

## PRESTON PARISH NEIGHBOURHOOD PLAN

### STEERING GROUP RESPONSE TO AMENDED PLANNING APPLICATION LAND WEST OF CASTELFIELD

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

Tuesday 30 November 2021

Dear Mr Rea

**Reference: 21/02076/FP**

**Residential development comprising erection of 21 dwellings (including affordable housing) and associated parking, landscaping, open space and ancillary works with access off Castlefield. (As amended by plans and supporting documents received 29th October 2021). Land West Of Castlefield, Preston, Hertfordshire.**

The Steering Group is pleased to note that some of the comments it raised in the original consultation have been acknowledged and that action has been taken to address them. However, there are some policies which have still not been taken into account as much as it believes is necessary. The Steering Group highlights these here and requests that they are fully 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 Steering Group appreciates that amendments have been made to improve local distinctiveness and approves of the soft landscaping to replace brick walls between the dwellings and the replacement of buff bricks with red bricks. It is, however, of the view that the amendments, particularly tile hanging and decorative bargeboards are not enough to ensure that the proposed development reflects the rural character of Preston.

**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 is pleased that the proposed development has been reduced from 23 to 21 dwellings, but feels that the density is still too high, given that an area of the site is unsuitable for building. The Steering Group notes that the density is less than the Castlefield houses but would like to point out that it is much greater than that of other properties in the vicinity of the site. A further reduction in the number of dwellings would reduce the noise, traffic and environmental impacts of this development.

**Policy HD3: Housing Types:**

*Proposals for new homes should demonstrate the way in which they would address local housing needs. Proposals for or which include, two- and three-bedroom houses suitable for families, local people and first-time buyers will be supported.*

The Steering Group notes that in reducing the number of dwellings on the site from 23 to 21, it is 2 smaller houses which have been removed from the plans. This does not meet this policy which supports two and three bed dwellings. There are 6 four bed properties in this proposal but there is no need for more large houses in Preston. The Steering Group would like to suggest that the proposals are amended to remove 2 four bed dwellings and reinstate 2 two bed dwellings.

The Steering Group is pleased that there are 2 bungalows in the amended plans which are in line with this policy. Construction must ensure that these dwellings and their access are suitable for wheelchair users and meet the latest DDA laws.

**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.*

The Steering Group is disappointed that there is still not enough in these proposals to support NHDC's climate emergency motion which pledged to do everything within the Council's power to achieve zero carbon emissions in North Hertfordshire by 2030.

The Steering Group has noted the reasons why the developer intends to use air source heat pumps rather than ground source heat pumps but would like to point out that the statement on page 4 of the Formal Covering Letter is not enough to justify ASHPs instead of GSHPs

*These include the fact that GSHP technology requires a significant amount of external space to accommodate its infrastructure and which involves ground disturbance and has the potential to impact the root protection areas of retained trees.*

The trees are on the edges of the site so installation of GSHPs would not impact on their root protection.

The Steering Group has also noted a contradiction in the Energy Statement on weather compensation. Page 15 says:

*Proposed Heating Strategy*

*It is proposed that highly efficient air source heat pumps with efficiencies of circa 350% (SEDBUK) are to be installed. The system will incorporate optimum start, weather compensation and full zone controls to ensure efficient operation.*

On page 16, Table 5.5: SUMMARY PROPOSED HEATING AND VENTILATION SYSTEMS, the third section says:

*Heating Hot Water Controls: Time and Temperature Zone Control  
Delayed Start Stat  
No Weather Compensation*

This is unacceptable and what will actually be installed must be clarified prior to planning consent being granted. Not to include weather compensation seems to be a massive oversight in the climate change emergency, whatever type of heat pump is used.

The Steering Group also notes that the sixth section in this table says:

*Ventilation: Natural Ventilation. Standard intermittent fans.*

and would like to know why mechanical vent and heat recovery is not being used which would be more appropriate and more environmentally friendly.

The Steering Group's own research and comments submitted by local residents indicate that GSHPs, although more expensive, would be more appropriate in the longer term and it is of the view that a condition should be imposed on planning consent to ensure that they are installed on this site.

The Steering Group does not agree that solar panels are not required. While accepting that heat pumps will heat the homes efficiently and provide hot water, solar panels could provide electricity for some of the other requirements within the homes.

The Steering Group is also of the view that not to use grey water for flushing toilets is short sighted. It accepts that the provision of water efficient taps, cisterns and low output showers, the installation of water meters as well as flow restrictors to manage water pressures to achieve optimum levels, will reduce demand on the mains water supply. If grey water was used to flush toilets the demand on mains water would be further reduced and at the same time the expected water usage per person would also be reduced.

The Steering Group is of the view that every opportunity, however small, towards reducing carbon footprint must be taken.

**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 has noted that 46.6% of the representations to the original consultation specifically mention drainage and sewage issues as a concern but that the amended documents indicate that no changes will be made to the proposals for the disposal of foul water. The Steering Group finds this unacceptable, especially as case histories of sewage incidents have been provided. The Steering Group would like to request that Osprey Homes and Thames Water should together investigate this issue and submit details of how it will be addressed before the application is assessed by the Planning Control Committee. If necessary, a completely new sewerage system should be a condition of planning consent, including which organisation will pay for it.

The Formal Covering Letter says:

*On the subject of water pressure, I can confirm that my client has engaged with Affinity Water who has provided a statement confirming adequate capacity exists within the local network.*

Again, the Steering Group finds this unacceptable, particularly as 28% of representations to the original consultation specifically mention water pressure issues. The Steering Group would like to know what evidence Affinity Water has to justify the above statement and if it has actively engaged with any of the residents who experience water pressure issues on a daily basis. The Steering Group would like this issue to be investigated by Osprey Homes and Affinity Water and details of how the situation will be improved should be provided prior to the Planning Control Committee Meeting which will decide on this application.

If these issues aren't addressed prior to planning consent and appropriate conditions imposed, the issues of both sewage and drainage and water pressure will be exacerbated by an increase in dwellings and both new and current residents will be affected by them.

The Steering Group has noted the revised Flood Risk and Drainage Strategy. The comments from the Local Lead Flood Authority to this revision, when available, must be strictly followed to ensure that there can be no issues of surface water flooding in future and that the attenuation pond and borehole meet the required specifications.

#### **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.*

The Steering Group is pleased that the lighting bollards have now been removed from the plans to ensure that the skies remain dark as detailed on Page 3 of the Formal Covering Letter. It is, however, concerned that page 16 of the October 2021 version of the Energy Statement says:

*Any external lighting deemed necessary will be low energy and will have daylight and/or PIR sensors to avoid wastage.*

This is a contradiction and the Steering Group would like all external lighting to be removed from the proposals. As suggested in its submission to the first consultation, the Steering Group believes that a covenant restricting the installation of any external lighting, including

flood lights, should be in place for future property owners. This covenant should allow the installation of low energy lighting with PIR sensors, enough to allow sufficient light for safe access to properties, but not allowing them to be permanently lit during the hours of darkness causing unnecessary light pollution. Such lighting must also be configured to avoid light spill outside of the area required for safety. In any event this lighting must not affect neighbouring properties and be of an appropriate colour temperature, for example, not daylight or cold white.

The Steering Group is concerned that the position of the parking areas could result in noise and light pollution for both existing and new residents.

**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.*

While acknowledging that it is not a legal requirement to provide a 10% biodiversity net gain, the Steering Group is of the view that the developer could and should go above and beyond and meet the requirements of the Environment Bill in advance of it becoming law in 2023.

In the hierarchy of designation, this is a non-designated site that includes important habitats and species. In Policy NEx of the Emerging Local Plan, one of the following paragraphs says:

*11.xx Sites can contain important habitats or species even where they are not formally designated*

The Steering Group believes that the developer should implement this in order to provide a 10% biodiversity net gain and to mitigate against the impact of the proposed development on wildlife.

**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.*

While accepting that the development site is a distance away from Wain Wood, the Steering Group is of the view that a 12m buffer should still be provided to protect the existing trees and hedgerows and to provide a wildlife corridor.

The Steering Group is pleased to note that more soft landscaping has been included within the site and walls between dwellings have been replaced with hedges. However, there is still no indication about how the green areas within the site will be maintained. 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 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 Steering Group has noted the comments regarding broadband in the Formal Covering Letter and it is encouraging to read that this proposed development should qualify for BT Open Reach's free FTTP (fibre to the premises) scheme. However, it should be noted that at present Preston has FTTC (fibre to the cabinet) and broadband speeds depend on how close a property is to the cabinet. Osprey Homes needs to have further discussions with BT Open Reach to establish whether this development can have free FTTP or whether that has to wait until the work to connect the whole village to fibre broadband takes place between April 2022 and April 2025.

Although current residents of Castlefield "appear" to have superfast broadband available to them, their service is dependent on distance from the cabinet. This is the same throughout the village and until fibre is available to all homes this will be an on-going issue which will be exacerbated by the addition of another 21 dwellings. With the increased importance of connectivity, 2025 is a long time to wait for an improvement in service in Preston.

The Steering Group believes that Osprey Homes should be required to have further discussions with BT Open Reach to clarify timescales for the provision of FTTP to the proposed dwellings prior to planning consent being granted.

There is no indication in the amended plans that the developer intends to negotiate with mobile phone providers to improve the mobile signal which is inadequate in some areas of the village depending on which company they are with. The Steering Group is of the view that this should be a condition of planning consent.

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:  
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