

Public Response of behalf of Transition Town Letchworth to the Proposed Ivel Court Development of 24 flats (Planning Ref 21/00401/FP)

Site Layout

A significant area of the site is allocated to parking. Transition Town Letchworth would have liked to see a better use of the land, with less space utilised solely for surface level parking. For example, a more attractive development could have been achieved by including some of the following design ideas:

- town houses with parking at ground level and living space above;
- flats with parking in the lower level;
- covered parking adjacent to the flats with a ‘green roof’ on the garden providing a terrace garden for residents of first floor flats.

Planning Statement para 6.1.1. states “[The Jackmans estate does have some characteristics which could be said to be redolent of the Garden City but in my opinion, one would have to look quite hard to make the connection.](#)” Transition Town Letchworth consider the Jackmans estate to be one of the most important extensions to the Garden City. The car parking access to the rear of homes and a motorised traffic free network of green spaces and paths are an attractive feature of this estate and show how Garden City principles can be developed and adapted to accommodate increased car ownership. We would like to see these characteristics better embedded in the proposed Ivel Court development.

We have the following concerns with the proposed road and path layout:

- The site currently provides a step free access path to the Jackmans community centre and local shopping area from the south. The proposed layout suggests that the new development will be fenced off from the shopping centre. Thus an access route to the shopping centre will be removed. This will be particularly problematic for those with disabilities, pushchairs or bicycles they wish to park on stands in the shopping centre, as the next closest access point requires walking up a large number of steps.
- There are no pavements adjacent to the access road in the development, just a paved area to be shared by vehicles and pedestrians.

Transition Town Letchworth would like the design improved by:

- Redesigning the stepped entrance to the shopping centre to include a ramp
- the addition of a path / cycle way connecting the access road in the development into the shopping area.
- A pavement installed beside the access road, on the side closest to the flats and away from the parking.

Construction Details

Planning Statement Paragraph 2.3.4 states that, “The remainder of existing development surrounding the site generally comprises two-storey houses to the south and north of the site and two/three-storey apartment blocks, such as Hadleigh retirement housing development to the north-west. There are also examples of newly built housing schemes, namely the redevelopment of the former Hamonte site, which is currently being redeveloped to provide a three/four-storey sheltered apartment complex (16/02915/1).”

We recognise that there is a step change proposed in the building to reflect the terrain of the site, but relative to its closest neighbours the height of this development does seem excessive, especially, given its position at the main gateway into this estate.

The Planning Statement states that Art Deco has influenced the design, in particular the Spirella Building. This is not immediately obvious, probably because the roof construction is flat and lacks any of the character of the Spirella Building. There is a big opportunity to benefit from Solar PV if a well-designed sloping roof could be provided on this south facing building. Transition Town Letchworth would like to see a redesign of the roof with the aim of using Solar PV tiles as a roofing material.

With the land owner located at County Hall, it would appear that the land owner is Herts County Council. Herts County Council have declared a climate emergency and our expectation is that they will be seeking that all developments on land they provide for housing will be capable of operating at zero carbon as the grid decarbonises. Retrofitting is difficult and expensive, but will be particularly challenging on blocks of owner occupied flats. It is therefore extremely important that high fabric energy efficiency standards are achieved on the Ivel Court development if it receives planning permission. Appendix A of this submission provides the LETI building guidance for Medium and Large Scale Housing. We would like NHDC to use this guidance to set standards for the Ivel Court development. We are particularly keen that the development should be at least judged against the part L building standards that will come into effect in 2021 (which are available now in draft) but in addition, we would like this development to achieve a space heating demand of no more than 15kwh/m²/year, which is aligned to requiring walls and floors U values of at least 0.15 and 0.10 respectively. Walls and Floors are building elements that, national and local experiences have shown, are the most difficult to retrofit. The government’s Future Homes Standard Consultation and LETI zero carbon homes design guidance both indicate that U values for Walls of 0.15 and floors of 0.10 to 0.11 will be necessary for a home to be capable of becoming zero carbon.

Transport

The development has a plan for 27 car parking spaces and a bike store for 24 bicycles. We understand that the ‘dated’ NHDC planning requirements suggest more parking is necessary. Transition Town Letchworth support reduced provision of car parking

spaces on this development. To lever change to more sustainable transport it is important that new developments are designed to discourage car use and encourage sustainable transport use. Paragraph 7.4.3 of the Planning Statement (replicated below) suggests that 27 spaces will be an overprovision. Transition Town would like to see parking spaces further reduced and cycle parking provision increased in this development.

Para 7.4.3 “The development however proposes a total of 27 parking spaces, these being one per unit plus three visitor parking spaces. The proposed residents parking of 1 per unit is in line with the local car availability obtained from the 2011 census, which is 0.914, and which would indicate around 22 spaces would be appropriate here. Additionally, taking the rate for flats in the area (0.528) the number of spaces required would be just 13. This is backed up by the local convenience shopping and services available at Ivel Court and also by the good public transport connections available to Letchworth town centre and also to Stevenage.”

We understand a car share scheme has been included in the Hamonte development and would like to see this provision replicated on this development.

We would also expect to see electric charging points that are accessible from any parking space on the development, yet there seems to be no such provision.

Communal Spaces and Planting

We are pleased to see that there are some communal green spaces as part of this development. However, the development is some distance from local allotments and it would therefore be good to see space given for a community food garden. We would also like to see plans to plant trees and bushes which have edible fruits which residents can enjoy.

The appearance of the development would be softened by plants that can grow up the façade.

Waste

In response to Question 14 on the Planning Application Form the developer has stated that there is no plans for separate storage and collection of recyclable waste. However, the designs suggest there is to be a communal area for recycling waste. Transition Town Letchworth expect this development to support the separation of recycling material, including food waste, both at the communal collection point and within flats.

We would like to see a communal compost bin on the site, ideally located within a community growing space which can utilise the compost.

Medium and large scale housing

Operational energy

Implement the following indicative design measures:

Fabric U-values (W/m ² K)	Value
Walls	0.13 - 0.15
Floor	0.08 - 0.10
Roof	0.10 - 0.12
Exposed ceilings/floors	0.13 - 0.18
Windows	1.0 (triple glazing)
Doors	1.00

Efficiency measures	Value
Air tightness	<1 (m ³ /h.m ² @50Pa)
Thermal bridging	0.04 (ψ-value)
G-value of glass	0.6 - 0.5
MVHR	90% (efficiency) 52m (duct length from unit to external wall)

Window area guide (% of wall area)	Value
North	10-20%
East	10-15%
South	20-25%
West	10-15%

- Balance daylight and overheating
- Include external shading
- Include operable windows and cross ventilation

Reduce energy consumption to:

35 kWh/m²/yr
Energy use intensity excluding renewable energy contribution

15 kWh/m²/yr
Energy use intensity excluding renewable contribution

Reduce space heating demand to:

15 kWh/m²/yr

Heating and hot water

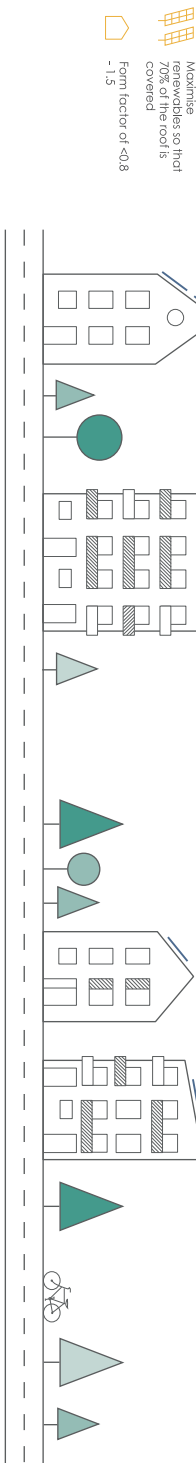
Implement the following measures:

- Fuel** Ensure heating and hot water generation is fossil fuel free
- Heat** The average carbon content of heat supplied (GCO₂/kWh_{th}) should be reported in-use
- Heating** Maximum 10 W/m² peak heat loss (including ventilation)
- Hot water** Maximum dead leg of 1 litre for hot water pipework
Green Euro Water label should be used for hot water outlets (e.g.: certified 6/L/min shower head – not using flow restrictors);

Demand response

Implement the following measures to smooth energy demand and consumption:

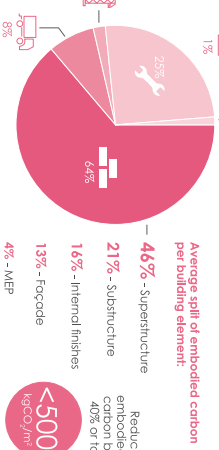
- Peak reduction** Reduce heating and hot water peak energy demand
- Active demand response measures** Install heating set point control and thermal storage
- Electricity generation and storage** Consider battery storage
- Electric vehicle (EV) charging** Electric vehicle turn down
- Behaviour change** Incentives to reduce power consumption and peak grid constraints.



Embodied carbon

Focus on reducing embodied carbon for the largest uses:

- Products/materials (A1-A3)
- Transport (A4)
- Construction (A5)
- Maintenance and replacements (B-BS)
- End of life disposal (C1-C4)



Data disclosure

Meter and disclose energy consumption as follows:

- Metering**
 - Submeter renewables for energy generation
 - Submeter electric vehicle charging
 - Submeter heating fuel (e.g. heat pump consumption)
 - Continuously monitor with a smart meter
 - Consider monitoring internal temperatures
 - For multiple properties include a data logger alongside the smart meter to make data sharing possible.
- Disclosure**
 - Collect annual building energy consumption and generation
 - Aggregate average operational reporting e.g. by post code for anonymity or upstream meters from part or whole of apartment block
 - Collect water consumption meter readings
 - Upload five years of data to GIA end/or CarbonBiz online platform
 - Consider uploading to Low Energy Building Database.