

Planning Statement

Planning application on behalf of Gade Homes Ltd

Erection of 24 dwellings, new access from High Street,
associated parking, drainage, amenity space and
landscaping

Land north of Milksey Lane, Graveley

DLA Ref: 2024/273

February 2025

CONTENTS

1.0	INTRODUCTION	1
2.0	SITE & CONTEXT ANALYSIS.....	3
3.0	RELEVANT PLANNING HISTORY	6
4.0	POLICY CONTEXT	7
5.0	DESCRIPTION OF DEVELOPMENT.....	9
6.0	CONSULTATIONS	11
7.0	PLANNING CONSIDERATIONS.....	15
7.1.0	Issue No 1: Principle	16
7.2.0	Issue No 2: Dwelling Mix	18
7.3.0	Issue No 3: Layout & Design	19
7.4.0	Issue No 4: Movement	24
7.5.0	Issue No 5: Environment	26
7.6.0	Issue No 6: Developer Contributions.....	29
8.0	CONCLUSIONS	30

1.0 INTRODUCTION

1.1.0 Background

1.1.1 This report relates to a full planning application for the erection of 24 dwellings, to include 8 affordable units (35%), the provision of a new access from High Street and associated parking, landscaping and amenity space at land north of Milksey Lane, Graveley.

1.1.2 The scheme is promoted on the following basis:

- The site is allocated in the Local Plan for residential development and therefore the principle of the proposal is acceptable.
- An appropriate mix of housing type, size and tenure is proposed to include 35% affordable housing, in full compliance with Local Plan policies HS2 and HS3.
- The provision of 35% affordable housing would be a significant benefit over the current scheme under 17/04017/FUL.
- The increased number of dwellings would also contribute to the NPPF aim of significantly boosting the delivery of homes and making the most efficient use of land. The higher density scheme would not result in any harm to the character of the area due to the substantial boundary planting, enclosed nature of the site and limited views.
- The proposal would comprise a high quality, well designed development, which would preserve the landscaped, semi-rural character of the area, drawing on the disparate elements of the surrounding built environment. This landscaped led, spacious development would also provide a high standard of amenity for both existing and prospective occupiers.
- It is considered that the proposal would have a neutral impact on the significance of the Conservation Area and the setting of the nearby listed properties. If however a different view is taken, any harm would have to be less than substantial - and at the lower end of this scale - such that public benefits resulting from the provision of much needed market and affordable housing would outweigh it in accordance with the NPPF.
- Appropriate archaeological research has been undertaken and a WSI submitted detailing further work proposed.
- The proposal would exploit the accessible location of the Site and existing public transport services and public rights of way. It is considered that a safe means of access can be provided from High Street, whilst the scale of development would preclude any safety or capacity issues. Policy compliant cycle and car parking is proposed.

- The proposal incorporates measures to improve biodiversity and retain and protect trees.
- An appropriate drainage strategy is proposed along with sustainability and energy efficiency measures.

1.2.0 **The Developer - Gade Homes**

1.2.1 For over 65 years, Gade have been building residential and commercial developments, as well as an excellent reputation for honesty and integrity on the following basis:

“As a privately-owned and family run developer, Gade design independently and thoughtfully balancing practicality with timeless design. Like our own business, our developments are built to stand for generations, to respond to and enhance their environment. Channelling decades of experience to build communities that respect the surroundings and leave a legacy of lasting quality.

Gade build houses that we are not only proud of, but would love to live in.”

2.0 SITE & CONTEXT ANALYSIS

2.1.0 Location

2.1.1 The Report Site is located on the northern edge of the village of Graveley, on the northern side of Milksey Lane and on the western side of High Street (B197) onto which it has a limited frontage, with the majority of the site being set to the rear of the existing landscaped bank.



Extract from design statement showing site location and context

2.2.0 Application Site

2.2.1 The application site comprises an irregular shaped piece of land of approximately 1.4 hectares located on the north side of Graveley village bounded the High Street to the east, Bridleway 21 to the west and Milksey Lane to the south. The application site itself is mainly open in character and includes a large U-shaped stable block with associated paddock land. There are several small timber / metal storage buildings close to the stable block. Several lengths of post and wire fencing cross the land. The site is largely screened from the surrounding roads and footpath by mature trees and hedgerows and there is a fall in levels across the site from north to south.

2.2.2 Following the adoption of the Local Plan 2011 – 2031 the village of Graveley is designated a Category ‘A’ village and the whole of the site falls within the village boundary. The site as well as the separate parcel of land to the north comprising several stables and agricultural storage barn have been allocated as a housing site for approximately 8 dwellings (GR1 – Land at Milksey Lane).

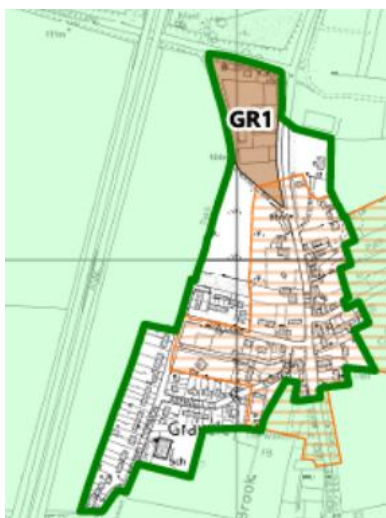
2.3.1 Context

2.3.1 The southern tip of the application site (comprising about 10% of the total site area) lies within the Graveley Conservation Area, no development is proposed within the Conservation Area. The nearest listed buildings are located approximately 140m to the south (Fife House, The White House and Nos 24 – 28 High Street). Graveley House to the south and No. 48 on the east side of the High Street are non-designated heritage assets which are considered to make a positive contribution to the character and appearance of the Graveley Conservation Area.

2.3.2 To the north the site abuts land containing several stables and a barn which are set back from Graveley Lane. The western boundary of the site abuts a bridleway (Graveley 021) which then links with Bridleway 024 heading south into the village and the public footpath Graveley 018 which runs along the southern boundary of the site and terminates at the junction with High Street. Graveley High Street is a classified road (B197). Beyond the right of way to the west, the site adjoins a linear arable field, bounded to the west by the A1M motorway, beyond which is further agricultural land.

2.4.0 Proposals Map Notation

2.4.1 The proposals map for the Local Plan - the North Hertfordshire District Local Plan 2011-2031 shows the site allocated by policy GR1 for residential development of an estimated 8 dwellings. This is shown on the extract from the proposals map below.



2.5.0 **Accessibility**

2.5.1 High Street (B197) comprises a single carriageway road subject to a 30mph speed limit, with footways to both sides providing level access to the services in the village to the south of the Site.

2.5.2 A public footpath abuts the eastern Site boundary, which can be accessed via Milksey Lane and which feeds into the Hertfordshire Way to the north and a range of local routes to the east. This route also forms part of National Cycle Route 12, which runs from North London (Enfield Lock) to Peterborough.

2.5.3 There are bus stops to both sides of High Street, with that to the western side around 225m from the site and that to the eastern side some 275m. These stops are served by the Letchworth to Stevenage No 55 route, which provides 2 services an hour, in both directions Monday-to-Saturday and with a reduced Sunday service. The service calls at Stevenage Railway Station, which provides trains to London Kings Cross Station to the south and Peterborough to the north.

2.5.4 More detail on the accessibility of the site is included in the accompanying transport statement.

2.6.0 **Local Services**

2.6.1 The Site is within safe and easy walking distance of the village based facilities / services, which crucially include a primary school within 600m. Other local services include two public houses and a village hall, all of which are within 300m of the Site. This matter is covered in more detail by the transport statement.

3.0 RELEVANT PLANNING HISTORY

3.1.0 Application Site

3.1.1 The relevant history of the application site is summarised in Figure 3.1.0 below.

LPA Ref	Proposal	Outcome
17/04017/FP	Residential development comprising of 4 detached, 2 link detached and 4 semi-detached dwellings with detached garages and provision of new vehicular and pedestrian access off of High Street (as amended by plans received 4/4/23)	Committee minded to approved subject to resolution of drainage and highway issues – 16.11.23
20/01437/FP	Change of Use of existing hay barn to one 3-bed residential dwelling include insertion of front and rear rooflights and alterations to fenestration (as amended by drawing nos. 03A & 05A).	Granted 25.11.20

3.2.0 Other Relevant Sites

3.2.1 Land to the south of Milksey Lane

LPA Ref	Proposal	Outcome
23/00186/FP	Residential development comprising of 26 dwellings including creation of vehicular access off High Street and associated parking, drainage, landscaping and amenity space.	Committee minded to approved subject to completion of s106 agreement 25.7.24
80/0109/1	Outline application for erection of 12 houses and garages	Refused July 1980
81/00314/1	Outline application for erection of 10 houses and garage	Refused March 1981

4.0 POLICY CONTEXT

4.1.0 National Policy / Guidance

4.1.1 The National Planning Policy Framework (NPPF) December 2024, sets out the Government's planning policies for England. The following sections are considered directly relevant:

- Section 2: Achieving Sustainable Development
- Section 5: Delivering a sufficient supply of homes
- Section 8: Promoting healthy and safe communities
- Section 9: Promoting sustainable transport
- Section 11: Making effective use of land
- Section 12: Achieving well designed places
- Section 13: Protecting Green Belt land
- Section 15: Conserving & enhancing the natural environment
- Section 16: Conserving & enhancing the historic environment

4.1.2 The National Planning Policy Guidance contains detailed guidance on the application of the NPPF.

4.2.0 Development Plan

4.2.1 North Hertfordshire Local Plan 2011-2031 was adopted on Tuesday 8 November 2022, the following policies are considered relevant.

Policy No.	Title
SP1	Sustainable development in North Hertfordshire
SP2	Settlement Hierarchy and Spatial Distribution
SP5	Countryside and Green Belt
SP6	Sustainable Transport
SP8	Housing
SP9	Design and sustainability
SP10	Healthy Communities
SP13	Historic Environment
D1	Sustainable design
D3	Protecting living conditions
NE1	Landscape
HE1	Designated Heritage Assets
HE4	Archaeology

4.3.0 **Supplementary Planning Guidance / Documents**

4.3.1 Reference is made to the following documents:

- Design SPD July 2011
- Graveley Conservation Area Character Statement February 2020
- North Herts Annual Monitoring Report 2019-20
- Vehicle Parking Standards at New Development 2011
- Sustainability Supplementary Planning Document - 23 September 2024

5.0 DESCRIPTION OF DEVELOPMENT

5.1.0 Use

5.1.1 24 dwellings are proposed of which 35% (8 units) would be affordable. The mix of houses proposed is set out in the table below.

Unit size	Market	Affordable Rent	Shared Ownership	Total
1 bed	0	2	0	2
2 bed	0	2	0	2
3 bed	9	1	3	13
4 bed	7	0	0	7
Total	16	5	3	24

5.2.0 Layout

5.2.1 The site would be accessed via a new entrance from High Street, the principle of the new access was established by application 17/04017. The access road would provide access approximately halfway along the eastern boundary, the road would then run east-west through the centre of the site with two roads extending north and a single road and a private drive extending south. The roads extending north and south are all cul de sacs.

5.2.2 The housing would be mainly contained within the road circuit. The dwellings on the site would be located in a back to back arrangement with parking mainly to the side on driveways and/or garages and private gardens to the rear. On the southern part of the site would be a landscaped area including the attenuation basin.



5.3.0 Appearance & Scale

5.3.1 The dwellings are traditional in appearance with pitched roofs and some gable projections and bay windows to add interest. The dwellings would be finished in brick with some render and cladding.

5.3.2 The dwellings are all proposed as two storey in height. The design of the dwellings would reflect those on the application site to the south of Milksey Lane and appropriate existing dwellings in the locality.

5.3.3 More detail on the design approach to the proposals is included in the accompanying design and access statement.

5.4.0 **Landscaping**

5.4.1 There are large mature trees and hedgerows to the east, south, and western boundaries that will be retained. Some landscaping will be lost to enable the new access to be provided but a comprehensive scheme of landscaping across the site would compensate for the losses. The location of the access was chosen in consultation with the arboriculturalist to ensure the impact on trees was minimised.

5.4.2 The southern part of the site would be a landscaped area which would also include the attenuation basin. The area would be circa 1000sqm and would link with the proposed landscape buffer along the western edge of the site.

5.5.0 **Access**

5.5.1 A new access would be provided from High Street, in line with the principle of such an approach which was accepted under planning application 17/04017. The access point would be designed to provide the necessary visibility splays and would include footways to link with the existing one on High Street.

6.0 CONSULTATIONS

6.1 A pre-application enquiry was submitted to the Council in January 2024 and was formally acknowledged on 25 January 2024. Formal written advice was issued dated 19 April 2024. The advice is summarised in the table below.

Topic	Summary of advice
Principle	The principle of housing development is accepted on this site given its allocation as a housing site in the Local Plan under Policy GR1. Policy GR1 sets out the following site-specific criteria: • Sensitive design to minimise impacts upon Graveley Conservation Area • Archaeological survey to be completed prior to development • Maintain Public Right of Way (Graveley 018) through the site.
Impact on Conservation Area	Only a relatively small section of the southern part of the site is within the Conservation Area, there would be no houses or access roads in the CA part of the site and only an attenuation basin with additional landscaping. I find that this would respect the landscape character of the CA. In terms of the impact of the built development on the setting of the CA, there will be some inevitable impact as a result of the allocation of the site for housing. That said, the southern corner is left open with this proposal and the main part of the CA is located further south beyond Milksey Lane. I do not consider that residential development of this site will have any significant impact on the setting of the CA because of its relatively contained nature and separation from the main part of the CA to the south.
Archaeology	Previously the Historic Environment officer had required the geo-physical survey and trial trenching evaluation prior to the determination of application ref: 17/04017/FP. As only 0.75 ha of the site was examined as part of the geo-physical survey due to excess vegetation and waste on the site, it is my view that a further geo-physical survey will be required by the County archaeologist as well as trial trenching. I would therefore recommend that the site is cleared sufficiently to allow a fuller geo-physical survey and an archaeological Written Scheme of Investigation prepared to include trial trenching prior to the submission of any planning application.
Right of Way	It would appear that the application site for this 24 unit scheme excludes the public footpath 018 and does not encroach upon it

	therefore it would appear that there would be no concerns in terms of complying with this particular requirement of Policy GR1.
Quantum of development	The proposal is for 24 dwellings which represents an increase of 200% on the dwelling estimate for the site in Policy GR1. Not all of GR1 allocation is included in the application site area so the dwelling increase is arguably higher than a 200% increase over the 8 dwelling estimate. That said, the proposal for 24 dwellings would equate to a density of around 14 dwellings per hectare which is low by normal urban standards. The site is not within an urban area but rather an edge of village location so I consider that 14 dph is about right for this site taking into account its peripheral location and its rural setting.
General layout & landscaping	The proposed layout focusses the main built part of the development north of the CA part of the site which I would support in terms of minimising the impact on the CA. Furthermore, the land falls to the south and therefore the southern tip would be the natural location to accommodate drainage including any attenuation basin. More importantly however the southern area is more sparse in terms of tree coverage – the eastern and western boundaries containing a more established and continuous belt of trees – and any development in the southern area would be more conspicuous particularly in views from the public footpath 018 that links the bridleway 021 with High Street. The layout shows the majority of the houses presenting their main elevations to the site boundaries and new access roads. I support this outward facing approach and welcome the set back of garages and driveways to the side / flank elevations of the dwellings (and in the case of the affordable maisonette units courtyard parking behind) as in this way cars do not dominate the site frontages. The setback of the houses proposed along the eastern boundary is supported. This part of the site is elevated above the High Street and the setback would help to minimise public views from the High Street of the built form whilst also maintain the quite significant landscape buffer that exists along this boundary. In terms of the design of the dwellings there is a case to be made for a more agrarian style of building design to be considered in this rural location rather than a suburban housing style. Certainly, there is potential for plots 3 – 7 to feature a more traditional barn style as the most visible parts of the development. In terms of boundary

	treatment, at least for the more public areas, timber post and rail or metal parkland fencing should be considered.
Flood Risk	The Lead Local Flood Authority will need to see a detailed drainage infrastructure proposal as part of this development for both foul water and surface water disposal (based on SuDS principles) together with a maintenance schedule for all features of the infrastructure. Full details of all calculations and modelling will be required.
Ecology	From 12 February 2024 developers in England are required to deliver 10% biodiversity net gain (BNG) when building new housing, industrial or commercial developments. This will apply to all new planning applications. A BNG Metric assessment will be required.
Energy Assessment	Any formal planning application should include a detailed Energy and Sustainability Statement This should be set out in two parts – energy and general sustainability issues. The sustainability issues would generally be site wide cover issues such as biodiversity net gain, sustainable water management, sustainable and active travel measures (including new and improved permissive footpaths), open space provision, waste management and construction methods management and materials. The energy element should be informed by an energy hierarchy which should consider passive design, energy efficiency in construction and the use of low carbon and renewable technologies.
Planning Obligations	A development of the scale proposed will require planning obligations to be secured via a Section 106 Agreement. It is highly likely that Hertfordshire County Council will require obligations to cover the following services: • Primary and Secondary Education and Special Education Needs • Libraries and youth services and childcare services • Contributions towards waste services • Sustainable Transport (in accordance with the HCC Guide to Developer Infrastructure Contributions 2021). North Herts District Council will require obligations in respect of: • Waste collection and recycling • Graveley Parish Council infrastructure (subject to negotiation) • Affordable Housing

- 6.2 Representatives of the applicant attended the Graveley Parish Council meeting on Tuesday 29 January 2025 to share the proposals ahead of formal submission.

7.0 **PLANNING CONSIDERATIONS**

Based on the analysis set out in Sections 2 to 5, I consider that the application proposal raises the following issues, which I will consider in turn below:

1. Principle
2. Dwelling Mix
3. Layout & Design
4. Movement
5. Environment

7.1.0 **Issue No 1: Principle**

7.1.1 The site is allocated by policy GR1 in the Local Plan for residential development of an estimated 8 dwellings. The policy states that development should:

- Sensitive design to minimise impacts upon Graveley Conservation Area;
- Archaeological survey to be completed prior to development; and
- Maintain Public Right of Way (Graveley 018) through the site.

7.1.2 The proposal is for 24 dwellings which is an increase on the dwelling estimate for the site in Policy GR1, however the footnote 33 to Policy SP2 (Settlement Hierarchy and Spatial Distribution) states:

‘The figures shown in this policy for individual settlements are the total of planned, permitted and completed development for the period 2011-2031. These figures are not a target and do not necessarily represent the maximum number of new homes that will be built.’ It is clear from this that the Local Plan allocations are not intended to be a limit on the number of dwellings that could be delivered on each site.

7.1.3 Even though all of the GR1 allocation is not involved in this proposal it is noted that other applications in the district have been accepted where increases on the dwelling estimate for allocated sites are proposed. The key issue is whether the quantum of development for any development is appropriate given the specific circumstances of a site and whether the proposed scheme would, as a result of its density, be harmful to the character and appearance of an area. It is considered that the application site can provide substantially more than 8 dwellings without being harmful to the character of the area.

7.1.4 The aim of the NPPF is to significantly boost the supply of homes, increasing the density of an allocated site would be an effective way to achieve this. It is also considered that a higher density scheme would align with the NPPF’s aims of making the most efficient use of land. Making most efficient use of land is particularly important on this site as it is land removed from the Green Belt to provide housing so it should aim to provide as much as possible to maximise the benefit of the Green Belt release. The proposals deliver a density of 17 dwellings per hectare (gross).

7.1.5 The report on the Local Plan provides the Inspector’s view on the suitability of site GR1 for development. In paragraph 396 of the report, after considering the larger sites north of Stevenage, the Inspector states:

‘Site GR1 is clearly of a wholly different scale to these. It consists of a stable yard, equestrian buildings and a riding arena. While the site itself is quite open, it is reasonably well enclosed in the landscape, largely as a result of the high trees around its boundaries. The Green Belt Review Update concludes that the new homes proposed on it would lead to moderate Green

Belt harm. In my view, the Green Belt impacts would be moderate at most, and the trees and other vegetation present will ensure that these effects are ameliorated as much as is reasonably possible.'

- 7.1.6 The proposals would be contained within the well enclosed site with the trees and other landscaping being retained as far as possible. This would significantly limit views of the development and protect the character of the area as a whole. This is clearly applicable to either a development of 10 dwellings or 24 dwellings, the enclosure of the site and limited views benefit any scheme proposed on the site. Due to the enclosed nature of the site, it would be possible to achieve a higher density of development without harm to the character of the area.
- 7.1.7 As the site is allocated in the Local Plan for residential development the principle of the proposal must be considered acceptable. This higher density proposal also provides an opportunity to deliver more housing in line with the Government's aim to significantly boost the supply of housing and make more efficient use of land as set out in the NPPF. Consideration of other issues is included in the following sections.

7.2.0 Issue No 2: Dwelling Mix

7.2.1 Affordable Housing

7.2.2 The proposal would include 8 affordable units, equating to 35% of the total, so as to comply with the requirements of Local Plan Policy HS2. Application 17/04017/FP would provide no affordable housing as it falls below the threshold of policy HS2. This is a significant benefit of a scheme for a larger number of dwellings. A search of the Council's planning register shows that no major residential developments have been approved in Graveley Parish in recent years, (although application 23/00186/FP for 26 dwelling is pending an approval) the result of this means that no affordable housing has been delivered either. The delivery of 8 affordable housing units should weigh heavily in favour of the scheme.

7.2.3 Dwelling Mix

7.2.4 The dwelling mix is in accordance with Policy HS3 of the Local Plan include 1 bed to 4 bed dwellings. Local plan policy HS3 also seeks a mix of 60% larger (3+ bed) and 40% smaller (1 and 2 bed) homes which is also complied with. Planning application 17/04017/FP proposed only 3, 4 and 5 bedroom dwellings, limiting its success in meeting local housing need and failing to comply with policy HS3.

7.2.5 It is considered that the higher number of dwellings proposed on the site would contribute to better meeting local housing needs, in line with the SHMA evidence, by providing a range of different size and tenure dwellings, including 10 affordable homes. This is a significant benefit over the 10 dwelling scheme of 17/04017/FP.

7.3.0 Issue No 3: Layout & Design

7.3.1.0 Policy Backdrop

- 7.3.1.1 In general design terms NPPF (2024) Section 12 - Achieving well-designed places - states at paragraph 135 that planning policies and decisions should ensure that developments should add to the long term quality of the area; be visually attractive; be sympathetic to local character and history, including the surrounding built environment and landscape setting; establish or maintain a strong sense of place; optimise the potential of the Site; and create places that are safe, inclusive and accessible, with a high standard of amenity for existing and future users.
- 7.3.1.2 The NPPF also notes the important contribution made by trees to the character and quality of urban environments and accordingly requires that planning policies and decisions should ensure that new streets are tree-lined and that opportunities are taken to incorporate trees elsewhere in developments.
- 7.3.1.3 The Framework also states at paragraph 139 that development that is not well designed should be refused, especially where it fails to reflect local design policies / guidance.
- 7.3.1.4 At a local level Local Plan Policies SP9 and D1 in respect of Sustainable Design reflect the approach of the NPPF, whilst further general guidance is provided in the Design SPD (2011), which identifies the following design principles for Graveley:
- *New development should be integrated into the existing development.*
 - *Any development fronting the High Street should respect the historic character of the existing buildings and building line to maintain the important vista.*
 - *Potential enhancement of entrance of the village to improve village identity."*
- 7.3.1.5 In considering this issue, account is taken of the fact that the Site is partly located within the Graveley Conservation Area.
- 7.3.1.6 In the above circumstances account is taken of NPPF paragraph 212 which states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation -and the more important the asset, the greater the weight should be. Paragraph 215 further states thus:
- "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."*
- 7.3.1.7 Only the southernmost part of the site is within the Conservation Area, around just 10% of the whole site. To preserve the character of the Conservation Area no built development is proposed on the portion of the site within it. The land within the Conservation Area would

be used for the attenuation basin and landscaping. It is considered that on this basis the character and appearance of the Conservation Area is preserved. This view is supported by the accompanying Heritage Statement.

- 7.3.1.8 The character of the development would be appropriate for the site and reflect that proposed on the land south of Milksey Lane. Although the proposal is for higher density development compared to the current application on the site, it is considered that as the strong, landscaped boundaries would be maintained and there would be limited, if any, views across the site it can be judged as acceptable. Views into the site are minimal and the site well enclosed so the increase in the number of dwellings would not have any impact outside of the site.

7.3.2.0 **Landscape & Visual Impact**

- 7.3.2.1 The application is accompanied by a landscape and visual appraisal which provides a detailed appraisal of the surrounding study area has been undertaken using Ordnance Survey data, historical map data, local policy, and published character assessments. This has informed the on-site field analysis to identify key viewpoints, analyse the landscape character and visual environment of the local area, and determine the extent and significance of any potential landscape and visual effects.

- 7.3.2.2 The appraisal concludes that *“In relation to impact upon the visual environment, the photographic record illustrates that the Site is visually well-contained from most publicly accessible viewpoints by the established network of woodland and vegetation which is typical of the wider landscape. The most notable change will be perceived from PRow Graveley 018, which passes adjacent to the Site’s eastern and southern boundary (along Milksey Lane) and will be retained alongside the development, as confirmed in Policy GR1 of the adopted North Hertfordshire Local Plan. A landscape buffer will reduce the impact from this point. It is also accepted that a minor change to the visual environment will be experienced from the adjacent B197 High Street to the east, where receptors are road users passing in vehicles and less sensitive to a degree of change.”*

- 7.3.2.3 In relation to landscape character the appraisal concludes *“the Site lies on the village edge of Graveley, and while washed over by ‘LCA 216 Arlesey – Great Wymondham’ of the Hertfordshire Landscape Character Assessment, the Site displays few of the characteristics of the wider LCA due to its village edge location and previously equestrian land use. Due to urbanising influences within the wider landscape including the busy A1(M) road corridor approx. 150m west of the Site, it is considered that the development can be incorporated into this location without resulting in a significant impact upon any of the published characteristics which comprise the localised and wider landscape.”*

7.3.2.4 In line with the consideration of the landscape and visual impact on the site at the Local Plan allocation stage, the submitted appraisal demonstrates that the site is appropriate for residential development with the increased density of a size and scale which remains acceptable from a landscape and visual perspective.

7.3.3.0 Design & Layout

7.3.3.1 The scheme layout includes key areas which are identified as public open space, existing vegetation, site entrance gateway, key focal locations and primary arcadian streets. The accompanying Design and Access Statement explains that *“Essential urban design principles have been maintained, such as back-to-back plotting, consistent building lines, ensuring dwellings overlook key areas of public open space and corner turning plots where possible; high-quality strategic and private landscaping to enhance the environment and soften the development edges and a layout configured to emulate a distinctive sense of place and destination.”*

7.3.4.0 Amenity

7.3.4.1 The proposal would ensure a high standard of amenity for existing and prospective occupiers in the following circumstances:

- The proposed layout would preclude any overlooking of existing properties and the scheme would be physically well separated from the proposed development to the southern side Milksey Lane.
- Within the Site, the spacious, informal perimeter block layout similarly reduces the instances of direct overlooking, whilst separation distances required by Local Plan Policy 57 are achieved where it does occur.
- This degree of separation would also preclude any harm in respect overbearing impact and levels of sunlight and daylight.
- The provision of links to the right of way and the linear perimeter open space would ensure that the creation of a well related, permeable development.

7.3.5.0 Heritage & Archaeology

7.3.5.1 A small portion of the southern tip of the application site is within the Graveley Conservation Area. The boundary of the Conservation Area as it crosses the site does not follow any defined features on the ground. The southerly part of the site within the Conservation Area is framed by trees and post and rail fencing along the High Street and Milksey Lane boundaries. There will be no built development within the CA part of the site the area would remain open with an attenuation basin and landscaping. The officer report on application 17/04017 addresses the Graveley Conservation Area Character statement (GCACS) stating *“The GCACS identifies a narrow length of trees between the site and the High Street footpath as being ‘Significant areas of trees’. The identified tree belt lies outside of the application site and is not proposed to be removed or affected by the proposed development.”*

7.3.5.2 The officer report on 17/04017/FP also considers the impact of development on the application site on the nearby listed buildings setting out that:

“Approximately 130 m to the south of the application site are a collection of Grade II listed buildings comprising Nos 24, 26 and 28 High Street and The White House and Fife House and linked outbuildings. As noted on the various listed descriptions the significance of these heritage assets lies wholly with the buildings and structures themselves, either individually or as group value (in the case of Nos 24 – 28), deriving their heritage significance mainly from the evidential value of their historic fabric rather than their curtilage or wider area around them. None of these buildings rely on the application site for their special interest and there is no historical or functional association with the application site.”

7.3.5.3 Evidence of a Roman road, running in a north-south direction, was discovered in trial trenching on the adjacent development site to the south the subject of planning application ref: 23/00186/FP and therefore the archaeologist consulted considered that it would be likely that the road could continue through the application site. An archaeological geophysical survey was therefore requested. The survey was undertaken and concludes that *“No anomalies of archaeological potential have been identified, however anomaly of undetermined origin detected in the centre of the survey area. Modern disturbance was extensive across the survey area related to the former horse paddocks, modern debris and extant equipment and buildings potentially masking weaker anomalies if present.”*

7.3.5.4 The application is accompanied by an archaeological desk based assessment and written scheme of investigation. The DBA concludes the following:

- *“Prehistoric settlement of the study area is indicated by a number of cropmarks in the vicinity of the study site. There is, therefore, considered to be a low to moderate potential for Prehistoric finds or features within the study site.*
- *A review of the available evidence suggests a high potential for Iron Age/Roman remains.*
- *The line of the Roman Road from Baldock to Rush Green is projected to run on a southwest-northeast alignment through the centre of the study site.*
- *A moderate potential for Saxon and early medieval archaeological remains relating to agricultural practice is considered for the study site.*
- *The study site is considered to have a moderate potential for finds and features from the medieval period and a low potential for finds and features from the postmedieval period, other than those associated with agricultural practices.*
- *The stable block within the study site comprises the only known previous phase of development, which would have had a localised impact on potential remains.*
- *Archaeological remains, if present, are likely to be considered of local to regional significance. Archaeological remains of national significance requiring preservation*

in-situ are not expected. Archaeology is therefore not considered to present a design constraint on development.

- *Given the likely presence of a Roman Road within the study site, a requirement for further phased archaeological investigation is anticipated and discussions will be held with the LPA's archaeological advisor to agree an appropriate scope of works. These works could reasonably be secured as a condition of planning permission should it be granted."*

7.3.5.5 In light of the identified need for further phased archaeological investigation a WSI has been prepared and submitted. The WSI sets out that the archaeological evaluation will comprise the excavation of ten evaluation trial-trenches (a 4% sample of the site) as shown on the plans; contingency for a further three trenches should those be required; and post-excavation research, analysis, report and archive production.

7.3.6.0 **Conclusions**

7.3.6.1 In summary, it is considered that the proposal would comprise a high quality, well designed development, which would preserve the landscaped, semi-rural character of the area, drawing on the disparate elements of the surrounding built environment. The proposal would not challenge the dominance of these existing elements. This landscaped led, spacious development would also provide a high standard of amenity for both existing and prospective occupiers. The well-enclosed nature of the site and strong landscaped boundaries would limit views into the site resulting in no impacts outside of the site, irrelevant of the number of dwellings proposed.

7.3.6.2 As a result of the above factors, it is considered that the proposal would have a neutral impact on the significance of the Conservation Area and the setting of the nearby listed properties. If a different view is taken, any harm would have to be less than such that public benefits resulting from the provision of much needed market and affordable housing would outweigh it in accordance with the NPPF.

7.4.0 **Issue No 4: Movement**

7.4.1 The proposal has been designed in the context of NPPF paragraphs 110 to 112 in the following circumstances:

- **Accessibility / Sustainable Transport Modes** With reference to Sections 2.5.0 and 2.6.0 above, the site has excellent and safe pedestrian access to nearby local services including a primary school two public houses and a village hall, all of which are within 900m of the Site. There are frequent and regular bus services running in both directions, Monday to Sunday between Letchworth and Stevenage accessed from High Street within 300m of the Site. As noted elsewhere the Site has been designed to be permeable, with pedestrian access directly onto the existing right of way to the west and Milksey Lane to the north, with priority given to pedestrians throughout. A Travel Plan can be provided if required to further promote the existing sustainable transport options.
- **Highways Safety and Capacity** NPPF paragraph 116 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. A Transport Statement accompanies the application; and demonstrates that there would be no adverse impact on highway safety of capacity.
- **Car and Cycle Parking** Policy compliant car and cycle parking will be provided, comprising curtilage spaces and useable garages. A total of 56 car parking spaces are proposed 46 allocated to the dwellings in line with the standards and 10 visitor spaces.

7.4.2 Policy GR1 requires that the right of way is maintained through the site. As with the planning application (17/04017/FP) for 10 dwellings the right of way would be unaffected by development and outside of the application site, this was considered acceptable in the officer's report to committee.

7.4.3 The accompanying transport statement confirms that the proposed new access would be designed in line with standards and would have the appropriate visibility splays. Drawings are provided to demonstrate the relevant swept paths for a refuse vehicle. There would be 2m wide footways on both sides of the access road.

7.4.4 MEC were commissioned to prepare a Transport Statement. A review of the existing transport conditions confirms that the site is well-connected to a variety of local amenities, easily accessible via established pedestrian, cycle, and public transport networks. As such, it is considered a sustainable location in line with the NPPF. The conclusions of the Transport Statement are as follows:

- *A review of the most recent 5-year PIC data indicates that there do not appear to be any significant road safety concerns on the local highway network in the site vicinity prior to assessment of the proposed development.*
- *The development proposals would provide a new vehicular access from the B197 High Street via a Simple Priority Junction. This would be designed to adoptable standards as a 'P2/M1 residential street' in accordance with NHDC guidance, supported by speed surveys and vehicle tracking undertaken by MEC.*
- *The parking strategy demonstrates suitable levels of vehicle and cycle parking would be provided within the site in accordance with local policy requirements.*
- *The trip generation assessment indicates the site is not anticipated to result in a severe, residual impact on the external highway network during the typical weekday AM and PM peak hour periods assessed.*
- *It is therefore concluded that safe and suitable access to the site can be achieved in accordance with the NPPF, with no severe impacts on highway capacity anticipated. On this basis, it is recommended that approval be granted on Transport and Highways grounds to the planning application.*

7.5.0 **Issue No 5: Environment**

7.5.1 **Ecology**

7.5.2 Appropriate ecology surveys and appraisals have been undertaken and in accordance with NPPF paragraph 193, the finalised design incorporates measures to improve biodiversity. The initial feedback confirms that no statutory designations of nature conservation appear to be located within 2km of the site, the nearest statutory designation is Knebworth Woods Site of Special Scientific Interest (SSSI), located approximately 4.8km south of the site. The nearest European-level designation is Lee Valley Special Protected Area (SPA) and Ramsar, located approximately 20.5km south east of the site. The site is dominated by long sward grassland in the northern half of the site and tall ruderal vegetation in the southern half. A single stable block building is located towards the centre of the site with some associated hardstanding and scrub. Boundary habitats include a tree line located along the western boundary and a woodland (mainly off-site) along the eastern boundary. Overall, the on-site habitats are not considered to be of elevated ecological importance and no rare or notable floral species were recorded during the survey

7.5.3 The proposals must deliver the mandatory 10% biodiversity net gain. The Council is able to secure the BNG details through a planning condition, which is set out in the mandatory guidance which states *“A biodiversity gain plan is a document that shows how you will achieve BNG. In your biodiversity gain plan you must provide evidence for your BNG decisions. You can submit the biodiversity gain plan to your local planning authority after they approve your planning application”*. Relevant details of BNG provision will therefore be secured by the condition and submitted for approval at the relevant time.

7.5.4 **Trees**

7.5.5 The application is accompanied by a tree survey and associated tree constraints plan. The survey identifies that the trees are located along the boundaries of the site with no trees within the main, central part of the site. The majority of trees surveyed are category B. Trees are proposed to be retained wherever possible unless there is an arboricultural reason not to.

7.5.6 **Flooding / Drainage**

7.5.7 The site is located within Flood Risk Zone 1 which is considered to be at very low risk to fluvial and surface water flooding. The layout includes an attenuation basin and the application is accompanied by a full drainage strategy. The LLFA has commented extensively on planning application 17/04017/FP so those comments were taken into account in the preparation of drainage information to accompany the planning application.

7.5.8 MEC were commissioned to undertake a Flood Risk Assessment. This assessment was undertaken to ascertain the constraints of the development to the site and to assess the

impact of the design, concerning flood risk. The conclusions from the assessment are as follows:

- *The site is located within Flood Zone 1 and is therefore compatible with a “more vulnerable” development use in line with policy guidance.*
- *The site is at very low risk of surface water flooding.*
- *The risk of flooding from all other sources is low.*
- *Groundwater was not encountered during ground investigations.*
- *A CCTV survey of the highways sewer system showed connectivity from the two manholes located within the treeline on the easternmost boundary of the site. The sewer runs along High Street and into the surface water ponds located adjacent to Pondside, south of Oak Lane.*
- *Existing runoff conditions have been calculated using the FEH method within Flow Causeway. For an impermeable area of 0.59ha, the QBAR Greenfield Rate has been calculated as 0.6l/s. As this is a low rate, that may cause blockages in the system, a minimum discharge rate of 2.0l/s has been applied.*
- *In accordance with the National SuDS Standards, the strategy involves conveying surface water flows to a series of attenuation features, which will then discharge into the existing highways surface water sewer within High Street, at a controlled discharge rate of 2.0l/s.*
- *In total a storage volume of 695.28m³ would be required within the attenuation basins to accommodate the 1%AEP40CC storm event.*
- *Additional drainage features such as permeable paving will be used across the site and will provide extra storage on-site. Permeable paving will act as a first treatment stage for any run-off and will ensure adequate surface water treatment is provided. These features have been excluded from calculations at this stage.*
- *Foul water from the site will discharge via gravity into the existing public foul water sewer within High Street, at Manhole 1001, subject to agreement with Anglian Water.*
- *With the above measures in place, the development of the site will not create any flood risk issues for the wider area.*

7.5.9 Sustainability and Energy

7.5.10 In line with Local Plan requirements and the Sustainability Supplementary Planning Document, a sustainability and energy statement supports the application. The statement considers a range of energy and sustainability matters concluding that:

“The strategy achieves and meets the following requirements:

- *Maximises the energy efficiency performance of the building fabric, in accordance with the energy hierarchy.*
- *The fabric energy efficiency (DFEE) achieves a 7% reduction over the minimum standards defined by Building Regulations Part L1 2021 (TFEE).*
- *The carbon dioxide emissions of the houses are further minimised at the ‘Be*

Green' stage of the energy hierarchy by deploying air source heat pump technology to provide the dwellings with heating and hot water.

- Reduces a total estimated 19.29 tonnes of CO2 compared to the Part L 2021 baseline. This equates to a 65% saving.*
- Complies with all of the main compliance criteria required by Part L 2021 of the Building Regulations.*
- Details a specification of water efficiency measures which will limit the water consumption of the dwellings to no more than 110 litres/person/day."*

7.6.0 Issue No 6: Developer Contributions

7.6.1 The proposed scheme would attract planning obligations towards education, libraries, youth services, sustainable transport, waste and local projects. The applicant is willing to enter into a legal agreement to secure appropriately justified contributions.

7.6.2 It is also considered that there are benefits arising from the increased population resulting from the more efficient use of the site. New residents would use local services making them more viable in the long-term and possibly even attracting new businesses/services to the area.

8.0 CONCLUSIONS

8.1.0 Background

8.1.1 This report relates to a pre-application submission for the erection of 24 dwellings, to include 8 affordable units (35%), the provision of a new access from High Street and associated parking, landscaping and amenity space at land north of Milksey Lane, Graveley. The proposal is promoted in the following circumstances.

The site is allocated in the Local Plan for residential development and therefore the principle of the proposal is acceptable. An appropriate mix of housing type, size and tenure is proposed to include 35% affordable housing, in full compliance with Local Plan policies HS2 and HS3.

The proposal would comprise a high quality, well designed development, which would preserve the landscaped, semi-rural character of the area, drawing on the disparate elements of the surrounding built environment. This landscaped led, spacious development would also provide a high standard of amenity for both existing and prospective occupiers.

The provision of 35% affordable housing would be a significant benefit over the current scheme under 17/04017/FUL.

The increased number of dwellings would also contribute to the NPPF aim of significantly boosting the delivery of homes and making the most efficient use of land. The higher density scheme would not result in any harm to the character of the area due to the substantial boundary planting, enclosed nature of the site and limited views.

It is considered that the proposal would have a neutral impact on the significance of the Conservation Area and the setting of the nearby listed properties. If, however a different view is taken, any harm would have to be less than substantial - and at the lower end of this scale - such that public benefits resulting from the provision of much needed market and affordable housing would outweigh it in accordance with the NPPF. Appropriate archaeological research has been undertaken and a WSI submitted detailing further work proposed.

The proposal would exploit the accessible location of the Site and existing public transport services and public rights of way. It is considered that a safe means of access can be provided from High Street, whilst the scale of development would preclude any safety or capacity issues. Policy compliant cycle and car parking is proposed. The proposal incorporates measures to improve biodiversity and retain and protect trees. An appropriate drainage strategy is proposed along with sustainability and energy efficiency measures.

DLA | Heritage

DLA | Strategic

DLA | Commercial

DLA | Residential

DLA | Leisure

DLA | *Solutions*