



REED HOUSE JACKSONS LANE REED ROYSTON HERTFORDSHIRE SG8 8AB

REFERENCE: 25/00886/FP

OBJECTION SUBMITTED BY REED PARISH COUNCIL

4 SEPTEMBER 2025

Summary

Reed Parish Council objects to this application and requests that it be refused. The grounds for objection are summarised below and presented in greater detail under the relevant headings.

1. Housing growth in Reed:

Reed has already experienced a 10.5% increase in dwellings since 2011. It is foreseen that a further 22 dwellings will be built on allocated site RD1. If this proposal were allowed additionally, it would amount to a 25% increase on 2025 numbers, which would be unsustainable and incompatible with the Local Plan.

2. The RD1 allocated site:

The application site is not an allocated site in the adopted Local Plan. Reed already has an allocated Local Plan site, RD1, which provides for up to 22 dwellings (including affordable housing). Combined with existing growth since 2011, further housing on the application site, which is outside the SP2 settlement boundary, would be unsustainable expansion.

3. The Settlement Boundary, Heritage and Character of Reed:

The proposed development would be outside the SP2 settlement boundary, contrary to the Local Plan and NPPF, and not spatially integrated with the rest of Reed. This would cause significant harm to Reed's historically evolved and distinctive settlement pattern. This is a heritage asset that the SP2 settlement boundary and the conservation area are designed to preserve. Its location would also set a precedent, giving rise to irreparable harm to the settlement pattern that the Local Plan and NPPF seek to protect.

4. The Local Plan and Prematurity:

The Local Plan remains current and material. The present application pre-empts the ongoing Local Plan review. The application should therefore be rejected as premature. The Local Plan remains in effect, and full weight should be given to the policies adopted under it, including SP2.

5. Impact on the landscape and countryside:

The proposal would adversely affect the landscape setting of Reed, in particular the open character of the Chiltern Ridge.

6. Traffic and Highways issues:

The development would increase traffic and highway safety risks on The Joint, a narrow, de-restricted, unclassified road that is already in poor condition.

7. Five-year Housing Supply:

The District's housing supply deficit does not justify inappropriate development outside the settlement boundary. The adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits.

8. Provision of Affordable Housing:

The affordable housing offered is unclear in quantum and would in any event be delivered by the allocated RD1 site within the Reed SP2 settlement boundary.

9. "Brownfield" status:

The previously developed, "brownfield" designation of the site is technically arguable but materially misleading.

Detailed Objection

1. Housing Growth in Reed

- 1.1. Reed has already experienced a 10.5% increase in dwellings since 2011, largely through allocated development at The Kilns and infill within the SP2 settlement boundary. A further 22 dwellings are expected on the allocated RD1 site, which it is only realistic to assume will be granted planning consent within the term of the adopted Local Plan. Adding the 14 houses in the present proposal would result in a 25% increase overall on 2025 numbers – a level of growth disproportionate to the size and character of Reed. Such expansion is not sustainable or compatible with the plan-led approach to development set out in the Local Plan and the NPPF.
- 1.2. It is therefore material to assess this application in the context of the existing Local Plan allocated site RD1. The Planning Inspector's 2016 decision on the applicant site (APP/X1925/W/16/3147753) emphasised the limited facilities and services in Reed and the consequential reliance on private cars, a point equally valid today. That decision, and others relating to Reed, confirm the importance of confining development to **within** the settlement boundary to mitigate the inevitable sustainability challenge of all new housing in a small village like Reed.

2. The RD1 Allocated Site

- 2.1. The applicant's Planning Statement questions the deliverability of allocated site RD1 in the Local Plan. RD1's allocation followed due process, and it remains part of the development plan. It is not for the Parish Council to comment on the internal affairs of the Turney Trust or to speculate on deliverability. However, the Parish Council is aware of extensive pre-app discussions on this site and has no evidence to suggest this site is not coming forward in the period of the adopted Local Plan. What is certain is that the Local Plan has allocated RD1, and that allocation carries full planning weight unless and until the Plan is changed through review. Attempts to disapply Policy SP2 on the basis of unfounded assertions about RD1 must be rejected.
- 2.2. The applicant also seeks to draw equivalence between RD1 and the current site, referring back to the SHLAA update of 2016. However, Inspectors have consistently rejected this site in 4 appeals (including 2015 and 2016 decisions), noting that it is disconnected from the village, with no ingress via the village. The application site was not included within the settlement boundary during the Local Plan site selection process because *"Site access via The Joint makes it poorly related to the village in social terms"* (Housing and Green Belt Background Paper, page 63).
- 2.3. RD1, by contrast, is contiguous with the existing built form. The same document allocated it in terms stressing the *"coherent boundary along Blacksmith's Lane"*. The attempt to equate the two sites is therefore misplaced.

3. The Settlement Boundary, Heritage and Character of Reed

- 3.1. Reed, as a Category A village, has a defined settlement boundary. The proposed development is outside that boundary, within an area designated in the Local Plan as rural area beyond the green Belt. Permitting it would be contrary to Local Plan policies SP2, SP5, and CCB1. It would undermine the settlement hierarchy and the principle of planned, proportionate development, enshrined in the Local Plan and the NPPF
- 3.2. The applicant's Planning Statement repeatedly misrepresents the nature of Category A status in Policy SP2, assigning to it the purpose and attributes attached to the Local Plan's Growth Villages. However, Reed is *not* – like Barkway or Ickleford – a Growth Village in the Policy SP2 settlement hierarchy. Its Category A status in the Local Plan allows for a degree of sustainable development *within* the defined settlement boundary, not opportunistic, extraneous development *outside* the boundary.
- 3.3. Reed's existing layout – an interspersed of buildings and open land, medieval in origin – is a recognised heritage asset. The Local Plan identifies Reed as

"Part of a group of Saxon villages established on the chalk ridge which dominates the area".

It goes on to state:

“The village has a loose-knit layout with fields and open spaces in and around the village forming an important part of the village’s character”.

- 3.4. The nature and quality of this heritage feature is well described on page 3 of the applicant’s own Design & Access statement:

“The current layout of Reed Conservation Area continues to reflect the early pattern of medieval settlement. Groups of cottages and farmsteads, as well as an unusually high number of moated manorial sites, are scattered around three historic greens and tracts of agricultural land.”

- 3.5. The NPPF (2024, Section 16, 203 d) e) f) g)) requires great weight to be given to the conservation of such assets. Planning Inspectors, in dismissing earlier appeals relating to this site and adjacent land (APP/X1925/W/16/3147753; APP/X1925/W/20/3261525), have consistently recognised the heritage significance of Reed’s settlement form.
- 3.6. The Local Plan settlement boundary was agreed through the Local Plan and after a formal consultation process between 2011 and 2022. It has been delineated with sensitive attention to this inherited settlement form, a heritage asset which the Local Plan preserves and which the Reed Conservation Area exists to protect.
- 3.7. It follows that, while proportionate Category A development and infill within the SP2 settlement boundary can be compatible with preservation of the heritage asset, development outside the boundary cannot be.
- 3.8. The application site’s location is spatially disconnected from the existing village and would form an adjunct settlement, only peripherally connecting with Reed and likely to function as a separate community. Whereas dwellings in Reed are currently oriented inwards, along the interconnecting network of interior village roads, the proposed development would be a separate dwelling-cluster, oriented outwards and away from the village onto a road by-passing the village. Minor mitigations in the proposal do not overcome this intrinsic problem of the site’s location. The NPPF (para. 83) makes clear that *“in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities”*. This application fails that test. In this respect the application conflicts with Local Plan policy SP2.
- 3.9. The application also conflicts with Policy SP13 and the District’s commitment to
- “maintaining a strong presumption in favour of retention, preservation and enhancement of heritage assets and their setting.”*
- That *“strong presumption”* in this case can only be met by refusal of the application.
- 3.10. Likewise justifying refusal is the stipulation in Section 16, paragraph 212 of the current NPPF that

“great weight should be given to the (heritage) asset’s conservation ... irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm”.

- 3.11. The disconnected location of the application site is what has led, in 4 previous refused applications, to planners, the public and inspectors viewing development on this site as harmful to the distinctive character and identity of Reed.
- 3.12. The issue of **precedent** is also a material planning consideration in this case. If the SP2 settlement boundary is breached by this site, the precedent it will set would be deeply unwelcome. It will inevitably trigger linear development on adjacent fields along the rest of the corridor of open land beyond Reed and beside The Joint between the A10 and Crow Lane. This is illustrated by an application in 2020 (refused on appeal) on meadowland adjacent to this proposed site (20/01605/PIP). The additional development unleashed would cause irreparable harm to the evolved settlement pattern and to the character of the village which the Local Plan and NPPF seek to protect.
- 3.13. In addition, as noted in the Authority’s Housing Development Officer’s consultee response, the application site’s location outside the settlement boundary conflicts with Local Plan policy CCB2b (Rural Areas beyond the Green Belt) and fails to meet the exception criteria a) and b) in that policy, given the existence of an allocated site within the Reed boundary.

4. The Local Plan and Prematurity

- 4.1. The Local Plan runs until 2031 and is currently undergoing a mandatory mid-term review. That review includes an invitation for nominations of future housing sites, closing September 2025. The current application seeks to circumvent that process. The fact of review does not reduce the entire Local Plan’s weight. Inspectors have repeatedly confirmed that adopted Local Plans under review retain their full material weight unless and until formally replaced. The application should be refused as contrary to policies adopted under the Local Plan, including SP2.

5. Impact on the Landscape and Countryside

- 5.1. The proposed site lies on the southern side of the Chiltern Ridge, near one of the highest points in Hertfordshire. It is part of a valued, nationally important open landscape. The applicant’s own illustrative street elevations (see s1030 – PL30.P2 in the application documents list) show how the development would suburbanise this open corridor and degrade its character. The harm to both local and nationally important landscape, and to the Reed Conservation Area, is clear. Such harm would be amplified by the precedent set, as argued in 3.12 above. Planning officers have previously noted (in response to the pre-application enquiry in 2023) that the open nature of this site contributes positively to the

conservation area and would be compromised by development. The same conclusion applies today.

- 5.2. The application therefore conflicts with NPPF policies on landscape and heritage protection (NPPF 187a.). The application should be refused for this reason.

6. Traffic and Highways

- 6.1. Vehicle access would be onto Reed Joint, a narrow, winding, de-restricted, and unclassified country road. The road is already in poor repair, with craters at the verges making it hazardous in places for vehicles to pass one another – especially larger vehicles such as farm vehicles, buses and coaches, and construction vehicles. The additional traffic generated by this scheme would increase congestion, wear and tear, and highway safety risks. This would be compounded by traffic from the BK3 site (140 houses) one mile to the east. The application is therefore not compliant with Local Plan Policy T1, which requires development not to exacerbate highway safety problems.
- 6.2. The precedent of development on this site (see 3.12 above) would also result in creation of multiple additional junctions from further developments alongside The Joint, compounding the problem of congestion and increased hazard on the Joint and within Reed
- 6.3. The Inspector in 2016 found no evidence that a footpath link would overcome sustainability concerns, noting instead the very limited services in Reed (APP/X1925/W/16/3147753, para. 13). That reasoning remains valid. The location of this site, with sole vehicular access to Reed Joint, compounds the highway and sustainability problems.

7. Five-Year Housing Supply

- 7.1. While the District currently faces a five-year housing supply deficit, that does not give carte blanche to permit unsustainable development. The adverse impacts of this proposal – on heritage, character, and landscape – clearly outweigh its limited contribution to housing numbers, particularly in the context of a small village such as Reed. In the circumstance that Paragraph 11d of the NPPF is engaged in determination of this application, the exception clauses 11di and 11dii apply. The *“adverse impacts”* of granting approval on the heritage assets and on landscape *“outweigh the benefits when assessed against the Framework taken as a whole”*.
- 7.2. The 2020 Inspector’s decision on a nearby site (20/01605/PIP, Land Between Mill Corner Farm and Vine Cottage) is pertinent: it held that the addition of a small number of houses in Reed would make a negligible contribution to district-wide supply, but would have a disproportionate impact on the character and sustainability of Reed itself. The same reasoning applies here.

8. Affordable Housing

- 8.1. The applicant's documentation is inconsistent on affordable housing numbers (variously four, five, or six units). It is material that affordable provision will in any event be delivered by the allocated RD1 site, within the SP2 Settlement Boundary, when it is built out. Both RD1 and this application proceeding together would be unsustainable, as demonstrated in 1 above.

9. "Brownfield" Status

- 9.1. The applicant describes the site as "previously developed land." In reality, it was agricultural land before being converted into a garden in 1991. Whatever its technical classification, both previous uses preserved the open character of the site, without the adverse impact on landscape and countryside set out in 5 above. Any description of it as "brownfield" is therefore misleading and should not weigh in favour of development.

Conclusion

For all of the above reasons – conflict with Local Plan policy, harm to heritage, landscape, and character, precedent, highways concerns, and unsustainability in scale – Reed Parish Council urges that the application be refused. The adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits. This conclusion is supported by multiple previous Inspector decisions, which have consistently rejected development on this site and nearby land as harmful, unsustainable, and contrary to the adopted Local Plan.