

NORTH HERTFORDSHIRE DISTRICT COUNCIL



12 March 2021

Our Ref PCC – 24.03.2021
Contact. Committee Services
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To: Members of the Committee: Ruth Brown (Chair), Daniel Allen (Vice-Chair), Val Bryant, Morgan Derbyshire, Mike Hughson, Tony Hunter, David Levett, Ian Moody, Sue Ngwala, Sean Prendergast, Mike Rice and Tom Tyson

Substitutes: Councillors David Barnard, Sam Collins, George Davies, Ian Mantle, Michael Muir, Carol Stanier and Kay Tart.

**NOTICE IS HEREBY GIVEN OF A
MEETING OF THE PLANNING CONTROL COMMITTEE**

to be held as

A VIRTUAL MEETING

On

WEDNESDAY, 24TH MARCH, 2021 AT 7.30 PM

Yours sincerely,

Jeanette Thompson
Service Director – Legal and Community

****MEMBERS PLEASE ENSURE THAT YOU DOWNLOAD ALL AGENDAS AND REPORTS VIA THE MOD.GOV APPLICATION ON YOUR TABLET BEFORE ATTENDING THE MEETING****

Agenda **Part I**

Item		Page
1.	WELCOME AND REMOTE/PARTLY REMOTE MEETINGS PROTOCOL SUMMARY Members are requested to ensure that they are familiar with the attached summary of the Remote/Partly Remote Meetings Protocol. The full Remote/Partly Remote Meetings Protocol has been published and is available here: https://www.north-herts.gov.uk/home/council-and-democracy/council-and-committee-meetings .	(Pages 5 - 6)
2.	APOLOGIES FOR ABSENCE Members are required to notify any substitutions by midday on the day of the meeting. Late substitutions will not be accepted and Members attending as a substitute without having given the due notice will not be able to take part in the meeting.	
3.	NOTIFICATION OF OTHER BUSINESS Members should notify the Chair of other business which they wish to be discussed at the end of either Part I or Part II business set out in the agenda. They must state the circumstances which they consider justify the business being considered as a matter of urgency. The Chair will decide whether any item(s) raised will be considered.	
4.	CHAIR'S ANNOUNCEMENTS Members are reminded that any declarations of interest in respect of any business set out in the agenda, should be declared as either a Disclosable Pecuniary Interest or Declarable Interest and are required to notify the Chair of the nature of any interest declared at the commencement of the relevant item on the agenda. Members declaring a Disclosable Pecuniary Interest must withdraw from the meeting for the duration of the item. Members declaring a Declarable Interest, wishing to exercise a 'Councillor Speaking Right', must declare this at the same time as the interest, move to the public area before speaking to the item and then must leave the room before the debate and vote.	
5.	PUBLIC PARTICIPATION To receive petitions, comments and questions from the public.	

6. **20/01714/FP FOUNDATION HOUSE, ICKNIELD WAY, LETCHWORTH GARDEN CITY, HERTFORDSHIRE, SG6 1GD** (Pages 7 - 42)
REPORT OF THE DEVELOPMENT AND CONSERVATION MANAGER

Erection of 57 dwellings comprising of 18 x 1-bed apartments and 39 x 2-bed apartments including provision of car parking with all associated ancillary and landscaping works following demolition of existing office building (Amended by plan received 17.09.20).

7. **18/02913/OP FORMER NORTON SCHOOL PLAYING FIELDS TO THE NORTH OF, PRINCIPAL COURT, LETCHWORTH GARDEN CITY, HERTFORDSHIRE** (Pages 43 - 74)
REPORT OF THE DEVELOPMENT AND CONSERVATION MANAGER

Outline planning application (all matters reserved) for the erection of up to 45 dwellings (as amended by plan received 25 February 2020).

8. **PLANNING APPEALS**
REPORT OF THE DEVELOPMENT AND CONSERVATION MANAGER

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REMOTE/PARTLY REMOTE MEETINGS PROTOCOL SUMMARY

A protocol regarding remote meetings has been devised as a result of The Local Authorities and Police and Crime Panels (Coronavirus) (Flexibility of Local Authority Police and Crime Panel Meetings) (England and Wales) Regulations 2020 No.392 ('the Regulations') to provide guidance for the conduct of any remote meeting of the Council, and its various Committees and Sub-Committees, held under the provisions of the Regulations and subsequent changes to the Constitution.

The full Remote / Partly Remote Meetings Protocol has been published and is available to view on the Council's website via the following link: <https://www.north-herts.gov.uk/home/council-and-democracy/council-and-committee-meetings>

The Council's adopted Constitution will continue to apply to meetings of the Council and its various Committees and Sub-Committees. Where there is a conflict between the protocol and Constitution the Constitution takes precedence.

The protocol applies to this meeting. It outlines processes for conducting remote meetings. Some key points are highlighted here for guidance:

- Prior to the start of a meeting the Committee, Member and Scrutiny Officer/Manager ('The Officer') will confirm the meeting is being streamed live. They will confirm that they can see and hear all participating Members, Officers and/or members of the public at the start or upon reconvening a meeting.
- Any person attending the meeting remotely should join no later than 15 minutes prior to allow for technical checks. They should ensure that their name on screen appears in the agreed format, as indicated in the Protocol. They should mute their microphone when not speaking. Their background should be nondescript or virtual/blurred if possible. Headsets are recommended to reduce audio feedback.
- Remember to stay in view of the camera. While on camera everything you do is visible; please observe as far as possible the etiquette you would as if attending a meeting in person.
- Be careful to prevent exempt or confidential papers being seen within the video-feed. When a meeting is in private session there should be only those entitled to be present in the room. The live stream will continue with a holding card displayed.
- If a Member wishes to speak, they should use the raise hand function. Please wait to be invited by the Chair to address the meeting. The normal procedure rules with respect to debate and speaking times will apply as per the Constitution.
- If a Member has declared a Disclosable Pecuniary Interest and is required to leave the meeting during the consideration of an item, they will be placed in the waiting room. It is the responsibility of the Member in question to remind the Chair at the start of such item. The Officer will remind the Chair to return the Member as appropriate.
- Members will need to use the tools in the "Participants" function to vote: using a green tick to indicate 'for', a red cross to indicate 'against', or the "raise hand" tool to indicate an abstention. Where a Member has had to dial into the meeting by telephone, the Chair will ask for verbal confirmation as to how they wish to vote. Leave the vote in situ until told otherwise by either the Chair or Officer.
- The Officer will clearly state the result of the vote and the Chair will then move on.
- Details of how Members voted will not be kept or minuted unless a Recorded Vote is requested or an individual requests that their vote be recorded, although voting may be seen and/or heard on the video recording.
- If there are Part 2 (confidential) items Members will be invited to join a breakout room for these items. You must accept this invitation.
- Once Part 2 (confidential) discussions have concluded Members will need to leave the breakout room. Please do not leave the meeting.

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<u>Location:</u>	Foundation House Icknield Way Letchworth Garden City Hertfordshire SG6 1GD
<u>Applicant:</u>	Letchworth Garden City Heritage Foundation
<u>Proposal:</u>	Erection of 57 dwellings comprising of 18 x 1-bed apartments and 39 x 2-bed apartments including provision of car parking with all associated ancillary and landscaping works following demolition of existing office building (Amended by plan received 17.09.20)
<u>Ref. No:</u>	20/01714/FP
<u>Officer:</u>	Andrew Hunter

Date of expiry of statutory period : 03.11.2020

Submitted Plan Nos.:

19059wd2.01B, 19059su2.01, 19059su2.02, 19059su2.04, 19059wd2.05, 19059wd2.06, 19059wd2.07, 19059wd2.08, 19059wd2.09, 19059wd2.10, 19059wd2.11, 19059wd2.15, 19059wd2.02, 19059wd2.03, 19059wd2.04, 19059wd2.14, 19059wd2.13, LSDP 1281.01 Rev D, D35468/TF/A, ALD21955-03

Extension of statutory period:

Agreed to 29th March 2021.

Reason for referral to Committee:

The application is to be determined by Planning Control Committee by reason of the development being residential development with a site area of 0.5 hectares or greater, and any development with greater than 500sqm floor space on a site of more than 1 hectare (the site area is 1.36ha), as set out in 8.4.5 of the Council's 2019 Scheme of Delegation.

1.0 Relevant Site History

- 1.1 17/00614/1PN - Prior approval notification - Class O: Change of use from Use Class B1(a) (offices) to Use Class C3 (residential) to provide 9 x 1 bedroom flats and 7 x 2 bedroom flats and 20 car parking spaces – Prior Approval given 04/05/17.

- 1.2 11/02180/1DD - Demolition of former car auction buildings – Required 14/11/11.
- 1.3 01/01289/1 - Erection of two storey office building, formation of new access road and provision of 98 car parking spaces following demolition of existing buildings as amended by plan received on 1st November 2001 – Approved 10/12/01.
- 1.4 98/01499/1 - Alteration of existing vehicular access. Provision of 35 car parking spaces following demolition of rear canopy and supports – Approved 21/01/99.
- 1.5 93/00844/1 - Renewal of temporary permission for a maximum of 3 car auctions per week (granted 9.7.92 under reference 92/0617/1) – Approved 16/09/93.
- 1.6 92/00617/1 - Use of land and buildings for car auctions on maximum of three days a week for a temporary period together with use of land opposite for car parking – Approved 09/07/92.
- 1.7 91/00613/1DC - Section 64 Determination; to whether or not the sub-division of the Former shelvoke building into 5 class B1/B2 units with associated parking and modified access would constitute development requiring the specific granting of planning permission – Not required 03/06/91.
- 1.8 91/00109/1 - Demolition of redundant industrial roof and support structure, provision of 35 car parking spaces. Re-opening and modification of former east access into site – Approved 04/03/91.

2.0 **Policies**

2.1 **North Hertfordshire District Local Plan No.2 with Alterations**

Policy 8 – Development in Towns
 Policy 14 – Nature Conservation
 Policy 16 – Areas of Archaeological Significance and other Archaeological Areas
 Policy 26 – Housing proposals
 Policy 29A – Affordable Housing for Urban Local Needs
 Policy 36 – Employment Provision
 Policy 51 – Development effects and planning gain
 Policy 55 – Car Parking Standards
 Policy 57 – Residential Guidelines and Standards
 Policy 58 – Letchworth Garden City Design Principles

2.2 **National Planning Policy Framework**

Chapter 5 – Delivering a sufficient supply of homes
 Chapter 6 – Building a strong, competitive economy
 Chapter 8 – Promoting healthy and safe communities
 Chapter 9 – Promoting sustainable transport
 Chapter 11 – Making effective use of land
 Chapter 12 – Achieving well-designed places

Chapter 14 – Meeting the challenge of climate change, flooding and coastal change
Chapter 15 – Conserving and enhancing the natural environment
Chapter 16 – Conserving and enhancing the historic environment

2.3 North Hertfordshire Draft Local Plan 2011-2031 - (Approved by Full Council April 2017)

SP1 – Sustainable development in North Hertfordshire
SP2 – Settlement Hierarchy
SP3 - Employment
SP6 – Sustainable transport
SP7 – Infrastructure requirements and developer contributions
SP8 - Housing
SP9 – Design and sustainability
SP10 – Healthy communities
SP11 – Natural resources and sustainability
SP12 – Green infrastructure, biodiversity and landscape
SP13 – Historic environment
ETC2 - Employment development outside Employment Areas
T1 – Assessment of transport matters
T2 – Parking
HS1 - Local Housing Allocations
HS2 – Affordable housing
HS3 – Housing mix
HS5 – Accessible and adaptable housing
D1 – Sustainable Design
D3 – Protecting Living Conditions
D4 – Air quality
NE1 – Landscape
NE2 – Green infrastructure
NE6 – Designated biodiversity and geological sites
NE7 – Reducing flood risk
NE8 – Sustainable drainage systems
NE9 – Water quality and environment
NE10 – Water Framework Directive and wastewater infrastructure
NE11 – Contaminated land
HE1 - Designated Heritage Assets
HE4 – Archaeology
LG16 - Foundation House

2.4 Supplementary Planning Document

Vehicle Parking at New Development SPD (2011)
Design SPD (2011)
Planning Obligations SPD (2006)

3.0 **Representations**

3.1 **Site Notice:**

Start Date: 13/08/2020

Expiry Date: 05/09/2020

3.2 **Press Notice:**

Start Date: 13/08/2020

Expiry Date: 05/09/2020

3.3 **Neighbouring Properties:**

For the originally submitted plans, 12 objections were received from residents of Glebe Road, Haysman Close, Shaftesbury Industrial Centre Icknield Way, and Business Centre West Avenue One. The objections received were on the following grounds:

- High density of flats.
- Would like a fence higher than the 1.8m proposed and higher vegetation on the rear boundary – To prevent overlooking and light pollution of Glebe Road dwellings.
- Would like existing trees to remain.
- Want rear access gates removed as would open onto private property (an access track).
- This access should not be used for building/construction purposes.
- The former public footpath should remain closed. It was closed several years ago to stop anti-social behaviour.
- Impacts on wildlife/ecology, and mitigation.
- Car park lighting shouldn't illuminate my dwelling.
- Loss of privacy. Insufficient screening.
- Existing privacy should be maintained.
- Insufficient parking.
- Increased traffic.
- Increased noise.
- More noise complaints against existing businesses in this industrial area.
- Small affordable industrial units are needed here, not dwellings.
- Disappointed the site has been re-zoned to residential in the emerging Local Plan.
- Against garden city principles.
- Not realistic to allow the modern office building to be demolished.
- Need for more dwellings in or around the town centre.
- Disruption from construction.
- Effects of raised garden on retaining wall.

Following the receipt of amended plans on 13/10/20 and a further round of public consultation, no further comments were received.

Statutory Consultees:

3.4 Crime Prevention Design Advisor – Hertfordshire Constabulary

I have studied the documents submitted on the council's planning web site and have the following comments to make;

- I am pleased to see that the Design & Access Statement does include a section on 'Security' (page 12). I am also pleased to see that the intent is to seek accreditation to the Police preferred minimum security standard that is Secured by Design (SBD).
- Originally I did have some concerns regarding the proposed post boxes and the 'Protected Lobbies'. However, after contacting the applicant I can confirm that the Post will be delivered through the wall and the doors of the lobbies will be fitted with a fob access system. This is to prevent any unauthorised access from the stairwell (Compartmentalisation). In addition, the access control will be configured such that, in the event of a fire the locks will 'fail' in the open position allowing for easy escape.

I am pleased to say that the Police Crime Prevention Design Service fully support this application and I look forward to receiving the SBD application form.

3.5 Environment Agency

We consider that planning permission could be granted to the proposed development as submitted if the following planning conditions are included as set out below.

3.6 Environmental Protection Air Quality Officer

No objections.

3.7 Transport Officer, Planning Policy

I've read the Transport Statement and have the following comments:

Car Parking:

I note that the car parking provision is for 80 spaces (57 residents and 23 visitors) which is a shortfall of 30 spaces based on NHDC's Vehicle Parking at New Development SPD as is identified in the report. I also note that the report states that pre-application discussions have been undertaken with HCC Highways who have indicated that they would accept a reduction in parking provision if appropriate evidence supports this. Assuming the evidence has been shared with HCC Highways and no objections were raised, then I have no objections to this either.

Cycle Parking:

The cycle parking provision is acceptable meeting NHDC's Vehicle Parking at New Development SPD.

Public Transport Accessibility:

I'm concerned that no proposals are included for either improving the local bus service or even to encourage the new residents to make use of the current local bus services. Whilst the bus stop 'Irvin House' on Icknield Way is located near-by to the development, the 96A which serves this stop provides a very limited service and in one direction only away from Letchworth town centre so is unlikely to be used by many of the new residents. The nearest, more frequent bus service is the 55 which serves the Norton Common pair of bus stops located on North Way North as is identified in the Transport Statement; however given the distance of the bus stops from the development I would question how many of the new residents will choose to use the bus if they have access to private transport, plus for any residents with shopping, (i.e. returning from Morrison's) may be put off from catching the bus, again given the distance from the bus stops on Norton Way North to the development.

The current NHDC 2006 Planning Obligations SPD (Table 9, section 5.8) states that each on-site parking space associated with residential development will incur a second strand charge of:

1 bedroom: J375 Zone 2 (Town Centre) or J625 Elsewhere

2 bedroom: J500 Zone 2 (Town Centre) or J750 Elsewhere

See: <https://www.north-herts.gov.uk/sites/northherts-cms/files/Planning%20Obligations%20SPD.pdf>

Will these charges apply to this development? If so can these be used to enhance the existing 96A bus service? If this is possible then I am happy to liaise with the Passenger Transport Unit at HCC to discuss this further.

Would it also be an option to request that the developer fund a monthly bus pass for each new resident as a further means to encourage using the local bus service? If so I can provide you with some draft costings for bus passes.

Would it be possible for the developer to provide information packs providing details on active and sustainable transport options for each new resident when they move in?

3.8 Hertfordshire County Council Growth and Infrastructure

Based on the information to date for the development of 57 dwellings (see breakdown below) we would seek financial contributions towards the following projects:

Library Service towards the enhancement of Letchworth Library (J5,792 This contribution is based on Table 2 below (index linked to PUBSEC 175).

Youth Service towards the increase of capacity at Hitchin Young People's Centre (J506 This contribution is based on Table 2 below (index linked to PUBSEC 175).

Based on the information provided to date we would seek the provision of fire hydrant(s), as set out within HCC's Planning Obligations Toolkit.

3.9 Anglian Water

No objections.

3.10 Housing Supply Officer

No objections.

3.11 Landscape and Urban Design Officer

1. The proposal is to demolish an existing office block and erect, five, three storey blocks of apartments accessed off a widened existing entrance on Icknield Way. The land rises up from Icknield Way and levels off towards the rear of the site where there is a further change in level along the rear boundary butting onto the rear gardens of dwellings on Glebe Road.

2. The site is on Icknield Way, within easy walking distance of Letchworth town centre and the railway station and is surrounded by a mix of commercial and residential uses. The neighbouring three storey residential block, to the east of Foundation House, is set back from the road frontage on the higher level behind a brick wall. The adjoining residential development on Haysman Close, to the rear of Foundation House, is similar three storey blocks of flats.

3. The two largest residential blocks are located along the frontage of the site and would create an entrance into the scheme while the remaining three blocks form a group at the rear of the site. The residential blocks appear to have front and rear entrances which improve pedestrian permeability and accessibility and provide easier access to the parking bays which are located throughout the site.

4. The layout and treatment of the elevations of the residential blocks themselves have regard to the Letchworth Garden City principle of Vista; Closure; Accents; and Group design. The blocks are located away from existing residential development and existing boundary vegetation on adjoining land is being retained to help screen the new development.

5. The street scene is mixed along Icknield Way ranging from garage forecourts to planted verges, to brick walls and fences. This proposal will enhance the street scene and create a more residential character along the north side of this section of Icknield Way.

6. Landscape proposals, drawing no. LSDP 1281.01 Rev B are acceptable. Some existing trees within the site will need to be removed to accommodate the development but new trees and hedging proposed along the frontage with Icknield Way and within the site will strengthen the Garden City character. There are small areas of amenity space throughout the scheme: at the main entrance, within the centre of the site, along the northern boundary and within the courtyard area created by blocks B and C. There are other areas of planting proposed within the site and along the frontage with Icknield Way to enhance the setting of the development.

7. I have no objection to these proposals.

3.12 Environmental Health Contaminated Land

No objections.

3.13 Hertfordshire County Council highways officer

Does not wish to restrict the grant of permission.

VEHICLE ACCESS

The development has two points of access from Icknield Way that is designated as a local access road subject to a speed limit restricted to 30 mph.

TECHNICAL AUDIT

The design would have to be submitted to a scale of 1:200 to the highway authority and subjected to a Technical Audit with the ultimate design being technically approved prior to commencement of the s278 works on site.

The width of the main access road has been shown at 5.50 metres wide on the submitted drawings which would conform to the minimum width of an access road that would accommodate the waste collection vehicles in current use servicing the development. This width would support two-way traffic taking into account the passing of parked cars by waste collection vehicles for the scale of the development due to likely indiscriminate parking on the access roads.

The submitted road layout may not be to an adoptable standard. The site internal layout will need to comply with 'Roads in Hertfordshire - Highway Design Guide' if the roads within the estate were to be adopted under a Section 38 Agreement.

The Developer should contact the Development Management Team at County Hall to obtain the requirements for the adoption process for the associated road works as part of the development. This should be carried out prior to any development work being carried out. The accesses have an acceptable level of vehicle to vehicle inter-visibility from the junctions.

HIGHWAY SAFETY – vehicle to vehicle inter-visibility along the highway from the New Development

The vehicle to vehicle inter-visibility from the new junctions within the new development is shown on the submitted drawings to accord with Manual for Streets. In view of the geometry of the horizontal alignment of the road layout and estimated approaching speed of traffic visibility splays of 2.4 metres by 61 metres are considered acceptable to the new and reconfigured junctions.

Forward visibility around the radius corners within the development access roads conform to the sight stopping distance (SSD) criteria of Manual for Streets.

MANOEUVRABILITY WITHIN THE ROAD LAYOUT

To confirm that the geometry of the horizontal alignment of the road layout has sufficient capacity to accommodate two-way traffic for vehicles likely to serve the development a swept path analysis which has been tested as shown on the swept path analysis MLM drawing number 619577 PO1 that the layout would accommodate the manoeuvrability of waste collection vehicles at the reconfigured existing junction and along the new internal road layout without encroaching over footways and private amenity areas, the method of refuse collection must be confirmed as acceptable by North Herts refuse collection agency.

The details of the above vehicle tracking would accommodate fire and rescue vehicles also needed for delivery and other emergency vehicles at the end of the cul-de-sacs, along the access road and the turning areas.

TECHNICAL DESIGN OF THE ROAD LAYOUT

The gradient of the access road have been recommended to be a minimum 1:20 (5%) for the first 12 metres. This gradient is to avoid grounding of vehicles using the access to the new development from the access road offset from the carriageway of Whiteway.

Hertfordshire County Council as Highway Authority would consider that if the details were submitted showing the development layout with an acceptable level of vehicle to vehicle inter visibility on the road layout was provided and detailed to scale (1:200) on the site layout drawings of the proposal to accord with the above comments this may be considered for compliance with highway safety.

However prior to commencement on site preliminary design details of the new access roads should be provided to establish the technical design is to highway standards. An engineering drawing should be prepared drawn to a suitable scale of 1:200 to demonstrate the extent of re-profiling of the carriageway where it joins the existing road of Icknield Way, showing the access width, carriageway crossfalls and a scheme for the on-site and regulated discharge of surface water run-off drainage from the proposal.

Three copies of the preliminary design should then be submitted for approval to the highway authority where a in due course when progressing the s278 agreement a technical design check would also be carried out.

A topographical survey of the existing ground levels has been carried out to ensure that the vertical alignment is possible from the adjacent highway.

PARKING PROVISION

Parking provision has been sited to comply with the walking distance found within Roads in Hertfordshire "Highway Design Guide" which is 20 metres. (Section 4 – Design Standards and Advice Chapter 9 – Vehicle Parking Facilities)

A careful balance must be struck between the desire of residents to park as near to their house as possible and maintain the overall setting. If residents consider that the parking spaces are too far away from their dwellings they will park their vehicles on the access roads which will cause an obstruction and prevent emergency vehicles reaching their destination and service vehicles such as RCVs from collecting waste.

It is inevitable that residents that do not have individual driveways will not park in the prescribed areas and will park outside their homes.

PUBLIC TRANSPORT

BUS

The nearest bus stops are located along Icknield Way. These stops are both served by public routes 55 and 96A.

RAIL

Letchworth Railway Station is located approximately 1.25 km west of the site, on the northern edge of the town centre.

This rail station is on the First Capital Connect line with direct links to London Kings Cross,

Cambridge and Kings Lynn with a change at Hitchin that provides a link to Peterborough.

Journey time into London Kings Cross is approximately 32 minutes.

Other comments

The site is located within recognised accessibility criteria of a bus stop. The stops have shelters and easy access kerbing.

Services are frequent every 20 to 25 minutes and enable access to surrounding towns of Royston, Baldock, Hitchin, Stevenage and to Letchworth rail station.

Walking and Cycling

Pedestrians have access to an extensive network of footways within the vicinity of the site with a footway on each side of Icknield Way extending to the town centre.

The town centre and local facilities have a realistic access from the development by cycling albeit that there is no dedicated cycle lanes cycleway.

CONSTRUCTION TRAFFIC

Concerns over the impact that the volume of construction traffic travelling to the site by HCC has resulted in a Construction Traffic Management Plan recommended.

The proposal would need substantial construction traffic to serve the construction phase of the development for deliveries and site staff, as the manoeuvring of delivery vehicles would be concentrated to two access along Icknield Way a Construction Traffic Management Plan has been recommended to manage the vehicles when visiting the town centre and ensure the surrounding town centre network manages delivery traffic and is within operational capacity.

TRANSPORT IMPACT

Traffic data has been obtained by using an assessment of the TRICS database to calculate the trips rates for the development. The difference in Trip rates have been reduced as a result of the new development.

Considering that traffic flows are fundamental to the assessment of traffic impact HCC is satisfied that the data produced provides an overall picture of the existing traffic movements and the future traffic generated from the new development.

TRAFFIC GENERATION

Traffic generation has been derived from the volume of predicted traffic generated compared with the likely trip rates obtained from comparable residential site within the national TRICS software, (Trip Rate Information Computer System) trip generation database with equal multi modal splits with a reasonable level of public transport accessibility. The new development has been assessed and has been accepted of being comparable and realistic.

Given the proposal involves the provision of 57 units considering the TRICS software, the total peak generation of traffic would be around a total of 12 vehicles departing from the development in the morning peak travelling period (8:0 am to 9:0 am) this was compared with 0.5 trips taken per household (the figure of 0.5 trips taken from the 2012 (a) TRICS Data base) in the peak travelling period and 14 vehicles arriving at the development in the evening peak travelling period (5:0 pm to 6:0 pm) taking into account that the development is located adjacent to a local access road the new traffic generation of vehicles is considered as a reduction and have less impact on the local highway network.

The above data has been considered by HCC as being acceptable in traffic generation terms.

CONCLUSION

Hertfordshire County Council as Highway Authority has considered that the proposal would not have an unreasonable impact on the safety and operation of the adjoining highways and does not wish to restrict the grant of permission subject to the recommended planning conditions and highway informatives above.

3.14 Waste Officer

No development shall commence until further details of the circulation route for refuse collection vehicles have been submitted to the local planning authority and approved in writing. The required details shall include a full construction specification for the route, and a plan defining the extent of the area to which that specification will be applied. No dwelling forming part of the development shall be occupied until the refuse vehicle circulation route has been laid out and constructed in accordance with the details thus approved, and thereafter the route shall be maintained in accordance with those details.

3.15 Environmental Health Noise

I have reviewed the submitted noise assessment "Acoustic Assessment of a proposed residential development at Foundation House Letchworth" Report reference 180703-Roo1B, dated 24/9/20 by ACA Acoustics. The Report is satisfactory and refers to latest site layout plan. Mitigation measures are required and detailed in Section 5, Table 5 Acoustic Performance specification for facade elements and Table 6 Specification for ventilators. The Report may be Approved.

3.16 Hertfordshire Ecology

The site comprises a modern two-storey office building, four outbuildings, large hardstanding car park, an area of unmanaged scattered scrub and young broadleaved woodland, managed landscape planting and some specimen trees. The majority of the site has limited value to biodiversity, with the main interest being the woodland and scrub vegetation to the north; and opportunities for breeding birds and foraging (but not confirmed roosting) bats.

The majority of trees will be retained; however, 9 trees and groups of trees are proposed for removal including three category B trees. Replacement planting is proposed, including a native species-rich hedgerow on the northern boundary, which is acceptable.

Of course, any significant tree/shrub work or removal should be undertaken outside the nesting bird season (March to August inclusive) to protect breeding birds, their nests, eggs and young. If this is not practicable, a search of the area should be made no more than two days in advance of vegetation clearance by a competent Ecologist and if active nests are found, works should stop until the birds have left the nest.

Enhancements for bats, birds, insects and hedgehogs are proposed. These are modest and the inclusion of integrated bat and bird boxes/features within the new buildings, if possible, would also be welcomed. To allow passage of hedgehogs between the properties and in/out of the whole site, garden fence lines and surrounding close boarded fence lines should be made penetrable with gaps at ground level and/or creation of holes measuring 13x13cm ('Hedgehog Highways') to allow free movement of hedgehogs but not large pets.

Notwithstanding the above, I consider the landscape proposals and biodiversity enhancements, if secured as described, will deliver net gain for the development in line with NPPF and emerging Government expectations.

The Lighting Plan does not show the woodland and scrub area to the north of the site. These habitats should not be lit by artificial lighting, which could have the potential to negatively impact on wildlife.

3.17 Lead Local Flood Authority

No objections.

3.18 County Council archaeologist

No objections.

4.0 **Planning Considerations**

4.1 **Site and Surroundings**

4.1.1 The site comprises a two storey building with a pitched roof at the front of the site, used for offices (Use Class E). The remainder of the site is used for car parking, with a small flat-roof building at the rear of the parking area. The rear of the site comprises vegetation and younger trees. Mature deciduous trees form the north boundary of the site, with vegetation in the north of the site being relatively dense. The side and rear boundaries with Haysman Close are comprised of 3m high fences (a 2m close-boarded fence and 1m trellis). Ground levels rise slightly to the rear of the site. The site has three vehicular accesses, all from Icknield Way.

4.1.2 The properties adjacent to the site are three storey buildings comprising residential flats and some two storey dwellings in Haysman Close to the north and east, semi-detached and terraced dwellings to the north on Glebe Road (including a private access drive serving most of the dwellings to the rear), Unit 4 Icknield Way which is a funeral parlour, and an electricity sub-station to the south-west.

4.1.3 Uses opposite the site on the other side of Icknield Way are primarily a mix of Classes E (light industry and offices) and B8 (storage and distribution). The character of the wider locality is of a light industrial employment area which is comprised of Classes E, B8, and some *sui generis* and other uses related to the commercial operations that take place in the employment area.

4.1.4 In the 1996 adopted Local Plan, the site is designated as being within an Employment Area, and a Business Area within the Employment Area. A Conservation Area borders the northernmost edge of the site. In the emerging Local Plan, the application site is designated as a Housing Site LG16; and is adjacent to an Employment Area, a Business Area, and the Conservation Area.

4.2 Proposal

4.2.1 Planning permission is sought for:

Erection of 57 dwellings comprising of 18 x 1-bed apartments and 39 x 2-bed apartments including provision of car parking with all associated ancillary and landscaping works following demolition of existing office building

4.2.2 All existing buildings and structures on the site would be demolished and removed, including some trees and vegetation, to facilitate the proposed development. The proposed dwellings would be within five three-storey separate buildings, which would all have pitched roofs. The proposal includes vehicular parking areas and internal access roads, pedestrian paths, and soft landscaping including trees. An area at the rear of the site comprising mature trees close to the boundary would be used as a communal garden, with other smaller communal outside areas elsewhere within the site. Five ancillary buildings to be used for cycle storage and bin stores are also included, which would have pitched roofs.

4.2.3 The buildings would be of a more traditional design and appearance, with front and rear projecting gables and half-hipped ends, front and rear porches with pitched roofs, and front and rear dormers with flat and pitched roofs. External materials are proposed to be a mix of red tiles, red brick, cream render, UPVC windows, and composite doors.

4.2.4 The dimensions of the five main buildings proposed are as follows:

- Building A (6 one-bed flats and 15 two-bed flats) – Length 61.6m, depth 10m to 16.2m, height to roof ridge 13.1m to 14.3m.
- Building B (12 one-bed flats and 6 two-bed flats) – Length 39.1m, depth 10m to 23.8m, height to roof ridge 13.1m to 14.3m.
- Building C (6 two-bed flats) – Length 19.4m, depth 10.4m, height to roof ridge 13.1m.
- Building D (6 two-bed flats) – Length 19.4m, depth 10.4m, height to roof ridge 13.1m to 15.8m.
- Building E (6 two-bed flats) – Length 19.4m, depth 10.4m, height to roof ridge 13.1m to 15.8m.

4.2.5 The development would provide 80 car parking spaces, providing 1 per flat and 23 unallocated spaces, including six disabled spaces. Cycling provision will be 57 spaces in three of the ancillary buildings, and a further 20 outside cycle spaces on hoops. The main vehicular and pedestrian access point will be where the present main entrance is, with a further vehicular access point further west. The site will be re-landscaped with new hard and soft landscaping, retaining the mature trees at the rear of the site. Some existing trees would be removed, with new tree planting proposed.

Planning obligations

4.2.6 The applicant proposes the following planning obligations:

- 40% affordable housing.
- Youth service - J5,792.
- Library service - J506.
- Waste contributions - J1482.
- Open space management scheme.
- Fire hydrants.

4.3 **Key Issues**

4.3.1 The key issues for consideration are as follows:

- The acceptability of the principle of the proposed works in this location.
- The acceptability of the design of the proposed development and its resultant impact on the character and appearance of the area.
- The impact that the proposed development would have on the living conditions of neighbouring properties.
- Whether the proposal would provide an acceptable standard of accommodation for future occupiers of the dwellings.
- The acceptability of the proposed development with regards to parking, sustainable transport, and impacts on the public highway.
- The quality of landscaping proposed and the impact the proposed development would have on trees.
- The impact that the proposed development would have on ecology and protected species.
- The impact of the proposal on drainage and flood risk.
- The appropriateness of the planning obligations proposed.
- All other matters.

Principle of Development:

Physical construction work

4.3.2 In the 1996 adopted Local Plan, the application site is within the settlement of Letchworth Garden City, classed as a Town in Policy 8. This Policy states that the Council will normally permit proposals to meet the majority of the development needs of the District if the aims of other relevant Policies are met. The site is not within a Conservation Area and the building is not listed. In the emerging Local Plan, Policy SP2 is similar to Policy 8. Therefore the demolition of existing buildings and structures and the redevelopment of the site with new buildings is acceptable in principle in this location

Change of use

- 4.3.3 There are two aspects to this, firstly being the loss of the existing office use, and secondly the effective change of use of the site to residential.
- 4.3.4 With regards to the loss of the existing office use, in the adopted Local Plan the site is within an Employment Area (LE3), and a Business Area within the Employment Area (LEB5). Policy 37 ii of the adopted Local Plan states that employment uses at the site, as part of LEB5, will not normally be permitted if other than Use Class B1 where the use would be harmful to residential amenity or to the environment generally. Policy 36 states that the Council will limit some areas of the towns to business uses because of environmental and highway constraints.
- 4.3.5 Use Class B1 is referred to in Policy 37. B1 included office uses, however the Use Classes Order was amended in September 2020, which included changing Class B1 to Class E. This new Class E also includes financial and professional services, cafes or restaurants, clinics, health centres, creches, day nurseries, day centres, gyms, and indoor recreation. This new Class E can permit the B1 use to change to other uses in Class E as above without planning permission being required, which therefore limits substantially the weight and significance of the adopted Local Plan policies with regarding the objectives of maintaining an office/employment use on the site.
- 4.3.6 Policy 26 of the adopted Local Plan states that development proposals which involve the loss of land from existing employment use, and allocated for that purpose to meet the District's employment needs, will generally be refused. However as stated in 4.3.5, the recent changes to the Use Classes Order have substantially weakened this policy objective, and therefore much reduced significance can be placed on the loss of the existing office/employment use. Therefore only limited weight can be given to adopted Local Plan policies in respect of retaining the existing use. This also in turn increases the support and weight under adopted Local Plan policies for residential use on this site.
- 4.3.7 In the emerging Local Plan (ELP), the site has been designated for new housing under LG16, in association with Policy SP8. The policy presumption of the ELP is therefore that new residential development is acceptable on the site, and consequently so is the loss of the employment/office use. This site allocation has not been controversial with respect to the ongoing ELP examination, therefore it is considered that significant weight can be given to the ELP.
- 4.3.8 Taking the above into account, it is considered that the redevelopment of the site to residential can be supported on policy grounds.

Character and appearance, layout, size, scale and design:

- 4.3.9 The office building to be removed is not a listed building or in a Conservation Area. It is of relatively recent construction from the early 2000's, and is not of significant architectural or historic merit. While not an unattractive building, there are no objections to its demolition. The other buildings and structures to be removed are minor and of no significance, therefore there are no objections to their removal.
- 4.3.10 The proposed buildings would be large individually and cumulatively, however they would be comparable in size, height and scale to the 3 and 2 storey residential buildings of Haysman Close, Cromwell Road and Icknield Way a short distance to the east. Spacing of the buildings from each and site boundaries are considered to avoid a cramped appearance, while various detailing, landscaping etc. would further soften the overall visual impacts of the proposed development. Distances to the public highway Icknield Way would be comparable to the existing office building, with south elevation gables, dormers etc. successfully breaking up the larger mass of the proposed buildings.
- 4.3.11 The proposed buildings and the overall development approach is considered to be of high quality, and compares favourably to other residential buildings nearby to the east. The Council's Landscape and Urban Design Officer has no objection and considers the proposal in accordance with the Letchworth Garden City principles of *Vista; Closure; Accents; and Group design*, particularly through creating a strong group design over the whole site and notably at the main entrance where two distinctive corners of the larger two buildings face each other and provide an attractive entrance and focal point of the site. The proposed uses of steep pitched hipped roofs, window bays, gable ends and chimney features reinforce this.
- 4.3.12 Overall, I consider that the proposal would visually enhance the site and wider locality through improved buildings and landscaping. Densities of dwellings would be similar to nearby residential areas to the east and are acceptable. The layout of the development takes the ground levels of the site into consideration acceptably, with buildings predominantly on lower ground at the front and middle of the site, with the two rear buildings stepping up sympathetically to the higher area that would be used as a communal garden. The external materials and detailing are considered to be of an acceptable quality. I do not consider that the setting and significance of the Conservation Area to the north would be harmed as the proposed buildings are well designed, of a height and scale comparable to nearby buildings, and will be set away from mature trees (that will be retained) on the north boundary of the site with the Conservation Area that will provide substantial screening.

- 4.3.13 The site is a Strategic Housing Site in the ELP, which has a target of 47 homes. The application proposes 57 homes, which is considered reasonably close and an acceptable number. The detailed requirements of LG16 are considered to be complied with, as set out in this report as a whole. The housing mix proposed is of 18 one bed and 39 two bed units, which complies with Policy 57 Guideline 4 of the adopted Local Plan that requires a mixture of dwelling sizes (the degree of the mix is not specified). The proposal does not include dwellings with three or more bedrooms, however this is considered acceptable in this location where higher density residential development of smaller units are nearby, and as the size and character of the site means that development like that proposed is more suitable here. Were 47 dwellings proposed as per LG16, I consider it likely that the dwelling mix would be similar.
- 4.3.14 Waste would be kept in three separate smaller bin storage buildings, which are located in areas where refuse vehicles can access them and turn safely. The Council's Waste Officer has not objected to refuse arrangements, therefore this is considered satisfactory. Overall, the character, appearance and design of the proposal is considered acceptable, and it will result in public benefits of providing additional dwellings, including affordable housing, and improving the site and locality.

Impacts on Residential Amenity:

- 4.3.15 Buildings to the west and south are a funeral parlour and in employment use, and will not be adversely affected by the development. Dwellings on Glebe Road to the rear of the site are closest to proposed buildings D and E, which are the only buildings that could potentially affect them. These buildings would be approx. 16m to 20m from the end of the rear gardens of the opposite dwellings and would be substantially obscured by mature deciduous trees on the rear of the site that are a similar height or taller than D and E. The distances of D and E to the rear elevations of the closest Glebe Road dwelling would be approx. a minimum of 42m. Due to the above the proposed development would not appear overbearing or result in harmful loss of light and privacy to the Glebe Road dwellings. The amended plans omitted originally proposed gates on the rear boundary, therefore Glebe Road residents would not experience potential loss of amenity in this respect. External lighting would be confined to areas south of D and E, and will not affect Glebe Road dwellings. The proposed development would not therefore harm the amenity of dwellings on Glebe Road.
- 4.3.16 The closest dwellings to the site are flats in three storey buildings on adjacent Haysman Close to the east, in two separate buildings to the north and east of the existing office building. Between these buildings and the application site are car parking areas, parts of the highway leading to the parking areas, small communal garden areas, maturing trees up to 7m high interspersed in regular intervals along much of this boundary, 3m hedge and vegetation abutting the boundaries, and a 3m close-boarded and trellis fence comprising the boundary itself.

- 4.3.17 Buildings A, B and E are the closest to the boundaries of the site with Haysman Close. Building E would be approx. 8m from the boundary, and 34m from the west elevation of the closest Haysman Close dwellings. The 34m distance would exceed the 30m guideline distance between facing elevations of dwellings in Policy 57 Guideline 7 of the adopted Local Plan, and would not adversely affect Haysman Close dwellings. East-facing openings of Building E are proposed to be small kitchen windows which would provide views primarily of the car park, vegetation and communal gardens – these areas are presently substantially overlooked by dwellings in Haysman Close, therefore due to the small size of the east windows proposed for Building E I do not consider they would result in harmful loss of privacy and amenity. The impacts of Building E are acceptable.
- 4.3.18 Building B would at its closest be approx. 13m from the boundary at one corner, with the rest of the building tapering away from the boundary due to its design and siting. Building B would be a minimum of 37m from the closest Haysman Close dwellings, at an oblique angle, and would benefit from being obscured by trees, vegetation and the fence on the boundary. Due to the above I do not consider that Building B would be harmful to the amenities of dwellings in Haysman Close.
- 4.3.19 Building A would be south and west of two separate three storey buildings in Haysman Close. This building would be approx. 12m and 17m from the opposite north boundary (the majority of the building being 17m away); and a minimum of 29m from the Haysman Close building to the north (measured from the closest corners). The closest window-to-window distance would be approx. 32m. These distances are relatively large, which I do not consider would cause loss of amenity to Haysman Close dwellings to the north. Building A would in addition be obscured by the boundary fence, trees and vegetation. There would not therefore be loss of amenity to dwellings in Haysman Close to the north of Building A.
- 4.3.20 The other closest building in Haysman Close is east of the east wall of Building A. The east wall of Building A would be approx. 3m from the boundary with this part of Haysman Close, however as there is a car park adjacent to this boundary I do not consider the proximity and size of Building A in this location would cause loss of amenity. Building A would be a minimum of 17m from dwellings to the east and at oblique angles to the openings on that building, therefore I do not consider that Building A would cause loss of amenity. Building A would be approx. 25m from the side wall of the flats directly opposite the east elevation of A, which is considered sufficiently far away therefore preventing loss of amenity.
- 4.3.21 Regarding the objections from nearby properties, the majority have been addressed elsewhere in this report. Rear gates that resulted in many objections from Glebe Road dwellings have been removed from the plans, with the one pair of gates remaining providing access to an area of land that does not provide access to other land (these gates are proposed for maintenance).

There are no plans to re-open or create a public footpath. Construction access is anticipated to be from Icknield Way, and can be secured as part of a construction management plan. The 1.8m close-boarded fence for the rear of the site would be a sufficient height to maintain privacy of Glebe Road dwellings. Car park lighting will be from low-level bollards (further details will be required by condition) with light spillage at low levels and primarily within the site itself as shown on drawing D35468/TF/A, therefore I do not consider this would be harmful to residential amenity. No objections have been raised by the Council's Environmental Health Officer relating to potential noise from the development. Impacts from construction would be temporary and can be mitigated satisfactorily through an appropriate construction management plan. Potential structural impacts on a nearby retaining wall are not material planning considerations, being civil matters that would need to be resolved by the relevant parties.

Amenity of Future Occupiers:

- 4.3.22 Paragraph 127 (f) of the NPPF states that "*decisions should ensure that developments... create places that are safe, inclusive and accessible and which promote health and wellbeing, with a high standard of amenity of future and existing users*". Paragraph 127 (f) is largely reflected in Guideline 8 of Policy 57 in the Saved Local Plan and Policy SP9 of the Emerging Local Plan. Matters relating to whether future residents would have acceptable living conditions concern the quality and quantity of internal space, quality and quantity of outside amenity space, outlook and light that would be received by main habitable rooms, the privacy of dwellings, impacts from existing nearby development, and overall whether residents would have a satisfactory quality of life in the development.
- 4.3.23 Private amenity space guidelines are set out in Policy 57 Guideline 8 of the adopted Local Plan, which states 18 sqm per one bed flat should be provided, with a further 10 sqm for each additional bedroom. For the dwellings proposed, this amounts to 1416 sqm. The size of the communal garden at the rear of the site would be approx. 1020 sqm, with other smaller garden areas proposed. On this basis the amount and quality of private amenity space is considered satisfactory.
- 4.3.24 Guideline 5 of Policy 57 of the adopted Local Plan states that within a dwelling, the total space and the size of rooms should meet the reasonable requirements of the expected occupants and serve their intended purposes. The proposed main habitable rooms such as living rooms and bedrooms are relatively spacious with user-friendly layouts and shapes. Internal main habitable rooms are therefore considered acceptable and meet the objectives of Policy 57. Policy D1 of the emerging Local Plan states that residential development should meet or exceed the nationally described space standards, dating from 2015. The individual rooms and overall living space of the flats are in accordance with or exceed these standards, therefore the internal living space proposed is considered acceptable.

- 4.3.25 The main habitable rooms of the units proposed would be considered to receive adequate outlook and daylight, with direct sunlight varying although this would not be unacceptable. The proposed dwellings would not be overshadowed by nearby buildings or experience inadequate privacy, including from other proposed buildings and flats of this application. Occupants would be safeguarded from external and internal noise through a combination of insulation, double glazing, cavity masonry and acoustic ventilators (as set out in the Acoustic Report dated 24 September 2020), which are considered acceptable by the Council's Environmental Health Officer.
- 4.3.26 Overall, occupants of the development would have access to sufficient amenity space, outlook, light and living conditions. The site would have a well-designed fairly attractive and interesting environment including soft landscaping/planting. Routes for walking and cycling would be available within the site with wider connections externally, which would allow pedestrian and cycle access to nearby shops, services and public transport. I consider that the development as a whole would provide satisfactory living conditions for potential occupants.

Parking, Sustainable Transport, and Highways:

Parking

- 4.3.27 The flats are a mix of one and two bed units. One bed units require one parking space, with the 2 bed units requiring two spaces. 18 one-bed units and 39 two-bed units are proposed, resulting in a minimum requirement of 96 parking spaces. There would also be a requirement of 14 visitor spaces, resulting in an overall total requirement of 110 spaces. The application proposes 80 spaces, a shortfall of 30. These spaces would be allocated as one per flat, and 23 unallocated. The applicant considers the level of parking acceptable as it is based on 2011 Census data demonstrating that it will be adequate and would result in limited overspill.
- 4.3.28 Appendix 4 of the ELP, which refers to residential car parking standards, states that reductions will be considered only in exceptional circumstances e.g. in town centres or other accessible locations with the availability of a range of local services and good local sustainable transport options and for e.g. small-scale conversion of buildings for a small number of residential units in defined town centres. In this case each flat would at least have one allocated parking space, therefore resulting in acceptable provision for the one-bed flats, and under-provision for the two-bed flats.
- 4.3.29 The Census data cited by the applicant suggests car ownership would be 39-40 based on an average of 0.69 vehicles per household, with the spaces proposed being an over-provision. The site is also approx. 10-15 minutes walk from Letchworth town centre and railway station respectively, while there are also two bus stops close to the site on Icknield Way.

A petrol station with a convenience store is at most five minutes walk to the west of the site on that end of Icknield Way, which would provide some essential groceries. As stated by the County Council highways officer, the town centre and local facilities have a realistic access by cycling and on pedestrian footways. The site is considered to be in a sustainable location where occupants wouldn't always require a car, consequently demand for car parking is considered more limited. On this basis a reduction in car parking requirements can be justified.

- 4.3.30 For cycle parking, 57 spaces for residents would be provided within lockable secure ancillary buildings, with a further 20 outside visitor cycle hoops. These are considered to provide an acceptable quantity and quality of storage.

Internal circulation/routes

- 4.3.31 As stated by the County Council highways officer, the internal roads, cul-de-sacs and turning areas would be of sufficient dimensions for larger refuse and other vehicles to manoeuvre and turn safely. Internal pedestrian links are proposed to be comprehensive and of an acceptable quality, and would be sufficiently connected to external footways therefore encouraging walking to and from the site. The site is considered to be designed and laid out in a way that would encourage cycle travel to and from it. These aspects of the development are considered acceptable.

External connections and impacts on the public highways

- 4.3.32 The two vehicular accesses to the site as proposed are considered acceptable by the County Council highways officer, and there are no reasons evident to disagree. The existing eastern access will be required to be closed up by condition. The development would connect sufficiently with existing pedestrian footways outside the site.

- 4.3.33 Regarding traffic generation, the highways officer provided the following comments:

Given the proposal involves the provision of 57 units considering the TRICS software, the total peak generation of traffic would be around a total of 12 vehicles departing from the development in the morning peak travelling period (8:0 am to 9:0 am) this was compared with 0.5 trips taken per household (the figure of 0.5 trips taken from the 2012 (a) TRICS Data base) in the peak travelling period and 14 vehicles arriving at the development in the evening peak travelling period (5:0 pm to 6:0 pm) taking into account that the development is located adjacent to a local access road the new traffic generation of vehicles is considered as a reduction and have less impact on the local highway network.

The above data has been considered by HCC as being acceptable in traffic generation terms.

4.3.34 Traffic generation as above is considered acceptable and smaller than that from the existing use, and is acceptable. Impacts on the public highway from the proposed development are considered acceptable.

Trees and Landscaping:

4.3.35 The site contains smaller younger trees and vegetation, principally at the rear, and a small number of trees to the front. These trees principally range in height from 6m to 12m, with two being 14m and 15m high. Ten individual trees or groups of trees/vegetation are proposed to be removed. These trees are not protected by Tree Preservation Orders, are young, and are considered to be of limited visual significance to the site and wider area. The Council's Landscape Officer has not objected to their removal. Therefore I do not object to the removal of these trees as part of the development.

4.3.36 The application proposes replacement tree planting, with 34 new trees shown on the proposed plans. This would result in more regular tree planting of better quality throughout the site in an attractive planned layout, that would also result in an increase in the quantity of trees on the site. The proposed tree planting has also been considered to strengthen the Garden City character by the Council's Landscape and Urban Design Officer, which is given weight.

4.3.37 The most significant trees are at the rear of the site, close to or on the boundary. The proposed buildings would be sited away from these trees such that they would not affect their roots or canopies, and would not result in future pressures for their removal or lopping. Other smaller trees close to other site boundaries would also not be affected by the proposed development. Impacts on trees are therefore considered to be acceptable.

4.3.38 The hard and soft landscaping proposed within the site is considered to be of an acceptable balance between the two, with trees, vegetation and lawned/grassed areas providing an appropriate softening of the harder surfaces. The hard surfaces are also proposed to be varied, employing surface types ranging from tarmac for the main access road to block paving of various types for smaller areas of hard surfacing such as some of the parking spaces, which will add interest to the development. Details of planting have been provided which are acceptable. New landscaping proposed is considered acceptable, and will contribute to improving the character and appearance of the site and locality.

Ecology:

4.3.39 The applicant has provided a detailed Ecological Impact Assessment report, and a Tree Report and protection plan. The majority of the site has limited value to biodiversity, with the main interest being the woodland and scrub vegetation to the north; and opportunities for breeding birds and foraging (but not confirmed roosting) bats.

4.3.40 The application proposes new trees and other planting, and enhancements for birds, bats, insects and hedgehogs. Hertfordshire Ecology considers that the proposal will result in a net gain in biodiversity and will not harm protected species, therefore impacts on ecology will be acceptable.

Drainage and flood risk

4.3.41 The application proposes a drainage strategy of on-site drainage with appropriate capacity for water to limit off-site impacts. The Lead Local Flood Authority consider this approach acceptable, which will result in satisfactory drainage and avoid flood risk.

Planning obligations

4.3.42 The applicant proposes a number of planning obligations. As set out in paragraph 56 of the NPPF, planning obligations must only be sought where they meet all of the following tests:

- a) necessary to make the development acceptable in planning terms;
- b) directly related to the development; and
- c) fairly and reasonably related in scale and kind to the development.

Following detailed negotiations with the applicant, agreement has been reached on a range of matters that are included in a draft S106. All of the S106 obligations are listed in the following table:

Element	Detail and Justification
Affordable Housing (NHDC)	On site provision of 23 affordable dwellings based on 65% rented tenure (10 x 1 bed flats, 5 x 2 bed flats) and 35% shared ownership (8 x 1 bed flats) NHDC Planning Obligations Supplementary Planning Document Submission Local Plan Policy HS2 'Affordable Housing'
Library Services (HCC)	Contribution of J5,792 (before indexing) to go towards the enhancement of Letchworth Library Policy SP7 'Infrastructure requirements and developer contributions' Policy 51 of the North Hertfordshire District Local Plan No. 2 with Alterations. Planning Obligations SPD and HCC Toolkit
Youth Services (HCC)	Contribution of J506 (before indexing) towards the increase of capacity at the Hitchin Young People's Centre.

	Policy SP7 'Infrastructure requirements and developer contributions'
Waste Collection & Recycling (NHDC)	<p>Contribution based on NHDC Planning Obligations SPD (figures are before indexing):</p> <p>District Contributions:</p> <ul style="list-style-type: none"> - J26 per flat with shared or no amenity space <p>Total of J1,482 (before indexing)</p> <p>Policy SP7 'Infrastructure requirements and developer contributions'</p> <p>Planning Obligations SPD</p>

4.3.43 These obligations, and associated trigger points relating to the phasing of the development, have been agreed by the applicant and all relevant parties. These obligations are considered to meet the relevant tests in 4.3.42 and make the development acceptable in planning terms through acceptable mitigation of its impacts on relevant infrastructure.

Climate Change Mitigation:

4.3.44 The NPPF supports the transition to a low carbon future and the increased use of renewable energy sources. North Hertfordshire District Council has declared itself a Climate Emergency authority and its recently adopted Council Plan (2020 – 2025) seeks to achieve a Council target of net zero carbon emissions by 2030 and protect the natural and built environment through its planning policies. Emerging Local Plan Policy D1 seeks to reduce energy consumption and waste.

4.3.45 The applicant has stated that the proposed development would use materials from environmentally sustainable sources where possible and will be recyclable; the development will use high levels of thermal insulation to reduce energy requirements, and heating appliances will be selected to have low emission levels. The proposed development will also be required by condition to include electric vehicle charging infrastructure to simultaneously charge 60 electric vehicles. In addition, water saving measures such as flow restrictors, aerated taps and dual flush toilets will be incorporated into the development. Given the above, the proposed development is considered to meet the aims of minimising potential carbon emissions.

4.4 Planning Balance and Conclusion

4.4.1 Paragraph 11 of the NPPF states that where a local planning authority is not able to demonstrate a 5 year supply of deliverable housing sites, granting permission unless 1) the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or 2) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.

4.4.2 The LPA's current housing land supply position is that 2.2 years can be demonstrated. 1) in the above paragraph refers to designated areas/assets such as Green Belt or Conservation Areas, which the application site is not within. Paragraph 11 d) ii. of the NPPF is therefore engaged, therefore this application should be assessed according to whether any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits.

4.4.3 I will therefore list the adverse impacts and benefits of the proposed development so that the required balancing exercise can take place. The adverse impacts are considered to be:

- Loss of office space – This is considered limited due to September 2020 changes to the Use Classes Order, and the proposed allocation of the site for residential development in the emerging Local Plan.
- Under-provision of parking – This is considered limited as each dwelling would have one parking space, and as the site is in a more sustainable location within walking distance to shops, services and public transport.

4.4.4 The benefits are considered to be:

- The provision of 57 new dwellings on a site in a sustainable location – This is a moderate to significant benefit given according weight, particularly in light of the Council's poor housing land supply position.
- Visual enhancements to the site and locality – This is given moderate weight.
- New planting and biodiversity gain – This is given limited to moderate weight.

4.4.5 Taking the adverse impacts and benefits into consideration, the adverse impacts are all limited. The benefits would be moderate to significant and would be considered to outweigh the limited adverse impacts. The proposed development is considered acceptable and is considered to comply with the necessary provisions of both the existing and emerging Local Plan policies and the National Planning Policy Framework. It is recommended that planning permission is granted subject to appropriate conditions and the Section 106 legal agreement being signed that has been agreed in draft form.

4.5 **Alternative Options**

4.5.1 None applicable

4.6 **Pre-Commencement Conditions**

4.6.1 Pre-commencement conditions as below are recommended, which have the agreement of the applicant.

5.0 **Legal Implications**

- 5.1 In making decisions on applications submitted under the Town and Country Planning legislation, the Council is required to have regard to the provisions of the development plan and to any other material considerations. The decision must be in accordance with the plan unless the material considerations indicate otherwise. Where the decision is to refuse or restrictive conditions are attached, the applicant has a right of appeal against the decision.

6.0 **Recommendation**

- 6.1 That planning permission be **GRANTED** subject to the following conditions:

1. The development hereby permitted shall be begun before the expiration of 3 years from the date of this permission.

Reason: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out wholly in accordance with the details specified in the application and supporting approved documents and plans listed above.

Reason: To ensure the development is carried out in accordance with details which form the basis of this grant of permission.

3. External materials for the approved development shall be in accordance with 'Proposed Materials Schedule' (dated May 2020), unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure that the development will have an acceptable appearance which does not detract from the appearance and character of the surrounding area.

4. Hard and soft landscaping shall be completed in accordance with the details submitted with the application, unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure the submitted details are sufficiently comprehensive to enable proper consideration to be given to the appearance of the completed development.

5. The approved details of landscaping shall be carried out before the end of the first planting season following either the first occupation of any of the buildings or the completion of the development, whichever is the sooner; and any trees or plants which, within a period of 5 years from the completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced during the next planting season with others of similar size and species, unless the Local Planning Authority agrees in writing to vary or dispense with this requirement.

Reason: To safeguard and enhance the appearance of the completed development and the visual amenity of the locality.

6. Prior to occupation of the approved development, details of the proposed lighting columns shall be submitted to the Local Planning Authority and approved in writing. The development shall be carried out in accordance with these approved details.

Reason: To ensure that the development will have an acceptable appearance which does not detract from the appearance and character of the surrounding area.

7. Prior to occupation, the development shall incorporate Electric Vehicle (EV) ready charging infrastructure capable of simultaneously charging 60 electric vehicles, as outlined above.

Reason: To contribute to the objective of providing a sustainable transport network and to provide the necessary infrastructure to help off-set the adverse impact of the operational phase of the development on local air quality.

8. Prior to the first occupation of the dwellings, the noise mitigation measures detailed in Tables 5 and 6 of "Acoustic Assessment of a proposed residential development at Foundation House Letchworth" Report reference 180703-Roo1B, dated 24/9/20 by ACA shall be implemented. The measures shall be maintained in accordance with the approved details thereafter.

Reason: To protect the residential amenity of future residents.

9. Any suspected contamination encountered during the development of this site, shall be brought to the attention of the Local Planning Authority as soon as practically possible; in such a case, a scheme to render this contamination harmless, shall be submitted to, and agreed by, the Local Planning Authority and subsequently fully implemented prior to the occupation of this site.

Reason: To ensure that any contamination affecting the site is dealt with in a manner that safeguards human health, the built and natural environment and controlled waters.

10. Unless otherwise agreed in writing by the Local Planning Authority, in connection with all site demolition, site preparation and construction works, no plant or machinery shall be operated on the premises before 08.00hrs Monday to Saturday, nor after 18.00hrs on weekdays and 13.00hrs on Saturdays, not at any time on Sundays or Bank Holidays.

Reason: To protect the residential amenities of existing and future residents.

11. The measures set out in the submitted Ecological Impact Assessment, Tree report and tree protection plan, and other ecology provision measures as proposed (including any amendments and/or additions to these documents) shall be implemented prior to occupation of the development, and thereafter shall remain in perpetuity.

Reason: In the interests of the protection of ecology and providing a net ecological gain within the site.

12. The development shall be completed in accordance with the measures set out in section 4.2 of the Design and Access Statement (dated July 2020).

Reason: To minimise carbon emissions in the interests of the environment and climate change.

13. No demolition/development shall take place/commence until an Archaeological Written Scheme of Investigation has been submitted to and approved by the local planning authority in writing. The scheme shall include an assessment of archaeological significance and research questions; and:

1. The programme and methodology of site investigation and recording
2. The programme and methodology of site investigation and recording as required by the evaluation results
3. The programme for post investigation assessment
4. Provision to be made for analysis of the site investigation and recording
5. Provision to be made for publication and dissemination of the analysis and records of the site investigation
6. Provision to be made for archive deposition of the analysis and records of the site investigation
7. Nomination of a competent person or persons/organisation to undertake the works set out within the Archaeological Written Scheme of Investigation.

Reason: In the interests of archaeology.

14. The demolition/development shall take place/commence in accordance with the programme of archaeological works set out in the Written Scheme of Investigation approved under condition 13.

Reason: In the interests of archaeology.

15. The development shall not be occupied/used until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under condition 13 and the provision made for analysis and publication where appropriate.

Reason: In the interests of archaeology.

16. Prior to the first occupation of the development hereby permitted the main vehicular access shall be provided 5.5 metres wide and thereafter both accesses shall be retained at the positions shown on the approved drawing number 19059wd2.01. Arrangement shall be made for surface water drainage to be intercepted and disposed of separately so that it does not discharge from or onto the highway carriageway.

Reason: To ensure satisfactory access into the site and avoid carriage of extraneous material of surface water from or onto the highway in accordance with Policy 5 of Hertfordshire's Local Transport Plan (adopted 2018).

17. Prior to the first occupation of the development hereby permitted any disused accesses shall be closed and the footway shall be reinstated along the frontage of the site to the current specification of Hertfordshire County Council and to the local Planning Authority's satisfaction.

Reason: To ensure construction of a satisfactory access and in the interests of highway safety and amenity in accordance with Policy 5 of Hertfordshire's Local Transport Plan (adopted 2018).

18. The gradient of the vehicular accesses shall not exceed 1:20 for the first 12 metres into the site as measured from the near channel edge of the adjacent carriageway.

Reason: To ensure construction of a satisfactory access and in the interests of highway safety and amenity in accordance with Policy 5 of Hertfordshire's Local Transport Plan (adopted 2018).

19. No development shall commence until a Construction Traffic Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the construction of the development shall only be carried out in accordance with the approved Plan.

The Construction Management Plan shall consist of:

- a. Construction vehicle numbers, type, routing;
- b. Access arrangements to the site;
- c. Traffic management requirements
- d. Construction and storage compounds (including areas designated for car parking, loading / unloading and turning areas);
- e. Siting and details of wheel washing facilities;
- f. Cleaning of site entrances, site tracks and the adjacent public highway;
- g. Timing of construction activities (including delivery times and removal of waste) and to avoid school pick up/drop off times;
- h. Provision of sufficient on-site parking prior to commencement of construction activities;
- i. Post construction restoration/reinstatement of the working areas and temporary access to the public highway;
- j. where works cannot be contained wholly within the site a plan should be submitted showing the site layout on the highway including extent of hoarding, pedestrian routes and remaining road width for vehicle movements.

Reason: In order to protect highway safety and the amenity of other users of the public highway and rights of way in accordance with Policies 5, 12, 17 and 22 of Hertfordshire's Local Transport Plan (adopted 2018).

20. The development permitted by this planning permission shall be carried out in accordance with the Flood Risk Assessment and SuDS Strategy in relation to proposed residential development at Foundation House, Icknield Way, Letchworth Garden City, Hertfordshire, SG6 1GD, dated October 2020, reference: H12913 prepared by Marks Heeley The Flood Risk Assessment and SuDS Strategy, Rev A - 30/10/2020 and the following mitigation measures;

1. The detailed drainage design will be based on location specific infiltration testing at the depths and locations of the proposed soakaways.
2. All features are to be sufficiently modelled to accommodate and provide attenuation for all rainfall events up to and including the 1 in 100 +40% climate change event, to ensure no increase in surface water run-off volumes.
3. Implement drainage strategy utilising permeable paving, hydro bio filters, silt traps and geocellular storage crates.

Reason: To reduce the risk of flooding to the proposed development and future occupants.

21. No development shall take place until the final design of the drainage scheme is completed and sent to the LPA for approval. The surface water drainage system will be based on the submitted Flood Risk Assessment and SuDS Strategy in relation to proposed residential development at Foundation House, Icknield Way, Letchworth Garden City, Hertfordshire, SG6 1GD, dated October 2020, reference: H12913 prepared by Marks Heeley The Flood Risk Assessment and SuDS Strategy, Rev A - 30/10/2020/ The scheme shall also include:

1. Detailed infiltration testing to be carried out pre-commencement in accordance with BRE Digest 365 standards at the proposed locations and depths of all SuDS features. The test to be carried out at least three times in each location and the worst-case rate used for the design.
2. Depth of the permeable paving subbase to be increased by 50% to allow for additional attenuation to manage existing surface water flood risk.
3. Detailed engineered drawings of the proposed SuDS features including their, location, size, volume, depth and any inlet and outlet features including any connecting pipe runs and all corresponding calculations/modelling to ensure the scheme caters for all rainfall events up to and including the 1 in 100 year + 40% allowance climate change event.
4. Demonstrate appropriate SuDS management and treatment and inclusion of above ground features such as lined permeable paving and Hydro Biofilters.
5. Provision of half drain down times within 24 hours
6. Silt traps for protection of any residual tanked elements
7. If the access road is not being adopted then permeable paving should be considered.

Reason: To prevent flooding by ensuring the satisfactory storage of and disposal of surface water from the site.

22. Upon completion of the drainage works for the site in accordance with the timing / phasing, a management and maintenance plan for the SuDS features and drainage network must be submitted to and approved in writing by the Local Planning Authority. The scheme shall include:

1. Provision of a complete set of as built drawings for site drainage.
2. Maintenance and operational activities.
3. Arrangements for adoption and any other measures to secure the operation of the scheme throughout its lifetime.

Reason: To prevent flooding by ensuring the satisfactory storage of/disposal of surface water from the site.

23. No gates or other means of access shall be created on the north boundaries of the site with Glebe Road dwellings without planning permission being obtained.

Reason: In the interests of residential amenity.

24. No development approved by this planning permission shall take place until a remediation strategy that includes the following components to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the Local Planning Authority (LPA):

1. A Preliminary Risk Assessment (PRA) including a Conceptual Site Model (CSM) of the site indicating potential sources, pathways and receptors, including those off site;
2. The results of a site investigation based on (1) and a detailed risk assessment, including a revised CSM;
3. Based on the risk assessment in (2) an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken. The strategy shall include a plan providing details of how the remediation works shall be judged to be complete and arrangements for contingency actions. The plan shall also detail a long term monitoring and maintenance plan as necessary.
4. No occupation of any part of the permitted development shall take place until a verification report demonstrating completion of works set out in the remediation strategy in (3). The long term monitoring and maintenance plan in (3) shall be updated and be implemented as approved.

Reason: To protect and prevent the pollution of controlled waters from potential pollutants associated with current and previous land uses in line with NPPF paragraphs 170, 178, 179, EA Groundwater Protection Position Statements and Policy SP11 of the North Herts Local Plan.

25. Development shall not begin until a scheme for surface water disposal has been submitted to and approved in writing by the LPA. Infiltration systems shall only be used where it can be demonstrated that they will not pose a risk to groundwater quality. The development shall be carried out in accordance with the approval details.

Reason: To protect and prevent the pollution of controlled waters from potential pollutants associated with current and previous land uses in line with NPPF paragraphs 170, 178, 179, EA Groundwater Protection Position Statements and Policy SP11 of the North Herts Local Plan. Infiltration through contaminated land has the potential to impact on groundwater quality.

Proactive Statement:

















Planning permission has been granted for this proposal. The Council acted proactively through positive engagement with the applicant at the pre-application stage and during the determination process which led to improvements to the scheme. The Council has therefore acted proactively in line with the requirements of the Framework (paragraph 38) and in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015.

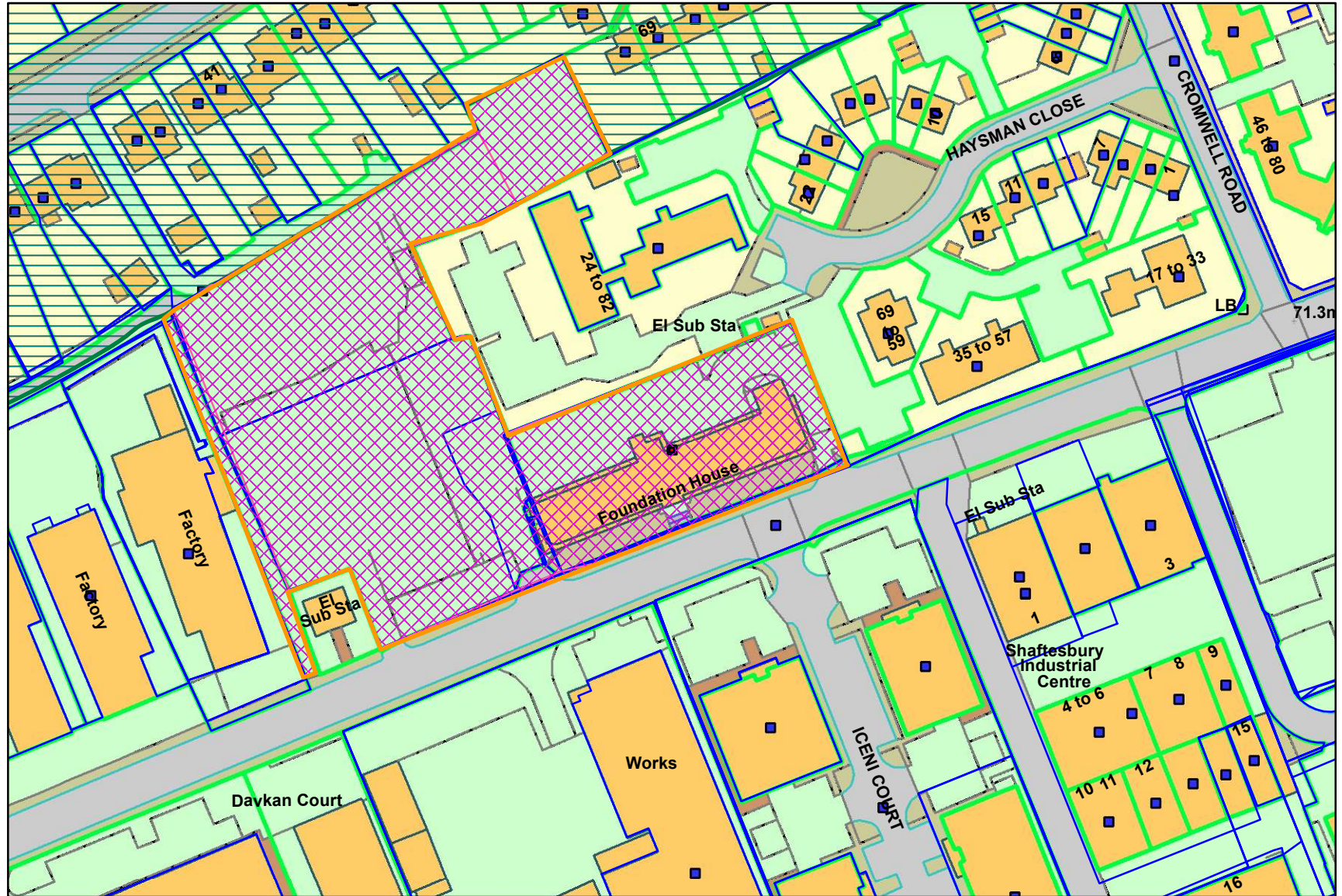
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Application Validation Sheet

20/01714/FP Foundation House, Ickniel Way, Letchworth Garden City, Hertfordshire, SG6 1GD

-  Acolaid Land Parcel
Property.shp
-  Acolaid Address Point
ap.shp
-  Planning Application (1999)
Prapps99.shp
-  Area of Outstanding Natural Beauty
Pranob.shp
-  Listed Buildings
Prlistbld.shp
-  Tree Preservation Order (Single)
ORACLE
-  Tree Preservation Order (Group)
ORACLE
-  Parish Boundary
Prparish.shp
-  Conservation Area
Prconrea.shp
-  District Local Plan Boundary
Prdlp2.shp
-  Green Belt
Prgrnbt.shp
-  Health & Safety Consultation Zone
Prjnzzone.shp
-  Landscape Conservation
Prlandca.shp
-  Ward Boundary
Prwardcd.shp
-  Noise Nuisance Indicators
Prnnis.shp
-  Indicative Flood Plain
Prifpm.shp



Scale 1:1,250
Date: 10/03/2021



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<u>Location:</u>	Former Norton School Playing Fields to The North of Principal Court Letchworth Garden City Hertfordshire
<u>Applicant:</u>	Mr Dick Bowler
<u>Proposal:</u>	Outline planning application (all matters reserved) for the erection of up to 45 dwellings.
<u>Ref. No:</u>	18/02913/OP
<u>Officer:</u>	Sam Dicocco

Date of expiry of statutory period: 31/01/2019

Submitted Plan Nos: A108277NRSP01; A108277_SK006 Rev P1 (indicative only, not to function as an approved drawing); A108277_SK005 (indicative only, not to function as an approved drawing).

Extension of statutory period: 26/03/2021

Reason for Delay: Prolonged negotiations between land-owner, owner of adjacent footpath to the north, and Hertfordshire County Council Highways in respect to pedestrian permeability and accessibility. Length of time taken to organise and formalise S106 where applicant is also, in part, service delivery departments for which obligations are sought.

Reason for referral to Committee: The development is residential development with a site area of 0.5 hectares or greater (1.88 Hectares)

1.0 **Relevant History**

- 1.1 None relevant for the site itself. The following is relevant history for the site immediately to the south:
- 1.2 04/00199/1 - Residential development of a total of 53 dwellings comprising full details of the conversion of existing (original) school building into 28 units and erection of 10 x 2 bed flats, and outline application for 4 x 1 bed flats, 5 x 2 bed houses, 2 x 3 bed houses and 4 x 4 bed houses (design, external appearance and landscaping reserved), 80 car parking spaces, children's play area and ancillary works, formation of new access onto Norton Road following closure of existing accesses and demolition of remainder of school buildings. – Conditional Permission 08/08/2006

- 1.3 06/02029/1 - Erection of 14 no. affordable housing units consisting of 2 no. three bedroom houses, 4 no. two bedroom houses, 4 no. two bedroom flats and 4 no. one bedroom flats and associated infrastructure. – Conditional Permission 06/12/2006
- 1.4 06/02031/1 - Approval of design and external appearance of 2 x 4 bedroom detached dwellings and 2 x 5 bedroom linked detached dwellings and associated garaging and parking (pursuant to outline planning permission no. 04/00199/1). – Conditional Permission 24/10/2006

2.0 **Policies**

2.1 **North Hertfordshire Local Plan No.2 with Alterations**

Policy 8:	Development in Towns
Policy 16:	Areas of Archaeological Significance and other Archaeological Areas
Policy 21:	Landscape and Open Space Patterns in Towns
Policy 26:	Housing Proposals
Policy 29A:	Affordable Housing for Urban Local Needs
Policy 51:	Development Effects and Planning Gain
Policy 55:	Car Parking Standards
Policy 57:	Residential Guidelines and Standards
Policy 58:	Letchworth Garden City Design Principles

2.2 **National Planning Policy Framework**

SECT 5	Delivering a sufficient supply of homes
SECT 9	Promoting sustainable transport
SECT11	Making effective use of land
SECT12	Achieving well-designed places
SECT 16	Conserving and enhancing the historic environment

2.3 **Supplementary Planning Documents**

Design Supplementary Planning Document
 Vehicle Parking at New Developments
 Guidance for Planning Obligations Supplementary Planning Document

2.4 **North Hertfordshire Draft Local Plan 2011-2031**

This report considers and takes account of the Emerging Local Plan policies as modified by the Local Plan Examination Inspector. The Inspectors Schedule of Modifications for the Emerging Local Plan was published on 19th November 2018.

The modifications were considered by the Councils Cabinet on 10th December, were-in the progress of the new Local Plan was noted, the range of additional documentation produced for the Examination to date under the delegated powers granted by Full Council on 11 April 2017 was noted and endorsed, and approval was granted to conduct a six-week consultation on the Inspector's proposed Main Modifications to the Plan, to include consultation on the associated sustainability appraisal as well as relevant additional documentation. The consultation on the main modifications ended 11 April 2019. Inspector letters were received and responded to in the months July through to December 2019. Hearings were scheduled for March 2020 in a letter dated January 2020, with matters, issues and questions specified. These hearings were rescheduled and ended in February 2021. Main modifications resultant from the most recent round of hearings are being produced, and will be consulted on as soon as is possible. No further hearings are considered likely. Any matters raised as a result of the consultation to take place will likely be considered under written representations.

The policies of relevance in this instance are as follows:

Section 2: Spatial Strategy and Strategic Policies

- SP1: Sustainable development in North Hertfordshire
- SP2: Settlement Hierarchy
- SP6: Sustainable transport
- SP7: Infrastructure requirements and developer contributions
- SP8: Housing
- SP9: Design and sustainability
- SP10: Healthy communities
- SP13: Historic environment

Section 3: Development Management Policies

- T1: Assessment of transport matters
- T2: Parking
- HS1: Local Housing Allocations
- HS2: Affordable housing
- HS3: Housing mix
- HS5: Accessible and adaptable housing
- D1: Sustainable design
- D3: Protecting living conditions
- D4: Air quality
- HE1: Designated heritage assets
- HE4: Archaeology
- HC1: Community facilities
- NE4: Protecting publically accessible open space
- NE7: Reducing flood risk
- NE8: Sustainable drainage systems
- NE11: Contaminated land

Section 4: Communities

LG4: Land north of former Norton School, Norton Road – dwelling estimate 45

3.0 **Representations**

3.1 **Site Notices: 27/11/2018 Expiry: 18/12/2018**
Press Notice: 22/11/2018 Expiry: 13/12/2018

Consultee responses

Waste and Recycling – No objection subject to pre-commencement condition relating to a layout issue – Officer note - condition not relevant to matters under consideration in this application.

Housing Development Officer – Concerns raised regarding affordable housing requirement regarding mix.

Landscape and Urban Design Officer – Concerns regarding number of storeys of proposed buildings, buffer planting and removal of category 'B' trees – Officer note – Scale and landscape details are not under consideration in this application beyond the scope to accommodate the development.

Environmental Health Land Contamination – No objection subject to conditions.

Lead Local Flood Authority – No objection subject to conditions.

Hertfordshire Archaeology – No objection subject to conditions.

Hertfordshire Fire and Rescue – No objection subject to obligation.

Local Highways Authority – No objection in principle subject to conditions and financial contributions

North Herts Planning Policy – No objection.

Hertfordshire Infrastructure Officer – No objection subject to financial contributions.

Sport England – Objection which could be overcome by financial contributions.

Hertfordshire Ecology – No response.

Environmental Health Noise and Other Nuisances – No response.

Environment Agency – No response.

Hertfordshire Public Rights of Way – No response.

Neighbour representations

16 neighbour representations have been received from premises adjoining the site. Furthermore, a petition has been submitted signed by 40 individuals objecting to the proposed development. The objections, on the whole, concern the vehicular access point onto Principal Court by reason of the narrow road width and on-street parking. The representations are further summarised, individually, below.

No address provided – Objection to vehicular access from Principal Court, harm through increase in transport movements causing traffic problems as a result of lack of parking on the existing residential site.

48 Principal Court – Access and road safety issues. Very significant road safety and community risk unless a completely new and bespoke access is created.

4 Principal Court – Was given assurance via solicitor from NHDC that the field and sport hall were to be refurbished and made available for a gym and football field. Parking on the street in Principal Court make the access arrangements unacceptable. Field would be greater benefit as a playing field.

39 Principal Court – Access off Principal Court is unacceptable given on street parking and narrow road.

27 Principal Court - Access off Principal Court is unacceptable given on street parking and narrow road.

8 Farm Close – Development could impact two daughters who suffer from asthma. Noise and environmental impact of works. Financial impact on property value. Increase in traffic and road safety for children, impact on local wildlife, lack of resources for schools.

Petition signed by 40 individuals – Increase in car movements harming safety for pedestrians and drivers who live in Principal Court, shortage of parking means existing road is used as a car park and the current car parking allocation in Principal Court is inadequate.

57 Principal Court – Objection to the proposed access from Principal Court. Suggests additional vehicular access onto/from Eastern Way/Farm Close or Cashio Lane/Croft Lane. Photographs of the street provided.

45 Principal Court – Additional dwellings would make parking issues worse. Access through Principal Court would cause problems. Quiet and peaceful neighbourhood disrupted and devaluation of properties.

No address provided - Impact the construction work will have on our general quality of life and how it will affect our wellbeing. Overlooking from rear of new properties onto properties in Eastern Way due to topography. Existing issues regarding flooding and maintenance of rear fence and drainage channel. Suggests the land should be turned into allotments allocated to adjoining residents.

55 Principal Court – Narrow road cannot safely cope with demands of additional traffic. Street over parking could hinder emergency vehicle access.

32 Eastern Way – Loss of rear aspect. Overlooking and loss of trees and greenery.

15 Cashio Lane – On-street parking on Norton Road and Principal Court hinders the flow of traffic. I worry that the footpath will become public, which will not only reduce the privacy of our property greatly - with increased noise and disturbance in what has always been a peaceful, quiet street - but also contribute to the rise in criminal activity in this area, which has recently proven to be an increasing problem, specifically with regards to burglaries. Devalue surrounding properties, littering countryside views. Disruption to wildlife.

23 Cashio Lane – Footpath being opened up will give further access to property, already been burgled three times. CCTV should be fitted under S106 contributions. Congestion on Norton Road. Impact on wildlife. Devalue properties in the area.

28 Principal Court – More traffic will result in dangerous road conditions.

1 Principal Court – Principal Court unsuitable as an access road. Excessive speed along Norton Road make the junction dangerous, calming measures not provided.

49 Principal Court – Concerns regarding the vehicular access and suggestion of double yellow lines along Principal Court.

4.0 **Planning Considerations**

4.1 **Site and Surroundings**

- 4.1.1 The site lies within the settlement of Letchworth Garden City and an area of Landscape and Open Space Pattern as specified in the Saved Local Plan. The site adjoins Letchworth Garden City Conservation Area to the south west, and is nearby to Croft Lane Conservation Area to the north east. There are some Listed Buildings nearby (Grade II Treetops and Grade II Croft Corner) to the east and north east. The site contains a building formally utilised in association with the former school building to the south of the site and is otherwise a vacant former playing field. The site is largely flat in terms of topography.

4.1.2 The sites surroundings are residential in nature. Immediately to the south of the site sits Principal Court, a residential cul-de-sac formed around a converted school building. Principal Court is relatively high density, albeit sensitively designed around Letchworth Garden City design principles. The dwellings and flats within the cul-de-sac are two storeys in nature.

4.1.3 To the east and south west of the site sit relatively low-density dwellings, all two-storey in nature, on Croft Lane and within Eastholm Green. The dwellings in Eastholm Green are exemplars of LGC design principles, while those along Croft Lane are more mixed and relatively modern. To the west and north of the site lie the moderately dense residential areas of Eastern Way and Farm Close. The dwellings are two storey in nature, with a consistent design mix of materials and property types (terraced and semi-detached).

4.2 **Proposal**

4.2.1 The application seeks outline planning permission for the erection of up to 45 residential dwellings within the site with all matters reserved. The dwellings are indicatively stated within the application form, and indicative site plans and indicative elevations have been provided to assist in the decision.

4.3 **Key Issues**

Preliminary matters

4.3.1 The application is for outline planning permission with all matters reserved. The matters reserved for future consideration are access, appearance, scale, landscaping and layout. Whilst these matters are reserved for later consideration, indicative details have been received to assist in deciding this application. The considerations of access, appearance, scale, landscaping and layout remain relevant, however, only to the extent that the site may be capable of accommodating the proposed development in the context of these considerations.

Principle

4.3.2 The site lies within a Landscape and Open Space Pattern area as allocated by the Saved Local Plan (SLP). In accordance with policy 21 of the Saved Local Plan, the Council would normally refuse development proposals which would have a significant impact on the character, form, extent and structure of the pattern. Further to this, and only where the development achieves the initial test, the policy requires development to retain the pattern through appropriate landscape and open space provision and quality of design; manage appropriate land for open spaces; encourage positive use and management of formal and informal recreation; and encourage small scale environmental improvements.

- 4.3.3 Whilst some flexibility is built into this policy, through the word 'normally', it cannot be said that the proposed development would not have an impact on the character, form, extent and structure of the pattern of the site as a designated landscape and open space. The proposal thereby conflicts with the aims of policy 21 of the SLP.
- 4.3.4 Other than the conflict with policy 21, the proposed residential development of the site is supported by the SLP. The development is supported by policy 8 of the SLP by being positioned within the settlement of Letchworth, where development needs of the District are directed. The site is within a Residential Area and thereby supported by policy 26 of the SLP, subject to an assessment on the impact on the environment and character of the existing area. An assessment of this part of policy 26, as well as policy 57, proportionate to the outline nature of this proposal, is set out later within this report. The proposal would provide affordable housing in excess of that required by policy 29A of the SLP.
- 4.3.5 The 2011-2031 Local Plan Proposed Submission (Emerging Local Plan (ELP)) has been submitted to the Secretary of State and is progressed as described in paragraph 2.4 of this report.
- 4.3.6 The site is identified as a proposed Local Housing Allocation under the provisions draft Policy HS1 as LG4. Paragraph 48 of the National Planning Policy Framework (NPPF) provides advice on weight which might be given to emerging policy having regard to:
- a. The stage of preparation the plan has reached;*
 - b. The extent of unresolved objections; and*
 - c. The extent to which the proposed new policies are consistent with the NPPF.*
- 4.3.7 The plan is well advanced, with the issuing of modifications and subsequent multiple hearings. No further hearings or unresolved objections are considered outstanding on those matters, issues and questions would not impact the sites allocation. The issued modifications considered representations made against the plan and resolve such issues. Allocation LG4 has been modified to remove the requirement for re-provision of the loss of open space as the site is not open to the public. The modification has not been raised as an issue beyond written representations. The modification is subject to an objection from Sports England. It is considered that the policies within the ELP which the site would rely upon for any support are consistent with the NPPF.
- 4.3.8 The site is allocated in policy HS1 as LG4, for the provision of an estimated 45 homes. The policy stipulates that the development hosts appropriate access arrangements to minimise impact upon Croft Lane Conservation Area; addresses existing surface water flood risk through SUDs or other appropriate solution, particularly on the western boundary of the site; is sensitively designed and/or lower density housing where the site affects the setting of surrounding heritage assets; and an archaeological survey is to be completed prior to development. These matters are considered later within this report, in line with specific professional advice sought from consultees, however, the principle of residential development of the site draws support from the ELP.

Access

- 4.3.9 Whilst access is reserved by this application, it is necessary in establishing the principle of the development of the site, that the means of access is assessed in-so-far as to whether the site would be capable of accommodating the proposal. Access is defined within the Town and Country Planning (Development Management Procedure) Order 2015 (as amended) ("GPDO") as *"the accessibility to and within the site, for vehicles, cycles and pedestrians in terms of the positioning and treatment of access and circulation routes and how these fit into the surrounding access network"*.
- 4.3.10 Further interpretation of this consideration can be found within policy T1 of the ELP. Policy T1 is considered consistent with the NPPF, and states that permission will be granted provided that the development would not lead to highway safety problems or cause unacceptable impact on the highway network. The policy continues to state that sustainable transport infrastructure measures and improvements will be sought. The proposal does not meet the policy threshold for a transport statement, however the applicant must demonstrate how, as far as practicable, the proposed scheme would be served by public transport; provide safe, direct and convenient routes for pedestrians and cyclists, and be comprehensively integrated into the existing pedestrian and cycle, public transport and road networks.
- 4.3.11 Means of vehicular access has been raised multiple times within neighbour representations made through the duration of the consideration of this application. Representators believe that the use of Principal Court as a means of vehicular access would harm the safe use of the highway. Existing occupiers of Principal Court are concerned about existing on-street parking within Principal Court resultant from stated under-provision of on-site parking.
- 4.3.12 The site allocation requires appropriate access arrangements to minimise impact upon Croft Lane Conservation Area.
- 4.3.13 The means of vehicular access proposed is via Principal Court. Principal Court ends abruptly at a gate closing off the site of the proposed development. This point of vehicular access is seemingly natural and the formation of Principal Court, in terms of the access, appears intended to extend onto the former playing fields. The application has been supplemented by a Transport Assessment which has revealed, without contestation from Hertfordshire County Council as Local Highways Authority, that the means of vehicular access could accommodate associated transport movements with up to 45 dwellings without harm to the safe use of the highway.
- 4.3.14 Hertfordshire County Council as Highways Authority consider that, subject to conditions and legally secured contributions, that the transport impact could be sufficiently mitigated. The mitigation would be borne through the following improvements, provided by way of S278 and S106 agreements:

S278

Provision of pedestrian dropped kerbs / tactile paving at crossings between Croft Lane and Eastern Way/ Cashio Lane

Tactile paving provision at the roundabout of the Norton Road / Wilbury Road / Eastholm/Norton Way North

Provision of dropped kerbs and tactile paving on each side of Croft Lane where it joins with Cashio Close and Eastern Way

Provision of Kassel kerbing, shelter (with bench) at the nearest bus stop located along Eastern Way (Farm Close stop)

Potential mitigation measures to improve cyclists' safety at the roundabout of Norton Road/Wilbury Road/Eastholm/Norton Way North

S106 contributions towards

To form a sustainable corridor between Stevenage and Letchworth Garden City by upgrading existing cycling infrastructure, improving the public realm in villages on B197 as well as ensuring bus priority (Package 6 of the North Central Hertfordshire Growth and Transport Plan)

And/or

To provide improved sustainable connections by supporting a more frequent bus connection as well as a cycling facility between north Letchworth Garden City and the town centre (Package 12 of the North Central Hertfordshire Growth and Transport Plan)

- 4.3.15 The site contains a point of pedestrian access onto Cashio Lane, and will provide pedestrian access up to the point of the site where it connects with a footpath to the north. These pedestrian accesses show permeability, and make best efforts to connect the site sufficiently with neighbouring residential areas and provides essential accessibility to local facilities including schools. The applicant has evidenced engagement to provide access over third party land to the north, however, have been unable to secure any access agreement. A footpath has been shown from the site up to this third party land, and could be implemented in a way which would allow access over this land if it is achievable in the future.
- 4.3.16 The means of access, both pedestrian and vehicular, would cause no harm to Croft Lane Conservation Area. The means of access would, subject to mitigating conditions and planning obligations, be able to accommodate the development proposed without harm to the safe use of the highway and successfully connect the proposed dwellings to essential facilities without the requirement for independent vehicles. As such, it is considered that the means of access would be capable of accommodating up to 45 dwellings in a sustainable fashion.

Appearance

- 4.3.17 Appearance “means the aspects of a building or place within the development which determines the visual impression the building or place makes, including the external built form of the development, its architecture, materials, decoration, lighting, colour and texture” (GPDO). No objections have been raised from neighbouring premises in this regard. The most relevant site-specific criterion to this matter is that the development be sensitively designed and/or lower density housing where the site affects the setting of surrounding heritage assets.
- 4.3.18 Appearance is clarified within policy 57 and 58 of the SLP, policy D1 of the ELP and the Design Supplementary Planning Document. Generally, the policies aim for the design of buildings or places to reflect the character of the sites surroundings. The SPD and Policy 58 of the SLP goes into more detailing as to the materials used in the development of Letchworth Garden City and their rational (particularly paragraph 196 of the SPD). Notwithstanding this, the details within these policies are not particularly relevant to this application, as this detail is a reserved matter. The policy basis is only important in that it would remain possible to achieve the desired appearance on the site with the proposed development.
- 4.3.19 The indicative elevations show some quite desirable buildings in terms of appearance. Given the amount of good quality design buildings in the immediate surroundings of the site, it is considered that the proposal would be more than capable of accommodating buildings of an appropriate appearance in any future reserved matters application.

Landscaping

- 4.3.20 Landscaping is defined as “*the treatment of land (other than buildings) for the purpose of enhancing or protecting the amenities of the site and the area in which it is situated and includes -*
- (a) *screening by fences, walls or other means;*
 - (b) *the planting of trees, hedges, shrubs or grass;*
 - (c) *the formation of banks, terraces or other earthworks;*
 - (d) *the laying out or provision of gardens, courts, squares, water features, sculpture or public art; and*
 - (e) *the provision of other amenity features.”*

- 4.3.21 Policy NE1 of the ELP advises that proposals would be granted so long as they do not cause unacceptable harm to the character and appearance of the surrounding area taking account of any suitable mitigation measures necessary to achieve this, are designed and located to ensure the health and future retention of important landscape features and have considered the long term management and maintenance of any existing and proposed landscaping. Policy 57 of the SLP guides that the layout of proposals should be designed to keep landscape features where possible, and proposals should take opportunities to improve the landscape of the site and its surroundings.
- 4.3.22 Some landscaping details have been provided within an indicative plan. Further landscaping details can be found within the Tree Survey Report. The site contains some trees along the boundary and around existing buildings. It is noted that the survey goes outside of the site boundary, including details of trees within and around the footpath to the north of the site. The indicative site plan shows trees to be retained at this stage. It must be noted that this is indicative, and not definitive.
- 4.3.23 The indicative retention of category B and A trees is welcomed. Further consideration should be made to the retention of category C trees and hedges where they provide natural screening and boundary treatments and are no threat or constraint to the amount of development on the site. As such, the removal of the existing trees to the west of the mathematics block could well be justified in any future reserved matters application by reason of optimising the use of the site. The retention of the natural boundary screening to the Conservation Area to the south west corner of the site will, to an extent, mitigate the harm of the development on surrounding heritage assets.
- 4.3.24 The landscaping shown in the indicative details, in terms of the planting of trees indicated at the entrance to the east footpath, along the outer and inner side of the circular access road and within the central open space shows that a good level of compensatory planting could be achieved. Further consideration of perimeter screening planting should be considered in future landscaping reserved matters applications.
- 4.3.25 As a result, it is considered that the indicative layout shows that the site could accommodate the proposed development while maintaining a fair landscape.

Layout

- 4.3.26 Layout “*means the way in which buildings, routes and open spaces within the development are provided, situated and orientated in relation to each other and to buildings and spaces outside the development*”. Objections have been raised during the notification period in relation to overlooking and loss of privacy.

- 4.3.27 Layout is considered to be an important aspect of Letchworth Garden City Design Principles (policy 58 of the SLP and policy D1 of the ELP). Creating vistas, closure and accents within group design breaks the monotony of built form. Stepping of building lines with differing block designs with similar materials allows for the creation of accents. Vistas are best formed by tree lined streets and closure represented by feature buildings at key points.
- 4.3.28 The indicative layout is considered to be good quality design which encompasses to a high level the Garden City principles on which the wider settlement was founded. This is brought out by way of stepping the building line and a circular access road with central shared open space. The indicative internal layout is commended in this regard. It is not considered that the occupiers of any proposed building would suffer poor living conditions by reason of the relationship with other proposed buildings based on the indicative plan.
- 4.3.29 The indicative site plan does, at times, show a layout which may not be considered appropriate in regard the proposed buildings relationships with buildings outside the development. A particular design thorn in the site is the south east corner, whereby the garden of No.29 Cashio Lane extends further than the rear garden of neighbouring premises. Notwithstanding the proximity of side elevations of plots 09 and 10 on the indicative site plan, weight would be afforded to the existing structures in a similar location. It is considered that a reversal of the elevations of these plots buildings to host single storey garage elevations close to the boundary, no material harm would likely occur. This layout/relationship issue could be reasonably resolved in future reserved matters applications without prejudicing the nature of the development proposes.
- 4.3.30 A further concern in the proposed layout is the depth of the proposed gardens and proximity of the proposed buildings to the boundary. The approximate depth, based on the indicative plans, vary between 5m and 17m. It is not considered that 5m back to boundary distance would likely be agreeable in terms of neighbouring impact, however, this consideration would be firmed up at reserved matters stage. With configuration, it is considered that an acceptable layout, not unlike the indicative plan, would award sufficient spacing to accommodate the proposed development.

Scale

- 4.3.31 *"The height, width and length of each building proposed within the development in relation to its surroundings"* is how scale is defined in the GPDO. Again, this consideration is only covered in-so-far as to whether the site would likely be capable of accommodating the development proposed.
- 4.3.32 Scale is not directly addressed in the development plan beyond policy D1 of the ELP and policy 57 of the SLP. The scale of the proposed development should respect the character of the sites surroundings.

4.3.33 The indicative plans and elevations show two storey buildings. Notwithstanding this, the planning, design and access statement suggests the potential to rise to three storeys on key views and vistas (paragraph 3.1.3). It is considered that this entry in the planning, design and access statement is erroneous, as the indicative layout shows the site perfectly capable of accommodating the dwelling mix and floor space required for those dwellings over two storeys. It is not considered that three storeys would be required to accommodate the number of dwellings proposed, nor is that scale considered likely to be appropriate within the site’s context.

4.3.34 It is not considered that the indicative dwelling mix, height, width of length of built form, or spacing between buildings, would likely be considered incongruous to the sites surroundings. As such, the proposal is likely to be able to be accommodated on the site in an acceptable scale.

Ecology

4.3.35 The site is not considered to be of high ecological value. That being said, policy NEx of the ELP suggests that all proposals should seek to deliver net gains for biodiversity and geodiversity, contribute to ecological networks and the water environments, and/or restore degraded or isolated habitats where possible. In this light, a financial contribution has been sought and provided within a S106 covenant to provide for ecological off-setting to achieve a net gain. It is considered necessary to include a condition for additional bat surveys to be undertaken prior-to the demolition of the existing math block and gymnasium to ensure no harm to protected species. Subject to the S106 secured contribution and condition, the development is considered to accord with the development plan in regards ecology.

Flood risk

4.3.36 A flood risk assessment has been provided with this outline planning application. The assessment satisfies the Lead local Flood Authority that the proposal will be capable of being adequately drained and mitigate potential flood risk subject to conditions.

Housing mix

4.3.37 The indicative plans show the following housing mix –

House type	Number	Total large/small split (%)
1 bed flats	8	+
2 bed flats	10	+
2 bed houses	5	51
3 bed houses	12	+
4 bed houses	10	49
Total	45	100

Table 1

4.3.38 Policy HS3 requires that new home sites achieve the overall targets of the plan; the findings of the most up-to-date evidence including the most recent strategic housing market assessment, the Council's self-build register and other relevant evidence of housing need; the location and accessibility of the site; and recent completions, existing permissions and sites in the five year supply. Further to this, policy HS3 requires that the scheme would provide a density, scale and character of development appropriate to its location and surroundings.

4.3.39 Following this guidance, the policy requirement for housing mix is, broadly, shown below, based on up-to-date evidence –

House type	Number	Total large/small split (%)
1 bed flats	5	+
2 bed flats	4	+
2 bed houses	9	40
3 bed houses	18	+
4 bed houses	9	60
Total	45	100

Table 2

4.3.40 It is not considered that there are any site constraints which would evidence a housing mix otherwise than that required by the evidence supporting the ELP shown in Table 2. The proposed indicative housing mix would have knock-on effects on affordable housing delivery targets. The housing mix proposed on the indicative plans is not agreed. Whilst a differing housing mix in relation to the split of large and small housing numbers could be negotiated, the proliferation of flats for smaller unit delivery is not evidenced and contrary to housing needs evidence.

Affordable housing

4.3.41 Policy HS2 requires 40% affordable housing on sites providing 25 dwelling or more. This equates to 18 of the indicative 45 units. This percentage has been agreed and built into the S106 agreement to be delivered on-site. The policy continues that the expectation is for 65% be rented and 35% other forms of affordable housing. This has again been agreed and built into the S106 agreement. As with policy HS3, the affordable housing provision needs to meet the needs of the area. The other policy requirements have been secured within the legal agreement in the form of the S106 agreement.

4.3.42 Following negotiation, the affordable housing splits in terms of type and size are shown in the tables below –

Social/affordable rented	Number	Total	Total (%)
1 bed flat	4	+	+
2 bed flats	0	+	+
2 bed houses	3	7	58
3 bed houses	4	+	+
4 bed houses	1	5	41
Total	12	12	99

Table 3

Intermediate	Number	Total	Total (%)
1 bed flat Intermediate	0	+	+
2 bed flats Intermediate	0	+	+
2 bed houses Intermediate	2	2	32
3 bed houses Intermediate	3	+	+
4 bed houses Intermediate	1	4	66
Total	6	18	98

Table 4

Affordable total	Number	Total	Total (%)
1 bed flat	4	+	+
2 bed flats	0	+	+
2 bed houses	5	9	50
3 bed houses	7	+	+
4 bed houses	2	9	50
Total	18	18	100

Table 5

Legal agreements

4.3.43 Contributions have been secured by legal agreement for the following –

Category (Authority)	Figure (£)	Infrastructure Project(s)
Primary Education (HCC)	Based on final delivery	The expansion of the Garden City Academy School by 1 form of entry to 2 forms of entry
Secondary Education (HCC)	Based on final delivery	The expansion of the Fearnhill School from 8 forms of entry to 9 forms of entry
Library (HCC)	Based on final delivery	The development of the IT in the Study Area in Letchworth Library

Youth Services (HCC)	Based on final delivery	Towards additional information, advice and guidance (IAG) resources for the Letchworth Young People's Centre
Sustainable Transport Contributions (HCC)	Based on final delivery -30%	Towards a sustainable corridor between Stevenage and Letchworth Garden City by upgrading existing cycling infrastructure, improving the public realm in villages on the B197 and/or ensuring bus priority (Package 6 of the North Central Hertfordshire Growth and Transport Plan) And/or and to provide improved sustainable connections by supporting a more frequent bus connection and a cycling facility between north Letchworth Garden City and the town centre (Package 12 of the North Central Hertfordshire Growth and Transport Plan).;
Leisure (NHDC)	31,829.75	The provision of a dual use facility at Fearnhill sports centre, towards refurbishment of gymnasium and changing facilities to provide the dual use of the facilities within Fearnhill School
Open Space (NHDC)	16,360	Resurfacing of Grange path and both car parks at Norton Common
Community Centre (NHDC)	19,223	Community hall improvements at Norton Methodist Church, including improving the internal environment, better access and egress to cater for a wider range of community groups and organisations
Play Space (NHDC)	30,266	Play space provision at Howard Park play area to refurbish and replace equipment in Letchworth
Sports Pitch (NHDC)	14,928.50	Ongoing maintenance of Baldock Road football pitches
Biodiversity Off-Setting (NHDC)	10,000	Culvert removal at Norton Common
Waste and Recycling	2,790	Towards the cost of providing waste collection and recycling facilities serving the Development

Table 6

4.3.44 These contributions have been agreed to compensate additional stress on existing facilities based on the use by new residents. The amounts are considered proportionate to the scale of the development, directly related to the planning proposal and required to make the development acceptable in planning terms. The schemes to which the contributions will fund have been identified and meet the relevant criteria of the CIL Regulations 2012 (as amended).

The planning balance

- 4.3.45 The starting point for the determination of any planning application is the development plan. In this case, the development plan is considered out-of-date by reason of footnote 7 of paragraph 11 of the NPPF. The Council acknowledge a shortfall of the minimum target five-year housing land supply, and the application is for the delivery of housing.
- 4.3.46 The proposal clearly conflicts with the SLP, in that the plan intends to develop and build upon an area of designated open space, whereby policy 21 restricts significant effect on the character, form, extent and structure of open space patterns in towns.
- 4.3.47 The Council are well advanced with the ELP. This means that significant weight can be afforded to policies in the ELP. The proposal complies with the ELP. Given the progress of the ELP, this allocation carries significant weight in the planning balance.
- 4.3.48 The site represents a sustainable location for residential development. The residential use proposed would be near to essential facilities in a specified settlement. The information submitted to supplement the application, indicative though they may be, satisfy that the site could accommodate the proposed development of up to 45 dwellings, subject to later reserved matters applications. The S106 agreement would provide 18 affordable housing units of an agreeable mix of tenure and size. These social benefits carry significant weight in favour of the proposed development. Further economic and social benefits include employment during construction, as well as the continued and improved use of local services and facilities.
- 4.3.49 Any harm identified through conflict with policy 21 of the SLP and loss of designated open space would not significantly and demonstrably outweigh the benefits of the proposed development in the context of the allocation of the land for development in the ELP.

4.4 Conclusion

- 4.4.1 Whilst there is a conflict with policy 21 of the SLP, the proposal is entirely compliant with the ELP and NPPF. It is considered that the harm resultant from the conflict with policy 21 is not so significant and demonstrable as to overcome the benefits of the development, including affordable housing provision, contribution to an identified housing need, employment during construction and increased use and viability of local facilities. As such, the proposed development of outline permission for up to 45 dwellings should be **GRANTED**.

5.0 Legal Implications

- 5.1 In making decisions on applications submitted under the Town and Country Planning legislation, the Council is required to have regard to the provisions of the development plan and to any other material considerations. The decision must be in accordance with the plan unless the material considerations indicate otherwise.

Where the decision is to refuse or restrictive conditions are attached, the applicant has a right of appeal against the decision.

6.0 **Recommendation**

6.1 That planning permission be **GRANTED** subject to the following conditions:

1. Before the development hereby permitted is commenced, approval of the details of the siting, design and external appearance of the development, the means of access thereto and the landscaping of the site (hereinafter called "the reserved matters") shall be obtained in writing from the Local Planning Authority.

Reason: To comply with the provisions of Article 3 of the Town and Country Planning (General Development Procedure) Order 1995 as amended.

2. Application for approval of the reserved matters shall be made to the Local Planning Authority before the expiration of 3 years from the date of this permission, and the development hereby permitted shall be begun before the expiration of 2 years from the date of approval of the last of the reserved matters to be approved.

Reason: To comply with the provisions of Section 92 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

3. Prior to demolition of the Maths Block and Gymnasium, three dusk emergence / dawn re-entry surveys should be undertaken during May to August (inclusive) to determine with confidence whether the known roosting sites are active or not, to modify the outline mitigation and enhancement measures as appropriate based on the results (Ref: Bat Report WYG, November 2018, Bat Roost & Emergence Surveys Jones & Sons Environmental Sciences 2015), and to enable an EPS licence to be applied for if necessary. The subsequent report should be submitted to the Local Planning Authority for written approval.

Reason: To ensure the continued ecological functionality of bats and their roosts is maintained in accordance with European and national legislation.

4. No demolition/development shall take place/commence until an Archaeological Written Scheme of Investigation has been submitted to and approved by the local planning authority in writing. The scheme shall include an assessment of archaeological significance and research questions; and:

1. The programme and methodology of site investigation and recording
2. The programme and methodology of site investigation and recording as suggested by the evaluation
3. The programme for post investigation assessment
4. Provision to be made for analysis of the site investigation and recording
5. Provision to be made for publication and dissemination of the analysis and records of the site investigation
6. Provision to be made for archive deposition of the analysis and records of the site investigation
7. Nomination of a competent person or persons/organisation to undertake the works set out within the Archaeological Written Scheme of Investigation.

Reason: To ensure the preservation of any subterranean heritage assets which may be present at the site in line with Section 16 of the National Planning Policy Framework (2019).

5. The demolition/development shall take place/commence in accordance with the programme of archaeological works set out in the Written Scheme of Investigation approved under condition 4.

Reason: To ensure the preservation of any subterranean heritage assets which may be present at the site in line with Section 16 of the National Planning Policy Framework (2019).

6. The development shall not be occupied/used until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under condition 4 and the provision made for analysis and publication where appropriate.

Reason: To ensure the preservation of any subterranean heritage assets which may be present at the site in line with Section 16 of the National Planning Policy Framework (2019).

7. The development, including surfacing works or top-soil removal, permitted by this planning permission shall be carried out in accordance with the approved Flood Risk Assessment and Drainage Strategy carried out by EAS reference 1733 Rev 2 dated November 2018, and the information submitted in support of this application and the following mitigation measures;

1. Limiting the surface water run-off rates to maximum of 5l/s for all rainfall events up to and including the 1 in 100 year + climate change event with discharge into the surface water sewer.
2. Provide attenuation to ensure no increase in surface water run-off volumes for all rainfall events up to and including the 1 in 100 year + climate change event.
3. Implement drainage strategy as indicated on the proposed drainage strategy drawing utilising lined permeable paving and swales.

Reason: To reduce the risk of flooding to the proposed development and future occupants.

8. No development, including surfacing works or top-soil removal, shall take place until the final design of the drainage scheme is completed and sent to the LPA for approval. The surface water drainage system will be based on the submitted Flood Risk Assessment and Drainage Strategy carried out by EAS reference 1733 Rev 2 dated November 2018. The scheme shall also include;

1. Detailed design of the drainage scheme including detailed engineered drawings of the proposed SuDS features including their, location, size, volume, depth and any inlet and outlet features including any connecting pipe runs and all corresponding discharge and volume calculations/modelling based on suitable infiltration rates.
2. Details in relation to existing ditch acting as infiltration swale.
3. Silt traps for protection for any residual tanked elements.
4. Identification of any exceedance routes.

Reason: To prevent flooding by ensuring the satisfactory storage of and disposal of surface water from the site.

9. Upon completion of the drainage works a management and maintenance plan for the SuDS features and drainage network must be submitted to and approved in writing by the Local Planning Authority. The scheme shall also include:

1. Final confirmation of management and maintenance requirements
2. Provision of complete set of as built drawings for both site drainage

Reason: To reduce the risk of flooding to the proposed development and future occupants.

10. No development approved by this permission shall be commenced prior to the submission to, and agreement of the Local Planning Authority of a written preliminary environmental risk assessment (Phase I) report containing a Conceptual Site Model that indicates sources, pathways and receptors. It should identify the current and past land uses of this site (and adjacent sites) with view to determining the presence of contamination likely to be harmful to human health and the built and natural environment.

Reason: To ensure that any contamination affecting the site is dealt with in a manner that safeguards human health, the built and natural environment and controlled waters.

11. If the Local Planning Authority is of the opinion that the report which discharges condition 10, above, indicates a reasonable likelihood of harmful contamination then no development approved by this permission shall be commenced until a Site Investigation (Phase II environmental risk assessment) report has been submitted to and approved by the Local Planning Authority which includes:

- (i) A full identification of the location and concentration of all pollutants on this site and the presence of relevant receptors, and;
- (ii) The results from the application of an appropriate risk assessment methodology.

Reason: To ensure that any contamination affecting the site is dealt with in a manner that safeguards human health, the built and natural environment and controlled waters.

12. No development approved by this permission (other than that necessary for the discharge of this condition) shall be commenced until a Remediation Method Statement report; if required as a result of 11, above; has been submitted to and approved by the Local Planning Authority.

Reason: To ensure that any contamination affecting the site is dealt with in a manner that safeguards human health, the built and natural environment and controlled waters.

13. This site shall not be occupied, or brought into use, until:

(i) All works which form part of the Remediation Method Statement report pursuant to the discharge of condition 12 above have been fully completed and if required a formal agreement is submitted that commits to ongoing monitoring and/or maintenance of the remediation scheme.

(ii) A Remediation Verification Report confirming that the site is suitable for use has been submitted to, and agreed by, the Local Planning Authority.

Reason: To ensure that any contamination affecting the site is dealt with in a manner that safeguards human health, the built and natural environment and controlled waters.

14. Any contamination, other than that reported by virtue of condition 10 and 11, encountered during the development of this site shall be brought to the attention of the Local Planning Authority as soon as practically possible; a scheme to render this contamination harmless shall be submitted to and agreed by, the Local Planning Authority and subsequently fully implemented prior to the occupation of this site.

Reason: To ensure that any contamination affecting the site is dealt with in a manner that safeguards human health, the built and natural environment and controlled waters.

15. Prior to occupation of any of the dwellings hereby approved, a scheme identifying number and distribution of EV charging points shall be submitted and agreed in writing by the Local Planning Authority. The EV charging points agreed by way of this condition shall be implemented prior to the occupation of any dwelling hereby approved. It is expected that, at a minimum, each dwelling with dedicated car parking would have one charging point, with one charging point provided to every ten unallocated parking spaces.

Reason: To contribute to the objective of providing a sustainable transport network and to provide the necessary infrastructure to help off-set the adverse impact of the operational phase of the development on local air quality.

16. No development shall commence until full details (in the form of scaled plans and written specifications) have been submitted to and approved in writing by the Local Planning Authority to illustrate the following: i) roads, footways; ii) cycleways; iii) foul and surface water drainage; iv) visibility splays; v) access arrangements; vi) parking provision in accordance with adopted standard; vii) loading areas; viii) turning areas.

Reason: To ensure suitable, safe and satisfactory planning and development of the site in accordance with Policy 5 of Hertfordshire's Local Transport Plan (adopted 2018)

17. Prior to the first occupation the vehicular access shall be upgraded in accordance with the Hertfordshire County Council residential access construction specification for the first 10 metres as measured back from the near channel edge of the adjacent carriageway. Prior to use arrangements shall be made for surface water drainage to be intercepted and disposed of separately so that it does not discharge from or onto the highway carriageway.

Reason: To ensure construction of a satisfactory access and in the interests of highway safety, traffic movement and amenity in accordance with Policy 5 of Hertfordshire's Local Transport Plan (adopted 2018).

18. Prior to the first occupation of the development hereby permitted a scheme for the parking of cycles including details of the design, level and siting of the proposed parking shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be fully implemented before the development is first occupied or brought into use and thereafter retained for this purpose.

Reason: To ensure the provision of adequate cycle parking that meets the needs of occupiers of the proposed development and in the interests of encouraging the use of sustainable modes of transport in accordance with Policies 1, 5 and 8 of Hertfordshire's Local Transport Plan (adopted 2018)

19. No development shall commence until a Construction Management Plan (or Construction Method Statement) has been submitted to and approved in writing by the Local Planning Authority. Thereafter the construction of the development shall only be carried out in accordance with the approved Plan. The Construction Management Plan / Statement shall include details of:

- a. Construction vehicle numbers, type, routing;
- b. Access arrangements to the site;
- c. Traffic management requirements
- d. Construction and storage compounds (including areas designated for car parking, loading / unloading and turning areas);
- e. Siting and details of wheel washing facilities;
- f. Cleaning of site entrances, site tracks and the adjacent public highway;
- g. Timing of construction activities (including delivery times and removal of waste) and to avoid school pick up/drop off times;
- h. Provision of sufficient on-site parking prior to commencement of construction activities;
- i. Post construction restoration/reinstatement of the working areas and temporary access to the public highway;
- j. where works cannot be contained wholly within the site a plan should be submitted showing the site layout on the highway including extent of hoarding, pedestrian routes and remaining road width for vehicle movements.

Reason: In order to protect highway safety and the amenity of other users of the public highway and rights of way in accordance with Policies 5, 12, 17 and 22 of Hertfordshire's Local Transport Plan (adopted 2018).

20. Prior to the first occupation of the development hereby permitted any Traffic Regulation Orders (TROs), including for parking restrictions / waiting restrictions that are required as part of improving access and accessibility to the site must be secured in place and implemented.

Reason: In the interests of highway safety, amenity and capacity to ensure free and safe flow of traffic and to be in accordance with Policies 4, 5, 12, 15 and 17 of Hertfordshire's Local Transport Plan (adopted 2018).

21. The landscape details to be submitted as reserved matters shall include the following :

- a) which, if any, of the existing vegetation is to be removed and which is to be retained
- b) what new trees, shrubs, hedges and grassed areas are to be planted, together with the species proposed and the size and density of planting
- c) the location and type of any new walls, fences or other means of enclosure and any hardscaping proposed
- d) details of any earthworks proposed

Reason: To ensure the submitted details are sufficiently comprehensive to enable proper consideration to be given to the appearance of the completed development.

22. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 as amended no development as set out in Classes A, B, C, D, E and F of Part 1 and Class A of Part 2 of Schedule 2 to the Order, (or any subsequent Statutory Instrument which revokes, amends and/or replaces those provisions) shall be carried out without first obtaining a specific planning permission from the Local Planning Authority.

Reason: Given the nature of this development, the Local Planning Authority considers that development which would normally be "permitted development" should be retained within planning control in the interests of the character and amenities of the area.

Proactive Statement:

Planning permission has been granted for this proposal. The Council acted proactively through positive engagement with the applicant during the determination process which led to improvements to the scheme. The Council has therefore acted proactively in line with the requirements of the Framework (paragraph 38) and in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Informative/s:

1. The applicant is hereby advised of the following informatives to be considered prior to and before works commence on site -

- o Reptiles: Keep the grass cut short until commencement of development. An Ecological Clerk of Works (ECOW) should be present during top soil clearance, who will inspect the grassland for reptiles. Any reptiles that are found will be moved by the ecologist to a position of safety.

- o Badgers: any scrub clearance necessary for the development should take place with caution. Should any burrows be revealed by the scrub clearance, works should stop and a suitably qualified ecologist should be contacted immediately to provide advice.

- o Birds: vegetation clearance should be undertaken outside the nesting bird season (March to August inclusive) to protect breeding birds, their nests, eggs and young. If this is not practicable, a search of the area should be made no more than two days in advance of vegetation clearance by a competent Ecologist and if active nests are found, works should stop until the birds have left the nest.

2. Each charging point shall be installed by an appropriately certified electrician/electrical contractor in accordance with the following specification. The necessary certification of electrical installation should be submitted as evidence of appropriate installation to meet the requirements of Part P of the most current Building Regulations.

Cable and circuitry ratings should be of adequate size to ensure a minimum continuous current demand for the vehicle of 16A and a maximum demand of 32A (which is recommended for Eco developments).

- o A separate dedicated circuit protected by an RBCO should be provided from the main distribution board, to a suitably enclosed termination point within a garage or an accessible enclosed termination point for future connection to an external charge point.

- o The electrical circuit shall comply with the Electrical requirements of BS7671: 2008 as well as conform to the IET code of practice on Electric Vehicle Charging Equipment installation 2012 ISBN 978-1-84919-515-7 (PDF). This includes requirements such as ensuring the Charging Equipment integral protective device shall be at least Type A RCD (required to comply with BS EN 61851 Mode 3 charging).
 - o If installed in a garage all conductive surfaces should be protected by supplementary protective equipotential bonding. For vehicle connecting points installed such that the vehicle can only be charged within the building, e.g. in a garage with a (non-extended) tethered lead, the PME earth may be used. For external installations the risk assessment outlined in the IET code of practice must be adopted, and may require additional earth stake or mat for the EV charging circuit. This should be installed as part of the EV ready installation to avoid significant on cost later.
 - o A list of authorised installers (for the Government's Electric Vehicle Homecharge Scheme) can be found at <https://www.gov.uk/government/organisations/office-for-low-emission-vehicles>
3. Within any future reserved matters applications detailing the layout and access details, further details of the circulation route for refuse collection vehicles need to be included. The required details shall include a full construction specification for the route, and a plan defining the extent of the area to which that specification will be applied. No dwelling forming part of the development shall be occupied until the refuse vehicle circulation route has been laid out and constructed in accordance with the details thus approved, and thereafter the route shall be maintained in accordance with those details.
4. In the interests of clarity, please note that the freighter used for any analysis informing future reserved matters applications in respect to bin collections are -
- o Width: 2,500mm (without mirrors)
 - o Height: 3,400mm (without hazard beacons)
 - o Turning circle: 22,800mm
 - o Overall length: 12,100mm (from front to rear of bin lift)
5. The applicant is hereby notified of the following informative to inform any future reserved matters applications in these respects -
- Flats:
- Doors to bin stores should be sufficient in widths to allow the movement of bins at their widest and prevent entrapment of limbs. This is likely to be a minimum of 20cm in addition to the widest bin contained in the bin store.

Walls and doors should have protection strips to prevent damage and a mechanism for holding doors open should be available.

Doors should ideally be keypad entry or standard fire brigade keys. We do not support the use of electronic key fobs.

Roller shutters on bin stores can be considered to save space however the additional noise impacts should be considered.

Dropped kerbs should be provided to allow for ease of movement of bins to the collection vehicle and the pathway should be 1.5m in width taking the most direct route avoiding passing parked cars.

We do not advise the use of bin compactors, as they often cause excessive damage to bins or cause waste to get stuck inside bins. If bin compactors are used on site you should advise your waste collection contractor.

Bins in communal bin stores should be manoeuvrable to the refuse collection vehicle without the need to move other bins.

The surface to the collection point should be uninterrupted, level with no gravel or similar covering, and have a width to enable the easy passage of wheeled bins. For two-wheeled bins this should be 1 metre for four-wheeled bins this should be 1.5 metres wide (including doorways), with a maximum gradient of 1:12.

Consideration should be given to parking arrangements alongside or opposite the access to individual streets. If car parking is likely in the vicinity of junctions then parking restrictions may be required to ensure access is not inhibited.

For flats, bins should be ordered direct from the Council's contractor 10 weeks in advance of first occupation to ensure they arrive in time for the first residents moving in.

General:

Separate internal storage provision for waste should be provided in kitchen areas to support the recycling of different waste streams to support the National Planning Policy for Waste's requirements to support driving waste up the waste hierarchy.

Storage areas should be conveniently located with easy access for residents -residents should not have to take their waste and recycling more than 30metres to a bin storage area, or take their waste receptacles more than 25metres to a collection point, (usually kerbside) in accordance with Building Regulations Approved Document H Guidance.

Consideration should be given to parking arrangements alongside or opposite the access to individual streets. If car parking is likely in the vicinity of junctions then parking restrictions may be required to ensure access is not inhibited.

For infill applications consideration should be given to parking arrangements alongside or opposite the access to the site. If car parking is currently permitted the consideration of parking restrictions may be required to ensure access is not inhibited.

For houses, bins should be ordered direct from the Council's contractor 2 weeks in advance of first occupation to ensure they arrive in time for the first residents moving in.

Pull distances from the storage point to the collection point should not be within close proximity to parked cars.

The gravel drive makes pulling bins difficult and consideration should be given to whether this surface is the most suitable or whether bins stored closer to the collection point would be more preferable.

The applicant should note that collections occur from the kerbside and residents will be required to present their bins in this location on collection day.

















Further advice on waste provision for developments is available on our website. <http://www.north-herts.gov.uk/home/planning/waste-and-recycling-provision>

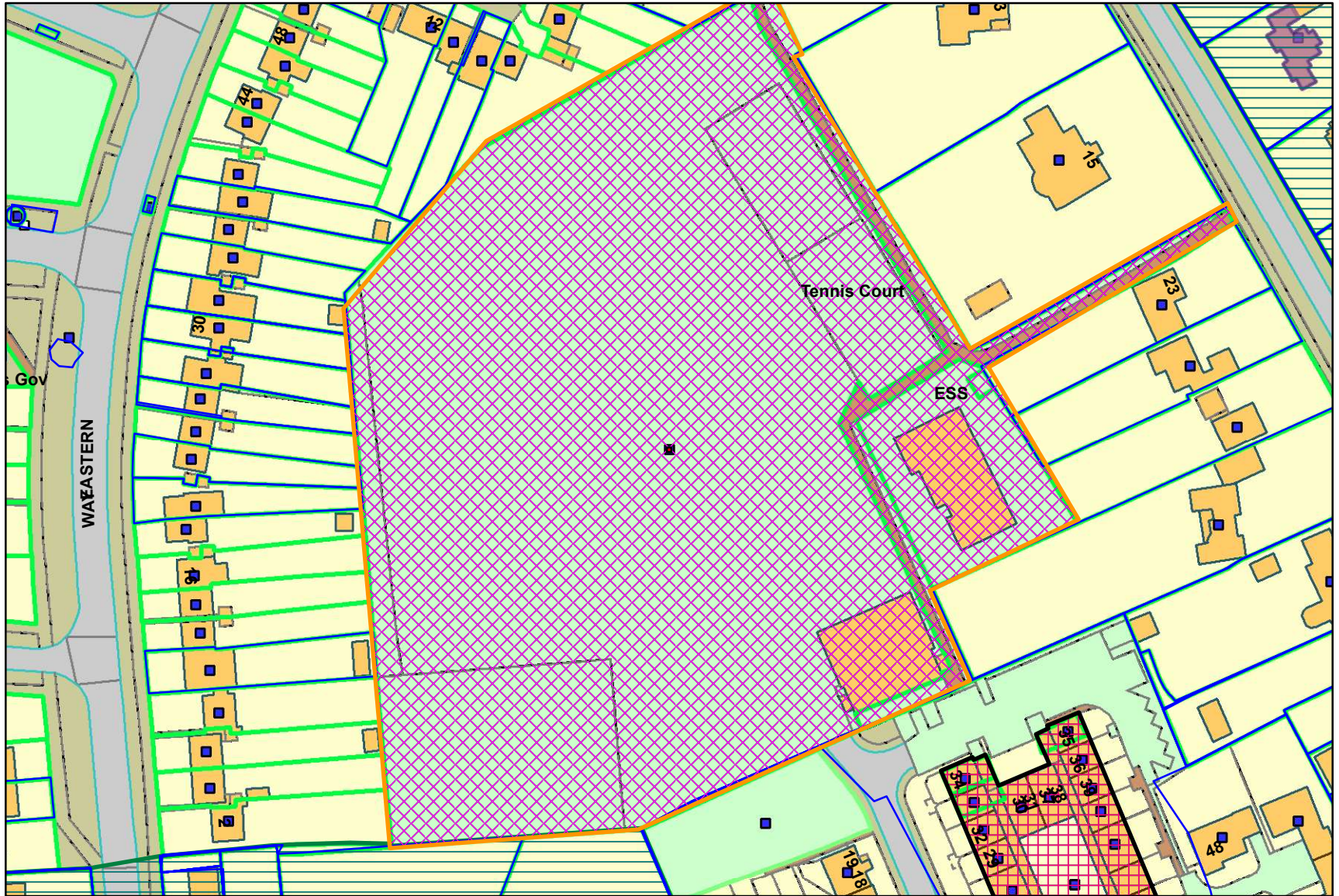
6. The applicant is advised that the storage of materials associated with the construction of this development should be provided within the site on land which is not public highway, and the use of such areas must not interfere with the public highway. If this is not possible, authorisation should be sought from the Highway Authority before construction works commence. Further information is available via the website <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/business-licences/business-licences.aspx> or by telephoning 0300 1234047.
7. The applicant is advised that in order to comply with this permission it will be necessary for the developer of the site to enter into an agreement with Hertfordshire County Council as Highway Authority under Section 278 of the Highways Act 1980 to ensure the satisfactory completion of the access and associated road improvements. The construction of such works must be undertaken to the satisfaction and specification of the Highway Authority, and by a contractor who is authorised to work in the public highway. Before works commence the applicant will need to apply to the Highway Authority to obtain their permission and requirements. Further information is available via the website <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx> or by telephoning 0300 1234047.
8. It is an offence under section 137 of the Highways Act 1980 for any person, without lawful authority or excuse, in any way to wilfully obstruct the free passage along a highway or public right of way. If this development is likely to result in the public highway or public right of way network becoming routinely blocked (fully or partly) the applicant must contact the Highway Authority to obtain their permission and requirements before construction works commence. Further information is available via the website <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/business-licences/business-licences.aspx> or by telephoning 0300 1234047.
9. It is an offence under section 148 of the Highways Act 1980 to deposit mud or other debris on the public highway, and section 149 of the same Act gives the Highway Authority powers to remove such material at the expense of the party responsible. Therefore, best practical means shall be taken at all times to ensure that all vehicles leaving the site during construction of the development are in a condition such as not to emit dust or deposit mud, slurry or other debris on the highway. Further information is available via the website <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/highways-roads-and-pavements.aspx> or by telephoning 0300 1234047.



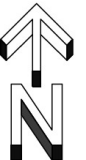
Application Validation Sheet

18/02913/OP Former Norton School Playing Fields to the North of Principle Court, Letchworth Garden City, Herts

-  **Acolaid Land Parcel**
Property.shp
-  **Acolaid Address Point**
ap.shp
-  **Planning Application (1999)**
Prapps99.shp
-  **Area of Outstanding Natural Beauty**
Pranob.shp
-  **Listed Buildings**
Prlistbld.shp
-  **Tree Preservation Order (Single)**
ORACLE
-  **Tree Preservation Order (Group)**
ORACLE
-  **Parish Boundary**
Prparish.shp
-  **Conservation Area**
Prconca.shp
-  **District Local Plan Boundary**
Prdlp2.shp
-  **Green Belt**
Prgrnbt.shp
-  **Health & Safety Consultation Zone**
Prjnzzone.shp
-  **Landscape Conservation**
Prlandca.shp
-  **Ward Boundary**
Prwardcd.shp
-  **Noise Nuisance Indicators**
Prnnis.shp
-  **Indicative Flood Plain**
Prifpm.shp



Scale 1:1,250
Date: 10/03/2021



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