



PLANNING STATEMENT

In respect of

LAND AT POUND FARM, HITCHIN, SG5 3RS

On behalf of

BUGLER HOMES LTD

QUALITY MANAGEMENT

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1. INTRODUCTION

- 1.1 This Planning Statement has been prepared on behalf of Bugler Homes Ltd ('the Applicant') in support of a full planning application for the development at Pound Farm, Hitchin, SG5 3RS ('the Site').
- 1.2 The application seeks planning permission for the following development ('the Proposed Development'):

“Hybrid application for a mixed-use development to provide a total of up to 230 dwellings, a residential care home (Use Class C2), an Independent Special School (ISS) and new sports pitch, with access from Bedford Road, landscaping, parking and SuDS comprising: Phase 1 – Application for full planning permission for the erection of 100 dwellings, an ISS, new sports pitch and associated parking, landscaping, open space and SuDS; Phase 2 – An outline application on the remaining part of the site for the erection of up to 130 dwellings, a residential care home (Use Class C2) and associated works with access from Bedford Road (all matters reserved apart from access).”

Planning Application Submission

- 1.3 This Statement assesses the Proposed Development against relevant national, regional and local planning policy, guidance and material considerations.
- 1.4 It should be read and considered in conjunction with the other documents, planning drawings and technical studies submitted in support of this planning application as set out below:

- Cover Letter, prepared by ROK Planning;
- Planning Application Form, prepared by ROK Planning;
- Site Location Plan, prepared by ON Architects;
- Existing and Proposed Drawings, prepared by ON Architects;
- Ecology Report and Biodiversity Net Gain Assessment, prepared by Arbtech;
- Air Quality Assessment, prepared by KP Acoustics;
- FRA and Drainage Strategy, prepared by DHA;
- Site Archaeological Report, prepared RPS;
- Geophysical Survey Report, prepared by SUMO GeoSurveys;
- Preliminary Risk Assessment, prepared by Aviron;
- Noise Impact Assessment, prepared by KP Acoustics;
- Transport Assessment, prepared by DHA;
- Residential Travel Plan, prepared by DHA;
- School Travel Plan, prepared by DHA
- Sustainability and Energy Statement, prepared by Watkins Payne;
- Landscape Visual Impact Assessment, prepared by Enplan;

- Landscape Plan, prepared by Match;
- Statement of Community Involvement, prepared by CCP;
- Alternative Site Assessment, prepared by ROK Planning;
- Breeding Bird Survey, prepared by Cherryfield Ecology.
- Phase 1 Tree Survey, prepared by MJC;
- Phase 2 Tree Survey, prepared by MJC;
- Planning Care Needs Assessment, prepared by Carterwood.

Structure of Planning Statement

1.5 The subsequent sections of this Planning Statement are structured as follows:

- **Section 2** – Describes the Site and context.
- **Section 3** – Provides an overview of the pre-application engagement undertaken.
- **Section 4** – Provides a description of the proposals.
- **Section 5** – Sets out the relevant national and local planning policy context.
- **Section 6** – Provides an analysis of the main planning considerations against national and local planning policy.
- **Section 7** – Sets out the planning obligations.
- **Section 8** – Concludes the planning statement, outlining the key planning benefits of the proposals.

2. SITE CONTEXT

Site Description

- 2.1 The Site is approximately 20ha and is located in Ickleford, North Hertfordshire. It currently comprises unused agricultural land with the existing settlement of Ickleford bordering the Site to the south and the existing buildings of Pound Farm to the north. The Site lies on the edge of Ickleford, with the surrounding area predominantly agricultural and green field land. The eastern border of the site is bound by A600 Bedford Road to the east and an established field boundary runs along the Site's western edge. A Public Right of Way (Bridleway 016) runs east-west through the centre of the Site.
- 2.2 The Site location is shown on Figure 1 below.

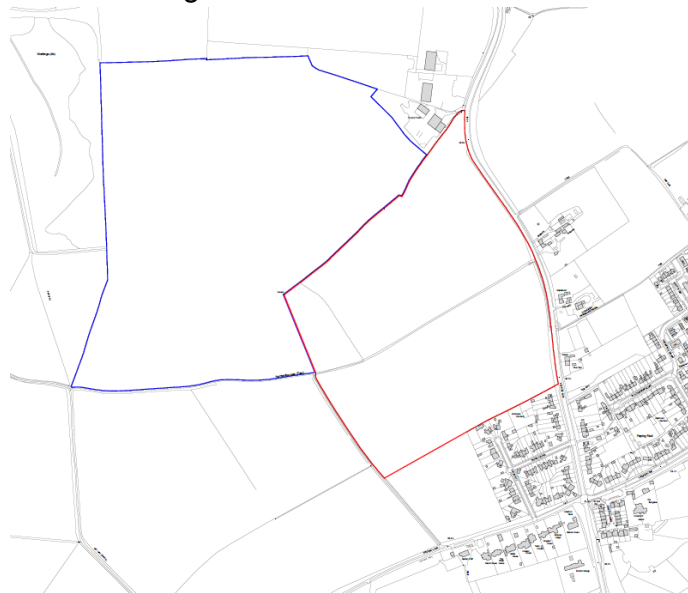


Figure 1 Site Location Plan

- 2.3 The Site is located in the Green Belt.
- 2.4 There are no listed buildings on or near the Site, and it is not within a Conservation Area.

Location and Accessibility

- 2.5 The Site is in a sustainable location with pedestrian access to Ickleford Village (approximately an 8-minute walk), which offers a range of services and amenities, such as Ickleford Stores, Plume of Feathers Public House, The Old George Public House, Co-op Funeral Services, Ickleford Village Hall, Ickleford Primary School. There is also easy access to the highway network as the Site lies next to the A600 providing convenient transport links to the surrounding areas.

- 2.6 Bus stops are located in close proximity to the Site, including at Ryder Avenue (150m to the south) and Burford Grange (315m to the south). The 9B, 9D, 74 and 89 services running frequently throughout the day from these stops towards Hitchin, Bedford and Stevenage (and intermediate locations).
- 2.7 Hitchin is a market town with a range of services and amenities available, including retail and café/ restaurants, schools and sustainable transport options. This limits the degree to which future residents would need to travel to access day-to-day services and amenities. Additionally, Stevenage is located approximately 5 miles from the Site and provides further access to a wide variety of amenities and services.
- 2.8 Hitchin railway station is approximately 2 miles (11-minute cycle) from the Site. From this station, various locations are accessible, including stations in Hertfordshire and London. There are also several bus stops within Hitchin, providing local and inter-urban services.
- 2.9 Therefore, the Site is considered to benefit from a good level of accessibility and constitutes a sustainable location in transport terms for future residents.
- 2.10 Vehicular access to the Site is provided via the creation of a new access from Bedford Road, located at the southeastern corner of the Site. A strip of existing dense vegetation between the development and Bedford Road screens the Site from views to the east.

Planning History

- 2.11 There is no relevant planning history on the Site.
- 2.12 The table below displays relevant planning history for neighbouring sites:

Application Ref.	Address	Description	Decision
19/01106/FP	Burford Grange, Bedford Road, Ickleford, Hitchin, Hertfordshire, SG5 3XG	Erection of 48 dwellings with associated access, parking, private and public amenity space and associated works, following demolition of existing buildings	Granted 06 Feb 2023

- 2.13 In addition, the site opposite Bedford Road (Land east of Bedford Road) was allocated in the North Herts Local Plan (site allocation IC3) for a residential development comprising 150 homes. To date, no planning application has been submitted in respect of the Site, although it is anticipated that this will come forward in due course.

2.14 The following section provides an overview of the pre-application engagement undertaken.

3. PRE-APPLICATION ENGAGEMENT

3.1 The proposed development has evolved over the course of pre-application discussions held with the Council. The list below provides an overview of the discussions that have taken place:

- Pre-application advice was requested from the Council in December 2024. A meeting was held on the 12th January 2025, and formal advice was received on 25th March 2025;
- A Highways pre-application meeting with Hertfordshire County Council (HCC) was held on Monday 7th April 2025.
- A further Planning pre-application meeting was held with the Council on the 1st October 2025.
- The written response was received on the 9th February 2026.

3.2 Key engagement and the evolution of the scheme are summarised in the paragraphs below.

LPA Pre-Application (October 2025)

3.3 The most recent proposal was presented to the LPA on 1st October 2025 and the subsequent advice letter was received on 9th February 2026. The pre-application was attended by Paul Chaston (Senior Planning Officer, Major Projects) and Sam Diccoco (Team Manager, Development Management).

3.4 The scheme presented to the Council consisted of the following:

- Erection of approx. 200no. residential dwellings;
- A new DfE approved Independent Special School (ISS)
- Provision of cycle and refuse storage at policy compliant levels;
- Creation of new sports pitches, public open space and play space; and
- Construction of new access road into the Site, providing vehicular and pedestrian/cyclist access to the new dwellings.

3.5 The written response from the Council contained the following key points:

Principle of Development

- At the time of writing their pre-application feedback, the Council did not consider the Site to constitute Grey Belt land, considering the following arguments:
 - The LPA consider the combination of Ickleford and Hitchin as constituting one large built-up area, and that there are no features that would weaken the Sites contribution to purpose A.

- The council consider that in approving development in the Green Belt, there is an inherent discouraging of the recycling of previously developed land, which attributes moderate weight to this conflict with purpose (e).
- It was agreed that there is considered to be limited or no contribution under purposes (b) and (d).
- In their pre-application response, the LPA requested further detail on the identified need for the provision of a SEND school, as well as on the assessment of Alternative Sites

Ecology

- NHDC's Senior Ecologist confirmed that there would be no ecological objection to the principle of development on this Site
- It was welcome that the boundary hedgerows are to be retained
- The LPA noted the requirement for the statutory 10% BNG to be secured on Site, with any proposal exceeding this being granted proportional additional positive weight

Transport

- The LPA confirmed that given the location of the site and the previous recommendations made by HCC Highways, it is considered likely that a policy compliant residential scheme could come forward with appropriate highways and transport mitigation to encourage modal shift and alternative modes of transport.

Housing Strategy

- It was agreed by the LPA that significant weight would be attributed to delivery of market housing, and very significant weight would be attributed to the delivery of affordable housing.
- The council has confirmed that the anticipated affordable housing provision of 50%, would exceed the minimum 40% Local Plan policy requirement.
- It was noted that within the overall 40% affordable housing, the Council requires a 65% rented/35% other intermediate affordable housing tenure mix, in accordance with the Local Plan, the Council's Developer Contributions SPD and the most recent Strategic Housing Market Assessment (SHMA) for the district.
- Furthermore, the LPA note the need for both 2-bed homes and larger family homes.

- 3.6 The comments received from North Hertfordshire District Council ("NHDC") have served to steer the evolution of the development, as can be seen through the final design.
- 3.7 Additionally, the application is supported by a full suite of supporting documentation in accordance with the NHDC validation checklist, as agreed with Paul Chaston (Senior Planning Officer, Major Projects).

- 3.8 The following section sets out the engagement and consultation activities held as part of the pre-application process.

Place Services Consultation

- 3.9 As part of the pre-application process, external consultation was received from North Hertfordshire Place Services, a summary of which is provided below:-
- The applicant must provide supporting information which relates to the requirements of section 3.4, in Policy SP9 Design & Sustainability North Hertfordshire Masterplanning Principles - March 2023.pdf.
 - Any application must include the submission of the following items:
 - Design Principles
 - Parameter Plan
 - Framework Plan
 - Illustrative Masterplan

Engagement and Consultation Activities

- 3.10 The Community Consultation Partnership (CCP) supported engagement throughout the design process in 2025 involving a wide range of stakeholders, including:
- Local elected representatives and parish councils.
 - Hertfordshire County Council members and SEND commissioning officers.
 - Education providers and SEND stakeholders.
 - Voluntary and community organisations.
 - Local sports clubs.
- 3.11 Local ward councillors for North Herts District Council were emailed information about the proposals and offered a meeting to discuss the proposals further. Meetings were subsequently held with Cllr Daniel Allen (and Anthony Roche, Chief Executive of NHDC, Alastair Strathern MP, Pirton Parish Council, Hitchin Belles FC, St Albans DBE, Ickleford Primary School, HCC SEND Commissioning Service Officers, NHDC Cllr Jon Claydon, FC Comets.

Public Consultation

- 3.12 Ahead of the main public consultation, a dedicated SEN school awareness campaign was undertaken. Its purpose was to explain the identified need for additional specialist provision and set out the proposed educational offer and delivery model. This phase created a clear route for local residents to register support and interest, with 268 expressions of support recorded.

- 3.13 A public consultation ran from 21st November 2025 to 12th December 2025 to provide residents with information about the proposal. This included a dedicated consultation website, leaflet distribution, a targeted social media campaign and a community workshop with a number of local residents and stakeholders.
- 3.14 In total, the website was viewed by 2,303 visitors, over 1000 leaflets were delivered to local properties, the social media campaign generated 16,213 views and the workshop was attended by c. 50 individuals.
- 3.15 This approach served to engage residents across North Hertfordshire, reaching a wider cross section of local people (through various communication methods) and those who are most likely to participate and respond digitally.
- 3.16 The aim of the public consultation was to inform and engage with members of the community and individuals with an interest in the Site and surrounding area. It was important to identify levels of support for the proposals and to sound out any areas of concern to help inform and shape the plans prior to submission.
- 3.17 Two consultation events were held with members of the public, with a Community Workshop on the 26 November 2025, with approximately 50 attendees and a stakeholder briefing meeting on Tuesday 3 February 2026.
- 3.18 Further detail is included within the Statement of Community Involvement prepared by The CCP and submitted as part of this application.

Highways Scoping

- 3.19 During the meeting with Hertfordshire County Council, highways comments were provided in relation to the principle of access and transport impacts. The highways comments included within the written response informed a highways scoping note, prepared by DHA.
- 3.20 The Strategic Transport Infrastructure Board (STIB) agreed in principle to the provision of a single point of access from Bedford Road and recommended the consideration of an emergency access instead of a second all-traffic vehicular access.
- 3.21 Key points raised by the Highways Authority include the need to prioritise pedestrians and cyclists and improve connectivity from the Site. It was advised that both a Toucan and Pegasus crossing should be provided across Bedford Road to provide a safe link between Bridleways 15 and 16 for pedestrian and equestrian users.
- 3.22 The Highways Authority requested further information regarding trip generation. It was confirmed that this information would be provided as part of a full planning application.
- 3.23 The following section details the proposed development.

4. PROPOSED DEVELOPMENT

Description of Development

4.1 The description of development reads as follows:

“Hybrid application for a mixed-use development to provide a total of up to 230 dwellings, a residential care home (Use Class C2), an Independent Special School (ISS) and new sports pitch, with access from Bedford Road, landscaping, parking and SuDS comprising: Phase 1 – Application for full planning permission for the erection of 100 dwellings, an ISS, new sports pitch and associated parking, landscaping, open space and SuDS; Phase 2 – An outline application on the remaining part of the site for the erection of up to 130 dwellings, a residential care home (Use Class C2) and associated works with access from Bedford Road (all matters reserved apart from access).”

Detailed Parameters of the Development

Phase 1

4.2 The detailed parameters of the development are set out below:

- Erection of 100no. residential dwellings;
- An Independent Special School (ISS);
- Creation of new sports pitch, public open space and play space;
- Cycle and refuse storage; and
- Construction of new access road into the Site providing vehicular and pedestrian/cyclist access.

4.3 The proposed unit mix for Phase 1 is as follows:

Type	No. of units
2 Bed	20
3 Bed	54
4 Bed	13
5 bed	3
Total	100

Design and Layout

4.4 The proposed development comprises a mix of two-storey houses.

- 4.5 The contemporary palette of materials used such as red brick, weatherboarding and tile roof have been drawn from those typically seen in the local vernacular, enhancing the architectural heritage and identity of this part of North Hertfordshire.
- 4.6 The massing and site layout has been designed to respond to the pre-application discussions, and advice from North Hertfordshire District Council and Place Services.
- 4.7 Further detail on the evolution of the massing, scale and height, and character of the design is included in the Design and Access Statement, prepared by ON Architecture and submitted as part of this application.

Sustainability

- 4.8 The proposed development seeks to deliver sustainability in all aspects as illustrated by the following key parameters:
- Highly efficient building fabric and MEPH proposals, including a specified MEPH plant which includes individual air source heat pumps;
 - Provision of EV charging for all dwellings;
 - Efficient building construction and high efficiency ventilation and lighting.
- 4.9 Further sustainability details are included within the Energy and Sustainability Statement prepared by Watkins Payne, submitted as part of this application.
- 4.10 As outlined, the Site is considered to be in a sustainable location. Additionally, the proposal includes an active travel plan to further improve the connectivity of the Site. A new Pegasus crossing, off road cycleway and improved footpaths are proposed as part of the scheme, encouraging active modes of travel and reducing carbon emissions in the operational phase.
- 4.11 The Planning Policy Context is detailed within the following section before the proposed development is assessed against this context in Section 6.

Access, Parking, Servicing and Waste

Servicing

- 4.12 Servicing and refuse collection will be accommodated by the proposed access routes. The access road is suitable for the accommodation of a 11.4m long refuse vehicle, and any smaller vehicles such as a large parcel van or food delivery vehicles.
- 4.13 Vehicle tracking has been undertaken that demonstrates that the proposed site layout can be safely navigated by all relevant vehicle types, including emergency vehicles, and that they can enter and egress the site in a forward gear.

- 4.14 Bin stores will be positioned to ensure carry distances for residents do not exceed 30m and drag distances for refuse workers do not exceed 10m from the bin stores to the kerb.

Parking

- 4.15 As the proposed plans demonstrate, each dwelling would benefit from a provision of 1no. or 2no. car parking spaces in accordance with Local Plan Policy. Additional visitor spaces are provided throughout the development, in accordance with local standards.
- 4.16 As a result of pre-application discussions, off-street car parking has been sensitively integrated into the layout, with allocated spaces provided adjacent to each dwelling, as well as car parks serving the school and residential care home, as well as garages adjacent to some houses.
- 4.17 Each dwelling will be provided with secure cycle parking spaces within the rear gardens of properties, in accordance with local standards. Secure cycle parking will also be provided for the school and residential care home uses.

Landscaping and Public Realm

- 4.18 The proposed development is centred around the provision of new public open space and high-quality landscaping throughout the Site.
- 4.19 Accordingly, the inclusion of pedestrian routes, SuDS features, landscaping, and "play-on-the-way" elements help soften the scheme's visual impact and provide significant public benefit to the local area.

5. PLANNING POLICY CONTEXT

- 5.1 Section 38(6) of the Planning and Compulsory Act 2004 requires any planning application to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

Local Development Plan

- 5.2 The relevant Development Plan for North Hertfordshire comprises the following documents:

- North Hertfordshire Local Plan 2011 - 2031 (2022)
- The Mineral and Waste Local Plan for Hertfordshire

- 5.3 The most recent update to the Council's 5-year housing land supply (5YHLS) (published November 2025) confirms that NHDC cannot demonstrate a 5YHLS, with only 2.6 years against their adopted housing requirement. As a result, the presumption in favour of sustainable development under paragraph 11d) of the NPPF is triggered.

- 5.4 The Site falls within the Ickleford Neighbourhood Plan area. The Ickleford Neighbourhood Plan was published in February 2024. Relevant documents and guidelines are as follows:

- Ickleford Neighbourhood Plan
- North Hertfordshire Design SPD (2011)
- Ickleford Design Codes

North Hertfordshire Local Plan

- 5.5 The North Hertfordshire Local Plan is the overarching document in the Local Development Plan and sets out fundamental visions and development management policies for the North Hertfordshire area up until 2031. The following policies apply in relation to the development scheme:

- SP1: Sustainable development in North Hertfordshire
- SP5: Countryside and Green Belt
- SP6: Sustainable Transport
- SP8: Housing
- SP9: Design 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
- 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

Local Plan Review

- 5.6 Policy IMR2 of the Local Plan committed the Council to undertake an early review of the Plan by the end of 2023 at the latest. The outcome of this exercise was that a full review of the NHLP will be undertaken.
- 5.7 In January 2024, Cabinet approved a full review and update of the North Herts Local Plan. To date there has not been any further published progress towards the preparation of a new Local Plan.

Other Material Considerations

Supplementary Planning Guidance

- 5.8 The Council has also published several Supplementary Planning Documents ('SPD') to support local plan policy. The following are relevant to this application:
- Sustainability SPD;
 - Community Infrastructure Levy and Planning Obligations SPD; and
 - Emerging Design SPD.

National Planning Policy Framework (NPPF)

- 5.9 The National Planning Policy Framework (NPPF) sets out national planning policy. The NPPF was originally published in 2012 and replaced all previous planning policy statements and guidance notes. The revised NPPF was adopted in December 2024.
- 5.10 A draft update to the NPPF was published for consultation in December 2025. This is currently under consultation until March 2026 and is expected to be adopted in spring 2026.

- 5.11 At the core of the NPPF is the presumption in favour of sustainable development, including supporting strong, vibrant and healthy communities, ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations, and contributing to protecting and enhancing the natural, built and historic environment.

National Planning Policy Guidance (NPPG)

- 5.12 In addition to the NPPF, the Department for Communities and Local Government (DCLG) published the National Planning Policy Guidance (NPPG) in March 2014. The NPPG is a web-based resource which delivers planning procedures and practical guidance in an accessible format and is continually updated when necessary.

6. PLANNING ASSESSMENT

- 6.1 Section 38(6) of the Planning and Compulsory Act 2004 requires any planning application to be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 6.2 This section therefore assesses the proposal against the development plan policies and examines relevant material considerations where relevant.
- 6.3 The assessment discusses each of the main planning matters relevant to the proposed development, before summarising the main technical matters which are dealt with in detail in the supporting reports.
- 6.4 The section is ordered as follows:
 - 1. Principle of Development within the Green Belt;
 - 2. Alternative Sites Assessment
 - 3. Provision of DfE Independent Special School for SEMH and ASD;
 - 4. Provision of Housing;
 - 5. Provision of Residential Care Accommodation;
 - 6. Provision of Sports Pitches;
 - 7. Loss of Agricultural Land;
 - 8. Character and Openness;
 - 9. Housing Mix and Tenure
 - 10. Quality of Accommodation;
 - 11. Design and Layout;
 - 12. Landscaping and Open Space;
 - 13. Biodiversity and Ecology;
 - 14. Neighbouring Amenity;
 - 15. Transport Considerations;
 - 16. Travel Plan;
 - 17. Flood Risk and Drainage;
 - 18. Archaeology;
 - 19. Energy and Sustainability;
 - 20. Air Quality.

Principle of Development within the Green Belt

- 6.5 The Site is located within the Green Belt, which serves five purposes as set out within paragraph 143 of the NPPF:
 - a) to check the 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.*

6.6 Strategic Policy SP1 (part c) of the Local Plan states that planning permission should be granted, for proposals that:

- 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;*

6.7 Throughout this Planning Statement, compliance with each limb of Strategic Policy SP1 (including Housing Mix, Quality of residential development and infrastructure improvements) is demonstrated.

6.8 Policy SP5 of the Local Plan states that development will only be permitted in the Green Belt where it would not result in inappropriate development, or where very special circumstances have been demonstrated. This Policy is considered out of date.

6.9 In accordance with paragraph 155 of the NPPF, the development of homes in the Green Belt should not be considered appropriate where the following apply:

- 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;*
- b. *There is a **demonstrable unmet need** for the type of development proposed;*
- c. *The development would be in a **sustainable location**, with particular reference to [paragraphs 110 and 115 of this Framework]; and*
- d. *Where applicable the development proposed meets the '**Golden Rules**'*
- e. *requirements set out in paragraphs 156-157 below. [emphasis added]*

6.10 The Proposed Development's compliance with the above criteria is set out in the following sections.

6.11 It is noted that North Hertfordshire undertook a Green Belt Review (2018) as part of its Local Plan review. This assessed land throughout North Hertfordshire within the context of the Green Belt and its purposes. The Site was not specifically identified throughout the assessments but was included within strategic parcel 12a.

6.12 While the overall evaluation of the parcel indicates a significant contribution, it is important to distinguish between the assessment of broad parcels of land and site-specific assessments, which may vary significantly in terms of the contribution to the Green Belt purposes, depending on local characteristics.

6.13 This principle is confirmed in planning appeal ref. APP/W4223/W/25/3367017 (Medlock Road) (**Appendix A**), in which the inspector noted:

“The GMGB concludes that this parcel contributes either moderately or strongly to the different Green Belt purposes. However, the site’s relatively small size and its position in comparison to the entire parcel suggests an assessment at a site specific level to be most determinative in this instance.”

6.14 As such, an individual assessment of the Site’s contribution to the Green Belt is summarised below, in accordance with NPPG paragraph 003.

a) Utilisation of Grey Belt land & impact on Green Belt purposes

6.15 The NPPF defines Grey Belt as being ‘land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143.’ The Site’s contribution to these purposes is assessed in turn below.

Purpose A – Unrestricted Sprawl

6.16 Purpose A of the Green Belt is to check the unrestricted sprawl of large built-up areas. Paragraph 005 of the NPPG sets out considerations for informing this judgement. As demonstrated below, the Site is considered to make a weak contribution to Purpose a). The table below provides an assessment against each degree of contribution, following the structure set out in the NPPG.

Contribution	Illustrative Features	Response
<i>Strong</i>	Assessment areas that contribute strongly are likely to be free of existing development and lack physical feature(s) in reasonable proximity that could restrict and contain development. They are also likely to include all of the following features:- • be adjacent or near to a large built up area	The Site adjoins the northern edge of Ickleford, which is a village as defined in the Local Plan. There is a distinct gap between Ickleford and Hitchin, comprising a clear ribbon of Green Belt between the two settlements. The Site does not relate to the distinct settlement of Hitchin, located to the south, and instead would form a

	if developed, result in an incongruous pattern of development (such as an extended “finger” of development into the Green Belt)	modest extension to the settlement at Ickleford, which is a village. The PPG states that villages do not constitute large built-up areas. As such, purpose a) is not served.
<i>Moderate</i>	Assessment areas that contribute moderately are likely to be adjacent or near to a large built up area, but include one or more features that weaken the land’s contribution to this purpose a, such as (but not limited to): - having physical feature(s) in reasonable proximity that could restrict and contain development - be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development - contain existing development - being subject to other urbanising influences	The PPG is explicit that even <u>just one</u> feature will demote a site’s contribution from ‘strong’ to ‘moderate’. It is clear that these can be natural or artificial and do not need to be present on all sides of the site. The Site benefits from not just one, but multiple physical features that constrain development, notably: Bedford Road – this is a permanent physical feature which forms the Site’s eastern boundary; Pound Farm - existing commercial buildings to the north; Ickleford - the settlement boundary of Ickleford lies to the south; Historic Field Boundary – to the west. The presence of multiple factors here supports the conclusion that the contribution to Green Belt Purpose (a) is no more than “Moderate”.
Weak/none	Assessment areas that make only a weak or no contribution are likely to include those that:	Given the fact that the Site not adjacent to a large built-up area, and benefits from

	• are not adjacent to or near to a large built up area • are adjacent to or near to a large built up area, but containing or being largely enclosed by significant existing development	features that constrain development, it is considered that there would be a weak/no contribution to purpose a).
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6.17 In determining whether the application Site can be considered adjacent to Hitchin, it is important to assess the Site as it is experienced ‘on the ground’. Between Hitchin and the Site lies a defined Green Belt buffer of approximately 200m, followed by the distinct settlement of Ickleford which extends approximately 400m north towards the site boundary. There is no continuous built form or visual integration linking the appeal site directly with Hitchin.

6.18 The strip of Green Belt between Hitchin and Ickleford provides a clear and defensible break in built form. This is further supported by Policy E1 of the Ickleford Neighbourhood Plan, which requires development proposals to respect the “undeveloped gap between Ickleford and Hitchin”.

6.19 This is supported by appeal precedent which confirms that physical and visual separation breaks the functional relationship with a settlement even where the distance to it is relatively modest. Namely, in an appeal in Durham (ref. APP/X1355/W/23/3336183; **Appendix B**), the Inspector noted the following, despite the relatively short proximities involved:

“Physically the site is separated from the main built-up area by intervening open space and woodland, and that woodland in part ensures that there is no visual relationship between the site and the existing settlement. Consequently, I conclude that the site is outside of and not ‘well-related’ to the main built-up area of Wingate.”

6.20 This assessment is further supported by an appeal in Staffordshire (ref. APP/B3438/W/24/3351328; **Appendix C**), in which the Inspector concludes:

“The closest part of the appeal site is approximately 180m from Ball Green with much of that containing the main area of built development significantly further away. This would be down the valley slope, separated from Ball Green by two tree and hedgerow lined open agricultural fields. Such are the distances and nature of open and undeveloped land, I do not regard the site as near the large built-up area.”

6.21 The Inspector goes on to state that:

“...it would certainly be by no means inevitable that development of the appeal site would lead to development of the land between it and the built-up area. Therefore, taking it in a wider context, the land makes moderate contribution in this regard.”

- 6.22 Applying these principles, the presence of the intervening Green Belt and separate settlement means the appeal site cannot reasonably be characterised as “near to” or part of the Large Built-Up Area in spatial, visual or functional terms. The Green Belt strip performs its policy purpose of checking sprawl and preventing coalescence. Moreover, the appeal site is physically and perceptually connected with Ickleford rather than Hitchin.
- 6.23 Furthermore, with regard to physical features, the inspector of the Staffordshire appeal notes the following:

“The access road area is lined on one side by a hedgerow, and the field comprising the main development area is lined by combinations of established hedgerows and lines of trees on four sides. These would be maintained, improved and retained. The land is part of a valley slope, with much of the built development to be on a shallower part. Due west it is steeper. These physical features would help restrict development around the site.”

- 6.24 This echoes the assessment of the subject site, which is also enclosed by existing trees and hedgerows and benefits from similar topography, with the land falling away significantly into the Pirton valley to the west. This supports the conclusion within this statement that the presence of tree and hedgerow features would restrict and contain development and that the contribution to purpose a) is ‘weak’.

Purpose B – Merging of towns

- 6.25 The purpose of part b) is to prevent neighbouring towns merging into one another. As demonstrated below, the Site does not contribute to Purpose b).

Contribution	Illustrative Features	Response
<i>Strong</i>	Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features: • forming a substantial part of a gap between towns • the development of which would be likely to result in the loss of visual separation of towns	The PPG is explicit that this pertains to towns, not villages. The Site does not form a substantial part of a gap between Hitchin and Shefford.
<i>Moderate</i>	Assessment areas that contribute moderately are likely to be located in a gap between towns, but include one or more features that weaken their contribution to this purpose, such as (but not limited to):	Due to its size and positioning in line with existing development on the southern side, the Site does not form a material gap between Hitchin and Shefford and therefore is not considered to

	- forming a small part of the gap between towns - being able to be developed without the loss of visual separation between towns. This could be (but is not limited to) due to the presence or the close proximity of structures, natural landscape elements or topography that preserve visual separation.	perform moderately on purpose b).
Weak/none	Assessment areas that contribute weakly are likely to include those that: - do not form part of a gap between towns, or - form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation	Given the above, namely the relative size and positioning of the Site, it is considered that the Site does not have any material role in preventing the merging of towns.

Purpose D – Historic Towns

- 6.26 There are no historic towns within proximity of the development. As such, the Site is not considered to contribute to this purpose of the Green Belt.

Conclusion on 'Grey Belt' land

- 6.27 As shown above, **the Site** does not contribute significantly towards any of purposes a), b) or d) of the Green Belt and therefore meets the definition of Grey Belt land, as per Appendix 1 of the NPPF.
- 6.28 Part a) of paragraph 155 of the NPPF requires that “**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” [emphasis added]. As such, the remaining Green Belt purposes are also addressed below.
- 6.29 Although these are taken in turn, it is highlighted that the assessment of the remaining purposes is taken together. The significance of this point is reflected in the Secretary of State’s decision in the Marlow Film Studios appeal (appeal ref. APP/K0425/W/24/3351904; **Appendix D**). The decision confirms that purpose c) is omitted from the definition of Grey Belt land and therefore that “a site could contribute ‘strongly’ to that purpose and still be ‘grey belt’.” The decision goes on to emphasise that

the change in wording in the NPPF (from the draft text for consultation) from “limited” to “not strong” is a deliberate change intended to raise the threshold of harm at which land should not be considered Grey Belt. As such, it is clear that land should not be excluded from the Grey Belt designation simply because it makes a contribution to Green Belt purposes; rather, only land where the contribution to purposes a), b) or d) is considered to be 'strong' should it fall outside the NPPF definition.

- 6.30 Additionally, **it is important to note that the assessment of the remaining Green Belt purposes is made with reference to the *development* proposed, rather than the land – which differs from the initial assessment of purposes a), b), and d).** As such, it must take account of the impact of the specific development proposals, including any mitigation provided by the layout, density, scale, and landscaping of the scheme.

Impact on Green Belt purposes (taken together)

Purpose C – Encroachment

- 6.31 As with any Green Belt development, it is acknowledged that there will be a degree of encroachment into the countryside. However, this will be substantially mitigated by the design and layout of the proposed development and the extensive introduction of landscape buffering.
- 6.32 The extent of the proposed residential development is designed to align with the northern extent of the adjacent site allocation IC3. The proposed school is located to the north of this, comprising single-storey buildings only situated within generous landscaped areas. The proposed development will further reinforce the new settlement edge by incorporating native hedgerow enhancement, tree planting, and open space provision along the north and western boundary. This follows historic field boundaries and will restore and strengthen the historic character of the surrounding landscape.
- 6.33 Accordingly, the scheme consolidates the existing development pattern (alongside existing and emerging development to the east of Bedford Road) without extending development into the open countryside or in an incongruous manner. It also provides a strengthened edge to the new settlement boundary with a clear, substantial, landscaped buffer. This approach ensures that the development remains contained, respects the established boundary framework, and mitigates encroachment into the open countryside beyond Ickleford (to the north and west).
- 6.34 As such, it is not considered that the proposed development would have a significant impact in terms of purpose c) of the Green Belt.

Purpose E – Urban Regeneration

- 6.35 Development on this Site would not impact on the likelihood of existing brownfield sites coming forward given the significant unmet need for housing in North Herts. As such, the development would not materially harm this purpose of the Green Belt.

Conclusion on 'Green Belt' purposes overall

6.36 It is not considered that the very limited harm in respect of purpose c), which is adequately mitigated through the design, layout and scale of the proposed development, would fundamentally undermine the remaining Green Belt across the area of the plan.

6.37 This conclusion is further supported by an appeal decision in Hemel Hempstead (Appeal Ref. APP/A1910/W/24/3345435; **Appendix E**) which confirmed that:

“Even though there is moderate harm to purpose (c), the evidence before this Inquiry does not indicate that the appeal site has a wider strategic role in the functioning of the Borough’s Green Belt as a whole. Therefore, in utilising ‘Grey Belt’ land, the appeal proposal would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the Borough’s development plan.”

6.38 The below extract from the DAS, submitted with this planning application, demonstrates that the purposes of the wider Green Belt in North Herts would remain intact and would not be fundamentally undermined.



Figure 2 Green Belt Plan

6.39 Additionally, in a recent case involving a High Court challenge to an appeal decision in Warwick District Council (ref. APP/T3725/W/25/3368738) the government conceded that the Inspector had erred in law by failing to consider the impact of the proposals on the

purposes (taken together) remaining green belt land across the Local Plan area, instead referring to a localised impact in relation to the site itself. The developer's lawyers argued in their challenge that the inspector had "*confined their consideration to purpose (c) in isolation rather than looking at all the purposes holistically and reaching an overall conclusion in the round*" and that the decision "*logically leaps from there being some encroachment into the countryside ... to there being a 'fundamental' conflict*", which they said was "*an irrational leap of logic*".

- 6.40 The government's response that they will concede the case confirms that this general point and the test under paragraph 155 is a high bar which will only be surpassed whether there is a very significant impact to the Green Belt when viewed at a Local Authority-wide level. Given that the Proposed Development affects a very small area of Green Belt land in relation to the Green Belt as a whole in North Hertfordshire, along with the other characteristics as discussed above, it is clear that this test would not be met in the case of the Proposed Development.

Summary of exception criteria (a) of paragraph 155

- 6.41 The above Grey Belt assessment details the Grey Belt requirements in turn and demonstrates that the proposed development utilises Grey Belt land and does not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan.

b) Demonstrable Unmet Need

Housing

- 6.42 Footnote 56 of the NPPF clarifies that "unmet need" as per part b) of paragraph 155 is defined as follows:

"...in the case of applications involving the provision of housing, means the lack of a five year supply of deliverable housing sites, including the relevant buffer where applicable, or where the Housing Delivery Tests was below 75% of the housing requirement over the previous three years..."

Housing Land Supply

- 6.43 The Council's most recent (November 2025) Five-Year Housing Land Supply Update confirms that it could not demonstrate a Five-year housing land supply (5YHLS), noting a supply of just 2.6 years against their adopted housing requirement.
- 6.44 In the November 2025 update, the council identifies a total five-year housing requirement of 6,976 dwellings over the five-year period from 2025/26 to 2029/30. Against this requirement, the identified supply results in a shortfall of 3,347 dwellings over the five-year period.

- 6.45 As highlighted above, the total requirement for housing delivery from 1 April 2025 – 31 March 2030 in North Herts is 6,976 dwellings. This figure is derived from the objectively assessed housing need of 1,120 dwellings per year (5,600 over five years), plus the accumulated shortfall of 1,044 dwellings (209 dwellings per year), and the application of a 5% buffer (332 dwellings). When compared against the identified supply for the same period this results in the deficit set out in paragraph 6.40. .
- 6.46 Therefore, it is clear that there is a substantial demonstrable unmet need for housing in North Herts.

DfE Independent Special School

- 6.47 There is an identified need nationally, and within the local community for Special School provision, as outlined in the SEND School Needs Assessment, which is submitted alongside this application.
- 6.48 The school provision therefore addresses a demonstrable demand that directly aligns with the 11–17 age range proposed at the Independent Special School (ISS) and focuses on filling the ASD/SEMH gap in Hertfordshire. This is further detailed in the below sections and in the submitted SEND School Needs Assessment.

Residential Care Accommodation

- 6.49 A Care Needs Assessment has been prepared by Carterwood and is submitted as part of this application. The findings of the assessment confirm that based on 2029 (the earliest the proposed care home could be available) there will be a net need for 76 full market standard bedrooms in the market catchment area and 190 beds in the North Herts Council local authority area. Shortfalls of full market standard dedicated dementia beds are 156 and 274 in the two catchments, respectively.
- 6.50 Furthermore, the population projections as per the North Herts Housing Needs Assessment (2023) show a substantial increase in the older population during the period 2022-2031. The associated toolkit identifies a need (current unmet need + future need) for 2,399 specialist older person additional housing units over the period 2022-2031 for North Herts.
- 6.51 It is evident that there is demonstrable unmet need for residential care accommodation. This is further detailed in the sections below, as well as the Care Needs Assessment

c) Sustainable Location

- 6.52 The NPPF places a presumption in favour of sustainable development at the centre of national planning policy. The Site represents a sustainable form of development given its location on the edge of Ickleford and convenient access to local amenities in the village (8-minute walk). These include Ickleford Stores, Plume of Feathers Public House, The Old

George Public House, Ickleford Village Hall, Ickleford Play Park, Ickleford Sports and Recreation Club, Co-op Funeral Services, and Ickleford Primary School.

- 6.53 There is a range of services and amenities accessible in Hitchin high-street/ town centre (approx. 2-miles from the Site), including shopping facilities, cafes, restaurants, and traditional pubs. It is also approx. 2.9 miles (12-minute cycle) to Hitchin Station, providing regular access to Hertfordshire and London. The centre of Stevenage is also located approximately 8 miles (25-minute drive) from the Site providing access to further services and amenities. Likewise, the Site is located off Bedford Road (A600) with easy connections to the A1 (M).
- 6.54 The Transport Assessment submitted alongside this application highlights that in accordance with the sustainability requirements of the NPPF and the Manual for Streets, it is considered that there is the potential for many everyday journeys to be undertaken by non-car means. This is further detailed throughout the Design and Access Statement, including the submitted Movement Framework Plan and the Pedestrian and Cycle Connectivity Diagram.
- 6.55 This assessment is supported in the supporting text 13.165 of the Local Plan for policy IC3, which relates to the allocation of Site IC3 (which is located opposite the proposed development) it was noted that through transport modelling work, no specific mitigation works were identified as being required on the Ickleford road network. While it was considered that new development in this area would contribute towards traffic generation, this was not determined to be a significant factor in the overall assessment. The requirement for contributions to the Active Travel Funding Gap should further address concerns regarding traffic generation.
- 6.56 Specifically, the proposed Independent Special School (ISS) requires a site with access to outdoor space/nature and a quiet, calm environment to meet the unique needs of its students. Spaces that are too urban or busy, often associated with noise, congestion, and constrained outdoor areas, would not provide the conducive environment required for sensory regulation and learning. These environments can be overwhelming and hinder the students' ability to focus, engage, and thrive.
- 6.57 The Site is considered to be an appropriate setting as it offers ample outdoor space, direct access to natural surroundings, and a peaceful atmosphere, all of which are essential for the learning environment required for the proposed ISS. The environment ensures minimal distractions, fostering a sense of security and calm that is crucial for their success.
- 6.58 In addition, it is anticipated that the proposed development would make important improvements to local transport infrastructure, to be secured by s106 agreement. As such, it satisfies paragraph 110 of the NPPF, which states that “significant development should be focused on locations which are **or can be made sustainable**, though limiting the need to travel and offering a genuine choice of transport modes” [emphasis added].

6.59 Potential measures to further contribute to the sustainability of the Site and the local area more broadly have been discussed with Hertfordshire County Council Highways, such as:

- A new footpath / cycleway on the east side of the A600 south of Lower Stondon to the Holwell Lane junction,
- Improvement of existing bus services (including new bus stops on the Bedford Road);
- New pedestrian and equestrian crossings on the Bedford Road; and
- improvement of local bridleways and Public Rights of Way.

6.60 As such, the Site accords with national planning policy and ambitions with regards to encouraging sustainable modes of travel and is considered to satisfy limb c) of the NPPF exception.

d) 'Golden Rules'

6.61 Paragraph 156 of the NPPF states that where major development involving housing is proposed on land released from the Green Belt, the following requirements ('Golden Rules') should be met:

- a) *affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below;*
- 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 home, whether through onsite provision or through access to offsite spaces.*

6.62 These are addressed in turn below.

Affordable Housing

6.63 The proposed development provides up to 115no. affordable dwellings, representing 50% of the total, in accordance with the Golden Rules set out above. This is comprised of 26no. affordable rented houses and 24no. shared ownership houses within Phase 1. This significantly exceeds the target requirement as per Policy HS2, which would equate to 40no. dwellings (26no. affordable rented and 14no. shared ownership dwellings).

6.64 It would make an important contribution towards the local unmet need for affordable housing, of which a significant amount is urgently required to meet current needs. The proposed development would constitute a 40% uplift on the delivery of all affordable completions in North Herts in 2023-2024.

Improvements to Infrastructure

- 6.65 The proposed development includes the provision of a new ISS, which represents a very significant improvement to local educational infrastructure. As noted above, the proposed development will also deliver substantial improvements to local connectivity and transport infrastructure.
- 6.66 Given the scale of the development, it is acknowledged that s106 contributions will be required towards infrastructure given the absence of CIL in NHDC. The precise nature and scope of these contributions will be subject to discussions with the district and county councils. It is anticipated based on the Council's published Developer Contributions Supplementary Planning Document that these may include contributions towards education and services within the local area. The proposed 50% affordable housing would also be secured by way of a S106 agreement.

Green Spaces

- 6.67 The proposed development delivers a large area of green space (approximately 11.47ha total). This significantly exceeds both national and North Hertfordshire standards (refer to *Table 1* in following section).
- 6.68 Paragraph 159 of the NPPF states that improvements should, "contribute positively to the landscape setting of the development, support nature recovery and meet local standards for green space provision where these exist in the development plan."
- 6.69 The scheme incorporates a generous level of publicly accessible green infrastructure, which has been designed to exceed the expectations of both national policy and local planning standards. The overall layout prioritises the provision of informal open space and children's play areas in line with North Hertfordshire's adopted benchmarks as outlined in the North Hertfordshire Developers Contributions SPD. This is discussed further in the following sections.
- 6.70 The scheme responds positively to these standards through a landscape-led approach, ensuring that future residents will benefit from high-quality, well-distributed green space throughout the development.

Conclusion on principle of development in the Green Belt

- 6.71 It is demonstrated in the above sections that the proposed development at Pound Farm would utilise Grey Belt land and would not fundamentally undermine the purposes of the remaining Green Belt land within the surrounding area.
- 6.72 In addition, there is a clear unmet need for housing, including affordable housing within the local area. The Site is in a sustainable location and would contribute towards improving local sustainability through upgrades to local cycling and pedestrian routes and local bus services.

- 6.73 Furthermore, the proposed development would meet the Golden Rules requirements as set out in paragraphs 156-157 of the NPPF, including the provision of 50% affordable housing and new open green space. Paragraph 158 of the NPPF states, **“A development which complies with the Golden Rules should be given considerable weight in favour of the grant of the permission”**.
- 6.74 It is also evidenced through the Alternative Sites Assessment that there are no sites in North Hertfordshire that are achievable or suitable for the proposed development.
- 6.75 Therefore, the proposed development would be appropriate development within the Green Belt, as per paragraph 155 of the NPPF, in line with Strategic Policies SP1 and SP5.

Alternative Sites Assessment

- 6.76 An Alternative Sites Assessment has been prepared by ROK Planning and submitted alongside this application.
- 6.77 The study was produced to identify suitable, achievable and available sites for the proposed development, specifically within the North Hertfordshire District local authority area. All potential sites were assessed against the spatial and locational requirements for a development of this size and nature. Thus, sites were excluded that were outside of the required site size limits of 10-30 ha or sites that were not achievable or suitable for the proposed development.
- 6.78 This alternative site assessment demonstrates that there are no suitable alternative sites within North Hertfordshire.
- 6.79 Notwithstanding this, it is noted that were there any suitable sites, these would be deemed ‘additional’ site rather than ‘alternatives’, given the substantial level of unmet need within the district (for both housing and SEND provision). This is in line with the Planning Inspector’s comments relating to appeal ref. APP/Q3115/W/24/3350890, in which the appellant’s submitted Site Selection Report highlighted that given the pressing need for Renewable Energy to meet national targets, any other suitable sites it found would be considered additional sites as opposed to alternative sites. The inspector found in the appellant’s favour on this point and concluded that the SSR and the earlier site selection documents showed that a reasonable and proportionate assessment had been undertaken that adequately demonstrated the appeal site is a preferable location.
- 6.80 Furthermore, the inspector for the same appeal noted that “Whilst smaller areas of land may be available in some of the search area, there is no policy requirement for developers to seek smaller sites or to fragment their proposed operations.” Similarly, the Applicant considers that the methodology applied in the Alternative Sites Assessment, which includes an analysis of sites suitable to deliver the entire development proposal (or broadly comparable), is justified.

Provision of DfE Independent Special School (ISS)

- 6.81 With regards to the provision of new community facilities, Policy HC1 in the Local Plan outlines the following:

Planning permission for new community facilities will be granted provided that they are:

- a) Appropriate in scale having regard to their local context;*
- b) Accessible by a range of transport modes; and*
- c) Would meet an identified need in the local community.*

- 6.82 The proposed development includes the creation of a new ISS for SEMH & ASD in Phase 1 of the development, located to the north-east end of the Site. The intended operator of the school is the Omnia Foundation, which is an independent special school which provides specialist learning for children aged 12-16 years old with special educational needs.
- 6.83 There is an identified need nationally, and within the local community for Special School provision, as outlined in the SEND School Needs Assessment, which is submitted alongside this application.
- 6.84 The proposed 30-place school would offer local, cost-effective provision, reducing reliance on out-of-county independent placements and aligning with new County strategies. The school provision therefore addresses a demonstrable demand that directly aligns with the 11–17 age range proposed at the Independent Special School (ISS) and focuses on filling the ASD/SEMH gap in Hertfordshire.
- 6.85 As such, it is considered that the proposal is in compliance with Policy HC1 of the Local Plan.

Provision of Housing

- 6.86 Policy SP8 of the North Hertfordshire Local Plan states that “Over the period 2011-2031, housing growth will be supported across the District.”
- 6.87 Limb (d) of Policy SP8 states that the Council will “Maintain a five-year housing land supply and target the completion of 20% of new homes over the plan period on previously developed land”. The proposed development is considered to be in line with the intent of Policy SP8, contributing significantly to the shortfall in the Council’s 5YHLS.
- 6.88 Furthermore, given that around 80% of housing delivery is planned to be on greenfield land, it is understood that schemes such as the subject development will be required to come forward in order to meet overall housing delivery objectives.

- 6.89 Policy HS2 of the Local Plan states that, for sites providing 25 or more dwellings, the target percentage of affordable dwellings is 40%, comprising 65% rented tenures and 35% other types of affordable housing. It notes that this is required to meet the considerable need for affordable homes in the district based on assessments of local housing needs.
- 6.90 The most recent assessment of local housing need is comprised by the North Herts and Stevenage Strategic Housing Market Assessment (SHMA) Part II Updated, published in November 2023. This finds an acute shortage of affordable housing in the district, with 1,908 households currently living in unsuitable housing and unable to afford their own housing. Over the Plan period (2022-2031), the overall need for affordable housing is estimated to be 3,190 affordable dwellings, equating to 354 per year.
- 6.91 The number of affordable housing completions for 2023-24, as per the most recent Authority Monitoring Report, was 81 dwellings. This is significantly below the annual identified need. Given the ongoing shortfall in affordable housing delivery, the overall need is likely to be significantly higher than that noted in the last assessment.
- 6.92 The most recent Housing Delivery Test (2023), published by the Ministry of Housing, Communities and Local Government shows that North Herts are currently meeting their Housing Delivery Target at 105%. However considering the stepped housing delivery rate, which is set to more than double the LPA's delivery target in 2024/2025, it is highly unlikely that they will be able to continue to meet this target.
- 6.93 The Housing Strategy outlined in the Local Plan identifies several policies including HS2 (Affordable Housing), HS3 (Housing Mix), HS4 (Supported, sheltered and older persons housing), and HS5 (Accessible and adaptable housing) each of which are addressed in detail within this planning statement.

Provision of Residential Care Accommodation

- 6.82 Policy HS4 of the North Hertfordshire Local Plan states:

“Planning permission for sheltered and supported housing in uses classes C2 and C3 will be granted provided that:

- a) there is good access to local services and facilities;*
- b) the site is well served by public transport;*
- c) appropriate levels of on-site landscaping, amenity space and car parking (for residents, visitors and staff) are provided; and*
- d) it would accord with Policy HS3(b).*

Planning permission for residential developments of 100 units or more will be granted provided that an element of accommodation within Use Class C3 for older persons housing is included under the requirements of Policy HS3(a) where this would be consistent with criteria (a) to (d) above.”

- 6.83 A Care Needs Assessment has been prepared by Carterwood and is submitted as part of this application. The findings of the assessment confirm that based on 2029 (the earliest the proposed care home could be available) there will be a net need for 76 full market standard bedrooms in the market catchment area and 190 beds in the North Herts Council local authority area. Shortfalls of full market standard dedicated dementia beds are 156 and 274 in the two catchments, respectively.
- 6.84 The Carterwood planning need assessment identifies a significant shortfall of full market standard care home bedrooms in the market catchment and North Herts Council local authority area. Even at minimum market standard level, the shortfall of care home bedspaces is clear in respect of dedicated dementia care.
- 6.85 Furthermore, the population projections as per the North Herts Housing Needs Assessment (2023) show a substantial increase in the older population during the period 2022-2031. The population aged 75+ is likely to increase by around 3,032 persons in North Herts and 1,348 persons in Stevenage based on providing the number of homes needed to meet the local housing need. The associated toolkit identifies a need (current unmet need + future need) for 2,399 specialist older person additional housing units over the period 2022-2031 for North Herts.
- 6.86 The proposed care home will provide spacious, flexible, infection control-compliant care accommodation to enable care to be administered most efficiently and effectively. It will assist in meeting the shortfall of full market standard care home bedrooms and the supply of dedicated dementia care bedrooms in the market catchment and North Herts Council area.
- 6.87 It is considered that the provision of a 65-bed care home would meet an identified need in this location and contribute towards the provision of an appropriate housing mix, in accordance with Policies HS3 and HS4.

Provision of Sports Pitches

- 6.88 Policy NE6 of the Local Plan states that:

“Planning permission will be granted for development proposals that make provision for new and/or improved open space which:

- a) Meets the needs arising from the development having regard to the Council’s open space standards and other relevant guidance;*
- b) Contributes towards improving the provision, quality and accessibility of open space; and*
- c) Incorporate any necessary open space buffer(s) for landscape, visual, ecological or air quality reasons.”*

- 6.89 Types of open spaces for the purposes of this policy include Outdoor Sports Facilities.
- 6.90 The proposals include the provision of sports pitches adjacent to the ISS. These will be associated with the school use and provide outdoor sports and play facilities for the school. Additionally, they will be made available for the use of the local community, including for example local sports clubs. It is anticipated that this would be secured by way of a Community Use Agreement as part of any planning permission, a draft of which is submitted with this application.
- 6.91 The North Hertfordshire Playing Pitch Strategy and Action Plan (PPS, 2018) details how both the demand for good-quality football and rugby pitches for use by the local community is high and likely to increase further with the increasing population. Two of the strategic aims include enhancing outdoor sports facilities by improving the quality and management of sites and enabling the provision of new outdoor sports facilities where there is current or future demand to do so.
- 6.92 An analysis of local need for football pitches found the future demand for each pitch type will result in a significant shortfall for adult, youth and mini pitches within the area, as shown below.

Pitch type	Actual spare capacity ⁴	Demand (match equivalent sessions)					
		Overplay	Strategic reserve (20%)	Latent demand	Current total	Future demand	Total
Adult pitches	10.5	2.5	2	0.5	-5.5	6	0.5
Youth pitches	6	1	1	2	-2	12	10
Mini pitches	10	-	2	-	-8	26	18

Figure 3 Summary of (football) pitches required to meet current and future demand, PPS (2018)

- 6.93 The proposed development provides both full-size adult and junior sports pitches that will be used by both the new school and the local community. The junior pitches will particularly help to address the significant shortfall of youth football pitches and community access to rugby pitches in the local area.
- 6.94 Given the assessment of local deficiency, the proposed provision of new sports pitches for both school and community use and should be supported in principle and should be given significant weight as a public benefit.

Loss of Agricultural Land

- 6.95 Paragraph 187 (a) and (b) of the NPPF state that planning policies and decisions should contribute to and enhance the natural and local environment by:

“(a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)

(b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland”.

- 6.96 The Site is classified within the Natural England Land Classification as Grade 2 agricultural land. As such, the proposed development will result in the loss of BMV (Grade 2) land.
- 6.97 The Agricultural Land Classification indicates that 91.1% of land within North Hertfordshire is classified as BMV agricultural land (Grade 3 or better). Only 0.7% of land in North Hertfordshire is classified as Grade 4 or 5. As a result, there are no available sites within non-BMV agricultural land that are capable of meeting the requirements of the proposed development, as demonstrated in the accompanying Alternative Site Assessment (ASA).
- 6.98 Notwithstanding, it is noted in Appeal Ref. APP/X4725/W/24/3354032 (**Appendix F**) that *“the preference for the use of poorer quality agricultural land in the PPG and other documents does not mandate the consideration of alternative sites.”*
- 6.99 Furthermore, an appeal in Central Bedfordshire (ref. APP/P0240/W/24/3341832; **Appendix G**) determined that the loss of grade 1, 2, and 3a BMV was justified considering the size of the area to be lost (c. 10ha); and the quantum of remaining BMV land in the surrounding area. In the case of the subject application, the Site represents less than 0.06% of the total area of BMV in North Herts (and 0.2% of Grade 2 agricultural land).,
- 6.100 It is noted that the loss of BMV land has been considered acceptable on other recent sites within North Hertfordshire. For example, application ref. (23/02935/OP), approved at committee in March 2025, involved the loss of 17ha of Grade 2 agricultural land, which attracted only moderate weight in the planning balance.
- 6.101 Additionally, in an appeal at Codicote, North Hertfordshire (Ref. APP/X1925/W/21/3273701; **Appendix H**) for a proposal that would result in this loss of 11ha. of agricultural land, the inspector noted that this was considered a “*lesser scale harm*” to which they attributed “*limited weight*”.
- 6.102 This is further confirmed in the appeal at Wandon End, North Hertfordshire (ref. APP/X1925/W/25/3359065; **Appendix I**), in which the inspector confirmed that “*whilst the use of BMV land needs careful consideration, there is nothing that indicates the use, or loss of such land is prohibited.*”. The appeal site proposed the loss of c.100ha of BMV, however the inspector concluded that “*Whilst anecdotal evidence suggests yields from the land are good, even taking the higher estimate for the amount of BMV land, the impact of the loss of this land for arable production would be negligible at a national scale.*” **[my emphasis]**
- 6.103 It is therefore clear that the consideration of such loss must be balanced against the benefits of the proposal. In this instance, the benefits of the proposed development (as

outlined in the following sections) are substantial and would not be outweighed by any harm arising from the loss of agricultural land, which is considered to be limited.

Character and Openness

- 6.104 Paragraph 142 of the NPPF states that *“the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”*
- 6.105 NPPF paragraph 153 states that when considering planning applications, LPAs should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. However, footnote 55 confirms that this does not apply to development of Grey Belt land, where development is not inappropriate. In accordance with the assessment above, the proposed development would be appropriate development within the Green Belt and therefore it is not necessary to consider the impact on the openness of the Green Belt.
- 6.106 Case law has established the openness may be conceived as having both spatial and visual components. In terms of spatial openness, it is not considered that the proposed development would have a harmful impact given that the Site is adjacent to built development to the south, confined by a main road to the east, and contained by existing commercial buildings at Pound Farm to the north.
- 6.107 Furthermore, significant landscaped buffering is proposed across the Site, linking to public open space and green infrastructure within the Site. This helps to mitigate the visual impact of the proposed development. This approach softens the impact of the proposed built form on views from each identified key viewpoints, focusing the development on the generous new public open space and SuDS ponds provided around the PROW. Appropriate buffering is also provided to the northern boundary to the Site, which has been identified as being the most sensitive area of the Site.
- 6.108 The sensitivity of the Site within the surrounding landscape and potential impacts to Green Belt openness have been assessed in the submitted Landscape and Visual Impact Appraisal, prepared by Enplan.
- 6.109 The existing site is contained on its eastern boundary by a semi mature hedge which helps to restrict views from the adjoining dwellings and the Bedford Road. The LVIA identified twelve viewpoints which are significant at Year 1. This will subsequently be mitigated by an extensive landscape strategy relative to the boundaries. This will mitigate this temporary impact leading to a Negligible magnitude of change, resulting in a Moderate/Minor effect which would result in a Not Significant impact at Year 15.
- 6.110 All the other viewpoints will have a Not Significant impact and therefore it is concluded that the proposed development will be acceptable in terms of the Landscape and Visual

Impact. Furthermore, the wider views to the north-east and west will be filtered by existing topography and intervening vegetation.

- 6.111 The LVIA concludes that while there are likely to be some visual impacts of the construction process, the impacts of such temporary events are generally considered to be Not Significant.
- 6.112 In terms of landscape character, it was concluded that the changes to the topography would be minimal and that within the local context of the Site, there would be some moderate adverse landscape effects, which would be Potentially Not Significant. Furthermore, in the wider landscape context the effects of the proposal would be minimal as a precedent for existing residential development in Ickleford to the south and south-east has already been set adjacent to the Site and thus there would be little change to the landscape character and value.
- 6.113 Furthermore, Policy E1 of the Ickleford Neighbourhood Plan requires proposals to respect the undeveloped gap between Ickleford and Hitchin. As the Site does not form part of this gap, it is considered the proposal is in full compliance with NP Policy E1.
- 6.114 Overall, it is considered the scheme would not have significant impact on openness, either in terms of the remaining Green Belt or the wider landscape area. As such, it would comply with paragraph 153 of the NPPF Policy SP5 of the North Herts Local Plan, and Policy E1 of the Neighbourhood Plan.

Housing Mix and Tenure

- 6.115 Paragraph 61 of the NPPF requires local authorities to plan for a mix of housing, informed by demographic trends and the needs of different housing groups which plays an integral part of successful placemaking.
- 6.116 Policy SP8 (Housing) of the Local Plan sets out that planning permission for new homes will be granted where an appropriate range of house types and sizes are provided taking into account a number of factors.
- 6.117 In accordance with this Strategic Policy, Policy HS2 (Affordable Housing) and Policy HS3 (Housing Mix) highlight key considerations, with Policy HS3 stating that:

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

- i. the overall targets of this plan;*
- ii. 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;*

iii. the location and accessibility of the site; and recent completions, existing permissions and sites in the five year supply.”

6.118 The table below sets out the general need identified in Figure 9 of the Stevenage and North Hertfordshire SHMA: Part II Update (2023) against the proposed housing mix for Phase 1 of the development:

Type	SHMA indicative mix			Proposed housing mix
	Affordable	Market	Total	
1 Bed	14%	7%	10.5%	10%
2 Bed	31%	15%	23%	20%
3 Bed	46%	48%	47%	54%
4 Bed +	9%	30%	19.5%	16%

6.119 Phase 2 of the development, shown indicatively on the illustrative masterplan, will be in line with that proposed in Phase 1 of the development, while having regard for Local Plan Policy and the most up-to-date SHMA.

6.120 On this basis, the provision is considered to be appropriate with reference to the most up to date SHMA, and therefore in accordance with Policy SP8 of the Local plan.

6.121 Policy HS3 also requires consideration to be given to the location and accessibility of the site and recent completions, existing permissions, and sites in the five-year supply.

6.122 In respect of the location and accessibility of the Site, it is demonstrated that it is accessible and would thus be suitable for the proposed mix of 2-, 3- and 4-bed housing. Regarding existing permissions, the proposal is in accordance with the mix considered to be acceptable in comparable recent schemes, including a development for 84no. dwellings (Indicative mix 8x2-bed, 15x 2-bed, 31x3-bed, 24x4-bed and 6x5-bed), granted permission with ref.21/00434/HYA.

6.123 Finally, in terms of five-year supply, given the severe shortfall in NHDC’s housing land supply position (2.6 years), it is evident that there is a substantial need for all dwelling types, including family-sized dwellings as proposed.

Housing Quality

6.124 Local Plan Policy HS5 requires proposals for major residential development to demonstrate that a minimum of 50% of homes can be built to M4(2) Accessible and Adaptable Standard, with 10% of affordable units built to M4(3) Wheelchair User Standards.

6.125 In accordance with Policy HS5, in Phase 1 of the development 50no. homes will be designed to M4(2) Accessible and Adaptable Standard, with 10no. dwellings designed to

fully accessible M4(3) Wheelchair User Standards. All dwellings in Phase 2 of the development will be in accordance with these requirements.

- 6.126 Furthermore, the proposed units all meet national space standards, as well as providing external amenity in excess of minimum standards.
- 6.127 All proposed dwellings will be dual aspect and will provide excellent levels of natural light, privacy and outlook.

Noise

- 6.128 A Noise Impact Assessment has been prepared by KP Acoustics and submitted as part of this application, assessing both phases of the development. In the first instance, the surveyed and predicted noise levels have been assessed to determine the minimum sound reduction requirements of the external building façade elements to achieve suitable internal noise levels, based on the requirements of local and national policy.
- 6.129 With regards to internal acoustic conditions, it is confirmed that new dwellings will satisfy the criteria in BS 8233 and ProPG through the provision of suitable glazing specifications across the development.
- 6.130 As such, it is considered that the proposed development is in accordance with Local Plan Policy HS5, and national policy in relation to housing quality.

Odour

- 6.131 It is considered that the proposed development is located at a sufficient distance from existing livestock operations to ensure that there would be no material adverse impact on the residential amenity of future occupants. In particular, it is not anticipated that noise or odour associated with livestock activities would give rise to any significant disturbance or harm to living conditions.
- 6.132 Notwithstanding this, the scheme incorporates a substantial area of landscaped open space and Sustainable Drainage Systems buffering. This, together with the intervening siting of the proposed school, is considered to provide an effective physical and visual separation between the residential development and adjacent farmland, thereby further mitigating any potential impacts arising from the proximity of agricultural uses.
- 6.133 As such, it is considered that the proposed development is in accordance with Local Plan Policy HS5, and national policy in relation to housing quality.

Design and Layout

- 6.134 National, regional and local policy places emphasis on the design of new developments, requiring new schemes to respect the architectural character of the surrounding area and to minimise amenity impacts on neighbouring properties.
- 6.135 Paragraph 135 of the NPPF places significant weight on the design of development, stating that new development should function well and add to the overall quality of an area, is visually attractive and is sympathetic to local character in terms of its architecture.
- 6.136 Policy D1 of the Local Plan notes that permission will be granted provided that development proposals:
- a) *Respond positively to the site's local context,*
 - b) *Take all reasonable opportunities, consistent with the nature and scale of the scheme, to:*
 - i. *create or enhance public realm;*
 - ii. *optimise the potential of the site by incorporating Sustainable Drainage Systems (SuDS);*
 - iii. *reduce energy consumption and waste;*
 - iv. *retain existing vegetation and propose appropriate new*
 - v. *planting;*
 - vi. *maximise accessibility, legibility and physical and social connectivity both internally and with neighbouring areas;*
 - vii. *future proof for changes in technology and lifestyle;*
 - viii. *design-out opportunities for crime and anti-social behaviour; and*
 - ix. *minimise the visual impact of street furniture and parking provision;*
 - c) *Have regard to the Design SPD, and any other relevant guidance;*
 - d) *Within Letchworth Garden City have regard to the Letchworth Garden City Design Principles contained in Appendix 5; and*
 - e) *For residential schemes, meet or exceed the nationally described space standards and optional water efficiency standards.*
- 6.137 Strategic Policy SP9 (Design and Sustainability) of the Local Plan requires development to have consideration for the detailed policy requirements set out in the Local Plan and have regard for the Design SPD.
- 6.138 The North Hertfordshire Design SPD outlines the foundations for good design. The key urban design principles identified as underpinning all development throughout the district are as follows:
- 1) *Character (sense of place and history)*
 - 2) *Continuity and Enclosure (distinguish between public/private space)*
 - 3) *Quality of the Public Realm (sense of well-being and amenity)*
 - 4) *Ease of movement (connectivity and permeability)*
 - 5) *Legibility (ease of understanding)*
 - 6) *Adaptability (ease of change)*
 - 7) *Diversity (ease of choice)*

- 8) *Quality of Private Space (useability)*
- 9) *Sustainability (reducing carbon and increasing efficiency)*

- 6.139 Specific design guidance is given for Ickleford in section 5.8 of the Design SPD. The key design principles outlined in the North Hertfordshire SPD for Ickleford outline the need to protect the trees through the centre of the village and strengthen the gateways into the village as well as the village itself. While these principles don't pertain to the Site, which lays outside of Ickleford Village itself, the intention of these principles will be maintained and upheld in the proposal.
- 6.140 Furthermore, Neighbourhood Plan Policy SD3 states that *"Proposals for good quality new development will be supported, where they are in accordance with the guidelines and design principles set out in the Ickleford Design Codes."* It sets out that proposals should:
- *Relate to the existing development pattern in terms of enclosure and definition of streets/spaces;*
 - *Be of an appropriate scale and density in relation to its setting;*
 - *Use materials appropriate to the development's context;*
 - *Be of a design with a locally inspired or distinctive character;*
 - *New dwellings should not be more than 2 storeys in height unless the context is appropriate;*
 - *Be well integrated with the community and facilities by reinforcing pedestrian connections and taking opportunities to provide new ones;*
 - *Integrate car parking within landscaping so that it does not dominate the street;*
 - *Incorporate Sustainable Drainage (SuDS) as the preferred method of surface water drainage for all development;*
 - *Provide facilities for secure cycle storage.*
- 6.141 A sensitively designed residential development at the edge of the Ickleford positively contributes to strengthening the village gateway by providing a clear, legible transition from open countryside into the built environment. The proposal would create a coherent and welcoming entrance to the village through high-quality architecture, appropriate building scale, and the use of materials that reflect the established character of the settlement. Enhanced landscaping, boundary treatments, and street frontage would frame views into the village and define the settlement edge more clearly.
- 6.142 The Ickleford Design Code distinguishes between Rural Countryside areas, which apply to the northern part of the Site, and Green Belt, which relates to the southern part. Site IC3, which is adjacent to the proposed development, is designated as a Settlement within the Ickleford Design Guidance. Given its close proximity to this designation, the proposal has had regard to the guidance applicable to IC3.
- 6.143 Neighbourhood Plan Policy E3 requires developments to reflect the rural character of the village and its surroundings through the scale and character of proposed buildings. The

Policy states that *“The design of new buildings should ensure that adequate space is provided around them to compliment the rural character of the village.”*

- 6.144 The proposed site layout is considered to respond positively to local context. It provides an appropriate sensitive density of approximately 20dph for Phase 1 of the development, and approximately 17.7dph for the Phase 1 and Phase 2 combined. This is considered to be in keeping with the edge of settlement location, as well as the Ickleford Design code which states that all new development should be under 20dph. The proposed typology, consisting of a mix of predominantly semi-detached and short rows of terraced houses is also in accordance with existing development in Ickleford.
- 6.145 The proposed layout is informed by pre-application discussions surrounding the site constraints. These discussions included retention of historic field boundaries, the consideration of overlooking onto Ryder Way and a careful consideration of urban grain, as well as a reduction of proposed access points and better integration of PROW's.
- 6.146 Critically, the layout has been designed with regard to its integration with the wider travel routes in the area, delivering a key public benefit of the scheme in terms of improving local connectivity, as shown on the connectivity map below.



Figure 4 Connectivity Plan

- 6.147 It is considered that the proposal for approx. 230no. dwellings can be comfortably accommodated on site whilst providing a high-quality scheme which will offer an acceptable standard of living for future occupants. As the proposed site plan demonstrates, each dwelling is located within a spacious plot with large gardens and car parking spaces. Circulation space is also provided across the Site.

- 6.148 Phase 1 of the proposed development comprises a mix of house types, including detached, semi-detached and short terraces. The proposed houses are two-storeys in height, minimising the bulk and massing of the development.
- 6.149 The proposed materials are in line with the established character of the area. Finishes will be of a high quality and ensure durability for the lifetime of the development, promoting circular economy and whole-life cycle principles. Further detail is provided within the Design and Access Statement, which includes a contextual study of existing development within the surrounding area.
- 6.150 It is considered that the proposed ISS, comprising 7no. modest single-storey buildings, is appropriate in scale, taking into account its local context. Its size and design are thoughtfully aligned with the surrounding settlements, ensuring it integrates with both the proposed residential development and the existing community features. The structure complements the area's character, both in terms of architectural style and overall massing, avoiding any disproportionate visual impact.
- 6.151 The proposed school provides adequate space for educational activities while respecting the natural surroundings. This is in accordance with the requirements of the school, which seeks to integrate learning with the natural environment to better meet the needs of students with special educational needs.
- 6.152 A wetland park will be located adjacent to the school, incorporating engaging educational features such as information boards, activity spaces, and pond dipping areas, providing an enhanced opportunity for nature learning.
- 6.153 Overall, the proposed development is considered to be in keeping with the local character, in accordance with Local Plan Policy SP9, D1, Neighbourhood Plan Policy E3 and the North Hertfordshire Design SPD.

Landscaping

- 6.154 Strategic Policy SP12 of the Local Plan aims to ensure that whilst significant growth is being accommodated during the plan period, the natural environment is being protected and enhanced, and in doing so, the Council will seek to:

“Protect other open spaces and support provision of new and improved open space.”

- 6.155 Policy NE1 of the Local Plan predominantly pertains to the protection of existing strategic green infrastructure, while Policy NE2 focuses on the impact of development on the Council's Character Areas. Both policies require development to have consideration for the long-term management and maintenance of any existing and proposed landscaping.
- 6.156 Policy E2 of the Neighbourhood Plan states that:

“Development proposals should protect and, where practicable, enhance the historic and natural landscape and local character of the Parish, including the delicate chalk rivers and their valleys, field ponds, mature trees, and hedgerows. Such features should be protected and, where appropriate, incorporated into landscape design schemes. Insofar as planning permission is required, the planting of hedgerows and trees, and the enhancement of the existing vegetation and the chalk stream ecosystem will be supported.”

- 6.157 Landscaping proposals have been integrated as part of the overall design approach from the outset. Various areas of landscaping are proposed, as set out in the Landscaping Design and Access Statement, prepared by Match Landscape Architects and submitted alongside this application. The submitted landscaping plan sets out a coordinated approach to the delivery of public open space. Led by green infrastructure, a series of ecologically rich, interconnected public open spaces are proposed, set around an improved PROW. Wet woodlands, landscape learning spaces, meadows, play areas, parkland walks and green streets become the woven tapestry of landscape-led open spaces and community amenities.
- 6.158 The landscaping strategy forms an essential component of the overall design approach, ensuring that key site constraints, namely flood-risk considerations, and the spatial requirements are effectively accommodated and turned into placemaking opportunities. The location, form, and function of the public open spaces have therefore been deliberately structured to align with Local Plan policy expectations for high-quality green infrastructure, accessible recreation, and integrated surface-water management.

Open Space

- 6.159 Policy NE6 of the Local Plan states that planning permission will be granted for development proposals that make provision for new and improved open space.
- 6.160 Furthermore, Policy C2 of the Neighbourhood Plan states that *“Development proposals for the improvement of existing recreation areas and open spaces and the provision of additional facilities will be supported.”*
- 6.161 In accordance with Policy NE6 and the North Hertfordshire Validation Requirements, an Open Space Assessment has been conducted.
- 6.162 The Developer Contributions Supplementary Planning Document (2023) sets out minimum open space requirements for new residential development. The SPD confirms that open space should be provided on-site where it is expected to be usable, of meaningful scale, and capable of long-term management.
- 6.163 Policy NE6 states that:

“Planning permission will be granted for development proposals that make provision for new and/or improved open space which:

- a) Meets the needs arising from the development having regard to the Council’s open space standards and other relevant guidance;*
- b) Contributes towards improving the provision, quality and accessibility of open space; and*
- c) Incorporate any necessary open space buffer(s) for landscape, visual, ecological or air quality reasons.”*

6.164 As such, the Site has been designed to maximise the public open space, SuDS attenuation features, and relationship to adjoining land uses, ensuring that spaces are functional, usable and accessible.

6.165 As per the North Hertfordshire Open Space SPD, a multiplier of 2.4 persons per dwelling is typically applied to determine the expected population of the development. On this basis, a comparative analysis of the quantitative standards has been undertaken, a summary of which is provided in the table below:

Type of Open Space	SPD Standard per 1,000 people	Required provision (552 pop.)	Proposed provision	Percentage of standard
Parks and Gardens	0.8ha	0.44ha	1.81ha	410%
Amenity Green Space	0.6ha	0.33ha	1.73ha	523%
Natural and semi-natural	1.8ha	0.99ha	4.31ha	434%
Outdoor sports pitches	1.2ha	0.66ha	0.74ha	119%
Equipped designated play areas	0.25ha	0.14ha	0.24ha	173%
Informal play	0.30ha	0.17ha	1.47ha	890%
Total open space		2.95ha	10.47ha	354%

Table 1 Open space provision vs local standards

6.166 As shown, the proposal delivers a hierarchy of open spaces, including amenity greenspace, naturalised SUDS, and children’s play areas, in full compliance with Policy NE6 of the Local Plan, Policy E2 and C2 of the Neighbourhood Plan and the North Hertfordshire Open Space SPD.

Biodiversity and Ecology

- 6.167 Policy NE4 of the Local Plan states that “*Planning permission will only be granted for development proposals that appropriately protect, enhance and manage biodiversity.*”, noting that development should deliver measurable biodiversity net gains.
- 6.168 The proposed development will ensure a minimum of 10% Biodiversity Net Gain (BNG) is achieved in accordance with current legislation (2021 Environmental Act).
- 6.169 A BNG Assessment was completed by Arbtech, which confirms that with the implementation of the Proposed Site Layout Plan and achievement of the condition of the proposed habitats, the development proposal for Phase 1 of the development will achieve:
- A net gain of area-based habitat units (+33.31%);
 - A net gain of linear-based habitat units (+114.27%); and
 - A net gain in watercourse units (16%).
- 6.170 A Baseline BNG Assessment was completed for Phase 2 of the development, which confirmed that in order to achieve a 10% uplift in BNG the following must be achieved:
- For area-based habitats, a minimum area-based unit score of 32.36 will need to be achieved.
 - For linear-based habitats, a minimum linear-based unit score of 0.73 will need to be achieved.
 - For watercourse habitats, a minimum linear-based unit score of 0.88 will need to be achieved.
- 6.171 These units will be included with any subsequent application for matters reserved, regarding Phase 2 of the development.
- 6.172 Furthermore, Policy NE4 states that applicants should submit an ecological survey commensurate to the scale and location of the development and demonstrate that adverse impacts can be avoided or minimised.
- 6.173 As such, a Preliminary Ecological Appraisal of the whole Site has been carried out by Arbtech. The report concludes that the majority of the survey area is of low ecological value. The site contains native hedgerow which is listed as a habitat of principal importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006). It was concluded that no direct impacts to any notable habitats will occur as a result of the proposed development.
- 6.174 The assessment highlights that wintering birds were observed on Site. Accordingly, a breeding bird survey was completed by Cherryfield Ecology. The report makes several recommendations in terms of creation, retention and enhancement of habitats, as well a bird-friendly lighting design, to avoid disturbance to breeding birds.

- 6.175 The appraisal report also notes that the Site contains habitats with a moderate suitability for bats. As such, further surveys are recommended to determine likely presence or absence. No other ecological constraints to development of the Site are identified in the report.
- 6.176 A variety of ecological enhancements including habitat creation are incorporated into the scheme, with the provision of new SuDS ponds that will provide significant ecological and drainage benefits.
- 6.177 This is considered to accord with the requirements of Policy NE4 of the adopted Local Plan.

Neighbouring Amenity

- 6.178 Policy D3 (Protecting living conditions) of the Local Plans states that *“Planning permission will be granted for development proposals which do not cause unacceptable harm to living conditions.”*
- 6.179 Supporting text of Policy D3 notes that such harm may arise from may arise from traffic generation, parking, loss of daylight and sunlight, noise, overlooking, pollution (including light pollution) and dominance as well as other issues.
- 6.180 The proposed development is not considered to result in any material impact on the amenity or privacy of neighbouring properties. The proposed houses benefit from a generous degree of separation from nearby residential properties, given the proposed landscape buffering and the orientation of the homes on Ryder Way which results in rear gardens backing onto the proposed development. As such, there are not considered to be any adverse impacts in terms of overlooking, overbearing or loss of natural light to any neighbouring properties or uses.
- 6.181 The design also incorporates several measures to ensure any potential impacts are appropriately mitigated. All pitches will feature a landscape buffer, following an ecologically beneficial structure of meadow, ground cover and native trees, establishing a woodland-edge style transition which protects the development from nocturnal light spill and screens views of the sport pitches. This will also provide meaningful noise and light mitigation.
- 6.182 Overall, it is considered that a good level of residential amenity will be provided for residents and the noise impacts associated with the development will not result in adverse noise impacts upon the amenity now or of future occupiers.

Transport Considerations

- 6.183 Strategic Policy SP6 of the Local Plan focuses on delivering accessibility improvements, and promoting the use of sustainable modes of transport, through encouraging

development in sustainable locations, assessing proposals against transport policies within the plan, and requiring applicants to submit associated transport assessments.

6.184 Furthermore, Policy T1 of the Local Plan states that permission will be granted provided that:

- a) *Development would not lead to highway safety problems or cause unacceptable impacts upon the highway network;*
- b) *Mechanisms to secure any necessary sustainable transport measures and / or improvements to the existing highway network are secured in accordance with Policy SP7;*
- c) *Suitable Transport Statements, Transport Assessments and / or Travel Plans along with supporting documents are provided where required; and*
- d) *For major developments, applicants demonstrate (as far as is practicable) how:*
 - i. *the proposed scheme would be served by public transport;*
 - ii. *safe, direct and convenient routes for pedestrians and cyclists will be provided; and*
 - iii. *comprehensive integration into the existing pedestrian and cycle, public transport and road networks will be secured.*

6.185 Neighbourhood Plan Policy MTT1 states that:

“Wherever practicable, development proposals should upgrade, enhance existing pedestrian routes, and connect into them. The development of new links within the village, to neighbouring villages and to the wider countryside will be supported. As appropriate to their scale, nature and location, development proposals should include measures that keep traffic speeds low and improve the provision of footways and access for pedestrians and cyclists and horse riders. Any such new roads, junctions, footways, and traffic management measures should be designed to complement the rural character of the village and respond positively to local heritage.”

6.186 Vehicular access is provided from the proposed access point from Bedford Road. The supporting information from DHA demonstrates that this provides suitable access and visibility from the junction with Bedford Road.

6.187 A Transport Assessment prepared by DHA is submitted with the application and should be referred to when assessing transport and highways considerations. A summary of the key elements is provided in the sections below.

6.188 This report includes an assessment of the trip generation and attraction for the total development. It concludes that the proposed development has the potential to generate and attract approximately 189 two-way vehicle movements in the weekday AM peak hour and 109 two-way vehicle movements in the weekday PM peak hour. The trip distribution exercise demonstrates that the vehicular trip generation of the proposed development will have a negligible impact in this regard.

- 6.189 Furthermore, as requested by HCC Highways at pre-application stage, the Transport Assessment includes a full capacity assessment of the following junctions:
- i. A600 Bedford Road / Site Access priority junction;
 - ii. A600 Bedford Road / Turnpike Lane / Westmill Lane mini-roundabout; and
 - iii. A600 Bedford Road / Station Road / Hitchin Road roundabout.
- 6.190 The full capacity assessment demonstrates that the proposed development can be accommodated without giving rise to 'severe' residual impacts on the operation of the local highway network, in line with Paragraph 116 of the NPPF.

Parking

- 6.191 Policy T2 of the Local Plan outlines the parking requirements for proposed developments. Parking for residential development is expected to be provided in accordance with the minimum standards set out in Appendix 4 of the Local Plan.
- 6.192 Neighbourhood Plan Policy MTT2 states that *"Proposals for new development that provide additional off-road car parking spaces will be supported."*
- 6.193 Appendix 4 of the Local Plan sets residential parking standards for both car parking and cycle parking. This is as follows:
- **1 bedroom:** 1 car parking space per dwelling minimum + 1 secure covered cycle space per dwelling (none if garage or secure area provided).
 - **2+ bedrooms:** 2 car parking spaces per dwelling minimum + 1 secure covered cycle space per dwelling (none if garage or secure area provided).
- 6.194 Each dwelling will be provided with one or two allocated vehicle parking spaces in accordance with Appendix 4 of the Local Plan. A total of 36 visitor spaces are also proposed, in accordance with the North Hertfordshire District Council: Vehicle Parking at New Development Supplementary Planning Document (SPD).
- 6.195 One Electric Vehicle (EV) charging point will be provided per dwelling, in accordance with Building Regulations (Part S).
- 6.196 Off-street car parking has been sensitively integrated into the layout, with allocated spaces provided adjacent to each dwelling. The strategy seeks to reduce the visual dominance of parking in the streetscene through careful placement, boundary treatments, and soft landscaping. This approach helps retain and reinforce the character of the Site and its surroundings.
- 6.197 Cycle parking is provided in accordance with the standards set out in the Appendix 4 of the Local Plan, within the curtilage of each dwelling.

- 6.198 With regards to the SEND school, a total of 39 car parking spaces are proposed, including three accessible bays. In addition, the school will be served by an internal drop-off / pick-up loop, with capacity for up to ten cars at any one time. A cycle store comprising eight spaces is proposed for staff. The car park will be provided with EV charging in accordance with Part S of Building Regulations.
- 6.199 Parking provision for Phase 2 will accord with the minimum standards set out in the North Herts Vehicle Parking at New Development Supplementary Planning Document (SPD). Full details will be provided as part of future Reserved Matters applications.

Access

- 6.200 Vehicular access to the Site is proposed from a new access point off Bedford Road to the south-east of the Site.
- 6.201 The site access has been designed in accordance with the Place & Movement Planning and Design Guidance for Hertfordshire. The main site access road will have a carriageway width of 5.5m, with 1.8m wide footways on both sides. It has been classified as a Local Access Road, which the HCC guidance states is intended to serve fronting residential properties within low-speed environments.
- 6.202 The principle of site access had been agreed with the Hertfordshire County Council and has been designed in accordance with Policy 5 of Local Transport Plan 4 as well as an independent Stage 1 Road Safety Audit. It is located in a safe and suitable location, and the local highway network has a good safety record.
- 6.203 Individual dwellings are accessed via a spine road with a footway present on one side of the carriageway. Safe and legible pedestrian pathways are incorporated throughout the Site, ensuring walkability and promoting sustainable modes of travel within the development. These will connect the development to existing pedestrian infrastructure.
- 6.204 The accessibility of the Site is discussed in more detail above, however it should be noted that ISS typically require specialist transport and as such provision will be in place, with specially trained drivers and carers, reducing the number of private vehicle trips associated with the school. Additionally, pupil numbers are limited to approx. 30 and as such will not result in significant trip generation.

Servicing

- 6.205 Servicing for the proposed development would primarily include waste management, post and deliveries. Vehicles associated with these deliveries include cycles, motorbikes and cars/vans.

- 6.206 The access road is suitable for the accommodation a 11.4m long refuse vehicle, fire tender, pantechnicon and estate car, as demonstrated by swept path analysis in the submitted Transport Assessment.
- 6.207 Bin stores will be positioned to ensure carry distances for residents do not exceed 30m and drag distances for refuse workers do not exceed 10m from the bin stores to the kerb.
- 6.208 A Delivery and Servicing Management Plan, which is anticipated to be secured by condition, will set out the typical operational requirements and would be overseen by the site management company.
- 6.209 The Transport Assessment prepared by DHA should be referred to when assessing the arrangements for servicing and delivery vehicles to and from the Site.

Summary

- 6.210 In summary, the proposed development would not have an adverse impact on highway capacity or safety, would promote sustainable travel choices and would include an appropriate level of cycle parking.
- 6.211 It is therefore considered that the proposed pedestrian and cycle access, delivery and servicing strategy, and waste management strategy comply with the objectives of the NPPF and the requirements of local policy.

Travel Plan

- 6.212 Paragraph 109 of the NPPF (2024) states that significant development should be focused on locations which are or can be made sustainable through limiting needs to travel and offering a genuine choice of transport modes.
- 6.213 Paragraph 117 of the NPPF (2024) continues, and states that all developments that will generate significant amounts of movement should be required to provide a travel plan.
- 6.214 An interim Travel Plan prepared by DHA has been submitted to support the application.
- 6.215 The core objective of a Travel Plan is a strategy for managing travel needs and transport provision within an organisation or site. It seeks to improve access to a development or site by sustainable modes of transport. It therefore contains both physical and behavioural measures to increase travel choices and reduce reliance on single-occupancy car travel.
- 6.216 The Travel Plan involves the development of a set of mechanisms, initiatives and targets that together can enable an organisation or site to reduce the impact of travel and transport on the environment, whilst also bringing a number of other benefits.
- 6.217 The plan will be implemented prior to occupation of the residential units and details provided to the Council. The Travel Plan Coordinator (TPC) will be responsible for the

day-to-day management, coordination, promotion, and implementation of the Travel Plan. Additionally, the TPC will be a point of contact for the Council, and for any occupants who have queries about their travel.

- 6.218 The proposal therefore meets the aims and objectives of policies T1 and SP6 of the Local Plan, and the strategic aims of the NPPF.

Flood Risk and Drainage

- 6.219 Paragraph 170 of the NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.
- 6.220 Policy NE7 of the Local Plan requires proposals for new development to adequately address flood risk concerns and water management. Furthermore, Policy NE8 highlights the requirement for proposals to include SuDS.
- 6.221 The EA identify that the Site is predominantly located within Flood Zone 1. The Site is not at risk from any other source of flooding.
- 6.222 A Flood Risk Assessment has been prepared by DHA and is submitted with the planning application. The Assessment concludes the development proposals can be suitably drained and will not increase the risk of flooding either on or off site. As such the proposals accord with the requirements of the NPPF, PPG and the National standards for sustainable drainage systems (SuDS) in respect of securing a suitable and sustainable drainage strategy for the development.
- 6.223 Additionally, a surface water drainage strategy has been prepared by DHA and submitted as part of this application, which takes into account local guidance and SuDS manual, with the aim of to improving water quality. A Sustainable Drainage System (SuDS) has been provided as part of the surface water drainage layout to deal with the surface water generated from the development to ensure that flood risk is not increased elsewhere.
- 6.224 Based on the phasing and site topography, the drainage for the development has been split into two catchments each with a controlled discharge into the watercourse located to the north of the Site.
- 6.225 For Phase 1, roof areas will discharge to a network of gravity surface water sewers into an above ground attenuation basin with a controlled discharge into the watercourse located to the North of the site. Areas of private hardstanding will be constructed as porous paving. For the part of the SEND school, areas of hardstanding will be constructed as a porous pavement which will discharge into an underground cellular storage tank located under the all-weather sports pitch before connecting into the attenuation basin.

- 6.226 For Phase 2, roof areas will discharge to a network of gravity surface water sewers into several above ground attenuation basin with a controlled discharge into the watercourse located to the North of the site. The attenuation basins will be linked via new swales. Areas of private hardstanding will be constructed as porous paving.
- 6.227 The foul drainage for the development has been shown draining to a proposed foul water pumping station with a connection to the existing foul water drainage network where available capacity can be provided.
- 6.228 The design of the surface water drainage system has been integrated into the landscape and masterplan and contributes to placemaking and environmental enhancement by keeping surface water runoff at or close to the ground surface. The proposed SuDS approach maximises benefits for amenity by incorporating into the masterplan via a network of footpath to create multi-functional places and landscapes.
- 6.229 The proposal is therefore considered acceptable in flood risk and drainage terms, and in line with national and local policy, with particular regard to policies NE7, NE8, NE9 and NE10.

Archaeology

- 6.230 Local Plan Policy HE4 requires planning applications to be supported by a desk-based assessment, with a subsequent archaeological field evaluation should it be deemed necessary.
- 6.231 An archaeological desk-based assessment (DBA) has been prepared by RPS Tetrattech and submitted alongside this application. The DBA confirms that no World Heritage Sites, Scheduled Monuments, Historic Battlefield or Historic Wreck sites have been identified within the immediate vicinity of the study site. The available information indicates an archaeological potential within the study site for the later prehistoric periods, the Roman, Saxon and Medieval periods, for remains considered most likely to be of low, i.e. local significance.
- 6.232 The DBA includes reference to a Geophysical Survey which was undertaken by Sumo GeoSurveys. This identifies anomalies relates to archaeological and possible archaeological features, focused within the western and southern areas of the Site.
- 6.233 In line with the above, further archaeological mitigation measures in association with redevelopment impacts have been recommended, and in accordance with the NPPF, and proportionate to the impact of the development, it is recommended that these works can follow the granting of planning permission, secured by an appropriate planning condition.

Energy and Sustainability

- 6.234 Policy D1 of the Local Plan outlines the key design principles of the Local Plan, including elements of public realm, SuDS, energy consumption, accessibility and visual impact.
- 6.235 North Hertfordshire District Council adopted the Sustainability Supplementary Planning document (SPD) in September 2024. This sets out best practice and requirements for residential developments, which include demonstrating compliance with policy and Building Regulations (Part L).
- 6.236 The SPD applies a tiered approach, with each level reflecting progressively higher standards of sustainable design and performance. Developments must demonstrate how they meet the minimum Bronze requirements, while Silver and Gold tiers encourage enhanced measures such as improved energy efficiency, biodiversity gains, and reduced embodied carbon.
- 6.237 Furthermore, Policy SD4 of the Neighbourhood Plan states that *“the design and standard of any new building should meet a high level of sustainable design and construction and be optimised for energy efficiency, targeting zero carbon emissions.”*
- 6.238 The proposed development represents a highly sustainable form of development, seeking to incorporate renewable energy and energy efficient measures where possible to reduce the carbon emissions of the scheme beyond the minimum Part L requirements.
- 6.239 An Energy and Sustainability Statement has been prepared by Watkins Payne and submitted alongside this application. The statement sets out that the development proposes the following energy efficiency measures:
- Enhanced building fabric performance (meeting or surpassing Part L standards)
 - Low g-value glazing to reduce solar gains
 - High-efficiency mechanical and electrical services
- 6.240 The Energy and Sustainability Statement demonstrates how the proposal would align with each of the requirements of the SPD. Accordingly, the proposal is expected to reach silver target level for ‘Optimising Passive Design & Fabric Performance’ in the residential aspect of the scheme and bronze for the remaining categories, with several silver criteria being met.
- 6.241 Furthermore, it is confirmed that the proposed development would therefore achieve a minimum of 65.44% and maximum of 68.96% reduction in regulated CO₂ emissions against the Part L compliant baseline for the residential aspect of the development, and minimum of 7.30% and maximum of 23.70% reduction in regulated CO₂ emission for the non-domestic (SEN School buildings) areas of the development.
- 6.236 On the basis of the above, the proposed development is in line Policy D1 of the Local Plan, the Sustainability SPD, Neighbourhood Plan Policy SD4 and National guidance, and is therefore considered acceptable in terms of energy, and sustainability.

Air Quality

- 6.237 Policy of D4 of the Local Plan sets out the local framework in respect of air quality. The policy requires policies to:
- a) *Give consideration to the potential or actual impact on local air quality, both during the demolition/ construction phase and as a result of its final occupation and use;*
 - b) *Propose appropriate levels of mitigation to minimise emissions to the atmosphere and their potential effects upon health and the local environment; and*
 - c) *Carry out air pollution impact assessments, where required, to determine the impact on local air quality of the development.*
- 6.238 An Air Quality Assessment has been prepared by KP Acoustics and submitted as part of this application. The assessment has been undertaken to assess both construction and operational impacts associated with the proposed development.
- 6.239 As assessment of the potential dust impacts has been carried out and concludes that during the construction phase, releases of dust and PM₁₀ are likely to occur during site activities. However, through good practice and the implementation of suitable mitigation measures, the impact of dust and PM₁₀ will be effectively minimised, and the residual dust impacts are expected to be not significant.
- 6.240 Additionally, a review of air quality monitoring data and the surrounding land-uses indicates that concentrations of NO₂, PM₁₀ and PM_{2.5} at the Site are well within the relevant long and short-term air quality standards. On this basis, the proposed development will not introduce new exposure to poor air quality.
- 6.241 Overall, the assessment concludes that the air quality is not considered a constraint to the development of the Site, as proposed and therefore it should not be a material consideration in relation to the planning application at the Site.
- 6.242 As such, the proposed development complies with Policy D4 of the Local Plan.

7. ECONOMIC BENEFITS

- 7.1 The Proposed Development will represent a substantial benefit for the local economy, comprising additional expenditure and employment during both the construction and operational phases. The following sections details the local employment market and the specific benefits generated as a result of the proposals.

Employment in North Herts

- 7.2 North Hertfordshire has a population of 83,928 aged 16-64, of which 73,800 are in current employment (Nomis, 2025). Taken as a proportion of the population, this gives an employment rate of 83.6%, higher than the national average of 75.6%.
- 7.3 Within this figure it is estimated that 61.3% of the population are in Groups 1-3 – meaning managers, directors, senior officials, and professional occupations; 13.4% are in Groups 4-5 – meaning administrative and secretarial occupations and skilled trades; 11.1% fall within Groups 6-7 – meaning caring, leisure and services, and sales and customer service occupations; and 14.2% are in Groups 8-9 – meaning process, plant, and machine operatives, and elementary occupations.
- 7.4 These figures mean that North Herts sits above the national average for residents employed in professional occupations – which constitute 31.2% of the total but only make up 27% on average nationally.
- 7.5 The percentage of the District's residents employed in caring, leisure and other service occupations (7% from Groups 8-9) is similar to the regional average of 8%.
- 7.6 This proportion of residents working in professional and caring occupations in NHDC indicates a strong supply of skilled workers locally, which will be aligned with the employment opportunities created by the Proposed Development.

Employment Creation

Construction Phase

- 7.7 The construction phase of the Proposed Development will create approx. 210 jobs in Phase 1 and approx. 250 jobs in Phase 2, totalling 360 jobs. This will bring a significant boost to the local economy over the course of the development.
- 7.8 Additionally, it is estimated that the construction value of the development will be in excess of £100m. This will provide significant indirect benefit to the local economy, creating a significant number of jobs within the supply chain.

Operational Phase

- 7.9 The proposed SEND school will have a staff to pupil ratio of 1:1. As such, it will create an estimated 30no. FTE jobs during the operational phase.
- 7.10 It is also estimated that the proposed 65-bed care home will provide between 60 and 70 FTE jobs.
- 7.11 Therefore, the Proposed Development will create approx. 100no. permanent jobs. This will provide a significant boost to the local economy, both through the direct and indirect effects of employment generation.

Local Expenditure / Council Tax

- 7.12 The Proposed Development will provide an additional population of approx. 552 (460 adults). This will have a direct impact in terms of increased council tax receipts, estimated to provide an additional £725,000 per annum to the local council to fund local services.
- 7.13 The population will also provide a boost to expenditure within the local economy. The spend per person is estimated in accordance with the ONS Family Spending Survey figure of £465.70 per week per household (excluding housing, fuel and power costs).
- 7.14 Therefore, it is estimated that the Proposed Development will add approx. £5.5m annually to the local area, benefitting local businesses and growing the local economy.

Conclusion

- 7.15 Overall, it is demonstrated that the proposals will provide a substantial benefit to the local economy in Ickleford, both during the construction and operational phases. This will contribute positively to local economic growth in North Hertfordshire, in accordance with paragraph 85 of the NPPF which states that “significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development”.

8. PLANNING BALANCE

Presumption in favour

- 8.1 Paragraph 11(d) of the NPPF states that “Plans and decisions should apply a presumption in favour of sustainable development.” It continues:

“where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance 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.”*

- 8.2 As detailed earlier in this Statement, the Council cannot demonstrate a five-year housing land supply. As such, in line with paragraph 11(d), planning permission should be granted unless any policies for protecting areas provide a clear reason for refusal or any adverse impacts of doing so would “significantly and demonstrably” outweigh the benefits. These two tests are addressed in turn below.

Footnote 7 considerations (Green Belt)

- 8.3 In respect of point i. and, as detailed in this Statement and within the supporting reports, the proposed development has been assessed as follows:
- The Site comprises Grey Belt land and proposed development is appropriate development within the Green Belt, in accordance with paragraph 155;
 - The development will be safe from flooding and not increase flood risk elsewhere, in accordance with paragraph 181; and
 - There are no impacts to national landscapes or designated heritage assets, in accordance with paragraphs 190 and 212-221.
- 8.4 While the Site is considered Grey Belt, and therefore there is no requirement to demonstrate Very Special Circumstances (VSC), it is considered that VSC would nevertheless exist given the nature and extent of the planning benefits identified (against the absence of harm in planning terms).
- 8.5 The proposal will deliver the following benefits:

- An Independent Special School (ISS) and new sports pitch, with the potential for further sports pitch provision;
- The provision of 230no. dwellings, meeting an acute identified local need for housing in North Hertfordshire;
- A residential care home (Use Class C2) including specialist dementia care, providing a mix of housing to meet local needs;
- A development which meets the Golden Rules, including:
 - The provision of 115no. affordable homes (50% of the total), making a significant contribution to local affordable unmet housing need (exceeding the total no. of affordable completions for 2023-24 of 81 dwellings);
 - Necessary improvements to local or national infrastructure; and
 - The provision of green spaces that are accessible to the public.
- A mix of dwelling sizes, including a majority of family homes, meeting the highest priority need;
- A landscape-led design which is sympathetic to the surrounding landscape and integrates with the character of the Site and wider locality;
- 11.47ha of new public open space integrated within the development, benefitting existing and future local residents;
- A net gain in biodiversity of habitat units, as follows, including ecological enhancements throughout the site;
 - area-based habitat units (+33.31%);
 - linear-based habitat units (+114.27%); and
 - watercourse units (16%).
- Significant new tree planting, contributing to local visual and ecological enhancement;
- Provision of new SuDS features, enhancing the natural environment and improving surface water drainage;
- Improvements to local connectivity, including the provision of new and upgraded bus stops and other works to upgrade existing highway and pedestrian/cycle routes, supporting active travel within the local area;
- Improvements to local infrastructure via s106 contributions; and
- Significant economic benefits including construction spend locally, creation of approx. 360 temporary jobs and 100 permanent jobs, training opportunities, and additional expenditure of approx. £5.5m annually to the local economy.

8.6 Paragraph 158 of the NPPF states: “*A development which complies with the Golden Rules should be given significant weight in favour of the grant of permission.*” This applies to all development, not only those considered Grey Belt.

8.7 It has been confirmed through a recent High Court ruling in Buckinghamshire that the weight afforded by paragraph 158 applies to any Green Belt development that complies with the Golden Rules (not only that which is on Grey Belt land). That ruling quashed a dismissed appeal (ref. APP/N0410/W/24/3347882; **Appendix J**) on the basis that compliance with the Golden Rules (e.g., delivering 50% affordable housing) must be afforded ‘significant weight’ regardless of whether a site is classified as Grey Belt. The appeal was subsequently allowed. The High Court’s statement of reason concludes:

“The secretary of state agrees that whether a development complies with the golden rules, and the effect thereof on whether planning permission should be granted, does not depend on whether a development is “grey belt” development.

As the inspector’s decision failed to consider and address whether the site was compliant with the golden rules, the decision also appeared not to consider the effect of paragraph 158, and therefore obviously relevant material considerations were not taken into account”.

- 8.8 In accordance with the above, the proposed development’s compliance with the Golden Rules must be awarded significant weight as per paragraph 158.
- 8.9 The planning assessment section of this Statement confirms that the proposed development would comply with the Development Plan in all other respects and that it would not result in any material harm in planning terms. As such, any harm would be clearly outweighed by the very significant benefits identified above, notably the provision of housing and affordable housing to meet an acute identified local need. Therefore, the proposals would meet the VSC test outlined in paragraph 153, if applicable.
- 8.10 Therefore, it is demonstrated that the policies referred to in footnote 7 do not provide a clear reason for refusing the development proposed.

‘Tilted balance’

- 8.11 Part ii. of paragraph 11(d) applies the ‘tilted balance’, such that development should be granted permission unless the adverse impacts of the proposed development would significantly and demonstrably outweigh the benefits. As outlined already, any harm in planning terms would not outweigh the very significant benefits identified. As such, the tilted balance is satisfied.
- 8.12 Overall, it is demonstrated that paragraph 11(d) is engaged in the assessment of this application and that the proposed development should be granted accordingly.

9. CONCLUSION

9.1 This Planning Statement has been prepared on behalf of Bugler Homes Ltd, in support of a full planning application for the redevelopment of Land at Pound Farm.

9.2 The applicant seeks planning permission for the following development:

“Hybrid application for a mixed-use development to provide a total of up to 230 dwellings, a residential care home (Use Class C2), an Independent Special School (ISS) and new sports pitch, with access from Bedford Road, landscaping, parking and SuDS comprising: Phase 1 – Application for full planning permission for the erection of 100 dwellings, an ISS, new sports pitch and associated parking, landscaping, open space and SuDS; Phase 2 – An outline application on the remaining part of the site for the erection of up to 130 dwellings, a residential care home (Use Class C2) and associated works with access from Bedford Road (all matters reserved apart from access).”

9.3 The planning statement and accompanying documents provide a comprehensive assessment of the proposal against the relevant national and local planning policies, demonstrating that the development has been carefully designed to respond positively to its context and the local planning objectives.

9.4 Paragraph 7 of the NPPF states that:

“The purpose of the planning system is to contribute to the achievement of sustainable development”.

9.5 In reaching a conclusion, the decision-maker must first assess the proposal against the Green Belt purposes set out at paragraph 143 of the NPPF and the fundamental aim of Green Belt policy to safeguard openness. For the reasons set out in this Planning Statement, the proposal does not conflict with those purposes and would preserve the openness of the Green Belt, both spatially and visually, such that no definitional or additional Green Belt harm arises. Accordingly, the development does not fall to be treated as inappropriate development within the meaning of paragraph 147.

9.6 As such it is not considered that a VSC case is required. Notwithstanding, any limited Green Belt harm would be clearly and demonstrably outweighed by the significant benefits of the proposal, which include consistency with paragraph 148 of the Framework.

9.7 The development would contribute to meeting the acute local housing (including affordable housing) shortage and need for SEND school places, while respecting the character and amenity of the area, and not significantly impacting the functioning of the remaining Green Belt or wider countryside.

- 9.8 The design of the development is of high architectural quality, optimising a sustainable site for housing and other uses, while respecting the existing character of the area, in accordance with Local Plan objectives D1 and SP9, as well as the North Hertfordshire Design SPD and neighbourhood plan objectives.
- 9.9 The proposed development would deliver very significant public benefits, not least a significant contribution to meeting an acute need for housing and affordable housing within the local area, that would weigh heavily in favour of the proposals.
- 9.10 As such, when all material considerations are weighed in the planning balance, the benefits of the proposal clearly outweigh any identified harm, such that very special circumstances exist. The proposal therefore accords with national Green Belt policy and the development plan, and planning permission should be granted.
- 9.11 Overall, this planning statement demonstrates that the proposal has been thoroughly assessed and confirms the proposals are in accordance with national and local policy. On this basis and, having regard to the presumption in favour of sustainable development set out in the NPPF, it is concluded that planning permission should be granted.

Appendix A – Medlock Road Appeal (ref. APP/W4223/W/25/3367017)

Appendix B – Durham Appeal (ref. APP/X1355/W/23/3336183)

Appendix C – Staffordshire Appeal (ref. APP/B3438/W/24/3351328)

Appendix D – Marlow Road Appeal (ref. APP/K0425/W/24/3351904)

Appendix E – Leighton Buzzard Road Appeal (ref. APP/A1910/W/24/3345435)

Appendix F – New Hall Lane Appeal (ref. APP/X4725/W/24/3354032)

Appendix G – Langford Road Appeal (ref. APP/P0240/W/24/3341832)

Appendix H – Land South of Heath Lane Appeal (ref. APP/X1925/W/21/3273701)

Appendix J – Buckinghamshire Appeal (ref. APP/N0410/W/24/3347882)