

Saturday, 11 April 2026

38 Souberie Avenue
Letchworth Garden City
Herts. SG6 3HZ

North Hertfordshire District Council
Council Offices
Gernon Road
Letchworth Garden City
SG6 3JF

For the attention of Henry Thomas – Planning

**Re: Planning Objection – Schedule 73 Variation to Condition 2 of 25/00466/FP
Introduction of External Lighting (EV Charging Installation) at Morrisons, Broadway,
Letchworth Garden City
See also complaint ref: 26/00058/1ENF (re non compliance)**

Dear Sir,

I wish to formally object to the proposed lighting scheme associated with the EV charging installation at Morrisons, Broadway, on the grounds that it would result in unacceptable harm to neighbouring residential amenity and fails to comply with the North Hertfordshire Local Plan and breaches the covenant (see attached) granted to nearby residents when Morrisons was first built.

This proposal fails to demonstrate that the lighting will not harm neighbouring residential amenity. Low-mounted floodlights close to the boundary, combined with a lack of lux assessment, present a clear risk of glare and light intrusion into homes. The scheme therefore conflicts with Local Plan Policies D3 and D4 and should not be approved.

While I support the principle of EV infrastructure, the lighting design as proposed is entirely inappropriate for a site directly adjacent to residential properties (in the conservation area) and has not been adequately assessed.

Conflict with North Hertfordshire Local Plan Policies

Policy D3 – Protecting Living Conditions

Policy D3 requires development to avoid unacceptable impacts on the living conditions of neighbouring occupiers, including through:

- Loss of amenity
- Disturbance from external influences

The proposed lighting, due to its proximity, height, and lack of demonstrated control, presents a clear risk of:

- Light intrusion into habitable rooms
- Glare affecting outlook and comfort
- Loss of dark night-time conditions

This directly conflicts with Policy D3.

Policy D4 – Design and Sustainability

Policy D4 requires development to be well-designed and to:

- Respect the character of the surrounding area
- Minimise environmental impacts, including artificial light

The proposal fails to demonstrate a sensitive lighting design appropriate for a residential edge. The use of multiple low-mounted floodlights without robust mitigation does not reflect good design practice and risks excessive light spill.

Key Technical Concerns

1. No Lighting Impact Assessment Provided

The application does not include a lux contour (isolux) plan or any assessment of lighting levels at nearby residential properties.

Without this, it is not possible to verify compliance with the Institute of Lighting Professionals (ILP) Guidance Notes (GN01), which are widely applied in planning decisions.

For residential areas, ILP recommends:

- Maximum 5 lux at windows (pre-curfew)
- Maximum 1 lux at windows (post-curfew)

Given the site layout, there is a clear risk these limits would be exceeded.

2. Inappropriate Mounting Height and Positioning

The proposal includes multiple floodlights mounted at 4 metres in height close to the site boundary with 49 Station Way.

This is problematic because:

- 4m aligns closely with residential window height
- It increases the likelihood of **direct light intrusion**
- It increases glare risk due to line-of-sight visibility

This is not consistent with best practice for lighting adjacent to residential properties.

3. Insufficient Shielding and Glare Control

The specification refers only to floodlights with a “back plate,” which does not confirm:

- Full cut-off luminaires
 - Elimination of horizontal light spill
 - Prevention of direct glare
- As a result, there is a high likelihood of:

Visible light sources from neighbouring properties

- Glare and discomfort for residents

4. Cumulative Impact Not Assessed

The proposal introduces 4 new floodlights while retaining existing lighting. This results in at least six active light sources, creating:

- A continuous illuminated zone
- Increased ambient light levels
- Amplified reflection from hard surfaces

No cumulative lighting assessment has been provided, which is a significant omission.
Potential Statutory Nuisance

Given the above, there is a credible risk that the development will give rise to a statutory nuisance under the Environmental Protection Act 1990 due to:

- Light intrusion into residential properties – especially 49 Station Way and the attached residence.
- Ongoing disturbance during night-time hours

5. Possible Additional Impact from EV Charging Signage and Advertising

The application does not provide sufficient detail regarding associated EV charging signage and potential advertising hoardings, which are typically installed as part of such developments.

At comparable installations operated by Motor Fuel Group within Morrisons car parks, EV charging areas commonly include:

- Tall totem-style signs (often 4–7m in height)
- Branded blue advertising panels
- Illuminated or reflective surfaces

These elements can:

- Act as additional vertical light sources at eye level
- Increase glare when viewed from nearby residential properties
- Contribute to a more visually intrusive and continuously lit environment

No information has been provided within the variation as to confirm:

- Whether such signage is planned and if so, will be illuminated (internally or externally)
- The height, orientation, or positioning of these structures
- Their combined visual and lighting impact alongside the proposed floodlights

This represents a further omission in the assessment of cumulative impact and reinforces concerns that the proposal underestimates the true extent of light pollution and visual intrusion experienced by neighbouring residents.

These additional factors must be considered alongside the proposed lighting when assessing compliance with Policies D3 and D4.

Conclusion

The proposal fails to demonstrate that it will protect neighbouring residential amenity and does not comply with the North Hertfordshire Local Plan or the attached covenant.

This is not and never has been an objection to EV infrastructure itself, but passing the application in the first instance was always going to result in this application for a variation to condition 2 and will lead to further variations regarding unsightly advertising hoarding.

Variation 2 application to application 25/00466/FP should not under any circumstances be approved.

Yours faithfully,



Marlene Gray

Appendices:

1. Deed of Release
2. Typical nighttime photograph of any one of 300 Morrisons Car Parks with this infrastructure
3. Photograph of a typical MFG site in a Morrisons car park with advertising hoarding and/or totem.