

Croudace House
Gernon Road
Letchworth
Hertfordshire
SG6 3HL

T: 01462 410710

30 May 2025

Naomi Reynard
North Hertfordshire District Council
Council Offices
Gernon Road
Letchworth
Hertfordshire
SG6 3JF

by email only

Dear Naomi

Planning application 24/02889/FP: Roundwood, Back Lane, Graveley

Following our various discussions regarding this planning application, I write to provide a number of further amendments for your consideration, aiming to address the remaining areas of concern raised by consultees.

As you are aware, an amendment package was previously submitted on 27 March 2025. Following the receipt of further responses from statutory consultees, notably Hertfordshire County Council in its capacity as Lead Local Flood Authority (LLFA), we have made a number of additional amendments, which we trust will now overcome the remaining areas of concern.

In general, the changes made have been relatively modest, with the main change to accommodate the LLFA's concerns relating to the extent of surface water storage to be provided under parking areas, which has had some minor knock-on effect on the layout particularly as regards street tree positions in those areas. We have also repositioned a couple of units to shorten the distances for bin collections in light of the comments from Waste Services.

Additional information to provide clarification is also provided regarding highway matters, particularly as concerns the mechanism for securing appropriate off-site highways works to allow for access and a fall-back mechanism by which we would facilitate the County Council as highways authority pursuing further alterations if required.

Amended content

The following table sets out the various new drawings and reports submitted in this pack, noting those which supersede material from the original submission in December 2024 or the previous amendment package in March 2025.

<i>New drawing / report</i>	<i>Superseding (where relevant)</i>
DES-716-101 Rev 2 Site layout plan	DES-716-101 Rev 1
DES-716-102 Rev 2 Tenure locations plan	DES-716-102 Rev 1
DES-716-103 Rev 2 Housing mix plan	DES-716-103 Rev 1
DES-716-104 Rev 2 Housing typologies plan	DES-716-104 Rev 1
DES-716-105 Rev 2 Storey heights plan	DES-716-105 Rev 1
DES-716-106 Rev 2 Elevation materials plan	DES-716-106 Rev 1
DES-716-107 Rev 2 Roof materials plan	DES-716-107 Rev 1

<i>New drawing / report</i>	<i>Superseding (where relevant)</i>
DES-716-108 Rev 3 Enclosures plan	DES-716-108 Rev 2
DES-716-109 Rev 2 Surface materials plan	DES-716-109 Rev 1
DES-716-110 Rev 2 Parking locations plan	DES-716-110 Rev 1
DES-716-111 Rev 3 Refuse servicing plan	DES-716-111 Rev 2
DES-716-112 Rev 2 Indicative services and lighting plan	DES-716-112 Rev 1
DES-716-113 Rev 2 The Green Collection locations plan	DES-716-113 Rev 1
DES-716-114 Rev 2 Fire appliance access plan	DES-716-114 Rev 1
Landscape General Arrangement Plan 10666 NPA XX XX DR L 3010 Rev P07	10666 NPA XX XX DR L 3010 Rev P06
Illustrative Landscape Sections: Sheet 1 10666 NPA XX XX DR L 4101 Rev P02	10666 NPA XX XX DR L 4101 Rev P01
Illustrative Landscape Sections: Sheet 2 10666 NPA XX XX DR L 4102 Rev P03	10666 NPA XX XX DR L 4102 Rev P02
Outline Planting Plan Sheet 2 10666 NPA XX XX DR L 5102 Rev P03	10666 NPA XX XX DR L 5102 Rev P02
Outline Planting Plan Sheet 4 10666 NPA XX XX DR L 5104 Rev P03	10666 NPA XX XX DR L 5104 Rev P02
Outline Planting Plan Sheet 5 10666 NPA XX XX DR L 5105 Rev P03	10666 NPA XX XX DR L 5105 Rev P02
Outline Planting Plan Sheet 7 10666 NPA XX XX DR L 5017 Rev P03	10666 NPA XX XX DR L 5017 Rev P02
Outline Planting Plan Sheet 9 10666 NPA XX XX DR L 5109 Rev P02	10666 NPA XX XX DR L 5109 Rev P01
Outline Planting Plan Sheet 10 10666 NPA XX XX DR L 5110 Rev P03	10666 NPA XX XX DR L 5110 Rev P02
Technical Memorandum from SLR Consulting: Response to LLFA consultation comments on surface water drainage, dated 23 May 2025	
Technical Note – Monitor and Manage 2105-037.TN/03 Rev A	

Layout plans

Changes are proposed to two plots on the site following comments received regarding drag distances for bin collections. Plots 274 and 279 have been adjusted (particularly by moving their garages and side passages) in order to reduce the required drag distance for bins. The public open space and the recreational path past plot 279 have been slightly realigned to cater for these changes, and all layout plans updated accordingly.

The positioning of street trees within the areas where additional surface water storage tanks have been introduced has been revisited. This is particularly the case for the area in the south-eastern corner of the site, with the main surface water storage tanks being under the parking courts for the blocks of flats in that part of the site. The inclusion of these tanks has reduced the capacity to accommodate trees distributed across those parking courts, and so we have sought to move them to the ends of the parking courts instead.

Highways

Following conversations with Hertfordshire County Council, TPA has provided a technical note to provide further clarity on how a 'monitor and manage' approach to mitigation would work. This responds to the proposed planning conditions from Hertfordshire County Council in relation particularly to Mendip Way and Calder Way.

As described within the TPA note, monitor and manage is a mechanism to mitigate impacts of a development through the use of surveys and data to assess any harm caused. The aim is to avoid providing over-engineered

solutions to highways solutions where a less intrusive intervention may suffice, but to also cater for monitoring so that the situation can be assessed and a mechanism for providing further alterations at a later date if required.

In this instance, the County Council's highways officers have encouraged us to focus on changes to Haybluff Drive and Mendip Way which minimise the physical changes to the road, instead aiming primarily to use parking restrictions along parts of those roads in order to achieve the level of access required for the site itself and to cater for a bus route. The note then sets out how we would monitor the impact of such changes and provide the results to the County Council. We would also provide a pot of money to the County Council for it to use if it concludes in light of the monitoring data that further interventions are required after all. As you are aware, this mechanism and the size of the pot has been the subject of some discussion with highways officers, who have indicated that they are content that a pot of £400k provided for this purpose (secured via the Section 106 agreement) would be adequate to cater for any such fall-back intervention that may be pursued.

Conditions

Separately from the updated drawings and reports, there were three conditions where you had sought our views on their acceptability, relating to water consumption, energy performance and photo-voltaic solar panels. Having discussed these with our technical department, I can confirm that:

- For water consumption, we would be happy to accept a condition along the lines of the first option you put to us in your 22 May 2025 email: "No individual dwelling shall be occupied until the optional requirement for water consumptions (110 litres per person per day) in Part G of the Building Regulations has been complied with for that dwelling."
- For energy performance, we would prefer to tie the condition to the standards set out in the council's Sustainability Supplementary Planning Document, in which a bronze standard is described as all dwellings achieving at least a C rating on their Energy Performance Certificates.
- For solar panels, we would be happy to accept a condition requiring the subsequent approval of a plan showing solar panel locations and quantities. In our discussions on this, you have indicated that you would want a minimum number of dwellings to have solar panels to be specified in that condition. Having reviewed orientations, we would be happy to accept a minimum proportion of 25% of units having solar panels under such a condition.

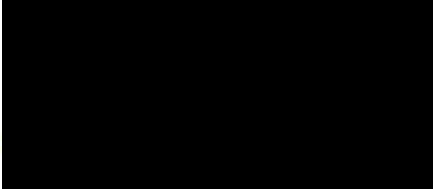
It is entirely possible that higher standards will be achieved once the technical design stage is reached on these matters (post-planning consent), but we would be uncomfortable pushing the minimum standards specified in the conditions higher at this stage. This is an area where there is considerable change at the moment to accommodate changes including the Government's proposed 'Future Homes' standards and anticipated changes to the Energy Performance Certificate criteria. We would not wish to commit to all dwellings achieving an EPC rating of B and then find that by the time we come to build that standard has changed.

As we have discussed in our meetings, there are 18 units on the site (plots 1-18) where we are looking to trial a variety of more sustainable construction techniques, materials, and technologies, with the aim of minimising future energy demands for those dwellings. However, we do not believe it is necessary to condition the higher performance for these units to make the development acceptable in planning terms, and nor do we seek to rely on their enhanced performance as part of the planning balance in determining the development's acceptability.

Conclusion

Please confirm safe receipt of this letter and the documents listed in the table above. We look forward to receipt of further comments in relation to the submitted documents, and moving towards determination.

Yours sincerely



Richard Kelly MRTPI
Senior Land Manager

M: [Redacted]
[Redacted]