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Your ref: 19/00520/OP

2 July 2021

Dear Sir

**Outline Application: residential development of up to 42 dwellings, all matters reserved but access (as amended by plans and information received 09-06-2020, 23-07-2020 and 10-12-2020)
Land between Croft Lane, Norton Road and Cashio Lane, Letchworth Garden City, Hertfordshire**

We write in response to your letter dated 16 June 2021 and make the following representations.

1. Briefing Note – Land between Croft Land and Cashio Lane – LTP4 Provisions

The Applicant has sought to establish that the proposed scheme complies with LTP4 by listing various scheme provisions. This is somewhat misleading, as it does not address the areas in which the proposed scheme does not comply with LTP4. We would also note that Applicant's summary of various policies omits certain terminology from LTP4 (which is underlined below for completeness). In particular:

- a. Policy 5: Development Management. Paragraph (g) sets out the following objectives for a local planning authority: *"Resist development that would either severely affect the rural or residential character of the road or other right of way, or severely affect safety on rural roads, local roads and rights of way especially for vulnerable road users..."*. The scheme proposal to widen the Croft Lane footpath to secure 2m width is contrary to Policy 5, as:
 - i. it would, severely affect the rural character of the road. As a reminder, the rural nature of the road was detailed in the Conservation Area Character Statement (please refer to paragraph 2 of our letter dated 7 July 2020); and
 - ii. it would severely affect safety of the road and existing rights of way. The proposal to increase traffic volumes on a road that has no footpath to the eastern side of the site, which is used by schoolchildren (vulnerable road users) and other pedestrians as a right of way, is contrary to Policy 5.

- iii. the Applicant's submission that "*Signage on Croft Lane warning of no footpath*" complies with safety requirements of Policy 5 is incorrect – a sign that warns that road is unsafe does not extinguish the fact that it will be unsafe given the additional traffic volume.

Per paragraph (d) the Local Planning Authority should "*resist development where the residual impact of development is considered to be severe*". For the many reasons detailed in our previous representations (and those of other neighbours), the impact of this development will be severe and therefore should be resisted.

- b. Policy 7: Increase priority for pedestrians relative to motor vehicles. The applicant submits that various aspects of the scheme comply on the basis that pedestrian links are increased and that proposals in respect of the road at the eastern end of Croft land are safe. We submit that the proposals do not increase priority for pedestrians relative to vehicles (existing and generated by the proposed development of 42 dwellings) and fall short of any reasonable test of safety considering the existing right of way exercised by pedestrians to the eastern end of Croft Lane. Please refer to para 1a above.

2. Briefing Note - Access Options: Land between Croft Lane and Cashio Lane

The applicant has highlighted that the Highways Authority acknowledged 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*". The proposals submitted by the Applicant (summarised at "Option 6") are fundamentally flawed:

- a. The proposals will have severe detrimental impact on the Conservation Area – the applicant acknowledges at paragraph 19 that there will be harm to the Conservation Area (although their analysis that these proposals will "minimise" harm is not accepted); and
- b. The proposals will have severe impact on safety of pedestrians, cyclists and other road users..

The Applicant states that this application delivers benefits of housing with the "*least harmful in terms of impact on the Conservation Area*". The Applicant seeks to justify detrimental impact to a conservation area through delivery of 42 dwellings – that is not a commensurate benefit.

Given the substantial harm that this proposal would cause, we restate that per Para.195 of the National Planning Policy Framework, the local planning authority should refuse consent for this proposed development.

3. Previous representations – letter dated 7 July 2020 and 4 February 2021

We refer to and restate our previous representations as detailed in our letter dated 7 July 2020 and 4 February 2021. The proposed development remains unviable given insufficient / unsuitable access, non-compliance with NPPF and wider significant impact on a Conservation Area without substantial public benefit. It is clear that the proposed development is undeliverable and the land should not have been allocated by the planning authority as land for housing development.

Yours faithfully,

Mr. P and Mrs. J Hawkes, 58 Norton Road, Letchworth Garden City.