



Planning Statement

Land South of Turnpike Lane, Ickleford

September 2025

Hawridge Strategic Land Ltd

TWENTY5

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Land South of Turnpike Lane, Ickleford

Planning Statement

1 Introduction

1.1 Introduction

- 1.1.1 This Planning Statement has been prepared by Twenty5 Planning on behalf of Hawridge Strategic Land Ltd (the 'Applicant') in support of residential development of Land South of Turnpike Lane, Ickleford. Access is a detailed matter for consideration and matters of appearance, landscaping, layout and scale are reserved for future approval.
- 1.1.2 Outline planning application for residential development including 50% affordable housing, with means of access from Turnpike Lane for consideration (all other matters reserved for subsequent approval), drainage, landscaping, car parking and all other ancillary and enabling works.

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1.2 Planning Application Pack

- 1.2.1 This Planning Statement should be read alongside the other documents and plans, which are submitted as part of this application. The relevant documents and plans are listed within the supporting Cover Letter.

1.3 Hawridge Strategic Land Ltd

- 1.3.1 Hawridge is part of the W.E Black group of companies, which has been trading for over a century and is one of the South East's leading SME housebuilders, with an unrivalled reputation for location, quality and design.

1.4 Planning Statement Structure

- 1.4.1 This Statement provides an overview of all aspects of the proposed development and an assessment of its appropriateness against the Development Plan and other material considerations. The scope of this statement is as follows:
- **Section 2** describes the Application Site and the main features of the surrounding area, including planning history;
 - **Section 3** sets out the pre-application engagement undertaken by the Applicant and details of consultation and engagement;
 - **Section 4** outlines the main components and features of the proposed development;
 - **Section 5** outlines the relevant planning policy context of the Application Site and the proposed development.

- **Section 6** deals with other material considerations relevant to the assessment of the planning application.
- **Section 7** addresses matters in relation to grey belt, green belt and very special circumstances
- **Section 8** sets out the planning assessment for the scheme and carries out the planning balance exercise;
- **Section 9** sets out the draft S106 Heads of Terms; and
- **Section 10** provides a summary and our conclusions on the proposed development.

2 The Site and Surroundings

2.1.1 This section provides detail on the Application Site's location, surroundings and key physical characteristics.

2.2 The Site

2.2.1 The Application Site is located on the southern edge of Ickleford, which is a village in North Hertfordshire. The Site comprises agricultural land with an area of approximately 6.98ha

2.2.2 Topography of the site rises from a low point of 54m AOD in the southwest to a high point of 60.7m AOD along the western boundary. A new junction off Turnpike Lane is proposed as the principal vehicular and pedestrian access to the site.

2.2.3 The northern boundary of the site is defined by established, mature trees and scrub with Turnpike Lane beyond. Part of the eastern boundary is shared with the recently consented Lodge Court development of 5 homes, with the remainder of the eastern boundary and part of the southern boundary defined by the disused Ickleford Flour Mill, since approved for the development of 71 homes.

2.2.4 The southern boundary is defined by mature tree and scrub vegetation, with the River Oughton beyond. To the west can be found the non-listed Ickleford Manor house and the recently completed Ickleford Manor development for 19 dwellings. The remainder of the western boundary is defined by mature tree and scrub planting, with Bedford Road beyond.

2.2.5 Existing, mature vegetation ensures the site benefits from a degree of containment when viewed from all directions. The site context is shown on the plan below:



- 2.2.6 The Site is located within Flood Zone 1 (Low Probability – land shown to be at less than 0.1% chance of flooding in any year).
- 2.2.7 There is a cluster of listed buildings adjacent to the north eastern corner of the site as detailed on the plan below and covered in further detail in the submitted Heritage Statement:



2.3 The Surrounding Area

- 2.3.1 The site is located in a sustainable location, in the centre of Ickleford, approximately 350m from the village centre. Ickleford is a village located north of Hitchin. It contains a number of smaller independent shops, pubs, a convenience store as well as community facilities and a primary school. All are accessible via existing footways from the site.
- 2.3.2 Larger shops and amenities are available within Hitchin, a 5 minute drive or 30 minute walk south. Bus services run from stops on Bedford Road, to the west of the site and provide access to the amenities of other service centres including Hitchin, Bedford, Pirton, Henlow Camp and Stevenage.

2.4 Planning History

- 2.4.1 There is no relevant planning history for the Application Site. There are however relevant planning applications surrounding the Site:
- **17/01955/1** – ‘Outline Planning application for up to 71 dwellings and associated access, car parking, garages, landscaping and open space including demolition and removal of all existing structures, buildings and hardstanding (all matters reserved except means of access).
 - **22/01448/FP** – Erection of five dwelling houses in association with a new access spur from the Lodge Court, on-site parking, landscaping (inclusive of new trees), formation of a pedestrian footpath and designated communal open space.
- 2.4.2 Both of the above sites have now been completed.

3 Pre-Application Engagement

3.1 Summary

- 3.1.1 712 leaflets were distributed to residents in the local area; along with a delivery to 16 businesses in June 2025.
- 3.1.2 21 objections and 1 supporting comment were received. summary of the responses received (and Applicant responses to the comments) is set out below:

3.2 Environmental Sustainability & Energy Efficiency

- **Sustainable Building:** Request for use of materials like straw, earth; questions about insulation levels, shuttering for sun, and type of glazing.
 - **Energy Efficiency:** Interest in heat pumps, photovoltaics, passive solar gain.
 - **Waste Systems:** Questioning whether composting toilets or grey water systems will be included.
 - **Climate Responsibility:** Strong criticism of developers for not adopting high environmental standards and contributing to climate change.
- 3.2.1 *Response: The development will meet current building regulations standards; new SUDS guidance and any policy standards in place at the time of the delivery of the scheme.*

3.3 Infrastructure Concerns

Roads & Access:

- Existing roads (e.g., Turnpike Lane, Bedford Road) are already congested.
- Significant traffic impact
- Question about suitability of the access routes to the development

Transport & Connectivity:

- No footpath connecting development to local facilities.
 - Concerns about isolation and poor access to amenities.
- 3.3.1 *Response: The site is located adjacent to the existing urban area and within walking distance of local services and facilities. With regard to the transport impact of the development, a Transport Statement is submitted with the application which demonstrates that the access is suitable and safe (a Stage 1 Road safety audit is submitted). The TS also demonstrates that there is sufficient capacity on the road network to accommodate the development.*

3.4 Sewerage, Drainage & Flooding

- **Sewer Capacity:** Current system already overburdened with reports of spillage.
- **Surface Water Drainage:** Concern about runoff into River Oughton and risk of flooding due to past incidents and climate impacts.

3.4.1 *Response: A flood risk assessment and foul drainage strategy are submitted with the application. With regard to surface water run off – it is necessary to demonstrate that the development will secure betterment over the existing position – taking into account climate change also.*

3.4.2 *With regard to foul water, the scheme will connect to the existing network, and the provider will be consulted during the course of the application.*

3.5 Local Services & Community Impact

- **Schools:** Local school is already oversubscribed; no room to expand.
- **Healthcare:** GP and dentist services already stretched beyond capacity.
- **Shops & Amenities:** Desire for better retail provision (e.g., small supermarket) / Existing village shop described as inadequate.

3.5.1 *Response: The scheme does not propose the provision of any new retail facilities. With regard to the impact on local services – should the NHS or local education authority request any contributions for expansion of existing facilities then this will be reviewed by the applicant and if found to comply with Regulation 122 of the CIL regulations, then the contributions will be included in the Section 106 Agreement.*

3.6 Planning Policy

Cumulative Development:

- Ickleford has already accommodated significant recent development.
- Other developments (Arnold's Farm, IC1–IC3, Bowman's Mill) should be completed first.

Exceeding Capacity:

- Village has reached (or exceeded) its infrastructure limits.

Planning Policy:

- Proposal is not included in the Ickleford Neighbourhood Plan or the North Herts Local Plan.

3.6.1 *Response: Whilst it is acknowledged that there have been recent developments in the village – the assessment of the scheme by the Applicant identifies no actual harm which would result from a further scheme in the village. It is also acknowledged that the site is*

not allocated, however North Hertfordshire Council cannot demonstrate a 5 year supply of housing and thus it is the applicant's position that the tilted balance is engaged and that the harms do not outweigh the benefits of the development.

3.7 Green Belt

Loss of Green Belt:

- Should be developing brownfield sites.

3.7.1 *Response: It is the applicant's view that the site meets the definition of grey belt and thus that along with the provision of 50% affordable housing alongside open space (thereby meeting the Golden Rules), means that the development is considered appropriate development. Furthermore, the Council cannot demonstrate a 5 year supply of housing land, factoring in development on brownfield sites, and thus greenfield / grey belt sites are required to meet housing need.*

3.8 Ecology

Impact on protected species

3.8.1 *Response: The application is submitted by a full suite of ecological surveys which demonstrate that there are no ecological impacts which cannot otherwise be mitigated. Furthermore, the scheme will deliver a minimum of 10% biodiversity net gain.*

3.9 Supporter / Potential improvements

Support for development

- Housing is needed

Smaller-Scale Development:

- Reduced number of houses may be more acceptable.

Inclusion of Commercial Space:

- Suggestions for mixed-use development to benefit the community.

4 The Site Proposals

4.1 Scheme Review

4.1.1 The planning application comprises the following description of development:

Outline planning application for residential development including 50% affordable housing, with means of access from Turnpike Lane for consideration (all other matters reserved for subsequent approval), drainage, landscaping, car parking and all other ancillary and enabling works.

4.1.2 The proposed development comprises the following principal elements:

- Up to 100 dwellings, including 50% affordable housing
- A range of house types, sizes and tenures;
- Vehicular and pedestrian access from Turnpike Lane; and
- Open Space for public amenity, recreation, attenuation, landscaping, and biodiversity.

4.2 Masterplan, Layout and Design

4.2.1 The Concept Masterplan is an illustrative plan which shows how the proposals shown on the Parameter Plans could be developed. It has been prepared in response to the Site's constraints and opportunities and planning policy requirements. The Design and Access Statement prepared by Insitu Design discusses the masterplan and its evolution in greater detail.

4.2.2 The Concept Masterplan includes the following key design principles for the Site:

- Delivery of up to 100 dwellings offering a range of house types, tenures and sizes to suit local housing need with 50% provision of affordable housing.
- Areas of open space which will provide public amenity, a locally equipped area of play, green infrastructure and a Sustainable Drainage System (SuDS) attenuation basin.
- Primary access and movement corridors across the Site have been developed to link with the vehicular and pedestrian access off Turnpike Lane.
- Residential blocks have been developed with dual active frontages overlooking key open space and landscape, providing natural surveillance.
- The proposals include SuDS attenuation features forming part of a new sustainable drainage system for the Site.

4.2.3 Design is a reserved matter; however, the proposals have been carefully considered in order to enhance the sense of place through the scheme and provide a distinct form of development appropriate to the Site. The Design and Access Statement and supporting Parameter Plans set out the maximum parameters for land uses; densities; building height; access and movement; and green infrastructure of the proposed development.

4.3 Housing Mix

- 4.3.1 Whilst housing mix will be determined through the submission of subsequent Reserved Matters, the Site has been tested to ensure it can deliver a range of house types, tenures and sizes to provide for a range of housing needs. This will also facilitate the establishment of a mixed and balanced community.

4.4 Affordable Housing Statement

- 4.4.1 It is proposed that 50% affordable housing will be provided as affordable housing on Site in accordance with the Golden Rules as set out in paragraphs 155 – 159 of the NPPF. The tenure mix will be determined through the course of the planning application with Officers based on local need and the layout will be determined through a subsequent Reserved Matters application.
- 4.4.2 The provision of affordable housing will greatly assist in meeting local needs across the District.

4.5 Access

- 4.5.1 This planning application seeks outline planning permission, including the determination of detailed access. The Proposed Site Access General Arrangement shows the location and design of the proposed vehicular and pedestrian access off Turnpike Lane.
- 4.5.2 A proposed right hand turn will be created on Turnpike Lane with the existing speed cushioned re-aligned to fit with the new layout.
- 4.5.3 The Concept Masterplan, which supports the application demonstrates the proposed point of access will allow for the creation of an appropriate road layout, facilitating the creation of a safe, legible and well-designed development.
- 4.5.4 This application is accompanied by a Design and Access Statement which provides an overview of the access and movement associated with the Site. Further to this, a comprehensive Transport Statement prepared by RGP has also been submitted to support the application and detail the rationale behind providing the access and road network.

4.6 Reserved Matters

- 4.6.1 Matters of appearance, landscaping, layout and scale are reserved for approval.

4.7 Planning Obligations

- 4.7.1 The proposal will be supported by a Section 106 Agreement to secure contributions to a variety of matters necessary to allow the development to be supported. The Applicants will liaise with the Council throughout the determination of the application agree the specific Heads of Terms. Further details on the draft Section 106 Heads of Terms are set out within Section 8 of this Statement.
- 4.7.2 North Hertfordshire does not currently have a Community Infrastructure Levy (CIL) in place.

4.8 Benefits

4.8.1 The proposed development would deliver the following benefits for both the local area and wider area, including:

- The early delivery of much needed housing on a suitable Site, creating a sustainable residential development adjacent to existing built form in Ickleford.
- The proposed development will contribute towards meeting the objectively assessed need for new homes in the District
- The provision of 50% affordable dwellings will see the delivery of much needed affordable housing for the locality;
- A mix of dwelling types will be provided to assist in improving house choice within the local area;
- The promotion of a development in a sustainable location which is well located for public transport connections and active travel opportunities;
- A contribution to the economy through local construction jobs during the construction phase of the development, in addition to the use of local tradespersons and services, along with materials to help to sustain the local economy through supply chain multipliers;
- Additional landscaping and buffer planting throughout the Site; and
- A Biodiversity Net Gain of at least 10%.

4.8.2 The above list is not exhaustive; however, it provides an indication of the principal benefits and opportunities that would result from the proposed development. This is explored in further detail in the Planning Balance and Assessment Section of this Statement, ultimately demonstrating that in addition to the Site constituting grey belt, very special circumstances are also demonstrated in this case.

5 Planning Policy

5.1 Introduction

- 5.1.1 This Section sets out the planning policy framework relevant to the Site and proposed development.

5.2 The Development Plan

- 5.2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires Local Planning Authorities to determine planning applications in accordance with the Development Plan unless material considerations indicate otherwise.

- 5.2.2 The Development Plan for North Herts Council comprises:

- North Hertfordshire Local Plan 2011-2031 (2022);
- Hertfordshire Waste Core Strategy and Development Management Policies Document 2011-2026 (2012);
- Hertfordshire Minerals Local Plan 2002-2016 (2007)

- 5.2.3 For the purpose of this application, the Ickleford Neighbourhood Plan (made on the 21st March 2024) also forms part of the Development Plan.

5.3 North Hertfordshire Local Plan 2011-2031

- 5.3.1 North Herts Council adopted the North Hertfordshire Local Plan 2011-2031 on Tuesday 8 November 2022. The Local Plan is the Council's principal planning policy document and sets out the vision, objectives, spatial strategy and planning policies for the District, for the period up to 2031.

- 5.3.2 The Local Plan policies relevant to the Site are, as follows:

- SP1: Sustainable development in North Hertfordshire
- SP2: Settlement Hierarchy and Spatial Distribution
- SP5: Countryside and Green Belt
- SP6: Sustainable Transport
- SP7: Infrastructure Requirements and Developer Contributions
- SP8: Housing
- SP9: Design and Sustainability
- SP10: Healthy Communities
- SP11: Natural resources and sustainability

- SP12: Green infrastructure, landscape and biodiversity.
- T1: Assessment of Transport Matters
- T2: Parking
- HS2: Affordable Housing
- HS3: Housing Mix
- HS5: Accessible and adaptable housing
- D1: Sustainable Design
- D3: Protecting Living Conditions
- D4: Air quality
- HE1: Designated Heritage Assets
- HE4: Archaeology
- NE1: Strategic Green Infrastructure
- NE2: Landscape
- NE4: Biodiversity and Geological Sites
- NE6: New and Improved Open Space
- NE7: Reducing Flood Risk
- NE8: Sustainable Drainage Systems
- NE9: Water Quality and Environment
- NE10: Water Conservation and Wastewater Infrastructure

5.3.3 A summary of these policies can be found at **Appendix A**.

5.3.4 The key policies within this list, which are relevant to the Site and proposals for residential development are covered below.

Policy SP1 (Sustainable development in North Hertfordshire)

5.3.5 Policy SP1 positive states that planning permission will be granted for new development subject to the provisions of the policy. Thus, in the event that there is accordance with Policy SP1, then planning permission should be granted.

Policy SP1: Sustainable development in North Hertfordshire

This Plan supports the principles of sustainable development within North Hertfordshire. We will:

- a) Maintain the role of key settlements within and adjoining the District as the main focus for housing, employment and new development making use of previously developed land where possible;
- b) Ensure the long-term vitality of the District's villages by supporting growth which provides opportunities for existing and new residents and sustains key facilities;
- c) Grant planning permission for proposals that, individually or cumulatively:
 - i. deliver an appropriate mix of homes, jobs and facilities that contribute towards the targets and aspirations in this Plan;
 - ii. create high-quality developments that respect and improve their surroundings and provide opportunities for healthy lifestyle choices;
 - iii. provide the necessary infrastructure required to support an increasing population;
 - iv. protect key elements of North Hertfordshire's environment including biodiversity, important landscapes, heritage assets and green infrastructure (including the water environment); and
 - v. secure any necessary mitigation measures that reduce the impact of development, including on climate change; and
- d) Support neighbourhood plans and other local planning initiatives where they are in general conformity with the strategic policies of this Local Plan.

Policy SP2 (Settlement Hierarchy and Spatial Distribution)

5.3.6 Under Policy SP2, the Plan makes provision for at least 13,000 new homes between 2011- 2031. Most new development (approx. 80%) is to be delivered in six key towns in the District and a further 13% of housing, along with supporting infrastructure and facilities will be delivered within the settlement boundaries of five villages. The remaining development will be dispersed across the district.

5.3.7 Ickleford is listed as one of the five villages with an assigned level of development of 235 dwellings. The Site sits outside but adjacent to the settlement boundary of Ickleford.

Policy SP5 (Countryside and Green Belt)

5.3.8 Policy SP5 sets the Council's approach to development in the Green Belt and at criterion C states, it will only permit development proposals in the Green Belt where they would not result in inappropriate development or where very special circumstances have been demonstrated.

Policy SP8 (Housing)

5.3.9 Policy SP8 sets out how the Council will support housing growth across the District both during and following the Plan Period to 2031 to provide long-term certainty. It states the Council will identify Strategic Housing Sites to continue delivery beyond the Plan Period by:

- i. identifying Strategic Housing Sites that will continue delivery beyond the end of the Plan period in 2031;
- ii. working with the Government and other relevant agencies to identify new settlement options within North Hertfordshire that can provide additional housing supply in the period after 2026; and
- iii. safeguarding land to the west of the A1(M) at Stevenage, as shown on the Policies Map to meet longer-term development needs in the period beyond 2026 subject to a future review of this Plan; and
- iv. undertaking a review of this plan by the end of 2023.

5.3.10 It is noted that the plan review has not been carried out in accordance with the above timetable.

Policy HS2 (Affordable Housing)

5.3.11 Policy HS2 states planning permission for new homes will be granted provided that affordable housing is provided in accordance with the targets set out in the policy, subject to viability. In accordance with criterion (a)(i) for applications of 25 or more dwellings the target is 40% affordable housing. In addition, Policy HS2 requires affordable housing to be delivered on-site unless robustly justified and homes to be genuinely affordable to local people where rents or prices are linked to open-market values.

5.3.12 The Council's expectation in that the size, type and tenure of any affordable housing meets:

- 65% of the affordable housing required by criterion (a)(i) will be social rented and 35% other forms of affordable housing (affordable rent / intermediate);
- the housing needs of the area including needs identified by relevant local authority housing register data, Neighbourhood Plans and any settlement- or parish-level surveys or assessments; and
- the requirements of Policy HS3 and will contribute to an appropriate mix of housing across the site as a whole.

5.3.13 As set out in Section 7, this policy predates the NPPF 2024 and the introduction of the Golden Rules.

Policy HS3 (Housing Mix)

5.3.14 Policy HS3 states planning permission for new homes will be granted provided that an appropriate ranges of house types and sizes are provided taking into account:

- the overall targets of this plan;
- the findings of the most up-to-date evidence including the most recent Strategic Housing Market Assessment, the Council's Self Build Register and other relevant evidence of housing need;
- the location and accessibility of the site; and
- recent completions, existing permissions and sites in the five year supply.

5.3.15 The Policy further states permission will be granted if the scheme would provide a density, scale and character of development appropriate to its location and surroundings.

5.4 Hertfordshire Waste Core Strategy and Development Management Policies Document 2011-2026 and Hertfordshire Minerals Local Plan 2002- 2016

5.4.1 Hertfordshire County Council is currently reviewing the Minerals and Waste Local Plan documents, through the preparation of a new Minerals and Waste Local Plan (the Plan). When adopted, the Plan will replace both the Minerals Local Plan Review 2002-2016 (adopted March 2007) and the Waste Core Strategy and Development Management Policies Development Plan Document (DPD) 2011-2026 (adopted November 2012). The documents set out the County Council's strategic vision, objectives, overall spatial strategy and development management policies for waste development and minerals planning within the county

5.4.2 The Site does not fall within a Mineral Safeguarding area.

5.5 Ickleford Neighbourhood Plan

5.5.1 The Ickleford Neighbourhood Plan was 'made' in March 2024

5.5.2 A summary of the key policies is enclosed at **Appendix B**. The accompanying Design Code is dealt within in the submitted Design and Access Statement.

5.5.3 In light of the 2024 December NPPF and the new standard method for calculating local housing need, North Herts Council published indicative housing figures for neighbourhood planning areas, following a simple process in the absence of the Local Plan update. The updated housing figure was applied according to the population of the parishes in the District, taken from the 2021 census.

5.5.4 Paragraphs 9.4 – 9.9 deal with housing provision as per below:

New Housing

- 9.7. Ickleford is an attractive village comprising a mixture of house types of various types and ages. It is acknowledged that the NPPF promotes sustainable development and encourages consolidation of rural settlements where it will enhance or maintain the vitality of rural communities. In terms of the Local Plan, Ickleford is identified as one of 5 villages which will support a higher level of new housing allocations. These villages are considered to have some provision of key services and facilities such as a primary school, making them moderately sustainable locations for development. The Local Plan defines the settlement boundary within which development will be allowed. In addition, three sites are allocated around the edge of Ickleford village for an estimated 199 new homes (shown in Annex 7). These are
- IC1: 9 homes at Duncot Close,
 - IC2: 40 homes at Burford Grange, Bedford Road
 - IC3: 150 homes plus reserve land for a new primary school on Land at Bedford Road
- 9.8. Within the Parish, although adjoining the village of Lower Stondon which lies in Central Bedfordshire, an additional 120 homes have been allocated (LS1 Land at Bedford Road, Annex 7). This development has been completed providing 144 dwellings including 37 dwellings in affordable rented tenure and 20 units as affordable housing for sale. These will satisfy the identified need in the Housing Needs Survey.
- 9.9. No allocations are therefore proposed in this Neighbourhood Plan.
- 5.5.5 However, the plan contains no allocations to meet housing requirements and thus provisions contained within paragraph 14 of the NPPF are not relevant to this application.

5.6 Summary of Development Plan

- 5.6.1 **Sections 6 and 7** of this Planning Statement assess accordance with the Development Plan however the following summarises the overall compliance.
- The proposed development includes the provision of 50% affordable housing on Site which, as above, is in excess of the policy requirement of 40%;
 - The proposed development would deliver new homes on the edge of Ickleford, which is identified as a key village for providing new housing, along with supporting infrastructure and facilities, helping to meet local housing need;
 - The proposed development is a logical extension to Ickleford and reflects the scale of existing and committed development in the village;
 - The Site does not fall within an Area of Separation or a Green Wedge and proposes the retention of as much of the existing natural boundaries as possible, with no established vegetation removal required to deliver the Site access; and
 - A number of supporting documents are provided as part of the application which address technical considerations such as highways, flooding and drainage, biodiversity and landscape.
- 5.6.2 It is considered that the proposal accords with the up-to-date policies in the Development Plan.

6 Other Material Considerations

6.1 Review

- 6.1.1 The following documents constitute other material considerations for the purposes of assessing this planning application.

6.2 National Planning Policy Framework (NPPF) (2024)

- 6.2.1 The most recent version of the National Planning Policy Framework (NPPF) was published by the Government in December 2024.
- 6.2.2 The updates made under the December 2024 NPPF seek to address issues in relation to housing provision, sustainability, economic growth, community wellbeing, and modernise the planning process.
- 6.2.3 Local Planning Authorities are required to establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need can be met over the Plan period (paragraph 69). Local Planning Authorities will also be required to meet any needs that cannot be met within neighbouring areas, strengthening cross boundary working. Section 5 of the December 2024 NPPF has also now restored the requirement for Local Planning Authorities to demonstrate a Five Year Housing Land Supply (5YHLS). Greater emphasis has also been placed on the need to provide a mix of housing types, sizes and tenures to ensure that provisions are made for different groups in the community. The mix and tenure split of proposed housing will be discussed with Officers to ensure the creation of a mixed and balanced community.
- 6.2.4 Further to the above housing provision updates, an updated Standard Method for calculating local housing need has been published. In most cases, the Standard Method significantly increases the level of housing which Local Planning Authorities are now required to plan for, especially in areas without an up to date Local Plan.
- 6.2.5 North Hertfordshire's local housing need calculated using the new Standard Method (June 2025) is 1,043 dpa.
- 6.2.6 NPPF paragraph 49 set out circumstances in which Councils may give weight to relevant policies in emerging plans. The Plan is not expected to reach a stage where weight can be given to until 2027 at the earliest (based on the November 2024 LDS).
- 6.2.7 Paragraph 50 states that in the context of the Framework – and in particular the presumption in favour of sustainable development – arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances where both:
- a. the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and
 - b. the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.

- 6.2.8 Paragraph 50 explains that refusal of planning permission on grounds of prematurity will seldom be justified where a draft plan has yet to be submitted for examination. In this case, given the scale of development, it is not considered that the scheme can be considered to be premature.
- 6.2.9 Paragraph 7 confirms that the purpose of the planning system is to contribute to the achievement of sustainable development. As such, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 6.2.10 In order that sustainable development is pursued in a positive way, paragraph 10 of the NPPF explains that at the heart of the Framework is a **presumption in favour of sustainable development** (paragraph 11). For decision-taking, this means:

11 c) approving development proposals that accord with an up-to-date development plan without delay; or

11 d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date (Footnote 8), granting planning permission unless:

- (i) the application of policies in this Framework that protect areas or assets of particular importance (Footnote 7) provides a strong reason for refusing the development proposed; or***
- (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination (Footnote 9).***

- 6.2.11 NPPF Footnote 7 states: The policies referred to are those in the Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 189) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.
- 6.2.12 NPPF Footnote 8 states: This includes, for applications involving the provision of housing, situations where: the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 78); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years. See also paragraph 227.

- 6.2.13 Paragraph 32 informs that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals. Paragraph 34 sets out that policies in Local Plans should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan.
- 6.2.14 Paragraph 39 states that LPAs should approach decisions in a positive and creative way. Paragraph 40 informs that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties and Paragraph 41 encourages engagement with the local community.
- 6.2.15 Section 13 of the NPPF sets out the Government's policy in relation to the Green Belt and introduces the concept of grey belt and the 'Golden Rules'. Paragraph 142 advises that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Paragraph 143 goes on to list the five purposes Green Belt serves. Paragraph 146 of the NPPF goes on to advise that exceptional circumstances do exist where an authority cannot meet its identified need for homes.
- 6.2.16 Given the relevance of this to the application and to avoid repetition, the Planning Balance and Assessment Section of this Planning Statement will review compliance with the Development Plan and the relevant aspects of the NPPF in further detail.

6.3 Written Ministerial Statement and Housing Supply

- 6.3.1 The Labour Government came into power in July 2024 with key messaging centred around tackling the housing crisis and building 1.5 million more homes along with critical infrastructure, with an overhaul of the planning system. The Government are committing to radically boosting the supply of homes and places that are high quality and genuinely affordable.
- 6.3.2 The Minister of State for Housing and Planning released a Written Ministerial Statement (WMS) on 12th December 2024 which was published in response to the national housing crisis and updates to national planning policy.
- 6.3.3 The Statement emphasises that the new Government has inherited an 'acute and entrenched housing crisis', hence the need to plan to deliver 1.5 million new homes and supporting vital infrastructure. The WMS makes reference to the National Planning Policy Framework (NPPF) consultation and the Government's intention to introduce a Planning and Infrastructure Bill in 2025 to speed up and streamline the planning process, including the delivery of more homes of all tenures and accelerating the delivery of major infrastructure projects.
- 6.3.4 The WMS informs that the Plan led approach is and must remain the cornerstone of the planning system. To further support the Plan led approach, mandatory housing targets have therefore been restored and Local Planning Authorities must now use the Standard Method as the basis to determine housing requirements in their Local Plans. The updated Standard Method now incorporates a stronger affordability adjustment, increasing housing numbers in places facing the most acute affordability pressures whilst maintaining ambitious targets. Further to this, the WMS also confirms that development on brownfield land is essential to ensure that previously developed land is used efficiently, whilst a more strategic approach will be taken to Green Belt release through

reformed policy and the introduction of Grey Belt and the Golden Rules. The revised policy reforms will seek to increase housing delivery, including affordable homes, securing greater public benefits and speeding up the planning process.

6.3.5 The WMS also sets out the Government's commitments to supporting local planning and engaging local communities in the process. To support the transitional arrangements and the pragmatic approach taken to new housing numbers in Local Plans, the following three stages are proposed by the Government:

- a. Local Planning Authorities will have an extra two months to progress their Plans under the existing framework. Those that reach examination will be assessed in line with existing housing targets but will be required to begin work on a new Local Plan as soon as possible. Similarly, those that reach the final stage of Plan preparation will be allowed to progress only where there is no significant shortfall.
- b. In response to the need to measure significant shortfall proportionately rather than absolutely, the 200 home threshold will be replaced with a requirement for at least 80% of the new Standard Method.
- c. Authorities with Plans adopted under the previous Standard Method must provide an extra year's worth of housing in their five year housing pipeline. This requirement will commence from 1st July 2026 and will bring more land into the system.

6.3.6 To ensure that the scale of delivering 1.5 million homes is met, the WMS confirms that further weight will be afforded to the presumption in favour of sustainable development. The proposed changes set out in the NPPF around the provision of affordable housing, design quality and the sustainability of locations now ensure that the presumption carries real weight, acting as a significant adjustment to the decision-making balance in favour of approving development.

6.3.7 Another key aspect of the WMS is not only to deliver more homes but also to improve affordability and offer affordable housing options for both ownership and rent. Local Planning Authorities are encouraged to adopt a flexible and positive approach to affordable tenure and mix.

6.3.8 As per case law (Cala Homes (South) Ltd, R v Secretary of State for Communities and Local Government & Anor [2011] EWCA Civ 639 (27 May 2011)), this WMS is a material consideration in planning application decisions. It provides a clear vision and direction for a supportive and proactive approach to future housing delivery, enhancing affordability, and highlighting the crucial role of sustainable development, which is entirely relevant for this application.

6.4 Affordable and Social Homes – Press Release

6.4.1 The Government released a press release announcement on 12th February 2025 informing that £350 million would be invested to increase the number of affordable and social homes. Further support is also proposed by the Government towards homeownership and reducing Council pressures.

6.4.2 The press release confirms that up to 2,800 extra homes will be built through a boost to the Affordable Homes Programme, with half of these homes being allocated for social

rent. The additional 2,800 homes will help contribute towards the delivery of 1.5 million homes proposed during the Government's parliamentary period, whilst boosting living standards for all.

6.5 North Hertfordshire Local Plan Review

- 6.5.1 In January 2024, a full review and update of the North Herts Local Plan began. The proposed Plan Period is 2025 to 2045.
- 6.5.2 The Local Plan Update is in the very early stages. The most recent Local Development Scheme, approved in January 2025, sets out the indicative timeframe with Regulation 18 Public Consultation anticipated in October-November 2025, and adoption not expected until December 2027.

6.6 Housing Land Supply

- 6.6.1 The latest published housing land supply position (May 2024) is said to be 3.9 years and this is confirmed in the most recent appeal decision in May 2025 in an appeal at High Street, Barkway¹ It should be noted that it appears that housing land supply was an agreed and not debated matter and it is noted that, for example, 469 homes included within the supply calculation, are subject to outline planning permission and would not normally meet the definition of deliverable for inclusion in 5 year housing land calculations. It is expected that a 2025 version will be published imminently.

6.7 Supplementary Planning Documents

- 6.7.1 The relevant Supplementary Planning Documents (SPDs) are summarised within **Appendix A**.

¹ APP/X1925/W/24/3351486

7 Green Belt, Grey Belt and Very Special Circumstances

7.1 Green Belt Policy

7.1.1 Policy SP5 is set out in full below:

Policy SP5: Countryside and Green Belt
We support the principles of the Green Belt and recognise the intrinsic value of the countryside. Green Belt and Rural Areas Beyond the Green Belt are shown on the Policies Map. We: a) Have conducted a comprehensive review of the Green Belt. Land has been removed from the Green Belt to: i. enable strategic development at the locations referred to in Policies SP8 and SP3; ii. enable local development around a number of the District's towns and villages; and iii. define boundaries for villages referred to in Policy SP2 which fall within the Green Belt but were previously 'washed over' by this designation; b) Have provided new Green Belt to cover, in general terms, the area bounded by the Metropolitan Green Belt to the east, the Luton Green Belt to the west and the A505 Offley bypass to the north; c) Will only permit development proposals in the Green Belt where they would not result in inappropriate development or where very special circumstances have been demonstrated; and d) Will operate a general policy of restraint in Rural Areas beyond the Green Belt through the application of our detailed policies.

7.1.2 The above wording pre-dates the introduction of grey belt through the December 2024 NPPF. Section 13 of the NPPF sets out the Government's policy in relation to the Green Belt. Paragraph 142 advises that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Paragraph 143 goes on to list the five purposes Green Belt serves as follows:

- a) To check unrestricted sprawl of large built up areas;
- b) To prevent neighbouring towns merging into one another;
- c) To assist in safeguarding the countryside from encroachment;
- d) To preserve the setting and special character of historic towns; and
- e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

7.1.3 Paragraph 145 informs that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of Plans. Paragraph 146 goes on to advise that exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes.

- 7.1.4 Paragraph 153 of the NPPF sets out that by substantial weight should be given to harm to the Green Belt and that inappropriate development should not be approved except in very special circumstances – i.e. that that in the event that harm to the Green Belt and any other harms is clearly outweighed by other considerations, then planning permission can be granted.

7.2 Grey Belt Policy

- 7.2.1 In December 2024, the concept of grey belt was introduced. Paragraph 155 of the NPPF informs that the development of homes in the Green Belt should also not be regarded as inappropriate where:

(a) The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the Plan.

- 7.2.2 Annex 2 of the NPPF defines grey belt as “land in the Green Belt comprising previously developed land and / **or other land that, in either case, does not strongly contribute to any of purposes a, b or d in paragraph 143**” (our emphasis added).
- 7.2.3 A separate assessment against the purposes is included in the submitted LVIA and Green Belt appraisal. In the event that the development is found to be appropriate development, then there is no harm to the Green Belt.
- 7.2.4 Purpose a) relates to the unrestricted sprawl of large built up areas. It is worth noting that the new PPG (paragraph 005 Reference ID: 64-005-20250225) notes that “villages should not be considered as large built up areas”. Ickleford is very clearly defined as a village in the adopted Local Plan and as such, the site makes a ‘weak or no contribution’ to purpose a.
- 7.2.5 In terms of the Site’s contribution towards Green Belt purpose b), it is worth noting that this purpose relates to preventing neighbouring towns merging into one another. As clarified within the updated PPG, Green Belt purpose b) specifically relates to preventing the merging of towns. In the context of the updated PPG that makes clear that areas which do not form a gap between towns will either contribute weakly or not at all to purpose b), the site makes a ‘weak or no contribution’ to purpose b.
- 7.2.6 Purpose d) relates to preserving the setting and special character of historic towns. The Site makes a ‘weak or no contribution’ to purpose d.
- 7.2.7 In light of the above, it is considered that the Site for the most part makes no contribution to towards Green Belt purposes a), b) and d). The Site would not undermine the wider Green Belt and would utilise grey belt land, in accordance with paragraph 155. This is also clearly set out in the submitted Landscape and Green Belt report accompanying the application.
- 7.2.8 The PPG’s requires consideration as to whether the policies in Footnote 7 of the NPPF provide a strong reason to refuse development - i.e., habitats sites (and those sites listed in paragraph 187) and/or designated as Sites of Special Scientific Interest (SSSI); Local Green Space; an AONB (NL), a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 72); and areas at risk of flooding or grey belt.

- 7.2.9 Several parcels of woodland within the Site boundaries are listed on the 'Deciduous Woodland' priority habitat inventory. No ancient woodlands were recorded on Site after consulting the Natural England Ancient Woodland Inventory.
- 7.2.10 Several parcels of semi-natural broadleaved woodland were identified from the HEN assessment. This habitat is listed within S41 of the NERC act and should be avoided by development, protected and enhanced by the development management system.
- 7.2.11 The submitted ecological appraisal advises in this regard (Section 3) that:

During construction, a Biodiversity Protection Zone (BPZ) delineated by appropriate protective fencing and signage in line with British Standard 5837: 2012 'Trees in relation to design, demolition and construction', will be established to protect the retained woodlands. The details of these measures will be set out in a CEMP for the Site, alongside appropriate pollution control measures. In line with Policy NE4, BPZs will be established at a minimum of 12m from woodland edges, but will be increased if arboricultural assessments indicate this is necessary to safeguard root protection zones.

The proposed development sites all infrastructure outside the retained woodland and tree root protection zones.

Design iterations have taken into account the 12m (Policy NE4) no-works woodland buffer, to relocate units and infrastructure outside this area, thus avoiding impacts on the woodland habitats, as much as possible. The southern woodland habitats (W5 and W6) were prioritised to be protected from impacts as they were of the highest ecological value, where the wider areas of the woodland and River Oughton form an important ecological network across the local area. Areas of proposed development within small sections of the 12m buffer are expected to have minimal impacts to the integrity of the habitat, such as creation of vegetated gardens, ponds and SuDS. At the closest point gardens are located 4m from the woodland edge.

The current design seeks to offset removal of woodland habitat and any development within 12m of the woodland through additional planting which is proposed around the edges of retained woodland and across the residential area to improve connectivity between retained woodland parcels. Such planting will comprise a native, locally appropriate, species-rich woodland edge mix.

Further mitigation to compensate for both direct losses as well as potential operational recreational pressure also includes a commitment to positive woodland management through removing non-native invasive species (i.e. cherry laurel) to reduce interspecific competition with more desirable woodland species. Further management will be detailed within a site specific LEMP. Targeted thinning of the woodland would allow more sunlight to reach the woodland floor and promote

a greater species assemblage; this can be achieved by coppicing trees to allow multi-stemmed regrowth or removing specific specimens. Existing manure piles will be appropriately removed, following guidance from North Hertfordshire District Council or the Environment Agency. Proposals should delineate paths within woodlands dedicated for POS by planting additional shrubs and installing dead hedging to prevent access beyond the walkways. Additional measures like waymarked paths, dog waste bins, interpretation signage, and fencing/boardwalks will also be considered.

A detailed lighting strategy should be developed to ensure minimal light spill onto the woodland (see details in Section 3.6 for Bats). No lighting should be installed within the woodland.

Provided the above mitigation measures are adhered to, the loss of W4 is predicted to result in a residual, minor adverse effect on the retained woodlands at the Site level.

7.2.12 On this basis, it is not considered that this directs a “strong” reason for refusal as per footnote 7.

(b) there is a demonstrable unmet need for the type of development proposed

7.2.13 Paragraph 78 of the NPPF informs that Local Planning Authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.

7.2.14 As set out above, the Council acknowledge that there is a shortfall in housing land supply and as such there is demonstrable need for new homes in the area.

(c) The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and

7.2.15 The development of the Site presents an opportunity to deliver a high quality sustainable development in Ickleford. The Site is situated in an accessible location and will provide residents with opportunities to access local services and facilities by sustainable transport methods, including public transport.

(d) Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156 – 157 below.

7.2.16 Paragraph 156 lists the ‘Golden Rules’ in the context of housing provision on Green Belt land that is subject to a planning application. Should the contributions (Golden Rules) be met, significant weight should be afforded to their compliance:

(a) affordable housing which reflects either Development Plan policies produced in accordance with paragraphs 67 – 68 of the Framework or 50% as set out in paragraph 157;

(b) necessary improvements to local or national infrastructure; and

(c) The provision of new, or improvements to existing green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their homes, whether through onsite provision or through access to offsite spaces.

7.2.17 In accordance with the above, the proposals will provide 50% affordable housing onsite. The development of the Site will also provide the necessary improvements to local or national infrastructure via relevant financial contributions. In terms of open space, the proposals provide open space in total that will be accessible to both new and existing residents in accordance with adopted Local Pla policy.

7.2.18 Paragraph 158 states

“a development which complies with the Golden Rules should be given significant weight in favour of the grant of permission”

7.2.19 It is considered that the Site consists of grey belt land as set out in Annex 2 of the NPPF and accords with the Golden Rule. On this basis, it is considered that the development of the Site is appropriate development and should be supported by the Council, in accordance with national policy.

7.3 Very Special Circumstances

7.3.1 It should be noted that it is the Applicant's view that as the site is grey belt; it is not necessary to demonstrate very special circumstances, however for completeness, this case is also set out below in the event that a different view is reached in respect of grey belt.

7.3.2 The Site is located within the Green Belt which comprises virtually all of the unbuilt areas of North Hertfordshire. In accordance with paragraph 153 of the NPPF, Local Planning Authorities should ensure that substantial weight is given to any harm to the Green Belt unless very special circumstances (vsc) exist where the potential harm to the Green Belt is clearly outweighed by other considerations.

7.3.3 In line with this, Policy SP5 (Countryside and Green Belt) sets out that the Council will not permit inappropriate development in the Green Belt, except in very special circumstances. As a result, and taking into consideration the background, as set out above, the main issues to consider are:

- The effect of the proposal on safeguarding the countryside from encroachment;
- The effect of the proposal on the openness of the Green Belt; and
- Whether the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations, so as to amount to very special circumstances.

- 7.3.4 The Site has been assessed against the purposes of the Green Belt. The Site's impact on the Green Belt purposes is in the Green Belt assessment provided by EDP, which concludes that the application site meets the definition of grey belt. However, alongside this, EDP also conclude that the site is a lower functioned area of Green Belt which does not fundamentally undermine the purposes of the Green Belt across the wider area.
- 7.3.5 Taking into account the magnitude of the Borough's housing shortfall being considered as acute and severe; it is considered that the substantial need for housing in North Hertfordshire in the absence of an up-to-date Development Plan and the benefits the proposals would clearly outweigh the harms that would arise from the development of this Green Belt Site.
- 7.3.6 As such, it is considered that there are very special circumstances which pull in favour of the grant of planning permission and further detail can be found on the benefits of the scheme at Section 9 of this Statement.

8 Planning Assessment

8.1 Planning Assessment

- 8.1.1 This section outlines our assessment of the proposed development against the planning policy context.

8.2 Decision-Making Approach

- 8.2.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act (2004), the Development Plan is the starting point for the determination of planning applications. Determination is required to be in accordance with the Plan unless material considerations indicate otherwise.
- 8.2.2 For this application the Development Plan comprises the North Hertfordshire Local Plan (2022); Hertfordshire Waste Core Strategy and Development Management Policies Document (2012, the Hertfordshire Minerals Local Plan (2007) and the Ickleford Neighbourhood Plan.
- 8.2.3 This Section of the Statement will assess the proposals against the relevant policies and will demonstrate that there are no clear reasons for refusing the proposals and that the benefits of the development outweigh any adverse impacts, and the application should therefore be approved without delay.

8.3 Principle of Development

- 8.3.1 The Site borders residential development and is well contained by existing vegetation. The Site is located within the Green Belt but is not subject to any further formal allocations, as per the adopted Development Plan.
- 8.3.2 As set out within the May 2024 housing land supply report, the Council has a housing land supply of 3.9 years at best. Given the Borough is mostly comprised of Green Belt land; that the Council are unable to demonstrate a five year housing land supply and that the new Local Plan is some 2.5 years away, it is evident that land situated within the Green Belt, or in this Site's case grey belt, will have to be released if the Council is to meet its identified needs. Not only is this in accordance with Policy SP5 of the Local Plan, paragraph 124 of the NPPF advises that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses.
- 8.3.3 As set out within this Planning Statement and the submitted Design and Access Statement, the Site is accessible by a range of transport modes and seeks to improve sustainable connections within the Site and into the surrounding area. There are no over-riding technical or environmental issues to prevent the development of the Site, given it is considered to be sustainable in planning terms and acceptable for housing.
- 8.3.4 The development proposals have been met through an extensive and careful iterative masterplanning process and through the creation of a comprehensive masterplan in line with strategic policies in the adopted Local Plan which affirm the need to use land efficiently, whilst also needing to achieve high quality design that respects local character and circumstances. As explained within the accompanying DAS, relevant opportunities and constraints have informed the development options and the masterplan proposals.

- 8.3.5 Taking the above into consideration and considering the sustainable location of the Site, its status as grey belt, its location in Ickleford, and it being adjacent to built form, it is considered that the principle of the suitability of the site development has been established.

8.4 The Need for Market Housing

- 8.4.1 Paragraph 61 of the NPPF recognises the importance of a sufficient amount and variety of land coming forward where it is needed in order to support the Government's objective of significantly boosting the supply of homes. The Council are unable to demonstrate a Five Year Housing Land Supply and therefore Footnote 7 of the NPPF demonstrates that Paragraph 11(d) applies in this circumstance. In this regard, the proposed development of Land at Turnpike Lane would deliver additional homes for the District, helping to meet current and future needs. Given the track record and experience of the Applicant, the Site would be immediately available to come forward for development.
- 8.4.2 The December 2024 NPPF introduce a new standard method for calculating local housing need. Based on the new standard method, North Herts's local housing need has risen to 1,043 dwellings per annum, as prescribed by NPPF paragraph 78.
- 8.4.3 Taking the above into account, substantial weight should be provided to the provision of new housing. The Site is located within a sustainable area and would make an important and positive contribution to boosting the supply of housing within the District, in accordance with national policy.

8.5 The Need for Affordable Housing

- 8.5.1 The proposed development includes affordable housing provision of 50% to assist in meeting affordable housing need within the District, which complies with the adopted Local Plan requirement set out by Policy HS2 (Affordable Housing).
- 8.5.2 The provision of 50% affordable housing from this Site will support the Council in delivering good quality affordable housing – helping the Council to meet its requirements and not fall further behind in providing such housing.
- 8.5.3 Taking the above into account and given that the application for a site within an administrative area, which has an acute housing delivery shortage and affordable housing need, substantial weight should be afforded to the contribution of affordable homes in this location,.

8.6 Planning Review

High Quality Design

- 8.6.1 The NPPF requires that developments are of good design, which is reflected in adopted Local Plan Policy D1 (Sustainable Design). As set out within the Design and Access Statement, which forms part of this application, the proposals will provide a high quality sustainable development of up to 100 dwellings, which reflects local design policies and government guidance on design.
- 8.6.2 Other benefits to note include:
- Public Open Space;

- Locally Equipped Area for Play (LEAP);
- Habitat enhancements, including 10% BNG;
- Active travel and sustainable transport;
- Green Infrastructure, SuDS features, retained hedgerows and trees, additional planting; and
- Efficient high-quality homes.

8.6.3 The factors listed above, when considered either individually or collectively, and in combination with other benefits of the development, demonstrate that the Site can be developed in a sustainable manner and achieve a high-quality design.

8.6.4 The Application is submitted in Outline at this stage and detailed matters will be considered as part of future Reserved Matters application. However, at this stage, it is evident that the proposal represents a high quality and sustainable scheme.

8.6.5 In light of the above, the proposed development is considered to be in accordance with Policy D1 (Sustainable Design) of the North Hertfordshire Local Plan, Section 12 of the NPPF and North Herts Design SPD (July 2011) and the Ickleford Neighbourhood Plan Design Code (as per the submitted DAS).

Residential Amenity

8.6.6 The North Herts Design SPD (2011) provides applicants with additional information and guidance relating to the Council's design aspirations for new developments, including boundaries, separation distances and parking.

8.6.7 Whilst layout is a reserved matter, the Concept Masterplan has been sensitively considered and designed, taking into account the context of the Site and its surroundings and will therefore ensure that the amenity and privacy of neighbouring properties is protected.

8.6.8 With respect to the amenity of future residents, the application is accompanied by a Noise Impact Assessment (April 2025), which concludes that the Site is suitable for residential use and that there are no acoustic constraints.

8.6.9 Future Reserved Matters applications will address the other detailed matters of amenity, such as privacy, outlook, daylight and sunlight.

8.6.10 The proposed development is therefore considered to accord with the adopted DPD and Section 12 (Achieving Well Designed and Beautiful Places) of the NPPF.

Arboriculture

8.6.11 The application is accompanied by a number of arboricultural documents which demonstrate that the application scheme can be delivered without significant harm to arboricultural features with appropriate regard to the recommended root protection areas. Whilst there is some priority habitat woodland on site – the ecological appraisal accompany the application advises that provided the recommended mitigation measures are adhered to then there will be a residual minor adverse effect on the retained woodlands at the site level.

- 8.6.12 The ecological appraisal concludes, on arboricultural matters (in relation to priority woodland habitat):

3.4.17 Design iterations have taken into account the 12m (Policy NE4) no-works woodland buffer, to relocate units and infrastructure outside this area, thus avoiding impacts on the woodland habitats, as much as possible. The southern woodland habitats (W5 and W6) were prioritised to be protected from impacts as they were of the highest ecological value, where the wider areas of the woodland and River Oughton form an important ecological network across the local area. Areas of proposed development within small sections of the 12m buffer are expected to have minimal impacts to the integrity of the habitat, such as creation of vegetated gardens, ponds and SuDS. At the closest point gardens are located 4m from the woodland edge.

3.4.18 The current design seeks to offset removal of woodland habitat and any development within 12m of the woodland through additional planting which is proposed around the edges of retained woodland and across the residential area to improve connectivity between retained woodland parcels. Such planting will comprise a native, locally appropriate, species-rich woodland edge mix.

3.4.19 Further mitigation to compensate for both direct losses as well as potential operational recreational pressure also includes a commitment to positive woodland management through removing non-native invasive species (i.e. cherry laurel) to reduce interspecific competition with more desirable woodland species. Further management will be detailed within a site specific LEMP. Targeted thinning of the woodland would allow more sunlight to reach the woodland floor and promote a greater species assemblage; this can be achieved by coppicing trees to allow multi-stemmed regrowth or removing specific specimens. Existing manure piles will be appropriately removed, following guidance from North Hertfordshire District Council or the Environment Agency. Proposals should delineate paths within woodlands dedicated for POS by planting additional shrubs and installing dead hedging to prevent access beyond the walkways. Additional measures like waymarked paths, dog waste bins, interpretation signage, and fencing/boardwalks will also be considered.

- 8.6.13 It is not concluded that there are any arboricultural matters which direct a strong reason for refusal as per footnote 7 of the NPPF.

Ecology and BNG

- 8.6.14 A summary of all the detailed survey work undertaken for the site can be found at Table 23 of the submitted Ecological Appraisal; however the report concludes:

4.1.6 Assuming the successful implementation of the measures, the proposed development can be considered in line with North Hertfordshire Local Plan 2011-2031, as the scheme includes measures to retain and protect important ecological features and ensure their favourable management in the long-term. The proposals also include detailed measures to avoid potential impacts on protected species during the construction and operational phases of the development, as well as providing enhancements to both habitats and species on Site.

8.6.15 In addition, the scheme will also deliver 10% BNG through a combination of on-site and off-site measures.

Energy and Sustainability

8.6.16 An Energy and Sustainability Statement (August 2025) has been prepared by Daedalus Environmental in support of this planning application submission. The Statement sets out how environmental sustainability is being addressed for the proposed development on the Site.

8.6.17 The Energy and Sustainability Statement demonstrates compliance with relevant policies from the North Hertfordshire Local Plan 2011-2031 (November 2022); the Ickleford Neighbourhood Plan (March 2024) and current Building Regulations.

8.6.18 Key features of the proposed development:

- The dwellings will be highly energy efficient, adopting a fabric first approach. They will be orientated to maximise solar gain where possible;
- There will be no natural gas connection to the site;
- Heating and hot water will be supplied via low carbon air source heat pumps;
- Solar photovoltaic panels will be installed where appropriate;
- The development will employ a combination of highly efficient fixtures, fittings and appliances to reduce domestic water use to achieve the 110 l/p/d target;
- Buildings will be designed and specified to adapt to a changed climate:
- Overheating will be managed through considered design;
- The retention of existing trees and additional planting will provide more comfortable microclimates in warmer weather;
- The landscape design will provide multi-functional benefits, supporting increased biodiversity and enhancing the overall aesthetic;
- Surface water will be managed via the integration of SuDS into the development.
- Electric vehicle charging points will be installed in line with policy requirements;
- High quality broadband will be provided in line with Approved Documents;

- The embodied carbon of the development will be considered and addressed through sustainable material choices and flexible and durable design;
- Demolition, construction and operational waste will be managed in accordance with the principles of the Waste Hierarchy.

8.6.19 Throughout the planning and development process, and as the wider regulatory environment develops, the approach to Energy and Sustainability will be kept under review. The final design solution and associated detail will be provided at the Reserved Matters stage.

Flood Risk and Drainage

8.6.20 The Flood Map for Planning indicates that the Site area is located within Flood Zone 1, and therefore at low risk of flooding from fluvial and tidal sources.

Surface Water Drainage Strategy

8.6.21 A Flood Risk Assessment and Drainage Strategy accompanies the application. The report concludes:

Based on the available data at the time of this report and our assessment, it is considered that the risk of flooding is generally low from most sources with the mitigation measures proposed.

6.2 The Flood Map for Planning indicates that the Site area is wholly located within Flood Zone 1, therefore the site is at low risk from fluvial and tidal sources, and this was not considered further within the report.

6.3 The Site is subject to surface water flooding up to a depth of 0.3 m during the present-day scenario ("Low" to "High" risk) and 0.6 m during the climate change scenario ("Low" risk). Currently the Site is greenfield in nature, and it is assumed that any surface water runoff will be infiltrated or outfalls to the River Oughton to the south or the ditch network adjacent to the River Oughton.

6.4 The proposed development has designed the built development away from the areas shown to be at surface water flooding risk.

6.5 The proposed built development is located away from the River Oughton and is approximately 130 m above the river channel level. This reduces the risk of groundwater emergence occurring with the proposed built development.

6.6 The FRA has concluded that thresholds and finished floor levels should be set 75-150 mm above surrounding ground levels, in accordance with CIRIA Design for Urban Exceedance to prevent any unforeseen or exceedance events entering dwellings.

6.7 A SuDS assessment has been undertaken, and the proposals are to attenuate surface water in a above ground

attenuation basin prior to outfall to the River Oughton. The flow rate to the River Oughton will be restricted at 3.1 l/s

6.8 The SuDS design has considered the existing private surface water sewer on the site, and the design work undertaken to date indicates that there should be no pipe clash between the existing sewer and the proposed drainage infrastructure. The SuDS basin is proposed to connect to the existing private sewer via a new manhole; therefore, no upgrading works to the riverbank or modifications to the existing sewer are anticipated. However, this will need to be confirmed at the detailed design stage.

6.9 The most eastern corner of the development has to be pumped due to the lower levels. Pumping has been restricted to the smallest amount possible.

6.10 Additional SuDS measures such as rainwater harvesting for irrigating landscaped areas and biorientation areas has been excluded from the calculations. These can also provide additional attenuation on the Site and can be used as additional storage in exceedance events but have been assumed to be at capacity, at the time of storm for the design work. This means the presented design can fully contain the 1% AEP + CC event on the Site, when these devices are full.

6.11 The freeholder will appoint a management company to be responsible for the upkeep and maintenance of the SuDS network for the private areas and a maintenance company will be responsible for the shared areas. The appropriate drainage and highway features will be offered for adoption where applicable.

6.12 The inclusion of SuDS reduces flood risk to others by attenuating and managing surface water on the Site. Currently the site would have uncontrolled free discharge of surface water and anything over greenfield rates would flow naturally overland and could cause flooding to others.

6.13 The proposed development is compliant with the NPPF, PPG, and local planning policy with regards to surface water management and flood risk. It is therefore considered appropriate development in this location.

8.6.22 In summary, the site is in flood zone 1 and there is nothing in this regard which would direct a strong reason for refusal.

8.6.23 In the absence of any built development / access road on any area subject to flooding from any source, then there is no requirement for the production of a flood risk sequential test.

Heritage and Archaeology

8.6.24 Separate heritage and archaeological reports are submitted with the application. With regard to heritage it is concluded that there will be no harm to the significance of any

listed buildings. Likewise in archaeological terms, it is concluded that there will be no impact upon the significance of any designated archaeological heritage asset.

- 8.6.25 The proposed development is in accordance with Local Plan Policy HE1 (Designated Heritage Assets) and Section 16 (Conserving and Enhancing the Historic Environment) of the NPPF.

Landscape and Visual Impact

- 8.6.26 In landscape terms (as distinct from grey / Green Belt matters which are not landscape matters), the report prepared by EDP concludes:

8.5 The proposals respect and enhance the landscape character of the surrounding area and site, and public visual amenity through a landscape led design. The site represents a logical and easily assimilated infill development that does not give rise to coalescence between the settlements of Ickleford and Hitchin due to the substantial areas of public open space that respects the River Oughton. The proposed development does not extend the settlement of Ickleford any further south that is already present due to the surrounding development that exists, alongside the proposals under construction and approved in planning at the time of writing, to the east and west.

8.6 The proposed residential development represents a small-scale and visually discrete feature and the site is not subject to any landscape designations seeking to protect specific landscape value.

8.7 The proposed development would create only very limited and localised landscape and visual effects. By including additional mitigation around the site's boundaries, it can be further integrated into its surroundings. Overall, the proposed development in the round, would not constitute an unacceptable impact in landscape and visual terms.

- 8.6.27 It is concluded that this should be afforded limited weight in the planning balance.

Noise

- 8.6.28 A Noise Assessment (August 2025) has been prepared by Hawkins Environmental to determine whether noise offers any significant constraints to development the Site for residential purposes.

- 8.6.29 The report concludes the site is considered a “low risk” site under the Pro-PG, with noise levels below the Lowest Observed Adverse Effect Level (LOAEL); therefore, if the site is to come forward for residential development, noise must be considered, and it must be mitigated and reduced to a minimum.

- 8.6.30 Furthermore, the report concludes using the guidance and calculation methods contained within BS 8233: 2014 ‘Guidance on sound insulation and noise reduction for buildings’, it has been shown that the recommended maximum internal noise levels for each room use under BS 8233 can be achieved through the provision of suitable glazing and ventilation.

- 8.6.31 It is considered that the noise environment of the Site is not a constraint for the proposed development, and it can be delivered in accordance with the guidance contained within BS 8233: 2014 and Paragraph 185 of the NPPF.

Air Quality

- 8.6.32 An Air Quality Impact Assessment (August 2025) has been prepared by Entran Limited to assess potential impacts associated with the proposed development during both construction and operational use.
- 8.6.33 The report states North Hertfordshire Council (NHC) has declared two Air Quality Management Areas (AQMAs) due to elevated concentrations of NO₂. With regard to the impact from this proposed development, in accordance with the EPUK & IAQM significance criteria, the overall impact of the operation of the Proposed Development on NO₂, PM₁₀ and PM_{2.5} concentrations is considered to be negligible. The impact of the Proposed Development with regards to new exposure to air quality is considered to be negligible. A pollutant emission costs calculation has been carried out in accordance with the NHC Air Quality Planning Guidance Document. A damage cost of £16,294.80 was determined and mitigation has been identified. It is concluded that air quality does not pose a constraint to the Proposed Development, either during construction or once operational.

Transport and Access

- 8.6.34 A Transport Statement (TS) has been prepared by RGP in support of this application.
- 8.6.35 The Transport Statement outlines the transport and highways characteristics of the proposed development and demonstrates how the development accords with relevant local and national planning policy.
- 8.6.36 The Transport Statement draws the following conclusions.
- The 'Accessibility Credentials' Section of the document demonstrate there are opportunities for travel associated with the proposed development to be completed by active and sustainable travel modes.
 - The proposed 100 residential dwellings could generate 74 two-way movements across the AM peak and 67 two-way movements across the PM peak, totalling 635 total daily two-way movements.
 - The proposed development would be accessed off Turnpike Lane. The access would comprise a new simple priority junction. The access would be designed to achieve visibility splays in accordance with Table 7.1 of Manual for Streets.
 - The site is accessible via alternative modes of travel, including public transport services.
 - The proposed development would not generate a significant level of traffic. This would all be accommodated within the local highway network without causing capacity issues.
 - Car and cycle parking would be provided with consideration to the standards contained at North Hertfordshire District Council 'Vehicle Parking at New Development Supplementary Planning Document' (2011).

- Internal streets would be designed to accommodate the North Hertfordshire District Council waste collection vehicle. Sufficient space would be given to the storage of waste containers within the curtilage of the dwellings.

8.7 Planning Balance

- 8.7.1 Notwithstanding that we conclude that the application is in accordance with the up to date policies in the Development Plan, the housing policies are out of date and therefore the presumption in favour of sustainable development is also engaged through Paragraph 11(d) of the NPPF.
- 8.7.2 The policies referred to in Footnote 7 do not provide strong reason for refusing the proposed development. The tilted balance therefore remains to be considered for the application.
- 8.7.3 The following weighting criteria is used in the application of the planning balance, as set out in Table 7.1:

Weightings
Very Substantial
Substantial
Significant
Moderate
Limited
Neutral

- 8.7.4 Table 7.2 below weighs the benefits of the proposals against the harms using conclusions of the respective planning application documents.

Harms	Benefits
Development on a greenfield site (Limited Weight)	Provision of up to 100 homes (Very Substantial Weight)
Localised landscape harm (Limited weight)	Provision of 50% affordable homes (up to 50 dwellings) (Very Substantial Weight)

Loss of protected habitat (Limited weight)	Delivery of temporary local employment provision (construction jobs) (Significant Weight)
	Compliance with Golden Rules (Significant Weight)
	Provision of Public Open Space and Play area (Moderate Weight)
	Enhancement to existing habitat (Moderate weight)
	BNG (Moderate Weight)

8.7.5 It can be concluded that the benefits clearly outweigh the adverse harms of allowing development of this grey belt site. significantly boosting the provision of homes in North Hertfordshire, this will secure economic, social and environmental gains and so achieving sustainable development. It is therefore our conclusion that should the Council consider that the Site does not constitute grey belt, very special circumstances exist that outweigh the harm to the Green Belt and as such, this warrants a grant out outline planning permission.

8.8 Flat Balance

8.8.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) sets out that the Development Plan is the starting point for the determination of planning applications. Determination is required to be in accordance with the Plan unless material considerations indicate otherwise.

8.8.2 It is considered that the proposals comply with the Development Plan when taken as a whole. However, should the decision maker take a contrary view, it is clear that the benefits demonstrably outweigh the harms, as shown in the table above. Is concluded that there are 'other material considerations', these being the benefits highlighted above, which justify the granting of planning permission under the flat balancing exercise.

8.9 Tilted Balance

8.9.1 If the Decision Maker were to find that the Application conflicts with the Development Plan when taken as a whole, they would need to consider the proposals against the application of Paragraph 11(d) of the NPPF.

8.9.2 Applying the tilted balance, it is considered that there are no adverse actual impacts of the development, and the benefits are extensive. The benefits of the proposals significantly and demonstrably outweigh the limited impacts. Planning permission should therefore be granted.

9 Draft Terms of Agreement for a Section 106 Agreement

9.1 Draft Terms of Agreement

9.1.1 The Council's Planning Obligations SPD (June 2022) informs the provision for on and off site facilities, services and improvements, for which a need is known to arise from new residential development, in addition to obligations towards Affordable Housing outlined in Policy H2, will be secured through the use of individually negotiated planning obligations to be secured through a planning obligation under Section 106 of the Town and Country Planning Act.

9.1.2 Paragraph 58 of the NPPF (as set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010) states that planning obligations must only be sought where they meet all of the following tests:

a) necessary to make the development acceptable in planning terms;

b) directly related to the development; and

c) fairly and reasonably related in scale and kind to the development.

9.1.3 It is anticipated that the following potential planning obligations will be required, further discussions are to take place with Officers during the determination of the application:

- 50% affordable dwellings are proposed to be provided as part of the development
- A detailed scheme to deliver the Biodiversity Net Gain
- Education contribution

9.1.4 Further to this, any requests for S106 contributions will be considered by the Applicant in light of the provisions of paragraphs 56 to 58 of the NPPF.

10 Summary and Conclusions

10.1 Summary

- 10.1.1 This Planning Statement has been prepared by Twenty5 on behalf of Hawridge Strategic Land Ltd to assess the planning issues arising from an Outline planning application for the following description of development for Land South of Turnpike Lane, Ickleford:

Outline planning application for residential development including 50% affordable housing, with means of access from Turnpike Lane for consideration (all other matters reserved for subsequent approval), drainage, landscaping, car parking and all other ancillary and enabling works.

- 10.1.2 The proposed development comprises up to 100 dwellings on Land South of Turnpike Lane, Ickleford. Ickleford is one of five villages listed within the North Hertfordshire Local Plan identified to deliver housing, along with supporting infrastructure and facilities. Through the extensive technical assessments and reports submitted in support of this application, it has been demonstrated that there are no overriding technical or environmental issues to prevent the proposed development of the Site. It is considered that the Site is sustainable in terms of location and development and the proposals comply with the Development Plan when taken as a whole.

10.2 Decision-Making Approach

- 10.2.1 The Development Plan comprises the North Hertfordshire Local Plan (2022); Hertfordshire Waste Core Strategy and Development Management Policies Document (2012), Hertfordshire Minerals Local Plan (2007) and the Ickleford Neighbourhood Plan (2024).

- 10.2.2 The proposed development represents a significant opportunity to deliver the following economic, social and environmental benefits to Ickleford and the wider area, including:

- The delivery of much-needed housing on a sustainable Site, creating a sustainable residential development adjacent to existing built form;
- The proposed development will contribute positively towards meeting the objectively assessed need for new homes within the District where a significant shortfall exists;
- The provision of 50% affordable dwellings, in compliance with Policy HS2 (Affordable Housing);
- A contribution to the local economy through the construction jobs phase of the development;
- The creation of new and accessible Green Infrastructure for new and existing residents and additional landscaping and planting throughout the Site; and
- A net gain in biodiversity and enhancements to existing habitat provision.

- 10.2.3 The supporting technical documents submitted as part of the planning application collectively confirm that the proposed development would not have any unacceptable adverse impacts, subject to the recommended mitigation measures being put in place.
- 10.2.4 The proposed development represents a high quality, sustainable development which, when set against material planning and policy considerations should be supported and planning permission granted. As such, it is our view that the proposed development should be supported.