

Preston Parish Council

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

Monday, 13 September 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.

Introduction

Preston Parish Council supports this development in principle but there are some key issues which must be addressed before planning consent is granted and, where necessary, conditions imposed to ensure that the outcome is appropriate and proportionate for the village and that current residents are not disadvantaged by the development.

The Parish Council notes that of the Preston residents who have responded to the public consultation and whose responses are available on the application website, 82% are supportive of some development but not the numbers or the mix of dwellings proposed in the planning application. Within this, 9% of residents support only affordable or social housing. Comments from anyone who does not live in Preston and is therefore not directly affected by the proposed development has not been taken into account.

The concerns raised by residents are similar to those which the Parish Council highlights in the following paragraphs.

Dwellings

The Parish Council would like the number of dwellings to be reduced from 23 to a maximum of 20. This is the original number when the site was first included in the Local Plan in 2014. As the area of the site available for development has been significantly reduced because of the requirement to install an attenuation pond, it seems reasonable to proportionately reduce the number of dwellings. A reduction of 3 properties, two open market dwellings and one affordable home, would keep the ratio of affordable housing while reducing the density on the site as the land saved could be used to enlarge some of the plots. A reduction in the number of dwellings must ensure that there is a mix of homes as there is a need for family housing in Preston. A reduction in dwellings would create a proportionate reduction in traffic.

The Parish Council suggests that plots 21 and 22 and the adjacent parking area could be swapped to reduce the impact and proximity of these dwellings on numbers 1 and 3 Castlefield. This would also help to preserve the trees at the end of the site which are at risk if houses are built close to them.

The Parish Council notes that no account appears to have been taken of the permission granted for an extension to 3 Castlefield. Plot 23 will have a detrimental effect on this property and it will also be adversely impacted.

To reduce the number by 3 dwellings, the Parish Council suggests two possibilities:

Option 1: Remove: Plots 23 (3 bed), 22 (3 bed, AH) and 16 (4 bed)

Plots 23, 22 and 16 are removed so that plots 17 and 18 could be moved nearer to the open space. The affordable housing could have 19, 20 and 21 as a terrace where the parking area is.

Option 2: Remove: Plot 5 (3 bed AH) or Plot 6 (2 bed AH), Plots 9 (3 bed) and 16 (4 bed):

Plot 5 or plot 6 is removed from the terrace of affordable houses. If plot 9 is removed plots 10, 11 and 12 could be spaced out to provide 3 detached 3 bedroomed houses with larger gardens. This would reduce the density on the longest section of dwellings on the site. Plot 23 looks as if it has been added as an after-thought and that could also be removed.

The comments above relate to the proposed site plan. However, Policy HS3 of the emerging Local Plan states that 60% of new development should be dwellings of 3 or more bedrooms and 40% should be 1 or 2 bed houses. In this proposed development, 78% (18 units) are larger properties and 22% (5 units) are smaller. As there are enough large properties in Preston, the Parish Council suggests that the housing mix in the Local Plan should be adhered to. On the reduced number of 20 dwellings, as suggested above, to meet the requirements of this policy 40% (8 units) would be smaller one or two bedroom homes and 60% (12 units) would be larger 3 or 4 bedroom homes.

The Parish Council is of the view that a new site plan which reduces the number of dwellings and provides the correct housing mix should be submitted prior to planning consent being granted.

With a clear vision for what is appropriate for a rural area, this development was an opportunity to enhance the character and setting of the village but this has been missed in the proposals. There is no local distinctiveness in the plans. Instead, there is overcrowding with small plots close together in a reduced area with uninspiring architecture which does not match the quality and high standards of development elsewhere in Preston. In addition, there will be overlooking and loss of privacy for some existing properties which should have been avoided.

The Parish Council notes that a variety of materials are planned for the proposed dwellings but are concerned that some have yellow bricks which are not a feature anywhere else in the village where red bricks are the usual colour. The Parish Council would like to see red

bricks being used as much as possible in this development so the dwellings fit in with surrounding properties.

Drainage, Sewerage and Water Pressure

The Parish Council notes that the flooding and drainage plans indicate and claim that the existing system will cope with the additional properties and that Thames Water has said there is no history of flooding and sewage issues. The Parish Council is aware that these claims are certainly not accurate and is of the view that the system must be vastly improved in order for it to work effectively for both existing and future residents. This would meet one of the criteria in PR1 of the emerging Local Plan.

Details of sewage issues in 2010 and 2017 at Wildwood, Church Lane have been provided to the public consultation by the resident who lives there. The same household has had other sewage events between 2005 and 2017. The residents of Latchetts on Butchers Lane have also had historical sewage events. If the current system is used, these sewage issues will be exacerbated and that is not acceptable.

In addition, there are issues with foul smells, particularly in warm weather from the manhole at Castlefield. This has been a problem since the 6 Castlefield houses were built and affects a number of residents on Chequers Lane and this is also not acceptable. It seems likely that this too would be exacerbated with additional dwellings.

There are also on-going water pressure issues for residents of Chequers Lane and Castlefield. Additional properties will make this situation worse.

There have also been issues with surface water flooding. 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 any flooding occurring in future.

The Parish Council believes that before planning consent is granted, the whole system of fresh water, water pressure, drainage, the sewerage system and surface water flooding should be completely reviewed and plans submitted which will ensure that new systems are included in the proposed development which are fit for purpose both now and into the future. This may involve a completely new sewerage system in Butchers Lane. If this isn't done, it is likely that there will be on-going major issues.

The Parish Council notes that Appendix 18 of the Flood Risk Assessment and Surface Water Drainage Strategy is a detailed SuDS Maintenance Plan. This does not indicate who will undertake the required work or who will pay for it. It is essential that this becomes a condition of planning consent and the Parish Council believes that it should be the responsibility of the developer in perpetuity. It must be noted that the Parish Council has neither the expertise nor the financial resources to undertake this vital work.

Energy and Sustainability

The Parish Council notes from the energy statement that air source heat pumps will be used for heating these dwellings. Its 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 Parish Council 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 it a condition of planning consent if necessary.

Air source heat pumps installed on the exterior of properties require space all around them for safety reasons and must be one metre away from a neighbour's nearest room to ensure that they are not affected by the noise. On small plots it will be challenging to ensure that these heat pumps conform to the required planning standards, especially as the plot sizes are the same as when gas boilers were the proposed heating system. As they need air flow around them, they will be unsightly and intrusive.

The inclusion of both solar panels and the use of grey water for flushing toilets would make these dwellings more sustainable. It is essential that any dwellings on this site meet the Government's target for the country to be carbon neutral by 2050.

Lighting

Preston is essentially a dark skies site and wildlife rich environment with almost no streetlights. It is important that these benefits continue. The Parish Council would like a condition put on planning consent to ensure that this strategy is continued. It would also like no external lighting anywhere on the site to be included in such a condition. This would comply with the Manual for Streets, published by the Department for Transport, paragraphs 10.3.11 and 10.3.6 and with the Preston Parish Neighbourhood Plan Policy EH5: Tranquillity and Dark Skies and Working Principle HERC9. Dark skies allows residents to enjoy the stars of the night sky, benefits nocturnal wildlife and is "green" since zero electricity is used.

Traffic and Roads

The increase in traffic on both Chequers Lane and Butchers Lane is the most concerning aspect of this development for current residents and it will have an adverse impact on their lives, although it is accepted that access to the site will be via Castlefield. Both these Lanes are single track roads with only one small section of Chequers Lane where two cars can pass. The increased traffic has the potential to cause traffic jams and accidents. The risk of these will be reduced with fewer dwellings on the site.

The Parish Council notes that the original traffic survey was undertaken during National Lockdown and for part of that time the road was closed because of a burst water pipe. An additional survey was conducted during the last week of June by Osprey Homes at the request of the Parish Council and this more accurate data should have been provided with the planning application documents.

The Parish Council notes from the statement in the Flood Risk Assessment and Surface Water Drainage Strategy, Part 1, Page 21, paragraph 4.31 that the roads within the development are not being adopted by Hertfordshire Highways, but will be maintained by a maintenance company. It would, therefore, like a condition to be imposed for the roads to be constructed to an adoptable weight-bearing standard. The roads must be suitable for all types of vehicles including NHDC's standard refuse vehicles which weigh up to 32 tonnes.

Broadband and Mobile Coverage

The Parish Council agrees with page 46, paragraph 7.18 and page 61, paragraph 7.100 in the Design and Access Statement, which state that provision will be made for the development to be served by the necessary communications infrastructure to facilitate home-working, including high speed broadband. 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 there is not enough line capacity in the recently renewed copper box to meet current requirements and more dwellings will exacerbate this.

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

The Parish Council believes that a condition should be imposed on planning consent to ensure that effective high-speed broadband, mobile phone service and landlines are provided so that all residents experience services and connectivity which meet the Government's criteria.

Ecology

The Preliminary Ecological Survey does not meet the Preston Parish Neighbourhood Plan Policy EH7: Protecting and Enhancing the Local and Natural Environment nor does it meet the policy in the emerging Local Plan which was added in the Main Modifications in 2018. This states that all development should deliver measurable net gains for biodiversity.

The survey does not include a Defra metric assessment and does not specify that a 12m buffer will be provided to all hedgerows. The Parish Council believes that a new survey should be submitted which meets these criteria. 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. There is some signage already in Wain Wood. The Parish Council would like to request that another sign, the same as the one already in place is installed at the entrance to the wood near Bunyans Cottage.

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 Parish Council suggests that hedges rather than fences are the boundaries between the properties to provide as much protection as possible to the wealth of wildlife which is present on the site.

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

Trees and Green Areas

The Parish Council 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 the trees near plots 9, 10, 19 20, 21 and 22. The dwellings on these plots will be very close to the crowns of the trees 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.

Neither the Arboricultural Impact Statement nor the Specification for Soft Landscaping Works includes 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 and trees are maintained to the correct standards. The Parish Council 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. The Parish Council has limited funds and it is unrealistic to assume that it would be able to maintain this extensive area.

Construction Management Plan

The Parish Council notes that a Construction Management Plan is included in the application documents. The Preston Parish Neighbourhood Plan includes a Considerate Constructors Scheme as well as a Construction Management Plan. The criteria in both must be strictly followed to ensure the safety of everyone, contractors and local residents, particularly children, during the construction process.

Conclusion

Preston Parish Council sincerely hopes that serious consideration can be given to the points raised here prior to planning consent being granted. It is vital that the correct decisions are made and appropriate conditions imposed to ensure that this site is developed in a way which is appropriate, proportionate and relevant for Preston so that it remains one of the most attractive and unspoilt villages in North Hertfordshire.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Lisa Lathane', written in a cursive style.

Lisa Lathane - Clerk to Preston Parish Council