

Planning application 19/00520/OP

Residential development of up to 42 dwellings,
all matters reserved but access

Former Norton School Playing Fields

Croft Lane, Letchworth Garden City

Consultation response from

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We write in response to Vincent & Gorbings's clarification letter of 11th June and the accompanying documents. The clarifications do not alter our **objection** to application 19/00520/OP. It seems that, in attempting to show that access via Croft Lane is the only suitable option for the site, they have in fact demonstrated that other access options are perfectly viable, subject only to minor changes.

Harm to Croft Lane Conservation Area

The applicant states:

“The Highways Authority acknowledged that the main challenge is that the applicant is dealing with an existing historic environment which cannot be re-engineered to modern standards without severely affecting the look and feel of Croft Lane, to the detriment of the heritage asset of the Conservation Area.” (paragraph 2)

This is precisely the point that we and many others have been making since the scheme was first presented in 2017. Various minor amendments have been proposed, but none can address this fundamental issue for as long as Croft Lane is used as the main vehicular access point. Consequently we consider the application to be in contravention of paragraph 195 of the National Planning Policy Framework:

“Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss.”

We also consider the application to be in contravention of Policy 57 of the North Hertfordshire District Council District Local Plan no. 2 with Alterations:

“Special account [should be] taken of the site's location at the edges of towns and villages and within or adjoining Conservation Areas. Development proposals on sites with areas having an 'established' character will need careful consideration as to whether they are acceptable at all. If they are, then the design and siting of buildings should enhance the area's character... Letchworth, in particular, has a character theme which is common throughout much of the town, being planned as the World's First Garden City early this century. These environments should be reflected and improved in all new housing, large or small, and changes to existing buildings.”

(Policy 57, guideline 2)

The “substantial harm” to the Croft Lane Conservation Area, described in Section 2 of our response of 12th April 2019 and in many other responses, will not be necessary if alternative means of access are sought.

Requirements for access

The applicant states:

“For this size of development (circa 40 houses) the technical baseline for the required vehicular, pedestrian and cycleway is as follows:

- **Minimum 5.5m two-way carriageway**
- **1.8m footway (ideally on both sides of the road)**
- **3m shared cycle/pedestrian route, (ideally located to link in with any existing cycle network)”** *(paragraph 3)*

This is inconsistent with the advice contained in “Roads in Hertfordshire”, which states that the minimum requirement for a development of up to 100 dwellings is a 4.8m wide carriageway. The relevant section of “Roads in Hertfordshire” is reproduced in the Appendix.

We do not understand who is insisting on a 5.5m wide carriageway to serve the proposed development of 42 homes, nor do we understand their motivation. It is clear to all parties that there is no sense in mandating a carriageway 5.5m wide, when it feeds into Croft Lane (3.8m wide) and Cashio Lane (4.3m wide). The capacity limit is self-evidently set elsewhere.

Furthermore we do not see why the provision of a 3m shared cycle/pedestrian route is presented as a baseline requirement when the Highways Authority has raised no objection to the lack of such provision at other sites, including site LG3 for 128 homes.

Alternative access options

The applicant states:

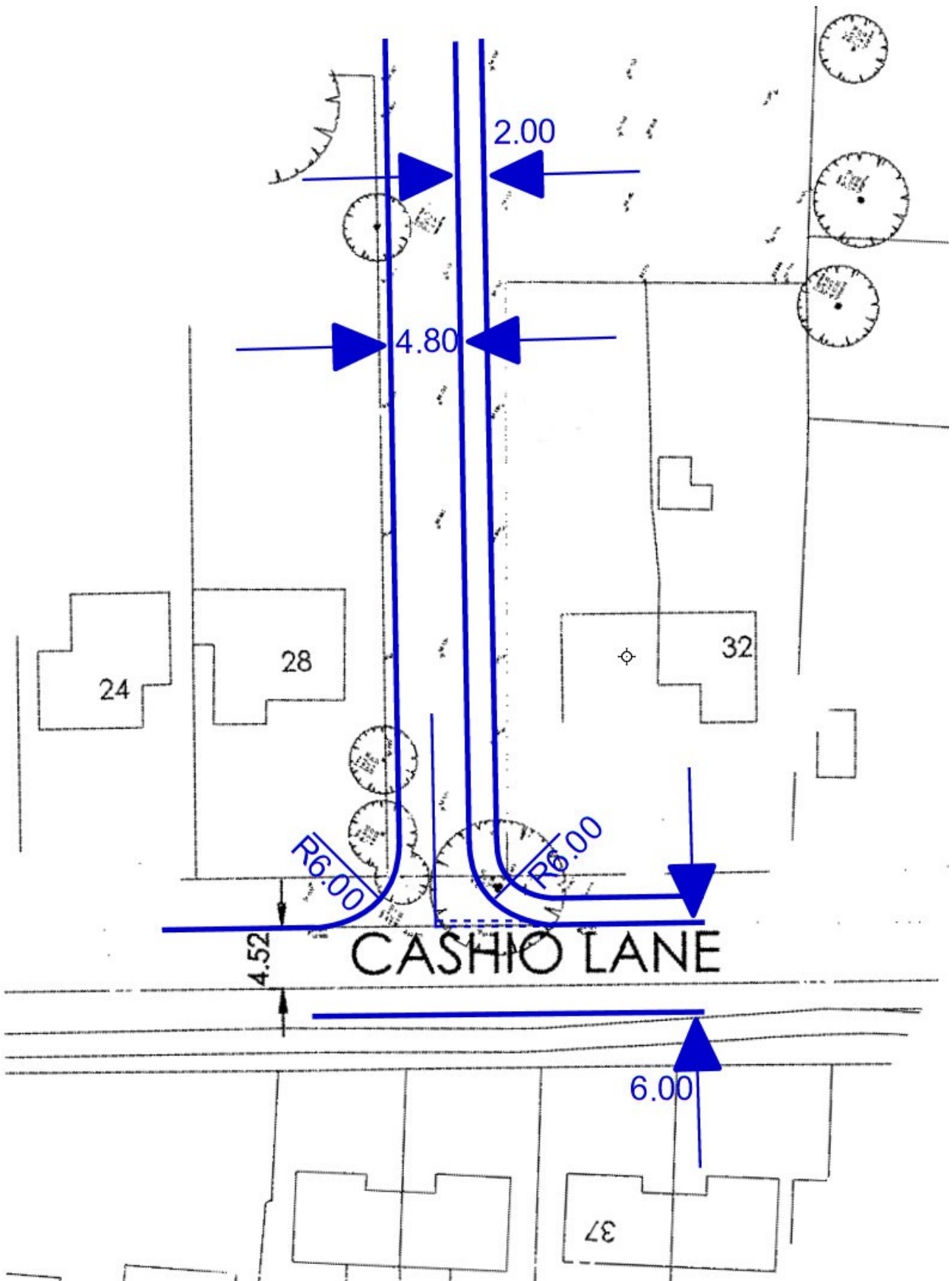
“[Access via Cashio Lane] would not require any works to access or widen Croft Lane area, therefore would not lead to any harm to the Conservation Area.”

The applicant presents a diagram showing how a 5.5m carriageway and a 1.8m footpath could be accommodated within the 8.4m width of the access strip on Cashio Lane. The applicant further states that modification to the access of 30 Cashio Lane would be required.

All technical requirements can be met with minor amendments to this access plan, as follows:

- The carriageway width can be reduced from 5.5m to 4.8m, in line with the guidance in “Roads in Hertfordshire”
- The kerb radius can be reduced from 8m to 6m. The applicant did exactly this to the proposed Croft Lane access on their plan of 8th June 2020, so it is hard to see why the same measure cannot be applied to the Cashio Lane access.

On our illustration below, we have shown the footway to the south of the carriageway, thus keeping the carriageway further away from the entrance to 30 Cashio Lane. However, the footway and carriageway could be configured either way round.



Our illustration shows a 2m footway, sufficient for two wheelchairs to pass, rather than the 1.8m footway proposed by the applicant.

Cycle provision

There is sufficient width for a 4.8m carriageway plus a 3m shared cycle/pedestrian route. However, we would note that this access road is only 54m long, this being the length of the plot at 28 Cashio Lane. No vehicle can attain high speeds on a road only 54m long.

A dedicated cycle path could still be provided onto Croft Lane. The extra distance to cycle into the centre of Letchworth – approximately 300m – seems barely significant and could even be regarded as positive in terms of promoting health and fitness. Furthermore, a cyclist turning left onto Croft Lane, continuing to the bus stop on Eastern Way and then turning left towards Norton Way North would avoid a busy section of Norton Road, which might confer health benefits of a different kind.

Conclusion

The applicant acknowledges that access via Cashio Lane would have the great advantage of causing no harm whatsoever to the Croft Lane Conservation Area. Our illustration above shows that this can readily be accommodated within the 8.4m width of the Cashio Lane access point, whilst meeting all technical requirements. This would reduce traffic levels and improve safety on both Croft Lane and the northern part of Cashio Lane, which is narrow (the applicant states 4.3m) and unsuitable for significant extra traffic.

LTP4 Policy 5 urges planners to “resist development that would either severely affect the rural or residential character of the road, or severely affect safety”. The applicant claims that access via Croft Lane is the only deliverable option for the site, and that all other access plans “result in greater harm to the Conservation Area, and do not deliver on the sustainable transport benefits required by LTP4”. This claim cannot be supported.

Appendix: Minimum road widths

An extract from “Roads in Hertfordshire” is reproduced below:

Roads in Hertfordshire: Highway Design Guide 3rd Edition
 Section 4 – Design Standards and Advice
 Chapter 1 – Road Design Criteria



Table 4.1.1.1 Road Design Criteria

	Secondary Distributor	Local Distributor	Major Access	Minor Access	Shared	Industrial
Maximum dwellings	Not applicable	Not applicable	300	100	50	Not applicable
Frontage access	Not normally	Not normally	Yes	Yes	Yes	No
Connections	Main Distributor (1).	Secondary Distributor (1)	Local Distributor	Local Distributor & Major Access	Major & Minor Access	Local Distributor
Gateway	None	None	Not normally	Desirable	Essential	Normally signing
Target maximum speed	40mph	30mph	25mph	20mph	10mph	25mph
Min forward visibility(3)	66m	43m	33m	25m	11m	51m
Junction spacing	40m opposite 66m adjacent	30m opposite 43m adjacent	20m opposite 33m adjacent	Not applicable	Not applicable	30m opposite 50m adjacent
Min c'way width (2)	7.3m	6.75m	5.5m	4.8m	4.1m	7.3m
Min horiz curve (radius)	DMRB standard	90m	40m	30m	25m	60m
Reverse curves (min separation)	DMRB standard	20m	17m	14m	11m	20m
Max distance betw'n speed restraints	Not applicable	150m	100m	60m	40m	Not applicable
Min vert curve (radius)	DMRB standard	1000m	1000m	600m	300m	600m
Carriageway construction	DMRB standard	Min 250mm total bitmat	Min 190mm total bitmat	Min 190mm total bitmat	Min 90mm r/b + block paving	Min 250mm total bitmat

NOTES:

1 - Main and Secondary Distributor roads are normally classified as 'A' and 'B' respectively. **The Principal Road Network comprises the most important routes in the County, which are normally 'A' roads.**

2- For Major Access and lower category roads the notional minimum widths of carriageway indicated above may be reduced locally for speed reduction purposes and in accordance with the aims of **MFS** subject to an absolute minimum width of **2.75m**.