

ARCHITECT'S DESIGN, ACCESS & HERITAGE STATEMENT



Frithwood Surveying

Conversion of Roof to Create One Dwelling

**Former HSBC Bank, Station Place, Letchworth Garden City,
Hertfordshire, SG6 3EU**

HSBC/2/tp/03Rev.A
Issued with Detailed Planning Application – 3rd June 2024
Circ: North Herts District Council, Frithwood Surveying

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Introduction & Character of the Area

It is proposed to create a 2-bed flat in the roof space of the former HSBC Bank. This work will include the installation of 4 dormers and 6 skylights, in the roof slope.

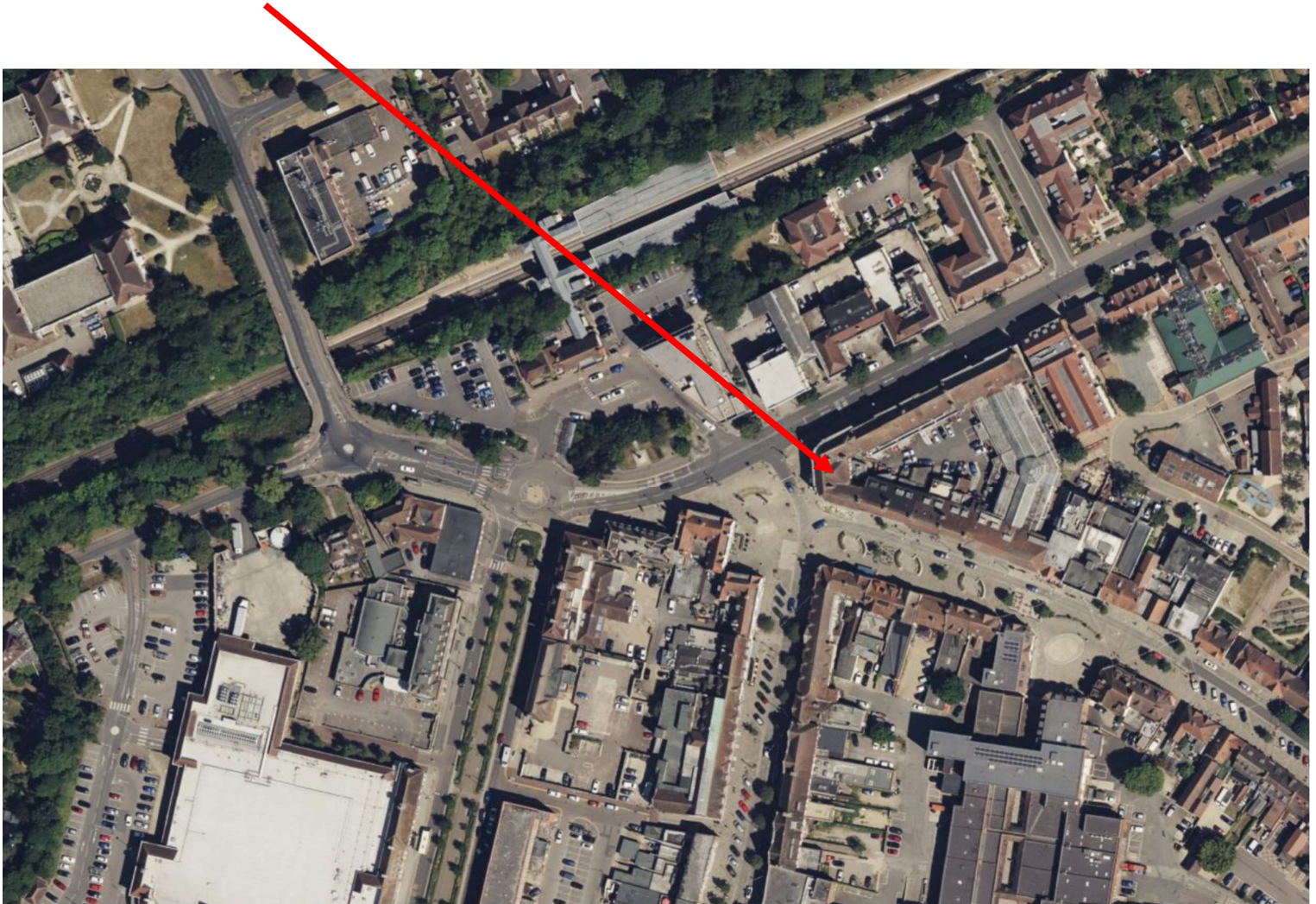
This application is submitted in tandem with 24/01087/PNG, where permission has been applied for the conversion of the first floor into 2 flats under Class G permitted development rights

This application has been informed by pre-application advice received from the council (23/02466/PRE), and the proposed development reflects the advice received.

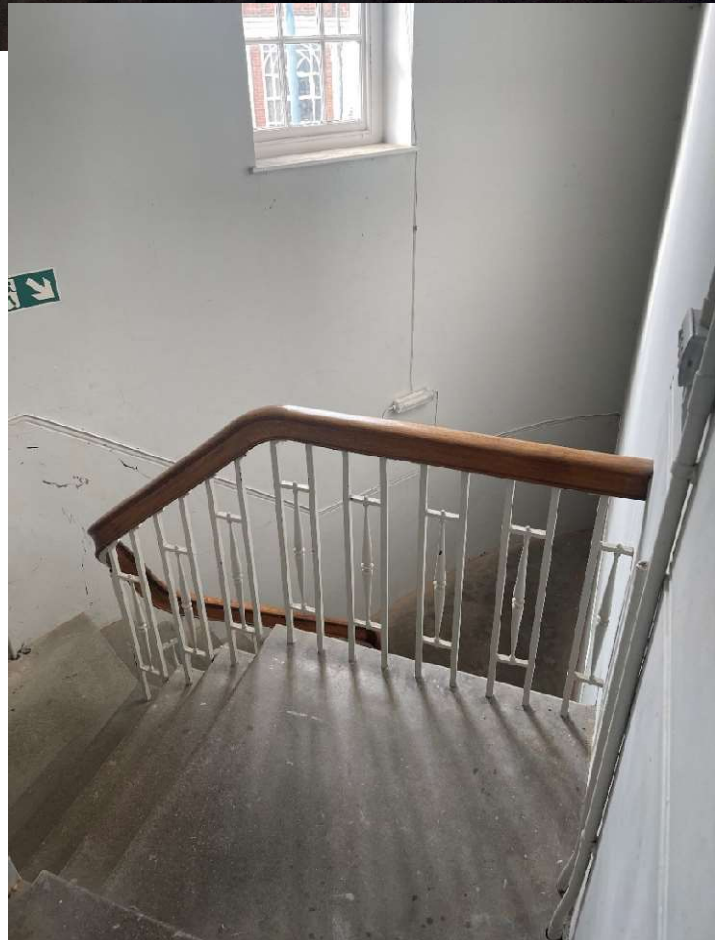
The proposed dwelling has a gross internal floor area of 77.3 m². This is in excess of the Nationally Described Space Standards which will require a minimum floor area of 70 m².

The application site is located in a highly sustainable town centre location opposite Letchworth Garden City Train Station, on major bus routes, and adjacent shopping and employment provision.

The application site is also located in a Conservation Area.



Photos of Existing Building



Photographs of extensive loft space and stairwell which will be extended to attic level.



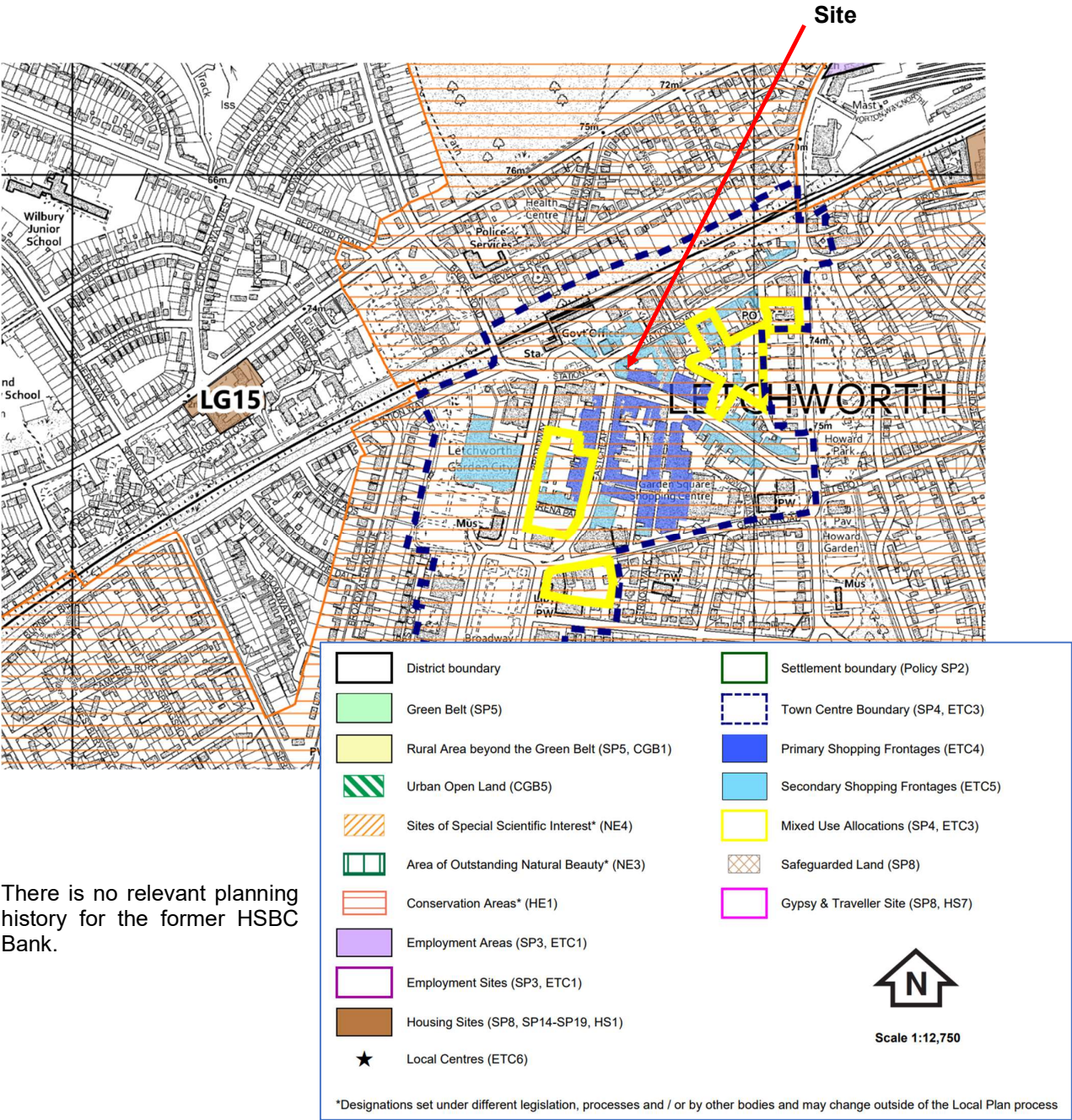
Front and rear elevations.



Development Control Guidance

In developing the proposals for the application site, we have complied with the Development Control Advice set out in the North Herts Local Plan 2011-2031, and the NPPF.

Letchworth Garden City has excellent transport connections, and the site is in the town centre and Conservation Area. The former HSBC Bank is designated as a Secondary Shopping Frontage.



Planning Policy and National Planning Policy Framework

The National Planning Policy Framework was revised on 19th December 2023 and post-dates the policies in the 2011-2031 North Herts Local Plan.

Achieving Sustainable Development

7. *The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs⁴. At a similarly high level, members of the United Nations – including the United Kingdom – have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection.*
8. *Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*
 - a) ***an economic objective*** – *to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.*
 - b) ***a social objective*** – *to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
 - c) ***an environmental objective*** – *to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*
10. *So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).*

Identifying land for homes

69. *Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:*
- c) *support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes;*

Achieving Well-Designed Places

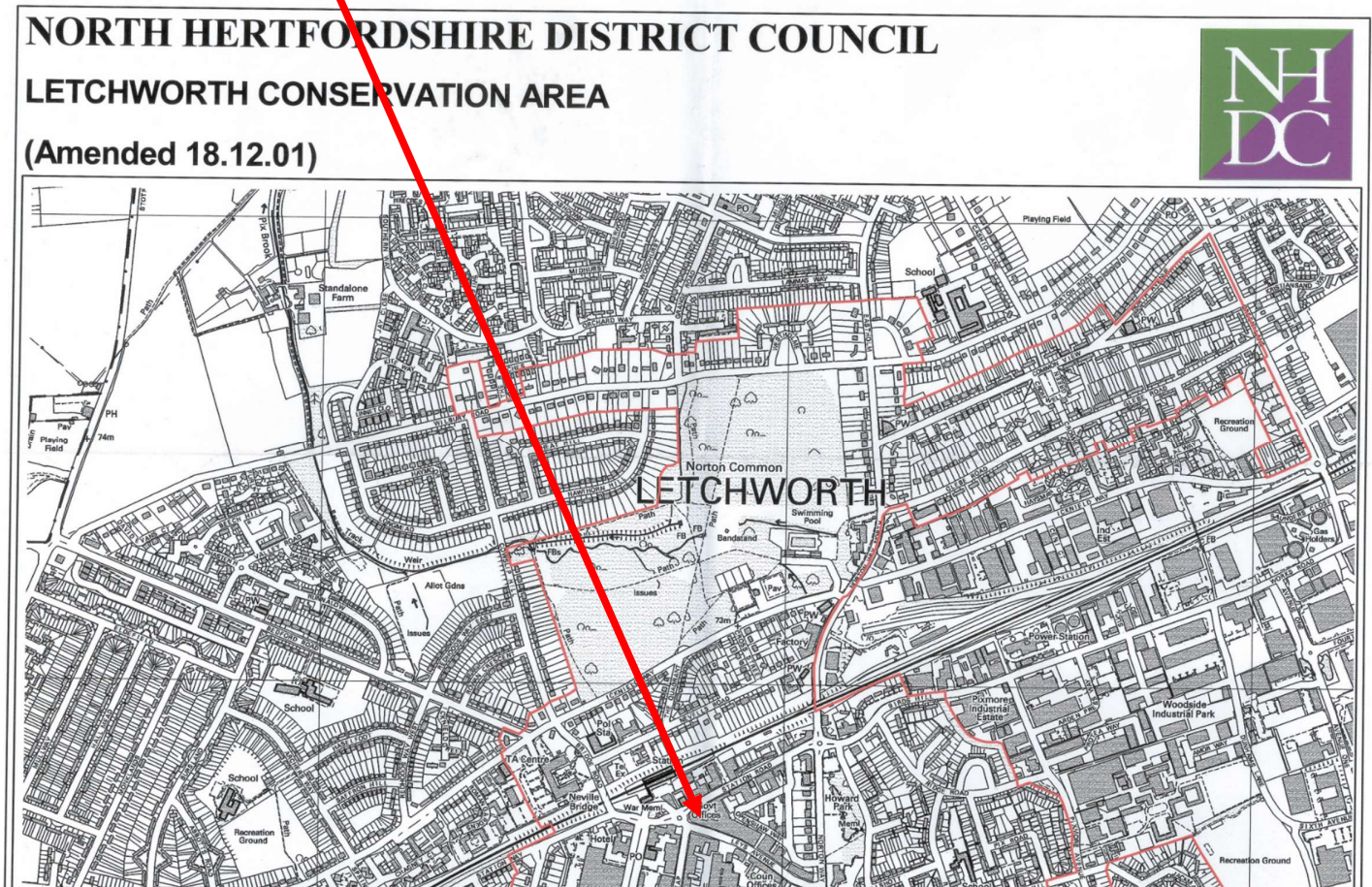
131. *The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable 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.*

135. *Planning policies and decisions should ensure that developments:*

- a. *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b. *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c. *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d. *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e. *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f. *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*

Letchworth Garden City Conservation Area.

The application site is in the centre of the Letchworth Conservation Area.



The Conservation Area Statement provides a description of the area and characteristics.

The Commercial Town Centre

- *The layout of the town centre conforms largely with the proposed layout shown on the Master Plan. In the commercial town centre buildings line the streets with focal buildings positioned at corners with some buildings arranged to create open spaces.*
- *Station Place forms a terminus not only for the main axis of Broadway, but also the other town centre roads. It therefore links these roads together and provides them with a focal point.*
- *The buildings surrounding Station Place, respect the lines of the roads, often those positioned on corners are stepped back. This is clearly seen on the corners of East Cheap and Broadway producing open spaces and reinforcing the overall open character of Station Place. Station Place provides an important area of open space and is a valuable contrast to the streets of tall buildings within the commercial town centre.*

- The positioning of the buildings along the main commercial streets results in their front elevations largely being joined to produce a continuous façade and a constant building line.
- Large buildings of two and a half or three storeys with continuous façades provide a high density within the town centre. The density becomes slightly lower in the areas of smaller two storey buildings, along Leys Avenue and Station Road. The scale and mass of buildings is counterbalanced by the relative width of the streets.

Focal Buildings

- The Station forms the focal building at the end of Broadway as well as Leys Avenue. It is constructed in a vernacular form reflecting the Arts and Craft Style. The station is largely masked from Leys Avenue and Station Road by the war memorial situated in its foreground backed by relatively high trees.
- The HSBC Bank occupies a prominent site, on a triangular plot on the corner of Leys Avenue and Station Road, facing into Station Place opposite the train station, providing a strong linkage between the two roads and the central space.

The Architectural Character of the Buildings

Building Design

- The Georgian style was envisaged for the town centre for two main reasons. Firstly a formal character was required, which it was felt the heights, building forms, design and materials of the Georgian style would clearly produce. Secondly, it was thought that the zones of the town should be clearly defined and the town centre should be distinctive and contrast from other parts of the town.
- Architects working in the Garden City designed many of the earliest buildings in the commercial town centre follow the Georgian style.... Both the Georgian Style and Vernacular style are characteristic, although there is a distinct area around Station Place and the top sections of the adjoining roads, which largely contain the envisaged Georgian style buildings, formal in character and dominant in size and scale.

Form and Scale

- In the commercial town centre the form and scale varies, with the largest buildings situated around Station Place, along the majority of Eastcheap and Broadway and along the top sections of Leys Avenue and Station Road.
- The buildings at the top of Leys Avenue and Station Road, around Station Place, and along the East Cheap and Broadway are tall buildings mainly of two and a half to three storeys in height. The overall height of these buildings is generally constant. These buildings are mainly designed to contain four to six shops. They are rectangular in shape and lie parallel with the street. The overall building is usually divided into composite parts, usually with a central section. Distinction is provided between each individual shop by the divisions of the shopfronts, the positioning of the upper floor windows and in some case the use of pilasters. The buildings have carefully conceived proportions based on the dimensions of the classical style. The blocks are large in scale and their height provides a sense of enclosure to the streets relaxed to some extent by the relative widths of the streets.

Pre-Application Advice

Planning officer Melissa Tyler provided advice at the pre-application stage in February 2024. (23/02466/PRE), she commented.

Principle of proposed development within this location

The site is within a sustainable location in the centre of Letchworth close to the train station and bus routes and as such there would be no objection in principle to new housing on this site. However, this is only in broad terms and any application would also need to satisfy the more detailed planning considerations, which I will comment on below.

Heritage Impact – Conservation Area

The proposals are located within the Letchworth Conservation Area a heritage asset and any proposed re-development will need to carefully consider the impacts on the significance of all relevant heritage asset/s, how the existing buildings and structures contribute to that significance in terms of making a positive, neutral or negative contribution and what design parameters and principles would need to inform any redevelopment proposals to limit any harm to the significance of heritage assets and preserve and enhance the character and appearance of the Conservation Area.

Consideration should be given to:

- *Reducing size of front dormers.*
- *Omitting rear gable extension but maybe consider new, smaller dormer.*
- *Omit rear balcony.*
- *Reduce attic conversion to single, more spacious, 2-bed unit.*

Commentary – the development proposals are amended to reflect the above comments.

Impact on Neighbouring Amenities

In my informal opinion, I do not consider that any future proposals would be likely to have any adverse impact on the living conditions of the neighbouring properties in terms of built impact or loss of privacy.

Residential amenity

All living rooms, bedrooms and preferably kitchens should benefit from an external window to provide natural daylight (bathrooms do not necessarily need this although ventilation would be required). Also, the flats would need to meet or exceed the nationally described space standards (Policy D1: Sustainable Design of the Local Plan).

Commentary – the development proposals are to provide one single attic flat with a floor area in excess of Nationally Described Space Standards, with windows providing natural light.

Pre-Application Advice – Heritage Officer's Comments

Conservation Officer Mark Simmons commented

Introduction

The former Hsbc Bank, Station Place is an unlisted building located within Letchworth Conservation Area. At 3.13 of the Letchworth Conservation Area Character Statement dated 18 December 2001 it states the following:

The HSBC Bank occupies a prominent site, on a triangular plot on the corner of Leys Avenue and Station Road, facing into Station Place opposite the train station, providing a strong linkage between the two roads and the central space

Looking at further map regression it is possible to reduce this building period to between 1925 and 1938 (see below) and the build type is consistent with Neo-Georgian architecture of the Inter-War period which was the dominant official building style at this time (at the same time as the first modern movement designs were being seen in this country).



With permission from
National Library of Scotland

Conversion of loft space to include extension of rear gable and insertion of three front dormer windows to facilitate the creation of a further 2no one-bedroom flats.

„,This building has a presence within the streetscene. Whilst this building does not currently have dormer windows there are several examples of dormer windows in the town centre. In the first Google Maps image below, the former bank can be seen alongside nos.2-12 (evens) Leys Avenue whilst in the second image below Broadway Chambers (unlisted) and Lyall Cambers (grade II) can be seen with dormer windows.

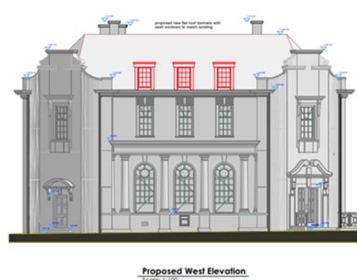


The front elevation to the former bank facing due west is noted for its shaped gable projections between which sits an expanse of clay tile roof. In my opinion, well-proportioned and well-detailed dormer windows would not have an adverse impact upon the host building or the character or appearance of the conservation area. However, it will come down to the detailing and ensuring that these are not over-designed in terms of bulky insulation systems. In addition, I am concerned that the depth of these dormers as 6-over-6 sashes may appear quite dominant at roof level even though it is noted that the first-floor windows below are larger still and are 6-over-9's.

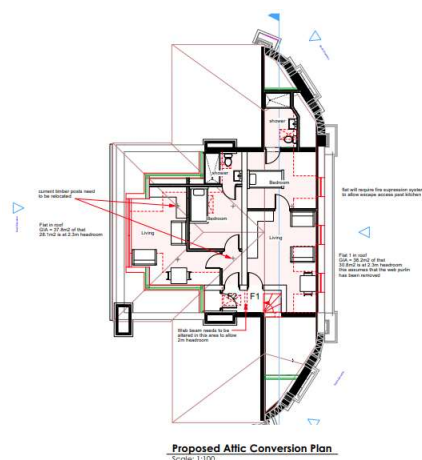
Commentary – the proposed dormer windows have been significantly reduced in scale.



There is perhaps a case to see the dormers reduced to let's say 3-over-6's but these may not then comply with fire regs if required to be an alternative means of escape.



My main issue with the attic conversion is in fact in relation to the rear, predominantly glazed, gabled extension sitting in front of the existing tiled hipped rear projection.



Even though not within public view, if considering the building as a whole (including rear elevations), by reason of its size, amount of glazing and impact on the existing roof form, the rear gable would have an uncompromising, dominant, and harmful impact on the appearance of the host building and upon the appearance of the Letchworth Conservation Area. I discourage this 'feature' and by doing so this is likely to require a reconfiguration of the layout. In this regard, I suggest that a more spacious 2-bed single unit is created maybe with a shallower, smaller two or three-light casement dormer at the rear (maybe something like these along Eastcheap). In my opinion, a well-proportioned and well-

detailed dormer window would not have an adverse impact upon the host building or the character or appearance of the conservation area. However, once again it will come down to the detailing and ensuring that this is not over-designed in terms of bulky insulation systems.

Commentary – the proposed rear dormer window has been significantly reduced in scale to 3 windows, and the proposal is now for 1 flat not 2 in the attic space.

Heritage Statement

The Conservation Area Statement details that the town centre buildings were designed in a Georgian Style to highlight their status., and the buildings in this location were 2.5 to 3 storeys tall.

The Conservation Area comments on the character of neighbouring buildings and demonstrates there are several buildings in the Conservation Area close to the application site which have dormer windows in the Conservation Area, including Broadway Chambers.



Adjacent to the site on Station Road, what is now know as the job centre is detailed with the appearance of three floors.



The only external changes to the front elevation are the insertion of 3 dormers to the front elevation which have been designed to be in keeping with neighbouring examples and in keeping with the Conservation Officer's comments.



Proposed East Elevation

Scale: 1:100

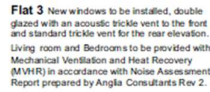
To the rear the only external changes are the insertion of some sky lights and a single dormer window, which has been reduced in scale to match the Conservation Officer's comments.



Proposed West Elevation

Scale: 1:100

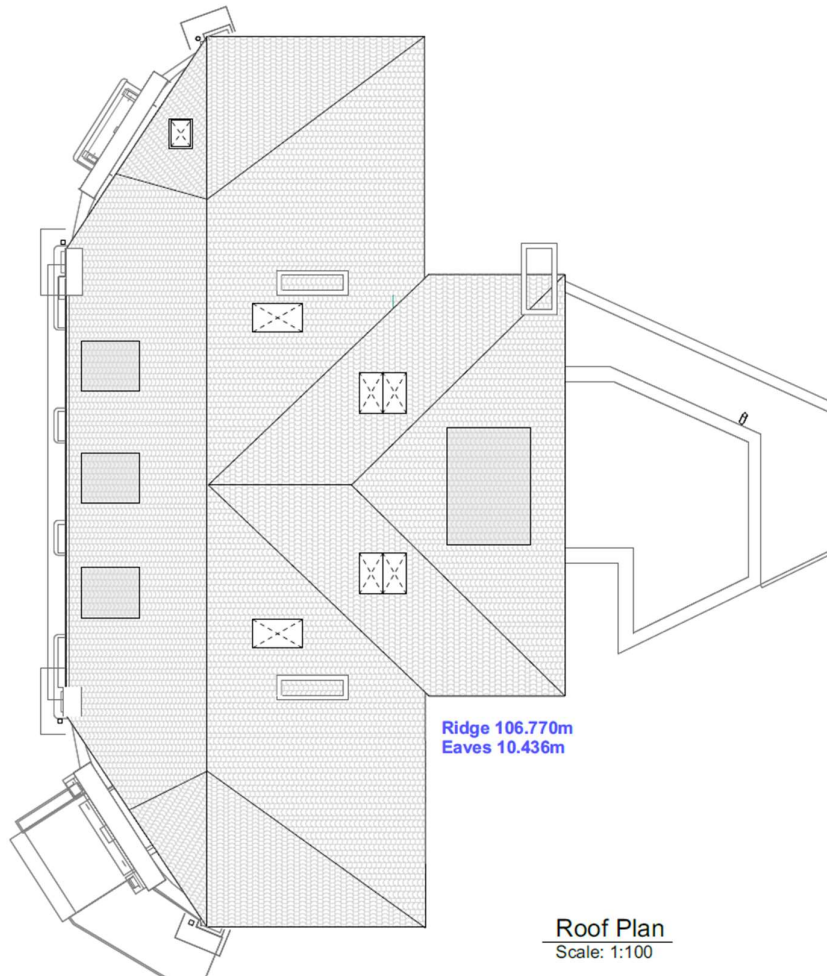
It is proposed to create one, two bed flat within the roof space. The only external changes will be the dormer windows and sky lights as detailed above. In the pre-app both the Conservation Officer and Planning Officer confirmed the acceptability of the proposal of the attic to create one dwelling, subject to suitable design.



Attic Floor Plan

Scale: 1:100

The roof plan will remain unaltered excepting the installation of the roof windows.



The original timber roof covers a substantial space below and with a few alterations as proposed will allow a suitable flat layout. No works to the external walls or the floor below will be required to enable this conversion, ensuring that the character of the building will be retained.



Proposed Materials

The only changes to the building will be the installation of dormers and skylights.

The sky lights will be from a company similar to the Rooflight Company

[The Conservation Rooflight - The Rooflight Co.](#)



The dormer windows will be timber sash windows, with lead cheeks and a cored roll lead flat roof, with detailing like this neighbouring pitched roof example.



Domestic Waste

Domestic refuse and recycling storage to be stored in the rear courtyard as shown on plan PE 01 J Consultation has been undertaken with Martin Trotter (shared service contract officer - waste for North Herts Council and it has been confirmed wheelie bins are currently collected from this area.

The storage location is existing.

Bio-Diversity Net Gain

Which planning permissions are in scope and which are exempt from biodiversity net gain?

While every grant of planning permission in England is deemed to have been granted subject to the biodiversity gain condition, commencement and transitional arrangements, as well as exemptions, mean that certain permissions are not subject to biodiversity net gain.



The biodiversity gain condition does not apply to the following types of development:

- **Development subject to the de minimis exemption.** Development that does not impact a priority habitat and impacts less than 25 square metres (e.g. 5m by 5m) of onsite habitat, or 5 metres of linear habitats such as hedgerows.

What development does the de minimis exemption apply to? And how should it be assessed?

The exemption is designed to cover planning permissions for:

- Development which only impacts on onsite habitat with a biodiversity value of zero so no gain would be required if there was no exemption.
- Developments where there is only a de minimis impact on other onsite habitat to ensure biodiversity net gain is applied proportionally.
- Minor development in established areas of habitat where the development would have less than 25 square metres (or less than 5 metres for linear habitat) impact on this habitat (unless priority habitat); and
- Change of uses to development where there is no or only a de minimis impact on onsite habitat.

Commentary

This application is for the conversion of a roof space above a commercial building and no external areas are impacted by the proposals. We therefore consider that the de minimis exemption applies to this application.

Noise

A noise report was carried by Anglia Consultants out in relation to application 24/01087/PNG.

This report detailed

Based on limited observation, the dominant noise source at the front of the building was from the fountains on the opposite side of the road. These appeared to operate from 10am to 8pm; peak noise levels were due to passing traffic. The results indicated significantly lower noise levels at the rear of the building, where the dominant noise source was from vehicle movements of local residents.

The results are summarized below:

Front Daytime	LAeq,16hr 62dB
Night time	LAeq,8hr 50dB
Night time	L _{Amax} 70dB,
Rear Daytime	LAeq,16hr 49dB
Night time	LAeq,8hr 38dB
Night time	L _{Amax} 58dB,

All to the nearest decibel.

NOISE GUIDELINES

<i>Criterion</i>	<i>Situation</i>	<i>L_{Aeq,T}</i>
Reasonable resting or sleeping conditions	Living Rooms	35dB Day (16hrs)
	Bedrooms	30dB Night (8hrs)

In addition to internal average noise level criteria, BS8233 recommends that a limit should be placed on maximum internal noise levels at night due to individual external events, such as a passing vehicle, although a specific guideline is not proposed. However, WHO Noise Guidelines recommend that internal maximum noise levels due to individual events at night, should not regularly exceed 45dB(A) on no more than 10 occasions. It is also recommended that ambient noise in external amenity spaces should not exceed a free-field LAeq,16hr 55dB.

RECOMMENDATIONS

For the creation of a new flat, new windows would be installed, assuming standard double-glazed units (4-16-4). For the front façade bedrooms an acoustic trickle vent would be required, meeting D_{ne,w} 35dB, such as the Greenwood 2500EAW.AC1, while for the rear façade living room a standard trickle vent would be adequate. Alternatively, MVHR could be installed, requiring no ventilators.

The ventilators would meet Part F System 1 which provides intermittent mechanical ventilation through kitchen and bathroom extract systems; however, the M&E engineer should check that adequate airflow is achieved by the extract fans as more than one ventilator may be required. MVHR would meet System 4 and not require the ventilators.

Ecology

The existing roof will be retained, with only small alterations. There are no signs of bats within the existing structure. No external works are proposed, so no habitats will be impacted by this application.

Flooding and drainage

According to <https://flood-map-for-planning.service.gov.uk>, the site is in Flood Zone 1 with low probability of flooding.



Environment
Agency

Flood map for planning

Your reference
HSBC

Location (easting/northing)
521774/232704

Created
24 Apr 2024 14:56

Your selected location is in flood zone 1, an area with a low probability of flooding.

You will need to do a flood risk assessment if your site is **any of the following:**

- bigger than 1 hectare (ha)
- In an area with critical drainage problems as notified by the Environment Agency
- identified as being at increased flood risk in future by the local authority's strategic flood risk assessment
- at risk from other sources of flooding (such as surface water or reservoirs) and its development would increase the vulnerability of its use (such as constructing an office on an undeveloped site or converting a shop to a dwelling)



Environment
Agency

Flood map for planning

Your reference
HSBC

Location (easting/northing)
521774/232704

Scale
1:2500

Created
24 Apr 2024 14:56



 Selected area

 Flood zone 3

 Flood zone 2

 Flood zone 1

 Flood defence

 Main river

 Water storage area



0 20 40 60m

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Environmental Sustainability and Layout

Where possible the scheme has been designed to be environmentally sustainable.

The new dwelling will be constructed to the latest 2022 Building Regulation Standards

Energy efficient lighting and A++ rated appliances will also be installed, and the potential for battery storage will be considered along with renewable energy sources at the construction stage.

A dedicated space in the kitchen for storage and separation of waste for recycling prior to collection, will also be provided.

Secure cycle storage is shown in the ground floor entrance lobby.

Access and Traffic and Local Amenities

The proposed dwelling is located in a highly sustainable location adjacent to Letchworth Garden City Railway Station and adjacent to several bus routes. It will be possible to live in this location without the requirement for a car.

The site is in the middle of the town centre abutting the main shopping streets and employment locations.

Domestic Waste

Domestic refuse and recycling storage to be stored in the rear court yard as shown on the plans accompanying the application.

Consultation has been undertaken with Martin Trotter (Shared Service Contract Officer - Waste for North Herts Council and it has been confirmed wheelie bins are currently collected from this area.

The storage location is existing.

