that Letchworth Garden City Heritage Foundation will be a consultee as well as other statutory consultees including the Environment Agency, the Lead Local Flood Authority and the Highway Authority.

Conclusion

It is my view that the proposed use of the site for a range of employment uses comprising Class E (g) (iii) (Light industrial use), Class B2 (General Industrial) and Class B8 (Storage & Distribution) would be acceptable in principle having regard to the allocation of the site for employment use in the Local Plan as supported by Policies SP3 and ETC1 of the North Herts Local Plan 2011 – 2031. Furthermore, the amount of floorspace proposed would make for a more efficient use of the site in this sustainable location close to the strategic road network and other supporting infrastructure such as public transport and other services. The development would be in step with Government guidance set out in Section 6 the Framework which seeks to support economic growth and productivity and specifically in this case to make provision for storage and distribution operations in an accessible location.

In terms of the scale of the proposed development it is considered that the site could, subject to all material considerations, satisfactorily accommodate the amount of development proposed in either option given the context of the site, its location within the allocated employment site and having regard to the scale of surrounding buildings particularly the Stapleford's warehouse immediately to the north. There is no strong design code for this area therefore I consider that the North Road, Stevenage example referred to in submissions would not be considered inappropriate in this location. The well landscaped character of the perimeter of the site should be maintained and enhanced and the submitted layout options indicate that this could be achieved. The sustainability credentials of the proposals will be of particular importance and any planning application should demonstrate that the development addresses climate change through a range of energy efficient and carbon reducing measures both at the construction and operational stages. On highway matters, the Local Planning Authority will be guided by the advice of the highway authority and pre-application engagement with the County Council in that regard is recommended. As mentioned however any Transport Statement should have regard to impact of the development on the immediately surrounding road network as well the hierarchical approach set out Local Transport Plan LTP4 and the measures to enhance sustainable transport promoted in the North Central Hertfordshire Growth & Transport Plan. On site parking will be primarily a matter for the LPA and should take account of the flexibility in the application of the Council's parking standards SPD and the encouragement to promote sustainable travel. Environmental issues have been outlined above however given the previously developed nature of the site and the immediate surroundings I can see no obvious environmental barriers to the development subject to the review of the proposals by relevant statutory consultees on submission of a formal application.

I trust the above information is of assistance. I would advise that the above views are offered as an opinion of an officer of the Council and is not binding on any future decision of the Local Planning Authority.

Yours faithfully



Ian Fullstone
Service Director – Regulatory

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