

## PRESTON PARISH NEIGHBOURHOOD PLAN

### STEERING GROUP RESPONSE TO CASTLEFIELD PLANNING APPLICATION

Tom Rea  
North Herts District Council  
Gernon Road  
Letchworth  
SG6 3TF

Tuesday 31 August 2021

Dear Mr Rea

**Reference: 21/02076/FP**

Residential development comprising erection of 23 dwellings (including affordable housing) and associated parking, landscaping, open space and ancillary works with access off Castlefield. Land West Of Castlefield, Preston, Hertfordshire.

The Steering Group is pleased to note that the Neighbourhood Plan has been addressed in the planning application for this development off Castlefield in Preston. However, there are some policies which have not been taken into account to the extent that we believe they should have been. The Steering Group would like to highlight these and request that they are addressed and, where necessary, conditions imposed before any planning consent is granted.

**Policy QL3: Local Distinctiveness:**

*The architecture of, and landscaping schemes in, all new developments should preserve and where possible enhance heritage assets, historic features, and rural character, thereby promoting community identity and preserving local distinctiveness.*

The plans for this development do not provide anything of a rural character to retain the village feel of Preston and create a sense of community. The materials being planned do not reflect or complement the diversity and mix of other dwellings in Preston. It is vital that these issues are addressed.

**Policy HD1: Residential Development:**

*The Plan defines a settlement boundary for Preston Village, see map on page 35. Proposals for residential development within the settlement boundary will be supported subject to the following criteria:*

- *Their height, scale and massing reflect the character of the village and its rural setting;*
- *Within the conservation area they preserve or enhance its special architectural or historic interest;*
- *Their density and layout take account of other buildings in their immediate locality; and*
- *They incorporate vernacular materials and characteristic design features found within the village as appropriate to their scale and location within the village.*

The Steering Group notes that the NHDC emerging Local Plan allocates site PR1 for “an estimated 21 new homes” and are concerned that these proposals are for 23 new dwellings despite there being an area of the site which is unsuitable for building. This fact should surely have reduced the number of dwellings provided rather than increase them. A reduction in the number of houses would allow for the site to be less cramped whilst still allowing for dwellings of different sizes. A reduction in dwellings would also reduce the noise, traffic and environmental impacts referred to later in this submission.

**Policy HD5: Sustainability and Energy Efficiency:**

*Proposals for the provision of measures for water conservation and landscape schemes that improve biodiversity will be encouraged. Proposals with a low carbon footprint will be encouraged. The provision of electric car charging points for all new homes will also be supported as will proposals that enable residents to work from home. Prior to occupation, each residential property shall incorporate an Electric Vehicle (EV) ready, domestic charging point.*

While the Steering Group is pleased to acknowledge that some of this policy has been met by providing electric car charging points, there are some key elements which have not been met.

We note from the energy statement that air source heat pumps will be used for heating these dwellings. Our understanding is that heat pumps only work effectively in well insulated homes. It is essential, therefore, that these houses have the correct level of insulation so that supplementary heating is not required.

The Steering Group also understands that ground source heat pumps are more effective and quieter so would like to ask that serious consideration be given to installing this system instead of air source heat pumps, making this a condition of planning consent if necessary.

The inclusion of both solar panels and the use of grey water for flushing toilets would make these dwellings more sustainable and go further towards meeting this policy.

**Policy HD8: Flood Risk and Drainage Provisions:**

*Development proposals in locations at the highest risk of flooding will not be supported. Where any development proposal can be demonstrated to be necessary in such areas the development should be made safe for its lifetime without increasing the risk of flooding elsewhere.*

*In other parts of the neighbourhood area beyond the locations at the highest risk of flooding, development proposals will be supported where they do not increase flood risk elsewhere in the neighbourhood area, and within Castlefield, Templars Lane, Chequers Lane, Church Lane and Butchers Lane in particular.*

*Major developments should incorporate sustainable drainage systems within their design and layout unless there is clear evidence that this would not be appropriate either within the neighbourhood area or on the site concerned.*

The Steering Group notes that there will be an attenuation pond and a deep bore soakaway on a corner of the site near the footpath to prevent rainwater from flooding Butchers Lane. The planning application documents say that there haven't been any issues with surface water flooding but we know that is not the case. In 2013, The Willows on Butchers Lane had to have a pipe laid and a French drain installed to prevent the garage from flooding. It must be

ascertained that the borehole soakaway and attenuation pond have the capacity to prevent this occurring in the future.

The Steering Group notes that the plans indicate that the existing gravity sewerage system will cope with an additional 23 properties and that Thames Water has said there is no history of flooding and sewage issues. The Steering Group is aware that this is certainly not accurate and are of the view that the system must be vastly improved in order for it to work effectively for both existing and future residents.

Details of sewage issues in 2010 and 2017 at Wildwood, Church Lane have been provided to the public consultation by the resident. If the current system is used, these sewage issues will be exacerbated and that is not acceptable. This issue needs to be thoroughly investigated and, if necessary, a completely new sewerage system should be a condition of planning consent.

There are water pressure issues for the residents of Castlefield and Chequers Lane. They must also be addressed and improved because the existing system will certainly not be able to cope with additional dwellings.

**Policy EH2: Conservation Areas and Heritage Assets:**

*All development proposals, including new build, must demonstrate how the particular environment of Preston has been taken into account during conception and evolution of the design. Proposals that do not positively contribute to the local character must explain why and demonstrate the reasons behind the alternative approach.*

**Bullet Point 4**

*Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment undertaken by an appropriately qualified specialist so that the impact of the proposed development on the significance of the heritage assets can be assessed and, where necessary, carry out a field evaluation.*

The Steering Group has noted the pre-application advice relevant to this policy contained in the Heritage Statement, in particular:

*In terms of archaeology, the Council's Historic Environment Advisors do not consider that there is any need for a pre-application archaeological assessment and that a planning condition is likely to be recommended requiring an archaeological evaluation (via trial trenching) prior to the commencement of the development.*

The Steering Group agrees that a condition should be imposed prior to planning consent which will ensure that an archaeological evaluation is both produced and assessed prior to the commencement of any development.

**Policy EH5: Tranquillity and Dark Skies:**

*Proposals for development should respect the tranquil character of the neighbourhood area. Proposals which would generate an unacceptable detrimental impact on its tranquillity through noise, generated traffic or light pollution will not be supported.*

There are no streetlights in Preston and the Steering Group would like a condition put on any planning consent to ensure that this strategy is continued. It would also like minimum external lighting to properties to be included in such a condition. This would conform to the Manual for Streets which says:

*10.3.11 Lighting should be appropriate to the context. In some locations, such as rural villages, lighting may not have been provided elsewhere in the settlement and therefore it would be inappropriate in a new development.*

*10.3.6: While lighting fulfils a number of important purposes in residential areas, care should be taken not to over-light, which can contribute unnecessarily to light pollution, neighbourhood nuisance and energy consumption.*

If imposed, this condition would meet Working Principle HERC 9. It is essential that this Working Principle is adhered to in order to mitigate the impact of additional domestic light pollution on wildlife in and around Wain Wood, as well as in the vicinity of the development site.

**Working Principle HERC9:** *In considering development involving potentially adverse lighting impacts to wildlife Preston Parish Council will expect surveys to identify movement corridors and ensure that these corridors are protected and enhanced.*

The Preliminary Ecological Survey says:

*Page 10: it is considered essential that use of a low impact lighting solution be employed during the construction and completed phase to avoid lighting the boundary features that provide potential foraging / commuting resource.*

The Steering Group strongly believes that low impact lighting is not acceptable in this development and that there should be no lighting at all. It suggests that a covenant restricting the installation of additional flood lights should be in place for future property owners.

A reduction in the number of dwellings on the site would have a proportionate reduction in noise and traffic and their impact on existing and prospective residents. This would meet the requirements of this policy.

**Policy EH7: Protecting and Enhancing the Local and Natural Environment:**

*Development proposals should maintain and where practicable enhance the elements of the natural environment as identified in Appendix C2 (pages 68 to 84). Where appropriate development proposals should also incorporate measures to ensure their connectivity to the wider habitats in the neighbourhood area.*

*Where significant harm to biodiversity arising from a proposed development cannot be avoided, adequately mitigated or as a last resort compensated for, any such proposals will not be supported.*

The Preliminary Ecological Survey does not meet the above policy, nor does it meet the policy in the emerging Local Plan which was added in the Main Modifications in 2018. This states:

*All development should deliver measurable net gains for biodiversity.*

*Integrate appropriate buffers of complimentary habitat for designated sites and other connective features, wildlife habitats, priority habitats and species into the ecological mitigation and design. The appropriateness of any buffers will be considered having regard to the status of the relevant habitat. 12 metres of complimentary habitat should be provided around wildlife sites (locally designated sites and above), trees and hedgerows*

*Ecological surveys will be expected to involve an objective assessment of ecological value and identify any priority habitat, protected or priority species on site with survey data and site assessment to establish the potential impact. Surveys should be consistent with BS42020 Biodiversity- Code of Practice for Planning and Development, or as superseded, and use the DEFRA Biodiversity Metric, or as superseded, or any statutorily prescribed alternative to assess ecological value and deliver measurable net gain.*

The survey does not include a Defra metric assessment and does not specify that a 12m buffer will be provided to all hedgerows. The Steering Group believes that a new survey should be submitted which includes a DEFRA biodiversity metric net gain assessment which clearly demonstrates a biodiversity net gain of 10% increase in habitat units. The survey should also include plans that show a 12m buffer of complimentary habitat to all hedgerows. The new survey should be submitted and assessed prior to planning consent being granted.

The mitigation measures to reduce the impact on Wain Wood, SSSI, are not enough and should be reconsidered. However, signage within the wood is not required as what is already in place is adequate.

In addition to the bird and bat boxes to be supplied, swift bricks should be incorporated into the buildings and open boundaries for the movement of hedgehogs and other small mammals should become an essential criterion.

The Steering Group requests that a condition, which takes account of these points, is imposed to ensure that the appropriate measurable net gains for biodiversity are met.

**Policy EH8: Hedgerows, Trees and Verges:**

*Where appropriate and relevant to the site concerned development proposals should retain and maintain existing trees and hedgerows within the site and along its boundaries. If their removal is necessary, they should be replaced in an appropriate location with trees of no less arboriculture or amenity value.*

*Where the boundary of a new development has existing hedgerows and trees these should be protected to give it a green and soft edge, with additional landscaping and planting to minimise the visual impact of the new development. Landscaping should be incorporated in the design of all new development to mitigate the visual impact of development and ensure that the development is sensitively incorporated into the existing village context. Landscaping schemes should include predominately native species.*

The Steering Group notes that the plans indicate that no trees or hedges will be removed if this development goes ahead. It is vital that the Tree Protection Measures within the Arboricultural Impact Assessment are followed exactly to ensure that all the trees are protected during the building process and afterwards when the properties are occupied. This is particularly important for T26, T27, T28, T29 and G16 in relation to plots 9 and 10; T9 and T10 in relation to plots 19 and 20; T1, T2, T3, T4, T5, G1 and G2 in relation to plots 21 and 2. The dwellings on these plots will be very close to the crowns of the trees indicated and there is a risk that trees will be cut back either during construction or by occupiers at a later date. This must be prevented.

The Specification for Soft Landscaping Works must also be closely followed, including the 5 year Maintenance Plan so all plantings are allowed to develop appropriately.

Neither the Arboricultural Impact Statement nor the Specification for Soft Landscaping Works include plans for on-going maintenance after the 5 year plan for the soft landscaping work. It

is vital that this is addressed to ensure that all the vegetation is maintained to the correct standards. The Steering Group suggests that a condition be put on planning consent for the management and maintenance of all the green areas on the site to be the responsibility of the developer in perpetuity.

**Policy TC1: Safe and Sustainable Transport:**

*Residential and community development proposals will be supported where amenities in the village can be readily and safely accessed by pedestrians and cyclists. In addition development proposals should conform to the following criteria:*

- a) development proposals should not generate an unacceptable increase in traffic volume and movements within or through the village and*
- b) development proposals should not generate unacceptable highway safety risks and*
- c) development proposals should provide a minimum of 2 off-road parking spaces per new residential unit with 2-3 bedrooms and a minimum of 3 parking spaces for 4+ bedroom residential units.*

The Steering Group understands that there can only be one access to the proposed development but it should be realised that the increase in traffic generated by this development will have a huge impact on Preston residents, particularly those who live on Chequers Lane. A reduction in the number of dwellings, as suggested earlier in this submission, would reduce this impact.

A traffic survey was undertaken between Monday 22 and Sunday 28 February 2021, with data on volume and speed of traffic included in the Transport statement accompanying the planning application. The Steering Group notes that this was during National Lockdown and for part of that time the road was closed because of a burst water pipe. The Steering Group is of the view that this data will not provide a true picture of traffic on Chequers Lane and that it cannot be used as evidence for this application. Another survey was conducted in the last week of June which would have provided more accurate data. This should be submitted so that a realistic assessment of traffic can be undertaken.

The Steering Group is pleased that the correct number of parking spaces has been planned.

**Policy TC2: Broadband and Mobile Coverage:**

*Provision of facilities to support the delivery of efficient and effective landline, broadband and mobile coverage throughout the parish will be supported provided they are sensitively designed and located in accord with other policies in this Plan.*

The Design and Access statement says:

*Page 46 paragraph 7.18*

*The proposed development will support home working through the provision of high speed broadband and flexible layouts within dwellings, helping to support employment provision over the long term and sustainable working practices.*

*Page 61 paragraph 7.100: Provision will be made for the development to be served by the necessary communications infrastructure to facilitate home-working*

The Steering Group welcomes and agrees with these statements. However, there is nothing in the plans which explain how the necessary communications infrastructure and connection speeds will be provided. At present high speed broadband is not available in all areas of the village and, with the current levels of home working, it is essential that a super-fast service,

which meets the Government's criteria, is available for everyone living and working in Preston.

In conjunction with BT, a project was started in July 2010 to bring fibre optic broadband to the village. Local residents contributed £37,830, including VAT, to the project and BT paid the remainder. This was the first such initiative in the country and a trial to see what was possible for other rural communities. The first householder was connected to super-fast broadband on 26 July 2012 with other residents following soon afterwards. Those living nearest to the box get the fastest broadband, gradually reducing for properties further away. Castlefield is a considerable distance from the box.

A new box was installed opposite the Recreation Ground to provide the fibre optic service but as there was not enough capacity within the old copper box for the number of lines required, this was replaced in July 2017. There is still not enough capacity in the new box and another 23 dwellings will exacerbate this, resulting in issues for both existing and new residents.

Depending on the provider, the mobile signal is poor for many residents. The Steering Group suggests that the developer negotiates with mobile phone providers to get more equipment installed on the recently erected mast.

The Steering Group believes that a condition should be imposed, prior to planning consent being granted, to ensure that effective high speed broadband, mobile phone service and landlines are provided so that all residents experience services and connectivity which are fit for the world we live in today.

### **Construction Management Plan**

The Steering Group notes that a Construction Management Plan is included in the application documents. Page 108 of the Preston Parish Neighbourhood Plan has the details of what is expected from a Construction Management Plan and a Considerate Constructors Scheme. The Steering Group sincerely hopes these criteria will be strictly adhered to.

The Preston Parish Neighbourhood Plan is now part of the Statutory Development Plan for North Hertfordshire until 2031 so must be taken into account by NHDC when this planning application is assessed.

The Steering Group hopes that the points raised here can be fully addressed prior to planning consent being granted.

Yours sincerely

Preston Parish Neighbourhood Plan Steering Group:  
Fay Higgin, Elizabeth Hunter, Rae Reynolds, Wally Steele, Margaret Trinder