

Luke Cottrell

Our Ref : 25/01441/PRE

FAO: Luke Cottrell

Contact : Henry Thomas
Direct Line : 01462 474138
Email : henry.thomas@north-herts.gov.uk
Date : 13th August 2025

Dear Sir / Madam,

Pre Application Advice : 58 room hotel extension with associated access parking and landscaping

Redwings Lodge Hotel, Great North Road, Hinxworth, Baldock, Hertfordshire, SG7 5EX

I refer to your request for pre-application advice regarding the aforementioned site; I am writing to you following an assessment of the supporting documents submitted and a site visit.

I would emphasise that this document does not constitute a formal determination and is without prejudice to any subsequent planning application.

The following assessment is based upon the following submitted details:

- Cover Letter

For your information the relevant government guidance and policies from the development plan are as follows:

North Hertfordshire Local Plan 2011 - 2031 (Adopted)

Policy SP1 Sustainable Development in North Hertfordshire

Policy SP2 Settlement Hierarchy and Spatial Distribution

Policy SP7 Infrastructure requirements and developer contributions

Policy SP8 Housing

Policy SP9 Design and Sustainability

Policy T1 Assessment of Transport Matters

Policy T2 Parking

Policy D1 Sustainable Design

Policy D3 Protecting living conditions

Policy NE4 Biodiversity and geological sites

Policy CGB1 Rural Areas Beyond the Green Belt

Policy CGB4 Existing Buildings in the Rural Area Beyond the Green Belt.

National Planning Policy Framework (generally and specifically).

Section 2 – Achieving sustainable development

Section 5 – Delivering a sufficient supply of homes

Section 8 - Promoting healthy communities

Section 9 - Promoting sustainable transport
Section 11 – Making effective use of land
Section 12 – Requiring good design

Vehicle Parking at New Developments SPD - November 2011

Design SPD - July 2011

Sustainability SPD

Site and Surroundings

The application site consists of a two-storey detached hotel and parking just off the southbound A1(M) dual carriageway. The hotel is situated North-east of Stotfold and just north of the AppleGreen Northway Services. There is development neighbouring the application site on all side with the highway to the west, restaurant and kennels to the north, a dwelling to the east and a Brookside Lodge to the south.

The hotel is located outside of any settlement boundary and is within the Rural Area Beyond the Green Belt.

Site History

Redwings Lodge Hotel

87/00974/1 – Refused permission for a two storey detached building for 32- bedroom motel.

87/01605/1 – Granted permission for a two storey detached building for 40-bedroom motel

Brookside Lodge

18/00095/FP – Refused permission for large scale two storey side, rear and side extensions to the building and the conversion of the building into a 21 bedroom bed-sit to sleep 42 people. The proposal was refused on the basis that the extensions were considered to be too large, there was a lack of parking and facilities for future occupiers to use. It was also unclear who would occupy the bedsit accommodation.

18/03209/FP – Subsequent application for a smaller two storey side and rear extension was granted permission.

The Proposal

Pre-application advice is sought for a two-storey side and rear extension with associated landscape, parking and ancillary work to add approximately 58 rooms.

Key Issues

The key issues for consideration include:

- the principle of commercial development in this location

- the design and appearance of the resultant building
- impact on the amenity of neighbouring occupiers
- highways, access and car parking
- ecology and biodiversity
- other

Principle of Development - Employment

Paragraph 85 of the NPPF states that “Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. 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”

The Local Plan Policy SP1 supports proposals which deliver jobs and facilities that contribute towards the targets and aspirations of the Plan. This is further iterated under Policy SP3 and ETC8 which states that planning permission for tourism-related development (where it improves visitor accommodation) will be granted subject to the sequential approach set out in Policy ETC3:

In assessing proposals for main town centre uses, we will adopt the ‘sequential approach’ as set out in Government guidance. Therefore, retail uses will be considered in the following order of preference:

- 1) within town centres, on allocated sites within town centres, or in local centres;*
- 2) the edge of centres; and*
- 3) out of centre, only where there are no available, suitable and viable sites which are sequentially preferable.*

I note that the following argument has been submitted within the cover letter:

“The PPG is clear that use of the sequential test should recognise that certain main town centre uses have particular market and location requirements which mean that they may only be accommodated in specific locations. It also makes clear that consideration of sequentially preferable sites should consider whether there is cope for flexibility in the format and/or scale of the proposal.

Case Law has clarified that a sequential approach cannot ‘sever’ development proposals in relation to expansion of existing facilities, ie., an extension is inherently linked to the function of the existing out-of-centre site and alternative sites within or adjacent to defined centres are unsuitable.”

In my view, given that the proposal is for an extension to an established business which is reliant upon this key transport link within North Hertfordshire, it would not be appropriate to apply the sequential test.

Principle of Development – Rural Area Beyond the Green Belt.

The Local Plan Policy SP2 sets out the hierarchy for new employment, retail and other development within the District, with the majority located within the adjusted settlement boundaries for towns and then with general development allowed within the category A villages, in-filling within category B villages and development for limited facilities for local

community needs meeting the requirements of policy CGB2 in category C settlements. This site is located within a semi-rural context which falls outside of the category A, B and C settlements and is an area protected by the designation of Policy CGB1, Rural Areas beyond the Green Belt where there is a presumption against new development.

The criteria of Policy CGB1 states:

In the Rural Areas beyond the Green Belt, as shown on the Policies Map, planning permission will be granted provided that the development:

- a) Is infilling development which does not extend the built core of a Category B village;*
- b) Meets a proven local need for community facilities, services or affordable housing in an appropriate location;*
- c) Is strictly necessary for the needs of agriculture or forestry;*
- d) Relates to an existing rural building;*
- e) Is a modest proposal for rural economic development or diversification; or*
- f) Would provide land or facilities for outdoor sport, outdoor recreation and cemeteries that respect the generally open nature of the rural area.*

Pre-application advice is sought for the extension of an existing Hotel and therefore falls under clause d) which is further fleshed out by Policy CGB4, stating that:

- a) Planning permission for the re-use, replacement or extension of buildings in the Rural Area beyond the Green Belt will be granted provided that:*
- b) Any existing building to be converted for re-use does not require major extension or reconstruction;*
- c) The resultant building(s) do not have a materially greater impact on the openness, purposes or general policy aims of the Rural Area beyond the Green Belt than the original building(s); and*
- d) Any outbuilding(s) are sited as close as possible to the main building(s) and visually subordinate to them.*

This proposal is therefore considered against paragraph c) of CGB4. The purpose of this clause is to protect the existing rural character and minimise the urbanisation of these sites. From the site plan submitted, it is estimated that the footprint of the existing hotel is approximately 103sqm, the extension would add a further 113 sqm, which would constitute an increase of roughly 110%. Looking purely at the footprint on paper, I would consider an extension of this scale to be a major extension which would be disproportionate in scale to the original building and would contradict the provision of CGB4.

Without any elevation plans, it is difficult to assess the impact on the openness of the site. I concede that the site is boarded by development on all sides and would have limited to no visibility from the highway, therefore the impact to the Rural Area Beyond the Green Belt is likely to be on the lower end of the scale. However given the disproportionate size of the proposed extension, it is my view that the level of harm would warrant an objection in principle. Therefore, any future submissions would benefit from a reduction in size unless and suitable justification can be provided.

Design and Appearance

Local Plan policies SP1 and SP9 require that proposals must respect and improve their surrounding and that new development will be supported where it is well designed and located and responds positively to its local context. This is further reflected in Policy D1 which outlines criteria for sustainable design. It states that planning permission will be granted provided that development proposals respond positively to the site's local context, enhance public realm and retain existing vegetation and propose appropriate new planting.

Given that no indicative elevation plans have been submitted, limited comments can be made on the design and appearance of the scheme. Local Plan Policy D1 supports proposals which "*Respond Positively to the site's Local Context*". I would therefore suggest that the chosen material palette either matches or is sympathetic to the materials used on the existing building or buildings within the vicinity of the site. In addition to this, the proposed extension ideally, should not exceed the eaves height and ridge line of the existing building.

Landscaping and Biodiversity Net Gain

Local Plan Policy NE4 states that planning permission will only be granted for development proposals that appropriately protect, enhance and manage biodiversity and that all development should deliver measurable net gains for biodiversity amongst other factors. Any future planning application would need to address the biodiversity loss of the garden area of no 41 and provide a net gain for biodiversity.

The development will be subject to mandatory Biodiversity Net Gain, as such a 10% uplift in biodiversity units will be required. Any future application will need to be accompanied by a Statutory Biodiversity Metric calculation which will determine the biodiversity baseline value of the site and therefore the number of units the development will be required to deliver. In addition to BNG, features that benefit species such as bats, birds and insects should be considered as part of the built design to provide enhancements and support wildlife.

North Herts Ecology Officer provided the following comment:

Thank you for consulting me on the above pre-app for a 58 room hotel extension with associated access parking and landscaping. I have read through the documents and note the intention to undertake a Preliminary Ecological Appraisal (PEA) which is welcomed. This would indicate any potential protected species interest on the site. Should such an interest be found it may be necessary to undertake further surveys to determine the level of use. The results of these surveys and details of proposed mitigation would need to accompany an application, as referenced in Appendix A.

The covering statement acknowledges that the proposal would be subject to mandatory Biodiversity Net Gain and that a biodiversity assessment and BNG metric will be supplied. It also states that the Cat Ditch runs along the southern boundary of the site, the applicant will need to ensure this is included as part of the watercourse element of the Biodiversity Metric. This is an IDB watercourse so the potential for enhancements to it may be limited due to flood alleviation works undertaken. As such, unless there is a need to include this area in the RLB the applicant may wish to reduce the boundary to avoid the riparian zone 10m from bank top. Given the extent of development proposed and the existing habitat interest indicated by aerial images of the site, 10% BNG is expected to be met on site and I look forward to reviewing the PEA and BNG assessments in due course.

With regard to the layout of the site, I consider that the scheme is overly heavy on the hardstanding and would constitute overdevelopment of the site. Although the existing field appears to be of limited ecological value, the line of trees and shrubs around the periphery of the boundary contribute to the amenity of the site. Although some planting has been proposed, in my view this would not offset the loss of the trees.

Therefore, I would suggest that further consideration is given to implement additional green spaces into the proposal. A comprehensive landscaping scheme would be welcomed in any subsequent application, or these details could be reserved via condition. In achieving well designed places, parking courts should be no more than 4-bays in a row before a half-bay width landscaped strip containing a tree is required.

Impact on Neighbouring Amenities

Local Plan policy D3 Protecting Living Conditions states that:

“Planning permission will be granted for development proposals which do not cause unacceptable harm to living conditions. Where.....the living conditions of an existing development would be affected by a proposed use, the Council will consider whether there are mitigation measures that can be taken to mitigate the harm to an acceptable level. If the Council is not satisfied that mitigation proposals would address the identified harm, development proposals will not be permitted.”

I note that the barn to the north of the site has been converted under ref 22/03168/PNQ. The proposed extension would be set off this boundary by approximately 8.5m and 12.3m to the barn itself. In my view, should a scheme be presented with an eaves and ridge height matching the existing building, the extension to the hotel itself would not be harmful to this neighbouring dwelling or the neighbouring properties on the other boundaries. I do raise some concerns however, regarding external lighting within the car park area, given the proximity of the car park to the site boundaries, consideration should be given to prevent light spill.

Highways, Access and Parking

Local Plan Policy T1 Assessment of transport matters states that planning permission will be granted provided that:

“a) Development would not lead to highway safety problems or cause unacceptable impacts upon the highway network”.

Policy T2 states that planning permission will be granted provided that:

“a) Parking for residential development is provided in accordance with the minimum standards set out in Appendix 4 of this Plan”.

Hertfordshire County Council Highways Authority have not been consulted on this application however, they would be consulted on any formal planning application as a statutory consultee. They would assess the impact of the proposals on the local road network and assess the acceptability of any access. The Highway Authority do offer pre-application services which may be of benefit given the intensification of the existing access.

*Parking standards set out in the Local Plan require hotels to provide the following provision:
1 space per bedroom (including staff accommodation) plus
1 space per manager plus*

2 spaces per 3 staff minus spaces related to staff bedrooms plus
 1 space per 5 m2 dining area plus
 1 space per 3 m2 bar area plus
 1 space per 5 m2 public area in conference facility plus
 1 space per 6 m2 of public area in exhibition hall plus
 a minimum of 1 coach parking space per 100 bedrooms

The following has been provided:

	Units	No. of Managers	No. of Staff	Maximum Parking Requirement
Redwings Lodge	98	1	12	107
Brookside Lodge	20	1	5	20
Cotey's Restaurant	75sqm	1	4	13
Flats Above Restaurant	5	2 bedrooms each per flat		10
Maximum Parking Requirement				150

The proposal would therefore provide 98 spaces for guests, 1 space for the manager and 8 spaces for the staff (for a total of 107). Given that the Parking SPD requires a provision to be made for dining, bar and public areas I consider the proposal to be an under provision of parking in this regard. Which will need to be addressed in future submission or suitable justification provided as to whether any guests external to the hotel use these spaces.

Climate Change Emergency

On 21 May 2019, the Council passed a Climate Emergency motion which pledged to do everything within the Council's power achieve zero carbon emissions in North Hertfordshire by 2030. As one of the first councils to pass this motion, NHDC is leading the way on climate action. This declaration asserted the Council's commitment toward Climate Action beyond current government targets and international agreements. Climate action has been a long-term corporate priority area for the Council, and has been pursued through our objective to Prosper and Protect North Hertfordshire:

This objective informs our commitments to:

- Green space provision;
- Representing the Climate Change interests of North Hertfordshire residents on county and regional plans, policies and aspirations;
- Supporting initiatives that increase the energy efficiency of residents' homes, reduce resource waste, and increase our sustainability for the longer term;
- Protecting our physical heritage;
- Finding environmentally sustainable solutions to the challenges

Along with the inclusion of EV charging points, other mitigation should be considered in order to make a positive contribution to the mitigation of the climate emergency. This might be achieved through layout and design of the proposed dwelling house,

maximising solar gain where possible. This would be seen as a positive attribute of any scheme alongside the inclusion of renewable energy technology.

The council provides some guidance and support for renewable energy under the Sustainability SPD. This can be found on our website here: [Sustainability Supplementary Planning Document | North Herts Council](#)

Planning Obligations

I would advise that you refer to the HCC Guide to Developer Infrastructure Contributions which was approved in July 2021 and can be found on the link below. Please note that although this Guide will set out the required contributions towards primary and secondary education, SEND, libraries and highways, given the nature of development and number of parking spaces it likely that highways is the main contribution. You may wish to note that these payments can be quite high.

At the District Council level contributions towards affordable housing, arts and culture; community halls, open space, pitch sport and play space can be sought depending on the development proposed. In my view given the nature of this scheme, I find it unlikely that the district council would require contributions.

If a S106 Agreement is required, both HCC and NHDC will require a S106 monitoring payment. This District Council monitoring payment will be required as a clause in the S106 of 2.5% of the value of the contributions being sought with a minimum fee of £750 and a maximum / cap of £25,000. The HCC monitoring fee is set out in their Guide.

S106 heads of terms will need to be agreed and a draft document submitted before the application is presented to Planning Control Committee for a resolution on the determination. In the event the application is refused, then the decision will be dispatched quickly post committee. In the event the application is resolved to be approved subject to a S106, the completion of the S106 can take some time and you will need to agree to EoTs to cover this time.

[Developer Contributions SPD.pdf \(north-herts.gov.uk\)](#)

[Planning obligations - GOV.UK \(www.gov.uk\)](#)

[Planning obligations and developer infrastructure contributions | Hertfordshire County Council](#)

Submitted Documents

If this proposal were to proceed to the application stage, please ensure that you have referred to our validation check list to ensure that all the needed information and documents are submitted for consideration. Our validation checklist can be found on this link:

[Submit a planning application | North Herts Council](#)

Conclusion

In my view, the scheme as proposed would not be supported by officers for the reasons set out above. If you wish to proceed with this proposal I advise a reduction in the proposed size of the building and to reduce the number of parking spaces required and to free up some space to provide more landscaping within the car park. Ideally, the trees along the boundaries should be retained to provide some screening from the neighbouring properties.

Questions Submitted

- 1) **Access** – To provide in-principal approval of the proposed layout and location of the access arrangement, in light of recent approvals for the same access?

Herts County Council Highways Authority offer their own pre-application advice service which may be of benefit.

- 2) **Policy CGB1 and CGB4** – We request confirmation whether officers share the same interpretation of the policy in regard to the principle of development within the Rural Area Beyond the Green Belt?

Covered under Principle of Development – Rural Area Beyond the Green section.

- 3) **Policy ‘ECT9 Tourism’** – We ask if officers share the same interpretation of the policy with regards to the need to undertake the sequential test?

Covered under Principle of Development – Employment section

- 4) **Validation Requirements** – Confirmation from the LPA regarding the intended list of validation documents to support the forthcoming planning application, attached at Appendix A?

No further documents would be required than is outlined under Appendix A of the submitted Cover Letter.

- 5) **Developer obligations** – As there is no CIL adopted, we request that the LPA provides an estimate of S106 off-site financial contributions based on the proposed developments?

Covered under Planning obligations heading.

Kind regards,

Henry Thomas
Planning Officer

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