

Preston Parish Council

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

Monday, 6 December 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,

Introduction

Preston Parish Council is pleased that representations to the original planning application have been taken into account and the plans amended but there are still some key issues which must be addressed before planning consent is granted and, where necessary, conditions imposed which are highlighted here.

Dwellings

The Parish Council acknowledges the reduction in dwellings from 23 to 21 which brings the development in line with the Emerging Local Plan (ELP) but concerns with the site layout and the housing mix remain.

While pleased that two bungalows have been included in the amended plans, it is disappointing that the reduction in numbers has been achieved by removing 2 smaller dwellings and retaining all the larger ones. This mix means that the amended plans still do not meet Policy HS3 of the ELP which states that 60% of new development should be dwellings of 3 or more bedrooms and 40% should be 1 or 2 bed houses.

The housing mix in the original proposal of 23 dwellings was that 78% (18 units) were larger properties and 22% (5 units) were smaller dwellings. In this amended proposal, 86% (18 units) are larger properties and 14% (3 units) are smaller. To achieve a housing mix which meets the criteria of Policy HS3 on a site of 21 dwellings, there should be 13 (62%) larger properties and 8 (38%) smaller dwellings. As there are already enough large properties in Preston, the Parish Council suggests that the housing mix in the ELP should be adhered to.

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

The Parish Council appreciates that an attempt has 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 other amendments, particularly tile hanging and decorative bargeboards are not enough to ensure that the proposed development reflects the rural character of Preston.

Drainage, Sewerage and Water Pressure

The Parish Council is of the view that these key issues have still not been satisfactorily addressed in the amended plans and that further information should be provided before planning consent can be considered.

The Parish Council has noted that 49% of the representations from Preston residents to the original consultation commented on drainage and sewerage as an issue for the village and 25% were directly affected by it. In the second consultation 65% of representations specifically mention drainage and sewage issues as a concern and 20% are directly affected by it. The amended documents indicate that no changes will be made to the proposals for the disposal of foul water. The Parish Council finds this unacceptable, especially as case histories of sewage incidents have been provided.

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 Parish Council finds this unacceptable, particularly as 28% of representations from individual residents to the original consultation mention water pressure as a concern for the village and 13% are adversely affected by it. In the second consultation, 32.5% of representations mention water pressure issues and 12.5% are directly affected by it. The Parish Council would like to know what evidence Affinity Water has used to justify the above statement.

It is not clear that the revised Flood Risk and Drainage Strategy will meet the requirements of the Local Lead Flood Authority. Its comments, when available, must be scrutinised to ensure that the proposed attenuation pond and borehole meet the required specifications so that they are fit for purpose.

The Parish Council believes that the representation it made to the original application on this aspect of the proposed development remains relevant. 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 again Appendix 18 of the Flood Risk Assessment and Surface Water Drainage Strategy is a detailed SuDS Maintenance Plan. There is still no indication as to 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 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 Parish Council has noted the reasons why the developer would prefer to install air source heat pumps (ASHP) rather than ground source heat pumps (GSHP) but does not find them acceptable. The trees are on the edges of the site so installation of GSHPs would not impact on their root protection.

The Parish Council notes that another proposed development in Preston: 21/02632/FP: Land adjacent to Dungarvan, is including ground source heat pumps in its plans and would recommend that they are included in this development too so that there is consistency within the village.

There is a contradiction in the Energy Statement which, on page 15, says that weather compensation will be included but on page 16 says there will be 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 Parish Council notes page 16 of the Energy Statement says that natural ventilation and standard intermittent fans will be installed and would like to know why mechanical vent and heat recovery is not being used which would be more appropriate and more environmentally friendly.

Although more expensive, the Parish Council is of the view that GSHPs 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 Parish Council 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 Parish Council 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.

Reducing water usage is particularly important for this development. The Parish Council understands that Preston's water supply comes from Kings Walden pumping station which is fed from the river Mimram. The Mimram is one of Hertfordshire's finest chalk streams but its flow is influenced by consistently dry climatic conditions which mean that the amount of rainfall which percolates down into the groundwater has declined. It is the groundwater system which provides flow to the Mimram and which is used to meet local drinking supply demands and other abstraction needs.

The Parish Council is of the view that, as well as reducing carbon footprint at every opportunity, measures must be taken to protect both the River Mimram and Preston's water supply. These measures should be a condition imposed on planning consent.

Lighting

The Parish Council 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 Parish Council would like no external lighting to be incorporated into planning consent. This will then meet PPNP Policy EH5: Tranquillity and Dark Skies while at the same time being another step towards a reduced carbon footprint, as well as retaining dark skies and being of benefit to nocturnal wildlife.

Broadband and Mobile Coverage

The Parish Council 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 (FTTP) this will be an on-going issue which will be exacerbated by the addition of another 21 dwellings.

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 residents are with. The Parish Council is of the view that this should be a condition of planning consent.

Ecology

While acknowledging that it is not a legal requirement to provide a 10% biodiversity net gain, the Parish Council 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 Parish Council 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 local wildlife.

Trees and Green Areas

While accepting that the development site is a distance away from Wain Wood, the Parish Council 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 Parish Council is pleased to note that more soft landscaping has been included within the site and walls between dwellings have been replaced with hedges.

It should be noted that in 2020, in conjunction with Hertfordshire Rights of Way, Preston Parish Council and Pilkington Farm Partnership, the public Right of Way in Wain Wood was replaced with a Permissive Path which runs along the western and southern edges of the inside of the wood. Signage is in place in the wood to indicate the route for walkers.

The amendments to the planning application do not include plans for the long-term maintenance of the trees and the green areas within the site. It is vital that this is addressed. As suggested in their original submission, the Parish Council believes that a condition should 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.

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 21 dwellings, there is an on-going consultation for 10 dwellings on Land adjacent to Dungarvan, 21/02632/FP, making a total of 31 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 31 dwellings across the Parish. This is an immediate increase of 16.6%, not a gradual increase over a ten-year period.

However, if data from within the settlement boundary proposed in the ELP, is used, in 2011 there were 109 dwellings in the village. Since then, 8 houses have been built and another has planning consent, making the number in the village 118 in 2021, an increase of 7.6% over 10 years. Both of these planning applications are within the settlement boundary so if both are granted consent, the number of dwellings would become 149, an immediate increase of 26%.

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 can be given to both the points raised here and to the Preston Parish Neighbourhood Plan 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 so that it remains one of the most attractive and unspoilt villages in North Hertfordshire.

Yours sincerely



Lisa Lathane
Clerk to Preston Parish Council