

Planning Application 25/03080/HYA

GA2 - Land North-East of Great Ashby, Stevenage

Representation from Dr Phil Power-Mason, resident of 25 Merrick Close

6 September 2026

Dear Ms Reynard and Members of the Planning Control Committee,

Purpose and position

I am writing as a resident of 25 Merrick Close, Great Ashby, to comment on the amended GA2 application. My home sits immediately beside the western end of the proposed Merrick Close active-travel connection. I therefore have a direct interest in the way that access is designed, constructed and operated. I also have a wider interest as a resident of Great Ashby in whether a development of this scale is supported by the schools, healthcare, transport, drainage, community facilities and environmental safeguards that will be needed by both existing and future residents.

My position is not that the allocated site should simply remain undeveloped. I recognise that GA2 is an allocated strategic housing site and that the principle of substantial housing growth at this location has already been established through the adopted Local Plan and the subsequent strategic masterplan. I also recognise that the application has evolved in response to consultation. In several areas the revised submission is stronger than the material originally lodged: the Mendip Way access has been amended, the active-travel framework is clearer, the construction-management material is substantial, and further ecological mitigation has been proposed.

My concern is narrower, but important. Allocation establishes a principle; it does not remove the need for the Council to be satisfied that the particular development now proposed is acceptable, that its impacts are properly understood, and that the mitigation on which acceptability depends is capable of being delivered at the point when it is needed. The question I ask the Council to address is therefore whether the application, as it now stands, contains enough evidence and sufficiently secure controls to justify approval without transferring foreseeable costs or harms onto the existing community, future residents or the environment.

That question has become particularly important at this stage. The application was received and validated on 15 January 2026. A full re-consultation then took place in July and August after the description was amended and additional and revised documents were submitted. The Council must now determine the application against the evidence currently before it. In addition, a new National Planning Policy Framework was published on 17 August 2026 and expressly replaced the December 2024 Framework.¹ Much of the applicant's original evidence and many earlier consultation responses were prepared under the previous wording. They remain relevant evidence, but the decision now needs to apply the current national decision-making policies alongside the adopted development plan.

I have therefore approached the revised application on the basis of its current strengths as well as its remaining gaps. I do not ask the Council to refuse permission merely because an issue exists. Where a problem can be made acceptable through further evidence, redesign, a planning condition, a Section 106 obligation or another enforceable mechanism, I have sought to identify that remedy.

Where an authority has already specified the necessary mitigation, I ask that it is secured rather than re-litigated. I have not relied on stronger objections where I do not consider the evidence sufficient to support them. As a local resident, my central request is that you do not treat an aspiration, indicative provision or future discussion as equivalent to secured mitigation. Where approval depends on infrastructure or environmental protection, the permission should make the required outcome sufficiently certain, timely and enforceable. I have therefore organised the specific issues below around the considerations that I understand the planning decision must address.

The conclusions below may need to be updated if the Council publishes a materially revised Section 106 package, condition schedule, further specialist re-consultation response or officer report before the application is formally considered in full.

Approval context and principles

Policy SP18 identifies GA2 for approximately 600 homes and supporting infrastructure. Its site-specific requirements include education land, access from Mendip Way, integration with pedestrian, cycle and public-transport networks, rights of way and green infrastructure.² The current application increases the residential ceiling to up to 640 dwellings and is hybrid in form. Importantly, means of access is not reserved: the Council is being asked to approve the access framework now, including the Merrick Close connection.

The Local Plan's wider infrastructure policy is also directly relevant. Policy SP7 requires development to provide the infrastructure needed to accommodate the additional demands it creates, to address cumulative impacts, to avoid unreasonable additional burdens on existing communities and infrastructure, and to secure essential infrastructure no later than the phase in which it is needed. It also says permission should be refused where the appropriate agreements or processes are not in place. The current NPPF reinforces that temporal principle. Policy HC3 requires development generating significant numbers of additional people to be informed by the associated need for community facilities and public-service infrastructure, and says conditions and obligations should secure timely delivery so that required facilities are available when the development, or an agreed proportion of it, is first occupied.

This is the recurring logic that runs through my representation: identify the impact; identify the competent authority's current evidence; identify what the applicant has already done; then ask whether the remaining mitigation is sufficiently defined and secured. That is not an argument for over-specification at outline stage. It is an argument that those matters essential to the acceptability of the development should not be left as unenforceable possibilities. The same principle applies to legal mechanisms. National planning guidance requires planning obligations to be necessary, directly related to the development and fairly and reasonably related in scale and kind.³ I am not asking the Council to secure unrelated improvements. I am asking it to close the specific impacts that this application and the relevant service authorities themselves identify.

Infrastructure and public services

Capacity must be available when demand arrives.

Healthcare

Healthcare is one of the clearest examples of an issue where the existence of a need is no longer speculative. The applicant's own Environmental Statement estimates a population of about 1,536 residents from the development. It acknowledges pressure on primary care and, in its cumulative-effects assessment, concludes that the combined effect of GA2 and other growth on local healthcare would be a permanent Moderate Adverse (Significant) effect. The possibility of healthcare space within the community hub is presented as one potential form of mitigation, but the use is not fixed.

The NHS response goes further and quantifies the infrastructure consequence. It identifies the Stevenage North Primary Care Network as already constrained, with Canterbury Way Surgery and St Nicholas Health Centre unable to accommodate the additional patient numbers arising from this development and wider growth. It calculates approximately 1,536 additional patients and a primary-healthcare requirement equivalent to about 153 square metres, with a requested contribution of approximately £1.07 million, subject to indexation. The NHS's strategic preference is a new medical facility of around 630 square metres NIA serving the wider growth area, principally at NS1, with a time-limited GA2 community-hub fallback if NS1 delivery falls materially behind. Crucially, the NHS seeks the GA2 mitigation at occupation of the first dwelling.

That evidence changes the nature of the planning question. The issue is not whether residents might prefer a new surgery. It is whether the healthcare capacity needed because of the development will exist when the new population begins to arrive. The applicant's draft Heads of Terms recognises the issue but still presents primary healthcare as 'TBA', with either a financial contribution or agreed space in the community hub. The Council should not treat the mere ability to put healthcare into a flexible building as equivalent to healthcare capacity actually being commissioned and available.

I therefore ask that the final Section 106 package secures an NHS-approved mitigation mechanism, amount and trigger before permission is issued, with the first-occupation timing sought by the NHS unless the NHS itself agrees a demonstrably equivalent alternative. If on-site healthcare is proposed instead, the permission should define the required floorspace, specification, commissioning responsibilities and delivery trigger so that the same space is not simultaneously relied upon to satisfy unrelated community, childcare and sports needs.

Primary education, early years and SEND

The education evidence also needs to be reconciled rather than reduced to a simple claim that there either are or are not spare school places. The applicant's Environmental Statement uses broad capacity figures and reports a surplus across primary schools in its selected planning area. Hertfordshire County Council, as the education authority, has expressly challenged that interpretation. Its March 2026 response explains that whole-school vacancy percentages can misrepresent the ability of individual year groups and admission points to absorb growth, and it relies on its own locally validated pupil-yield methodology.

On that basis HCC calculates that the 640 homes require 1.6 forms of entry of primary mitigation. Looking cumulatively with GA1, it seeks a new 1FE primary school on GA2, with costs apportioned between the schemes, while recognising that the on-site school will not meet the full pupil yield from GA2 alone. HCC also makes the timing point directly: children are likely to arise from the new development before the on-site school is delivered, so sustainable routes to existing schools and the timing of those links matter from the outset.

There is also a land-definition issue which should be resolved in the legal agreement. The applicant's draft Heads of Terms describes 2.1 hectares for the primary school and a further 1.9 hectares of reserved education land. HCC's current delivery proposal uses a different split - 1.15 hectares for the new 1FE primary school and 2.85 hectares of reserve education land - while still welcoming the overall four-hectare education allocation. This may be capable of straightforward reconciliation, but it should not remain ambiguous in a permission that depends on the education land being deliverable.

The same HCC response identifies quantified needs for early-years childcare, wraparound childcare and SEND provision. The figures are not incidental: HCC estimates around 129 additional 0-2 childcare users and seeks contributions for childcare and new severe-learning-difficulty school capacity. The applicant's community hub may be able to host some of these functions, but a flexible possibility is not the same as funded and operational capacity, particularly if the same hub is also presented as a potential solution to other service needs, such as healthcare. The final obligation should therefore identify which needs will be met on-site, which will be met through off-site contributions, and the triggers that prevent occupation from materially outrunning provision.

Foul-water capacity

Foul drainage provides a useful example of a constraint that can be made acceptable by a clear trigger. Thames Water's 24 August 2026 response says the existing foul-water network does not have sufficient capacity for the proposed development and that reinforcement is likely to be required to avoid sewer flooding and pollution. It asks for a condition preventing occupation until either the necessary upgrades have been completed or a development-and-infrastructure phasing plan has been agreed and followed.

I do not treat that as a reason to reject the development outright. It is exactly the type of issue for which a precise no-occupation condition can convert a known capacity limitation into an acceptable planning outcome. I ask the Council to use Thames Water's requested control, or an equally effective wording agreed with Thames Water, rather than relying on future modelling without an occupation safeguard.

Community and sports provision

The revised description broadens the community hub to Use Class F2 / Use Class E, which may improve flexibility. The consultation record also makes clear that local residents have consistently raised healthcare, community and leisure needs. Sport England has sought a contribution towards off-site indoor and outdoor sports provision, while HCC has identified childcare, SEND, library, youth and waste-service demands.

Flexibility can be an advantage, but it should not result in the same small area of floorspace being counted several times in the planning balance. Before approval, the Council should be able to see a coherent infrastructure schedule showing the use, scale, funding source, trigger and responsible delivery body for each relied-upon function. The applicant should demonstrate that the proposed provision is sufficient, and the Council must be satisfied that the resulting package is deliverable. At present, the community hub is repeatedly identified as a potential response to different service-capacity constraints, but those uses are presented separately rather than tested together. Any further appraisal should therefore consider the aggregate demands being placed on the hub and

whether, taken together, the proposals meet the minimum closure set out in Appendix C. Those requirements reflect both my own concerns and issues raised more widely by residents.

Ecology

Meaningful revisions have been made, but the latest specialist conflict remains unresolved.

The ecology case should be judged on the revised scheme, not on the earliest objections in isolation. The applicant has provided 15-metre woodland buffers, proposed habitat creation and biodiversity net gain, reduced road widths in sensitive areas, added or developed mammal-tunnel proposals, and committed to further woodland and habitat management. Natural England has not objected on the protected-landscape matters within its remit. Those are material improvements and I recognise them.

The difficulty is that the most recent response from the Hertfordshire and Middlesex Wildlife Trust, dated 6 August 2026, reviewed the applicant's July response and the additional April ecology note and still concluded that important matters remain unresolved. HMWT accepts that the 15-metre buffers have been provided but remains concerned about incursions into those buffers, largely where access roads penetrate ecological features. It continues to regard the scheme as non-compliant with Local Plan Policy NE4 on that point.

More importantly, HMWT identifies the isolation of Nine Acres Spring by roads and the bus loop as a landscape-scale connectivity issue. It expressly recognises mitigation already proposed - including narrowed roads, extended woodland and further mammal connectivity measures - but considers it insufficient or unclear. It also notes Natural England's request for stronger woodland corridors and says that the Environmental Statement does not provide a comprehensive assessment of the overall effect on ecological connectivity. Its resulting conclusion is that, despite mitigation, a significant adverse effect on biodiversity remains.

That is a current specialist disagreement, not simply a resident preference for more woodland. The current NPPF requires development to take suitable opportunities to connect and strengthen ecological networks, to minimise adverse impacts on biodiversity and to secure the long-term functionality of green infrastructure. It also gives particular protection to local wildlife sites and irreplaceable habitat such as ancient woodland. ⁴ Natural England and the Forestry Commission's standing advice states that 15 metres is a minimum ancient-woodland buffer for root protection and that a larger buffer may be needed where other effects extend further; where possible, buffers should contribute to wider ecological networks. ⁵

I therefore do not ask the Committee to choose between competing ecological opinions without explanation. I ask that the Council's own ecological advice explicitly reconciles the August HMWT response against the latest plans before determination. That reconciliation should address the network effect around Nine Acres Spring, the road/buffer incursions, the distinction between mitigation and compensation, and how any residual loss of connectivity will be compensated if it cannot be avoided or adequately mitigated.

The supporting habitat-management and biodiversity-net-gain mechanisms also need to be capable of being delivered for the full period on which the ecological case relies. Current outline management material is useful, but final responsibility, funding, monitoring, remedial action and in-perpetuity off-site compensation should be secured by condition or legal agreement where required.

I do not rely on the stronger claim that the submitted BNG calculation has already been proven invalid; the more proportionate request is that the final metric, habitat management and legal controls are transparently reconciled with the latest design and specialist advice. Approval should not turn only on whether minimum compliance has been demonstrated, but also on whether the proposals are sufficient to achieve the purpose of the regulatory framework: protecting the ecological conditions needed to sustain local biodiversity. Any approval should therefore be grounded in the ecological evidence and ensure that the commitments relied upon to maintain biodiversity are enforceable over the period in which the development's effects will become measurable. At present, the proposals, supporting evidence and long-term accountability mechanisms do not yet resolve the concerns raised by relevant specialist consultees about the acknowledged harms.

There are also narrower species issues - including bats, badgers and farmland birds - for which updated or pre-commencement controls have been proposed. Those matters should be resolved through the relevant specialist and licensing processes unless the Council's ecologist identifies a pre-determination information gap. They support the need for rigorous ecological control, but I do not present them as independent grounds for refusing the current application without that further specialist conclusion.

Transport

The revised strategic case is stronger, but local consequences and fallback controls still matter.

The revised transport evidence deserves a balanced reading. Active Travel England's 20 August 2026 response recommends conditional approval. It describes the re-consultation package as a material strengthening of parts of the active-travel evidence and welcomes changes to the Mendip Way access, including revised cycleway radii, removal of barriers and bollards, improved crossing details and clearer distinction between primary and secondary active-travel routes. That makes it inappropriate to argue that the current transport package has simply ignored earlier criticism.

ATE nevertheless frames the remaining issues as matters of detail, certainty and enforceability. That is significant for a development whose transport strategy anticipates that around half of journeys will be made by sustainable modes and whose proposed measures are delivered at different occupation stages. The current NPPF requires transport assessments and travel plans to explain how sustainable-transport objectives will be delivered, monitored and managed over time, including fallback options if initial measures do not produce the expected outcomes. It also requires reasonable future scenarios, relevant times of day, cumulative impacts and multimodal trip generation to be considered.⁶

The concern I retain is therefore not that the transport modelling should be disregarded. It is that the success of the planning package depends on a significant behavioural shift and on specific walking, cycling and bus measures becoming usable and attractive in practice. The final conditions and Section 106/S278 package should identify firm triggers, monitoring indicators, thresholds for intervention and funded fallback measures if modal-share assumptions are not being achieved. Although I do not have space to present the full retrospective analysis here, the experience of GA1 is directly relevant. There, modelled behaviours used to justify decisions about the allocation of space did not materialise to the extent assumed because the underlying behavioural drivers were not

adequately addressed. The resulting effects on parking, transport and sustainable travel are now well documented by the Council in relation to the existing population. In light of that evidence, I ask Planning Control to consider how lessons from GA1 have informed the assumptions used for GA2, and whether the level of confidence placed in those assumptions has been adjusted accordingly.

Parking displacement also deserves more explicit treatment. The applicant's own parking survey found parts of Merrick Close at or above their calculated nominal capacity on several survey occasions. The applicant's later parking-court survey argues that there is spare capacity across the wider group of nearby courts, recording 292 spaces, 201 occupied vehicles and 91 nominally unused spaces; it also acknowledges that not all of those spaces are unallocated or visitor spaces.

Restrictions or management measures that improve bus passage or highway safety may be entirely justified, but they are not impact-free if vehicles are displaced into adjoining residential streets. The officer assessment should therefore reconcile the route-specific kerbside evidence with the practical availability of lawful replacement spaces and explain where displaced vehicles are expected to go.

I also note the continuing August submission from the British Horse Society concerning the treatment of equestrians and the rights-of-way network. This is a secondary point compared with the issues above, but because Policy SP18 expressly requires integration of existing rights of way, I ask that the final rights-of-way/highways response identifies how equestrian use is accommodated where routes are affected rather than assuming pedestrian/cycle provision answers every user group.

Merrick Close

The fixed access needs site-specific closure before approval.

The Merrick Close connection warrants separate treatment because it is both a strategic active-travel link and a direct interface with existing homes. The revised Design and Access Statement states that the Merrick Close active-travel access forms part of the unreserved matters. It proposes removal of existing fencing, a widening of the present route from around 2 metres to 3 metres, permeable asphalt on a no-dig base and a new boundary treatment. The plan also shows that the entrance where the path meets Merrick Close remains constrained to about 2 metres, while the route broadens beyond it. Further east, the precise alignment can be refined at Reserved Matters stage; the western access itself is being determined now.

I support the objective of providing useful walking and cycling connections. My concern is whether this particular terminal arrangement has been demonstrated to work safely and acceptably at the point where a shared route enters a small residential access environment. The current national street-design policy gives priority to walking, wheeling and cycling but also requires routes to be safe and inclusive and to minimise conflict between pedestrians, cyclists and vehicles, with particular regard to those with limited mobility and other vulnerable users. The question is therefore not active travel versus residents; a good design has to work for both.

The evidence I have been able to identify does not provide a clear all-day forecast for the number and pattern of pedestrian and cycle movements expected specifically through the Merrick connection. This matters because the route is intended to connect the existing estate with the proposed community hub and primary school. School-related peaks, commuter trips and leisure use can create very different operating conditions. Without an access-specific demand picture it is difficult to test whether the shared width, entrance geometry and immediate interaction with

residential vehicle movements are proportionate to the actual use expected. This is particularly significant because key sections of Merrick Close do not have a continuous pavement. In poor weather, the soft verges (whose ownership is not considered in the application) and road surface can present practical hazards as pedestrian and cycle traffic increases. The issue becomes more important if this active-travel link is relied upon as critical infrastructure supporting access to the hub and other facilities discussed above.

The private-land interface is also of critical concern. The official 2008 Transfer of Part associated with title HD488534 identifies plot 107, records 25 Merrick Close as the intended property address, shows the transferred property (edged red) and identifies a (cross-hatched) 'Private Driveway'. The transfer defines a 'Common Facility' as including the Private Driveway and grants rights to use a Common Facility serving the property. This does not establish that the applicant has no lawful rights over land needed for its works, and I do not ask the planning authority to determine a private-law dispute. It does, however, demonstrate that the public route sits immediately beside a private/shared access area whose legal and physical boundary is relevant to the feasibility of construction and the continuing access to our home. Any designated pedestrian or cycle route through this part of Merrick Close will necessarily cross the single point of ingress and egress to the private driveway, used by residents as well as service and maintenance vehicles. Yet the practical task of providing a safe pedestrian and cycle route while maintaining unrestricted vehicle access to the private driveway does not appear to have been assessed specifically in the application (see Appendix B).

There is a practical reason not to treat the public/private boundary as self-evident on the ground. The submitted Flood Risk Assessment records that Terrain Surveys carried out the GA2 site topographical survey in July 2021. In separate correspondence from that month, following a complaint about surveyors entering the private drive and obstructing access, Terrain's director apologised in writing that 'our surveyors accessed your land' and said that they had not known it was private. I can provide the private email exchange if required. The apology does not identify the client for the particular Merrick Close activity or establish that the present applicant directly authorised the encroachment, so I do not make that claim. Its relevance is practical: professional operatives engaged in survey work in the GA2 area have previously misunderstood the public/private interface at exactly this location.

I have also observed survey or inspection activity in and around the route, including occasions when sections of fencing on the woodland side of the path were dismantled. I treat that as my own observation rather than evidence of who authorised the work. Taken together with the title plan and the proposed path widening, it reinforces the need for the construction footprint to be surveyed and marked before works commence rather than left to interpretation by contractors on site.

For my household, the consequence of getting this wrong is practical rather than abstract. The route lies immediately beside our home and shared driveway. We have four children; our household includes neurodivergent people with heightened sensitivity to noise and disturbance; and the house is regularly used for home working. The relevant planning effects are not a claim to silence or to prevent public movement. They are the need to understand and mitigate avoidable impacts, maintain safe vehicle and pedestrian access to the home, prevent plant or materials from encroaching onto or blocking the shared private drive, provide a clear and durable boundary after construction, and avoid an operational design that creates unnecessary conflict immediately outside the property.

Local Plan Policy D3 is directly relevant because it treats traffic generation, parking and noise as potential sources of unacceptable harm to living conditions and asks whether mitigation can reduce identified harm to an acceptable level. The current NPPF similarly requires cumulative effects on health and living conditions to be considered and recognises that surrounding populations may have different sensitivities. I am not asking the Council to find that the route is inherently unacceptable. I am asking it to complete the site-specific assessment that is necessary before an unreserved access is fixed. In light of the evidence available, that is a minimum level of due diligence.

Merrick Close - specific pre-determination request: require a surveyed overlay showing the Land Registry/title boundary, adopted highway and public-right-of-way extent, application boundary, permanent works and any temporary construction working area; and require an access-specific assessment of forecast pedestrian/cycle use, the terminal geometry, visibility, parking interaction and residential vehicle movements.

If the current geometry is demonstrated to be safe and workable, that evidence would resolve an important concern. If it is not, the answer should be proportionate redesign before the access is approved, not reliance on a later Reserved Matters application that cannot alter the principle or fixed location of the access. Appendix B sets out the evidence and construction safeguards I ask the Council to secure.

Construction

The outline framework is credible, but the controls must become specific where the impacts are local.

The submitted Outline Construction Environmental Management Plan is not a token document. It covers transport and logistics, noise, vibration, air quality, waste, ecology, water, pollution prevention and community liaison. North Herts Environmental Protection has described it as reasonably robust for noise and air-quality purposes, while recommending that a final version is approved before commencement. I accept that assessment and do not argue that the application lacks a construction-management framework.

The reason construction remains material is that many of the Environmental Statement's low or non-significant residual effects depend on those future controls working. The final CEMP and Construction Traffic Management Plan therefore need enough precision to make the mitigation enforceable. Core working hours are proposed as 08:00-18:00 weekdays and 08:00-13:00 Saturday, but the outline material also anticipates certain activities outside those hours, including workforce arrival/departure, deliveries and unloading, plant checks and site clean-up. For homes closest to the works, those exceptions can be as important as the headline hours.

I ask that the final controls identify HGV routes, delivery times, waiting/turning locations, noise and dust action thresholds, complaint response, ecological sequencing and the interface between construction phases and already occupied housing. At Merrick Close, a short site-specific method statement should be required before any access works: the lawful working area should be pegged or fenced, private/shared driveways kept continuously usable, no storage or parking allowed on private land without express authority, neighbouring residents given advance notice, and any damage promptly reinstated. These are ordinary construction safeguards, made necessary by the unusually close boundary interface rather than by opposition to the works themselves.

Other current matters that should be closed proportionately

Not every outstanding issue requires the same weight. Two recent consultation responses illustrate matters that should be dealt with clearly but need not dominate the representation. First, Hertfordshire's Senior Historic Environment Advisor wrote on 18 August 2026 that the additional archaeological Written Scheme of Investigation had not been prepared to an agreed brief and did not contain sufficient detail to satisfy either pre-determination or future condition requirements. The Council should therefore ensure that any archaeology condition is based on a WSI accepted by its specialist adviser rather than treating the July document as already approved.

Second, built-heritage advice dated 28 August 2026 concludes that the development will cause indirect harm to the setting and significance of the listed buildings at Tilekiln Farm and Dane End Farm, although the harm is not substantial and is not a 'significant adverse' EIA effect. This is an important distinction. The planning balance should acknowledge the identified heritage harm and the measures used to minimise it rather than equating an EIA finding of 'not significant' with no harm at all. These matters appear capable of being addressed within the normal heritage and archaeology decision framework, provided the current specialist advice is followed.

Cumulative effects

The main risk is timing and interaction, not the absence of a cumulative chapter.

The Environmental Statement contains a cumulative-effects assessment, so it would be unfair to say cumulative impacts have been ignored. The stronger issue emerging from the current evidence is how separate mitigation measures interact over time.

The recurring example is infrastructure lag. New homes create patients and pupils as soon as they are occupied; Thames Water needs network capacity before occupation; bus and active-travel measures have staged triggers; and construction may continue around earlier occupied phases. The application is acceptable only if those timelines are joined together so that the community does not experience the deficit first and the mitigation later. HC3's new first-occupation wording and Policy SP7's phase-of-need requirement make that timing question particularly explicit.

There are also interactions between mitigations. Parking restrictions may improve bus reliability or safety but displace vehicles onto adjacent streets, including streets that themselves form part of the active-travel network, such as those discussed in this submission. New active-travel links may reduce car use overall while increasing movements through a specific residential interface. Ecological mitigation may rely on land that also accommodates recreation or infrastructure. None of those interactions necessarily makes the development unacceptable, but the officer report should show that they have been considered together rather than simply repeating the conclusion of each separate technical chapter.

What I ask the Council to secure before granting permission

I have deliberately separated matters that need further closure before determination from matters that can reasonably be secured through conditions or obligations. My requests are as follows:

Before determination / before the unreserved access is approved

- A current LPA ecological reconciliation of the 6 August HMWT response, including Nine Acres Spring connectivity, woodland-buffer incursions, the mitigation hierarchy and any required compensation.
- A final or materially advanced infrastructure schedule/Section 106 Heads of Terms resolving the NHS, HCC education, childcare/SEND, Sport England and other necessary service requirements, with clear triggers and no double-counting of the community hub.
- Resolution of the primary-school land/delivery mechanism and a phasing approach that prevents pupil demand from outrunning available capacity without an identified interim solution.
- For the Merrick Close unreserved access, a surveyed boundary/highway/PRoW/works overlay and a route-specific assessment of demand, terminal safety, parking/visibility interaction and the transition into the residential access environment.

Matters capable of being made acceptable through precise legal controls

- Thames Water's no-occupation foul-network condition or an equally protective phasing condition agreed with Thames Water.
- NHS-approved healthcare mitigation available from first occupation, whether through contribution or properly specified on-site provision.
- Education, childcare, SEND, sport and other service contributions with triggers aligned to when the relevant demand arises.
- Final CEMP/CTMP controls, including a Merrick-specific working method and neighbour-access protocol.
- Ecological management, monitoring, remedial measures and long-term/off-site compensation secured for the periods on which the ecological case relies.
- Travel-plan monitoring with clear fallback measures if sustainable-mode targets are not being achieved, together with the agreed programme for walking, cycling and bus improvements.

Matters to monitor without overstating the current case

- Detailed bat and badger implementation matters where the current evidence indicates a plausible licensing/condition route, subject to specialist confirmation.
- Detailed lighting, landscaping and later layout matters that genuinely remain within Reserved Matters and do not determine the acceptability of the fixed access itself.
- Private property rights as a separate legal matter, except insofar as the Council needs to be satisfied that the approved scheme is practically deliverable without relying on unexamined adjoining private/shared land.

Democratic accountability

Whether approval would remain consistent with commitments made to Great Ashby.

I recognise that election pledges are not material planning considerations and should not determine the application. I include this final section for a different reason: elected representatives are also accountable to residents for the commitments on which they sought support, and the final handling of a development of this scale provides a practical test of whether those commitments are being honoured.

The April 2024 Great Ashby election leaflet for Laura Williams and VJ Poopalasingham made specific local commitments around stronger representation, GP and dental capacity, campaigning for a Great

Ashby medical centre, childcare, greener neighbourhoods, community spaces accompanying new development and 'challenging developers to do more'. Those commitments overlap closely with the issues that residents raised in the applicant's own consultation and with the infrastructure questions now identified by the NHS, HCC and other consultees.

It would be wrong, however, to suggest that the ward councillors have simply been passive. The applicant records meetings with both councillors, and Councillor Laura Williams lodged a formal objection to GA2 in February 2026. Her objection expressly recognised the site's allocation while challenging the highways evidence, reliance on 'monitor and manage', the strength of modal-shift assumptions and the absence of infrastructure delivery upfront. That is materially consistent with the principle of scrutinising development rather than opposing growth as such.

The accountability question is therefore prospective. If the application were approved while quantified healthcare needs remained unsecured, school-delivery timing remained unresolved, local transport mitigations lacked enforceable fallbacks, or the latest ecological concerns had not been reconciled, it would be difficult to see how that outcome sat comfortably with the commitments made to residents about local services, green space and challenging developers. Conversely, securing those matters before approval would allow elected members to support the allocated housing while demonstrating that the value propositions on which residents voted - infrastructure, community provision, environmental protection and effective representation - have practical effect in the decision.

I therefore ask ward councillors and Committee members to treat the conditions and obligations not as peripheral details to be tidied up after the principle has been accepted, but as the means by which the allocation can be converted into a development that is supportable for the community expected to live with it.

Concluding remarks

Taken as a whole, the revised application contains substantial evidence and several genuine improvements. I do not consider it fair to characterise it as an unmitigated proposal or to ignore the areas where statutory consultees now support approval subject to conditions. Equally, the current record still contains a number of material gaps between an identified impact and a secured solution.

The strongest of those gaps concern the timing and certainty of public-service infrastructure; the unresolved current specialist conclusion on ecological connectivity; the enforceability and fallback structure of the transport package; and the site-specific evidence needed to demonstrate that the unreserved Merrick Close access can be constructed and operated safely and acceptably at its actual residential interface. These are not objections to the principle of housing on GA2. They are questions about whether the present permission would contain the protections that make that principle acceptable in practice.

For that reason, my present position is that the application should not be approved in its current form unless the matters identified above are closed through further evidence, necessary design changes and a sufficiently complete package of enforceable conditions and legal obligations. Where that closure can be achieved, I would prefer that outcome to an avoidable refusal. Where it cannot, permission should not be granted on the assumption that the harm can simply be dealt with later.

I would be grateful if this representation and its appendices are placed before the decision-maker and addressed in the officer report, particularly where I have identified a current conflict between specialist evidence or a matter that concerns an unreserved access being determined now.

Yours sincerely,

Dr Phil Power-Mason
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Great Ashby, Stevenage

Reference notes

¹ Ministry of Housing, Communities and Local Government, National Planning Policy Framework, 17 August 2026. This edition replaced the December 2024 NPPF. <https://www.gov.uk/guidance/national-planning-policy-framework>

² North Hertfordshire District Council, North Hertfordshire Local Plan 2011-2031, adopted November 2022, Policy SP18 (GA2).
<https://www.north-herts.gov.uk/sites/default/files/2022-12/North%20Hertfordshire%20Local%20Plan%202011-2031.pdf>

³ GOV.UK Planning Practice Guidance, Planning obligations: the statutory tests are necessity, direct relationship to the development, and fair and reasonable relationship in scale and kind.
<https://www.gov.uk/government/publications/planning-obligations-good-practice-advice/planning-obligations-good-practice-advice>

⁴ Ministry of Housing, Communities and Local Government, National Planning Policy Framework, 17 August 2026, policies N2 and N6 on ecological networks, biodiversity and irreplaceable habitats.
https://assets.publishing.service.gov.uk/media/6a8334c03bd75b81e2329ac4/National_Planning_Policy_Framework.pdf

⁵ Natural England and Forestry Commission, Ancient woodland, ancient trees and veteran trees: advice for making planning decisions. Standing advice explains that 15 metres is a minimum buffer for ancient woodland and that larger buffers may be needed depending on likely effects.
<https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions>

⁶ Ministry of Housing, Communities and Local Government, National Planning Policy Framework, 17 August 2026, policies TR4 and TR6 on safe and inclusive movement, transport assessment, monitoring and fallback measures.
https://assets.publishing.service.gov.uk/media/6a8334c03bd75b81e2329ac4/National_Planning_Policy_Framework.pdf

Appendix A - Principal unresolved planning matters and proportionate remedies

This table is intended as a summary aid. It does not replace the reasoning in the letter and does not imply that every issue carries equal weight.

Issue	Current position	Main test	Potential consequence	Proportionate remedy
Healthcare capacity	NHS identifies constrained Stevenage North PCN and c.1,536 additional patients; applicant draft HoT still TBA.	NPPF HC3; Local Plan SP7/SP18	Additional demand arrives before capacity; pressure on existing/future patients.	Secure NHS-approved mitigation from first occupation.
Primary education	HCC calculates 1.6FE impact, expects pupils before on-site school and uses different land/delivery split from draft HoT.	NPPF HC3; SP7/SP18	Interim capacity and travel pressure; education land ambiguity.	Resolve land/delivery mechanism and occupation-linked interim capacity/route plan.
Childcare / SEND	HCC quantifies 0-2 childcare and SEND demand; current draft HoT remains TBA.	NPPF HC3; SP7	Existing services absorb development demand.	Fix contributions/on-site provision and triggers in S106.
Community / sport	Flexible hub may serve several functions; Sport England seeks sports mitigation.	HC3; SP10; SP7	Same flexible space could be over-credited; existing facilities take pressure.	Define uses/floorspace/funding/triggers; secure sports contribution where justified.
Foul water	Thames Water says existing network lacks sufficient capacity.	HC3 / pollution / SP7	Sewer flooding and pollution risk.	No occupation until upgrades or agreed phasing plan.
Ecological connectivity	HMWT Aug 2026 retains NE4 concern and significant-adverse-effect conclusion after revised mitigation.	NPPF N2/N6; Local Plan NE4	Fragmentation around Nine Acres Spring / woodland network.	LPA ecological reconciliation; redesign/mitigation/compensation as required.
Ancient woodland buffers	15m buffers provided but HMWT identifies road incursions; standing advice treats 15m as minimum.	NPPF N6; NE4; standing advice	Direct/indirect deterioration and loss of network function.	Demonstrate effects and protect/compensate; secure management.
Transport delivery	ATE recommends conditional approval but emphasises certainty/enforceability; sustainable-mode targets underpin package.	NPPF TR4/TR6; SP18	Mitigation under-performs after occupation.	Firm triggers, monitoring thresholds and funded fallback measures.
Parking displacement	Applicant survey records parts of Merrick at/above nominal capacity on several occasions.	TR6; Local Plan D3/T policies	Restrictions may transfer parking into stressed residential streets.	Assess displacement and secure proportionate parking/TRO response.
Merrick access	Unreserved 2m terminal / 3m shared path; route-specific demand and terminal-interface evidence not clearly demonstrated.	TR4/TR6; D3; SP18	Pedestrian/cycle/vehicle conflict; local amenity/access impacts.	Surveyed overlay + access-specific demand/safety/parking assessment; redesign if needed.

Issue	Current position	Main test	Potential consequence	Proportionate remedy
Merrick construction interface	Private/shared driveway immediately adjacent; past surveyors mistook public/private boundary.	DM6; P3; D3	Encroachment, blocked home access, noise/disturbance.	Merrick method statement, no-go zones, continuous access, liaison and reinstatement.
Construction controls	Outline CEMP is credible; final contractor details remain future.	DM6; P3	Residual effects depend on controls actually working.	Final CEMP/CTMP with precise routes/hours/thresholds/complaints.
Archaeology	HCC adviser Aug 2026 says submitted WSI is insufficient / not agreed to brief.	Current heritage decision framework	Investigation/mitigation not properly specified.	Use WSI accepted by HCC specialist and condition accordingly.
Built heritage	Aug 2026 advice identifies indirect harm to listed-building settings, while concluding it is not substantial harm.	NPPF heritage policies; SP18	Recognised heritage harm in planning balance.	Acknowledge harm; retain/minimise through final parameters/landscape controls.

Appendix B - Merrick Close / 25 Merrick Close evidence and safeguards

The images below are included to show the physical and legal interface at the western end of the proposed active-travel connection. They should be read alongside the applicant's surveyed drawings; the resident-supplied maps are contextual rather than cadastral.

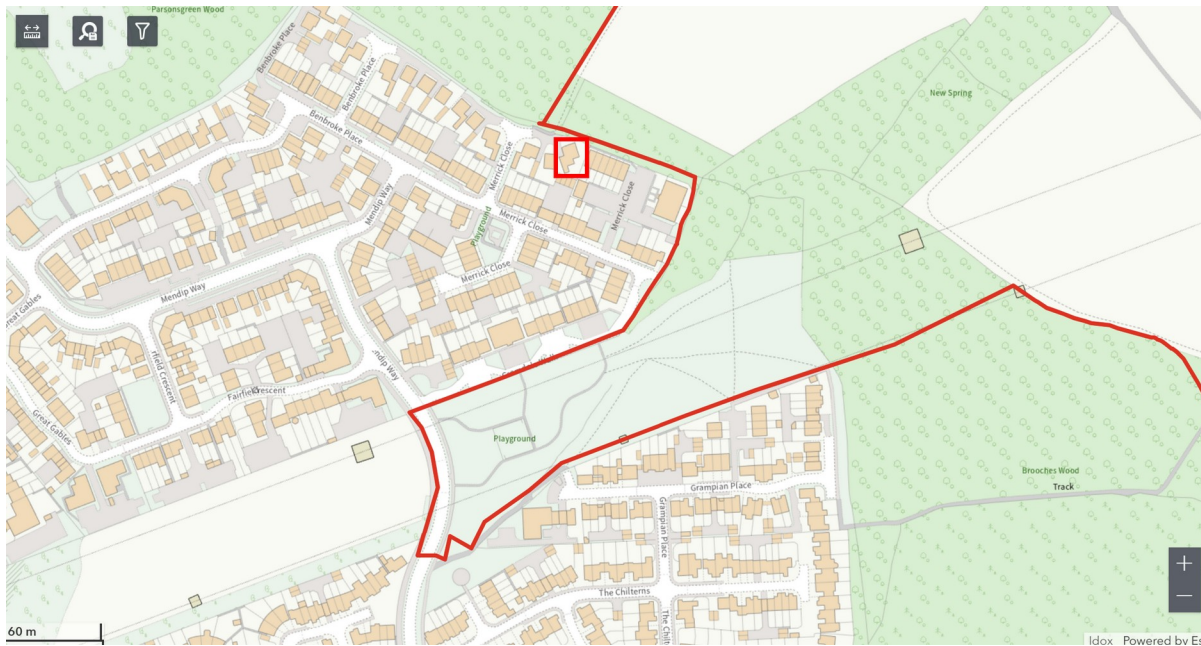
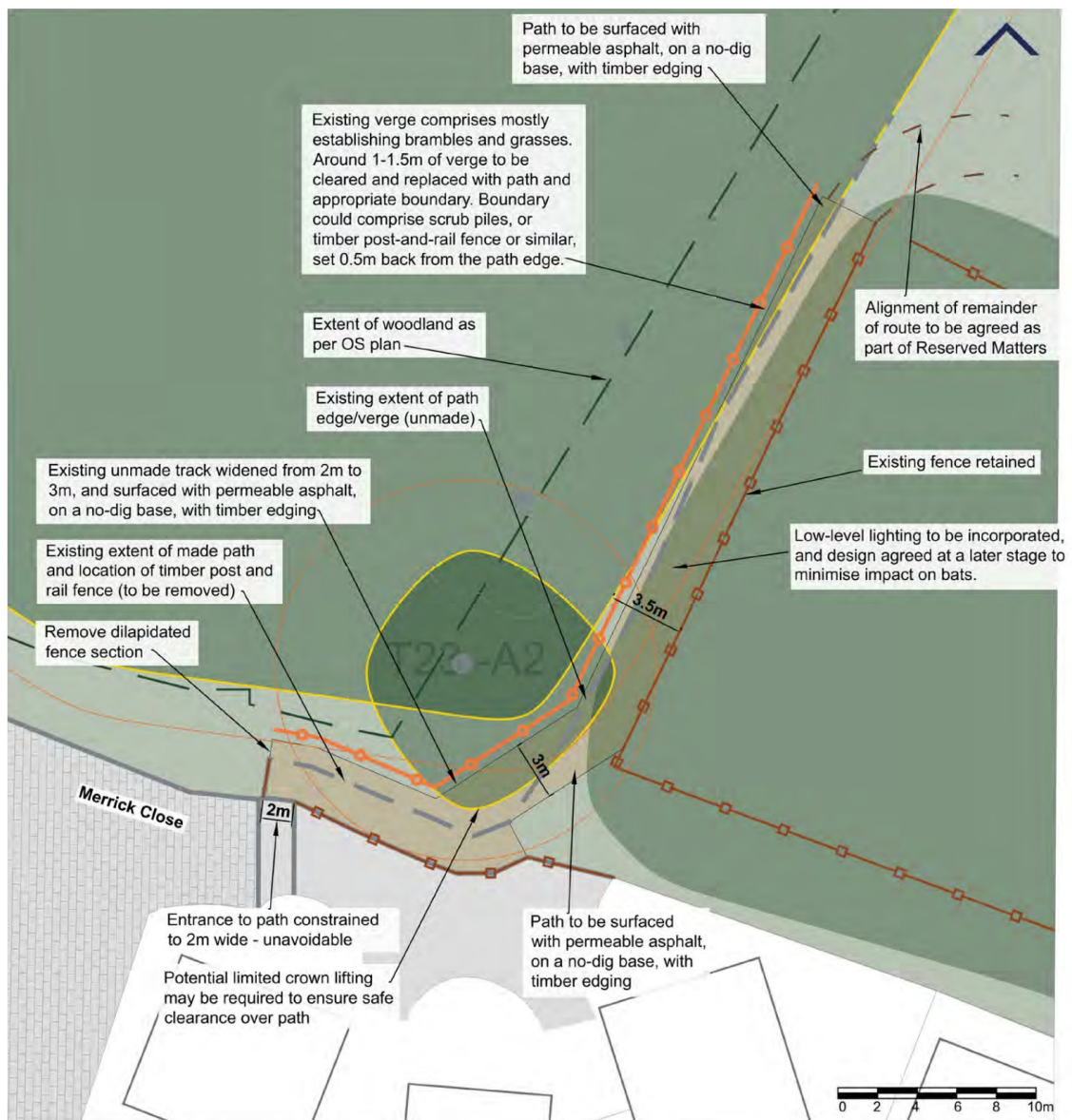


Figure B1. Context map supplied by the resident. Red square identifies 25 Merrick Close; red line is contextual marking of the GA2 relationship.



Figure B2. Existing Merrick Close path / driveway interface (resident-supplied Google Maps image). The open timber boundary and immediate relationship with residential access are visible.



▲ Figure 8.10 - Merrick Close Active Travel Access Plan

Figure B3. Extract from the revised Design and Access Statement, Figure 8.10. It shows the constrained entrance, proposed surfacing/fence changes and widening to 3m beyond the terminal section.



Figure B4. The edge of the private driveway, adjoining road surfaces and soft verges, and the onward route of the Merrick Close active-travel connection beyond the development boundary, intended to provide the main non-vehicular link between GA1 and GA2.

What the title material establishes

- The 2008 Transfer of Part relates to plot 107 and records 25 Merrick Close as the intended address.
- Its plan shows the transferred property edged red and identifies cross-hatched land as 'Private Driveway'.
- The transfer defines a 'Common Facility' to include the Private Driveway and grants rights to use a Common Facility serving the property.
- The material therefore establishes a private/shared-access interest immediately adjacent to the public path. It does not, by itself, prove that the applicant lacks any current right needed to carry out the proposed works.

Past operational evidence

The submitted Flood Risk Assessment records that Terrain Surveys undertook the GA2 topographical survey in July 2021. On 20 July 2021, following a complaint about surveyors entering the private drive and blocking access, the Director of Terrain Surveys Ltd wrote: 'I am sorry our surveyors accessed your land' and explained that they had not known the area was private. The apology does not identify the client for the particular Merrick Close activity or establish that the present applicant directly authorised the encroachment. Its relevance is practical: the public/private boundary was previously misunderstood during professional survey activity associated in time with the GA2 survey work.

Safeguards requested for Merrick access works

- Surveyed overlay before commencement: title boundary/private driveway, adopted highway, definitive PRow, planning application boundary, permanent works and temporary working area.
- Physical marking of the lawful construction footprint and private no-go areas before contractors attend.
- No contractor parking, plant, storage or temporary works on the private/shared drive without the relevant lawful right and explicit arrangements.
- Continuous vehicle and pedestrian access to adjoining homes except for any strictly necessary, pre-notified short closure agreed through an approved method statement.
- Advance notice to immediately adjoining residents, named site contact, complaint/escalation route and after-hours contact.
- Temporary fencing/security that prevents accidental encroachment while protecting the retained woodland and public route.
- Photographic condition survey and a clear reinstatement/damage-repair protocol.
- Operational review of route-specific pedestrian/cycle demand, school peaks, lighting, visibility, parking and driveway manoeuvres at the terminal.

Appendix B (continued) - title-plan extract

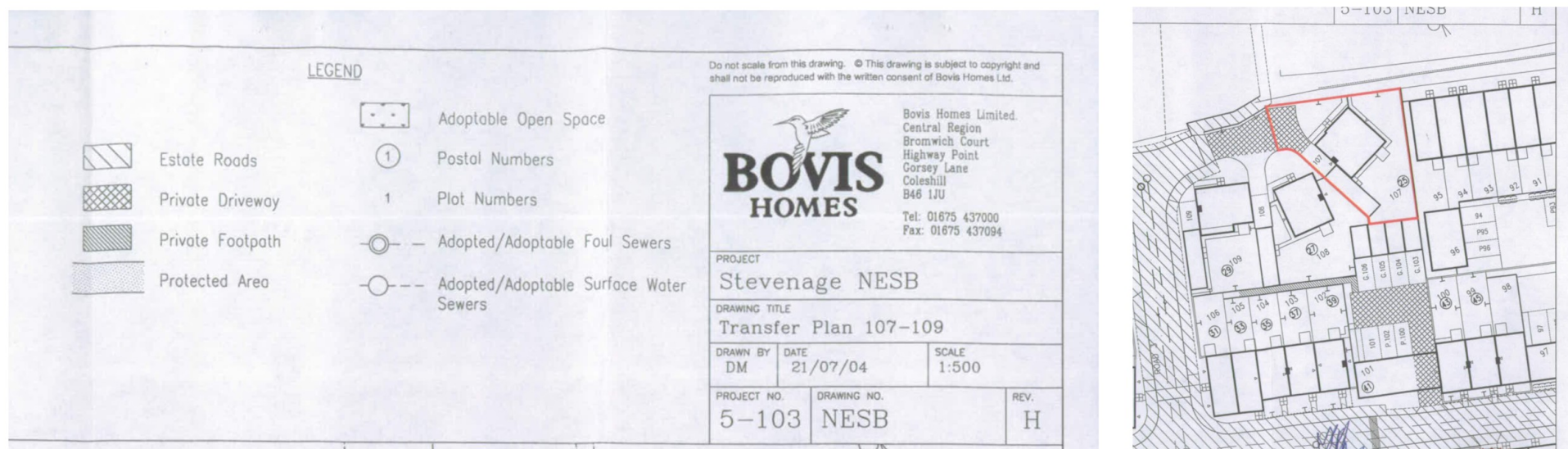


Figure B5. Composite cropped extract from the official 2008 Transfer Plan associated with title HD488534. The left panel retains the plan legend; the right panel shows plot 107 edged red and the adjacent driveway/footpath patterning. Prior-owner signatures are omitted.

I present this figure as evidence of the adjacency and private/shared-access context. It is not relied on to assert that the applicant has no legal rights over any land required for the scheme.

Appendix C - Infrastructure need, current proposal and timing closure

Infrastructure	Evidence of need	Current proposal	Timing issue	Closure required
Primary healthcare	c.1,536 additional residents/patients; constrained local GP premises; NHS c.£1.07m request; strategic c.630m ² NIA medical-facility need.	Draft HoT: contribution or hub floorspace, TBA; NHS identifies NS1 as principal facility location with time-limited GA2 fallback if NS1 lags.	NHS seeks first-dwelling occupation trigger for GA2 mitigation.	Fix NHS-approved option/amount/specification, fallback mechanism and first-occupation trigger.
Primary education	HCC: 1.6FE GA2 impact; 1FE school delivered cumulatively with GA1; pupils arise before school.	2.1ha primary site + 1.9ha reserve in draft HoT; school could come at any phase.	Need begins with occupied family housing.	Resolve land split/delivery and interim capacity/travel plan linked to occupation.
Secondary education	HCC says current spare capacity is limited and demand forecast to rise; seeks contribution.	Draft HoT TBA.	Demand arises with occupation.	Secure HCC contribution and payment triggers.
0-2 childcare	HCC estimates c.129 service users and c.£1.46m contribution.	Potential community-hub provision; HoT TBA.	Demand from resident families.	Specify on/off-site delivery and contribution trigger.
SEND	HCC identifies current provision unable to mitigate growth; c.£1.06m sought.	Draft HoT TBA.	Demand arises as pupils occupy.	Secure HCC contribution / agreed provision.
Sport/community	Sport England seeks mitigation; hub flexible.	Hub up to c.0.2ha / 2,000sqm equivalent site, exact use later.	Needs grow with population.	No double-counting: specify relied-upon uses and secure sports mitigation.
Foul sewer	Thames Water: insufficient full-development capacity; reinforcement likely.	Applicant acknowledges insufficient capacity; modelling/reinforcement follows.	Before occupation.	No-occupation condition until upgrades or agreed phasing.
Bus/active travel	Modal shift is central; ATE conditional approval; staged intervention package.	Numerous works triggered at 150th/400th occupation etc.	Some benefit needed from early phases; later triggers must be justified.	Final trigger schedule, monitoring and fallbacks if targets missed.

Appendix D - Ecology: current evidence and decision closure

This appendix distinguishes the matters that remain current after the applicant's revisions from earlier points that should now be treated more cautiously.

Matter	Latest concern	Progress already made	Current weight	Required closure
Woodland buffers / road incursions	HMWT 6 Aug recognises 15m buffers but says incursions remain and still considers NE4 non-compliance.	Applicant has added minimum buffers and detailed protection measures.	High - current specialist conflict.	Council ecologist to reconcile latest geometry against NE4/NPPF and identify redesign/mitigation if needed.
Nine Acres Spring connectivity	HMWT says roads/bus loop isolate woodland; mitigation recognised but insufficient/unclear; significant adverse biodiversity effect remains.	Narrowed roads, woodland extension, tunnels/connectivity measures.	High - unresolved landscape-scale effect.	Integrated connectivity assessment and explicit mitigation/compensation response.
Mitigation vs compensation	HMWT says distinction remains unclear outside identified farmland-bird/woodland compensation.	Multiple embedded mitigation measures proposed.	High where significant residual effect remains.	Apply mitigation hierarchy transparently; secure compensation if harm cannot be mitigated.
BNG / habitat management	Positive BNG ambition and statutory metric submitted; long-term governance detail still needs closure.	Applicant claims substantial net gain and provides outline management plans.	Medium-high, not proven failure.	Final metric/management/funding/monitoring legally secured; avoid relying on unverified double-counting.
Farmland birds	Off-site compensation land identified; HMWT suggests skylark plots and perpetuity.	Wild-bird seed mix proposed.	Medium.	Secure off-site habitat in perpetuity and consider specialist skylark recommendation.
Badgers	Applicant has refined sett-closure position and tunnel/fencing mitigation; HMWT defers to Badger Trust.	One outlier sett closure proposed; other setts retained subject to licences.	Medium / specialist-led.	Use licensing and ecology conditions unless current specialist advises further pre-determination evidence.
Bats / Merrick	Applicant maintains survey evidence remains valid and assumes wider species use; low-level lighting later.	No-dig path, limited crown lifting, lighting to be agreed.	Medium.	Specialist confirmation; secure lighting/tree-work controls and update surveys where required.

Appendix E - Principal application documents and external policy sources relied upon

Application / consultation documents

- North Herts Council planning application 25/03080/HYA and August 2026 re-consultation material.
- Revised Planning Statement and revised Design and Access Statement, including Figure 8.10 Merrick Close Active Travel Access Plan.
- Environmental Statement, including Socio-Economics & Health, Transport, Noise & Vibration, Water Resources and Cumulative Effects chapters.
- Woods Hardwick Transport Assessment (updated July 2026) and parking survey material.
- Outline Construction Environmental Management Plan (January 2026).
- Hertfordshire County Council Growth & Infrastructure response (20 March 2026).
- NHS / Hertfordshire and West Essex ICB primary-care consultation response within the application record.
- Hertfordshire and Middlesex Wildlife Trust re-consultation response (6 August 2026).
- Active Travel England re-consultation response (20 August 2026).
- Thames Water consultation response (24 August 2026).
- Hertfordshire Senior Historic Environment Advisor response (18 August 2026) and built-heritage advice (28 August 2026).
- Sport England, British Horse Society and other specialist consultation responses in the application record.
- Applicant draft Heads of Terms for the Section 106 Agreement.
- Official 2008 Transfer of Part / Transfer Plan associated with title HD488534 (plot 107 / 25 Merrick Close).
- Terrain Surveys Ltd correspondence dated 19-20 July 2021 concerning mistaken access onto private land.
- April 2024 Great Ashby election leaflet for Laura Williams and VJ Poopalasingham; Councillor Williams' February 2026 GA2 representation.

External/current policy sources

- Ministry of Housing, Communities and Local Government, National Planning Policy Framework, 17 August 2026.
- North Hertfordshire Local Plan 2011-2031 (adopted November 2022), including SP7, SP18, D3 and NE4.
- North Herts Council, North-East of Great Ashby masterplan and GA2 planning-application information pages.
- GOV.UK Planning Practice Guidance: Planning Obligations.
- Natural England and Forestry Commission standing advice: Ancient woodland, ancient trees and veteran trees - advice for making planning decisions.
- Department for Transport, LTN 1/20 Cycle Infrastructure Design, where referenced by ATE/applicant.