

Preston Parish Council

Keepers Cottage, Whitehall Lane, Kings Walden, Hitchin, Hertfordshire, SG4 8JZ

Tel: 01438 871103 / 07887 875442 Email: prestonclerk@gmail.com

Ben Glover
North Herts District Council
Gernon Road
Letchworth
SG6 3TF

Monday 25 October 2021

Dear Mr Glover

Reference: 21/02632/FP

Erection of 10 detached dwellings (1 x 2-bed, 4 x 3-bed, 3 x 4-bed and 2 x 5-bed) including garages, private amenities and creation of vehicular access off Back Lane. Land Adjacent To Dungarvan, Back Lane, Preston, Hertfordshire SG4 7UJ

Introduction

Preston Parish Council supports this development in principle, noting that it takes account of its comments to the previous application, 20/02564/FP and some of the policies of the Preston Parish Neighbourhood Plan (PPNP), 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 for both the Conservation Area and the village.

Dwellings

While acknowledging that a mix of housing has been included in this application, the Parish Council is of the view that the proposal is still not what is required in Preston. There is no requirement for large dwellings but there is a need for some smaller homes for younger members of the community who would like to get on to the housing ladder while remaining in the village in which they live. The Parish Council suggests that the 5 bed houses in this scheme should be removed and smaller homes provided in their place. The Parish Council realises that this suggested variation to the housing mix would require a new site plan to be submitted as a condition on planning consent.

The Parish Council agrees with the comment by the Housing Supply Officer who says in her response to this consultation:

Half of the dwellings proposed by the applicant are for 4+ bedroom houses and the applicant is proposing a solely market housing scheme, which does not meet the requirements of the Preston Parish Neighbourhood Plan.

The Conservation Area

While The Parish Council notes that an attempt to take account of historic features, rural character and local properties has been made in these proposals, it is of the view that the proposals do not enhance these aspects as much as they could have done, thus missing an

ideal opportunity to provide inspiring housing which enhances this part of the Conservation Area and which should have helped to preserve Preston's local distinctiveness.

The Parish Council notes that red bricks which predominate in Preston are planned but it is important that these bricks are a close match to those on existing dwellings. Some of the other materials are not those used on existing houses. It is vital that the conditions which will be placed on the materials to be used are strictly adhered to in order to ensure that any development enhances rather than detracts from this area of the village.

To ensure that this development maintains and enhances the characteristics of the Conservation Area in perpetuity, the Parish Council would like to suggest that an Article 4 Direction is imposed on consent which removes all permitted development rights so that future property owners have to apply for full planning permission to make any changes or extensions to their dwellings. The Article 4 Direction should include any construction within the curtilage of properties to ensure that the 12-metre buffer remains on all hedgerows. This will be important to ensure that any additions or amendments to these dwellings, particularly the roofs, do not have an adverse impact on neighbouring properties, both within the development and the wider area beyond and that the hedgerow buffer continues to protect wildlife.

Traffic and Roads

An increase in traffic on Back Lane as a result of this development is one of the main concerns of local residents. No account appears to have been taken of Preston Primary School and the increased traffic and safety issues at drop off and pick up times, especially as paragraph 8.3 of the Design and Access Statement refers to:

this lightly trafficked lane with very low associated vehicle speeds.

There are 75 pupils on roll at the school. Of these, 27% live in Preston, 73% live elsewhere and have to be driven to school. This is in addition to the 10 members of school staff who use Back Lane every day to get to work. If the development goes ahead there will be more traffic using this single width carriageway rural lane on a daily basis.

The Transport Statement does not acknowledge the potential impact on safety at the corner where Back Lane joins Crunnells Green. There is limited visibility at this point where there could be traffic coming in the opposite direction.

The Parish Council notes that traffic monitoring cables have been installed during the consultation period. It is essential that this data is used when this application is considered instead of the TRICS desk top exercise which is included in the Transport and Access Statement. However, it is important to be aware that even this information will not be a true representation of traffic on Back Lane. Due to a Covid outbreak at Preston Primary School, from 4th to 22nd October there was no wrap around care provision before or after the normal school day which is from 8.30am to 3.15pm. With pupils being absent due to illness, the number of vehicles will have been reduced during this period.

There is an area of grasscrete opposite and alongside the development site. This was installed by Hertfordshire Highways in conjunction with Preston Parish Council in spring 2009 to create a parking area for parents dropping off and picking up their children from Preston Primary School. It is used at other times during the school day as an overflow from the school car park which is locked during the day when pupils are on site.

The grasscrete preserves the verges and it is essential that it remains in place and in good condition opposite the site. Alongside the site, it seems likely that some of the grasscrete will have to be removed to provide the correct visibility splay and sight lines so that vehicles are able to leave the development safely.

The Parish Council would like to request that a condition is imposed on planning consent so that any damage incurred to the grasscrete during the construction period must be made good by the developer before leaving the site. This should include installing new grasscrete in the section before the access on the site side of the road to provide safe parking for parents at the start and end of the school day.

The Parish Council also suggests that the developer should agree with the Head Teacher, the Governors and Hertfordshire County Council any further measures which might be appropriate to mitigate the effect of this development on safety for all road users.

The Parish Council notes the Planning Statement, page 6, paragraph 3.3 says:

The access road will form a 5.5m wide private drive with suitable visibility splays.

This statement implies that the roads within the development are not being adopted by Hertfordshire Highways. The Parish Council would, therefore, like a condition to be imposed for the roads to be constructed and maintained in perpetuity 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.

In their response to this application, Hertfordshire County Council as Highways Authority has indicated that access to this site for high sided vehicles, such as refuse vehicles, will be obstructed by high trees, causing damage to both the trees and the vehicles and that the development would:

be to the detriment of public and highway safety.

The Parish Council would like the decision on this application to be deferred until a revised Transport Statement has been provided to ensure that this development will not cause any safety issues for any type of vehicle, trees or pedestrians. If this is not possible, the application should be refused.

Energy and Sustainability

While the Parish Council acknowledges that energy and sustainability has been addressed in this application by the inclusion of ground source heat pumps, rain water harvesting to reduce the overall water consumption and the provision of electric car charging points, it is of the view that this is not enough.

Solar panels are not being incorporated into these dwellings and the Parish Council would like this decision to be reconsidered. The orientation of some dwellings means that solar panels would not have an adverse impact on the Conservation Area and for others their orientation would make them ideal to benefit from solar energy. It is vital that every strategy is followed to ensure that this development has a low carbon footprint and particularly as NHDC has a strong climate change policy which should be implemented at every opportunity.

Lighting

Preston is essentially a dark skies site and wildlife rich environment with almost no streetlights and none in the vicinity of the proposed development. 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. It is important that these benefits continue.

Broadband and Mobile Coverage

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 inadequate 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 ELP Policy SP7: Infrastructure Requirements and Developer Contributions is relevant to this aspect of the application. In accordance with this policy, the developer should be required to finance appropriate broadband infrastructure to accommodate additional demands resulting from the development. The following points from this policy are particularly relevant:

- Ensure appropriate provision of facilities and infrastructure for new residents
- contribute toward addressing cumulative impacts that might arise across multiple developments
- Avoid placing unreasonable additional burdens on the existing community or existing infrastructure
- Mitigate adverse impacts where appropriate

The Parish Council believes that a condition which reflects this policy 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.

Drainage

The planning documents indicate that the proposed development will use a traditional below-ground gravity system for the collection of foul water which will flow into the existing Thames Water sewer. As this will be subject to a S106 application it must be decided at the same time as the decision is made on the development to ensure that there can be no issues with the disposal of foul water.

There are detailed plans for a SUDS drainage system and its maintenance. The Drainage Strategy Technical Note, Paragraph 4.2 suggests that the responsibility for maintaining the shared drainage components should lie with the development landowner unless it is delegated to an appointed external Management Company. The Parish Council is of the view that the decision on which organisation maintains this system should be a condition of planning consent so that it will be clear who is responsible and liable if any issues arise after

completion of the development. Any drainage or sewage issues would have an adverse impact on the wider community.

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.

Trees and Green Areas

The Parish Council notes the detailed plans in the Arboricultural Statement to protect the oak tree which has a Tree Preservation Order.

The Design and Access Statement Paragraph 7.1 states:

Although a portion of landscaping will be lost to allow for the new access road, this will be minimal and all landscaping will be maintained where possible to reduce the impact of the proposals.

There is no information as to how the existing landscaping will be protected. It is important that there are root protection areas for all the trees which are being retained otherwise they may not survive the construction period. It is important too that the boundaries between and around the dwellings do not damage any trees or hedgerows.

The boundary between the development site and Preston Primary School is the responsibility of the developer. It is essential that a 1.8m high fence is erected, prior to any work commencing on site, in order to meet the criteria for safeguarding young children. The Parish Council suggests that the developer should liaise with the Head Teacher and Governors of Preston Primary School to ensure that this boundary is appropriate and that its maintenance is agreed.

There is no indication in the proposals as to who will maintain the trees, hedges and landscaped areas within the development site. 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. This includes the boundary with Preston Primary School. The Parish Council has limited financial resources and it is unrealistic to assume that it would be able to maintain this extensive area.

Construction Management Plan

The Parish Council is pleased to note that a detailed Construction Management Plan is included in the application documents and which indicates that there will be no deliveries during drop off and pick up times for Preston Primary School.

An undesignated one-way system of arriving by Back Lane and departing by Crunnells Green is used during school drop off and pick up times by parents and residents of Back Lane to

ease congestion and make the lane safer for both adults and children. The Parish Council would like to request that all traffic and personnel attending the development site adheres to this system to ensure the safety of all road users.

Cumulative Impact

While acknowledging that each planning application is assessed individually, the Parish Council would like consideration to be given to the overall cumulative impact of two major developments in Preston at the same time. Alongside this development of 10 dwellings, there is an on-going consultation for 23 dwellings on Land off Castlefield, 21/02076/FP, making a total of 33 new dwellings being proposed, with decisions on both sites expected in early 2022.

Using data from the ELP Main Modifications 2021, at the 2011 census there were 158 dwellings in the Parish. By May 2021, there had been an increase of 29 dwellings, 18% either completed or with planning consent, so at the present time there are 187 dwellings in the Parish. If both of these applications are granted planning consent, there will be an increase of 33 dwellings, not across the Parish but in the village itself. This is an immediate increase of 18%, not a gradual increase over a ten-year period.

The Parish Council is of the view that such a large increase in housing in a small rural village will have an adverse impact on traffic, infrastructure including broadband and connectivity and the quality of life of both existing and prospective residents. The Parish Council would like to request that this information is taken into account when decisions are made on these applications.

Conclusion

Preston Parish Council sincerely hopes that serious consideration will be given to both the points raised here and to the PPNP which is now part of the Statutory Development Plan for North Hertfordshire 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 and its Conservation Area 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