

Mr. P. Chastan
Senior Planning Officer
Major Projects Team
North Hertfordshire Council

BY EMAIL: paul.chaston@north-herts.gov.uk

1058/A3

11 February 2026

Dear Paul,

OUTLINE APPLICATION 25/02401/OP: ERECTION OF UP TO 100 DWELLINGS WITH MEANS OF ACCESS FROM TURNPIKE LANE, INCLUDING ASSOCIATED LANDSCAPING, DRAINAGE, CAR PARKING; INFRASTRUCTURE AND ALL ANCILLARY AND ENABLING WORKS FOLLOWING DEMOLITION OF ALL EXISTING STRUCTURES (ALL MATTERS RESERVED EXCEPT MEANS OF ACCESS) LAND SOUTH OF TURNPIKE LANE, ICKLEFORD, HERTFORDSHIRE

We write on behalf of Hawridge Strategic Land Ltd (the Applicant) following receipt of a letter from Ceres Property on behalf of Hill Residential objecting to the above application. Hawridge are extremely disappointed to receive such a response from a fellow developer and a planning consultant – both of whom have successfully promoted, advocated for and secured planning permission for grey belt sites. Last year, Ceres Property published an article on the opportunities presented by grey belt sites to deliver a step change in affordable housing delivery (and yet fail to make a single mention of the contribution that this site can make to affordable housing in North Hertfordshire); and the Hill Group have promoted grey belt sites in Kings Langley (Hertfordshire) and further afield. Yet the letter mentions grey belt only once and fails to acknowledge that either party has actively sought grey belt consents themselves.

Much of the letter does not require a response, seemingly coming from the perspective of having a site (already consented) adjoining the site. However, using the headings provided in the letter, we provide a brief response as follows.

Overview

Unfortunately, whilst correctly setting out the Development Plan, Ceres Property fails to consider the weight to be afforded to Development Plan policies in light of both the latest NPPF but also the Council's acknowledged shortfall in housing land supply. Both of which mean that alongside the consideration of the Development Plan, the application also falls to be considered under the

tilted balance. The final sentence on page 1 is not correctly constructed however it would appear that the author is applying the flat balance as opposed to the tilted balance. It is assumed that they do not consider that the tilted balance applies. For completeness, the test under the tilted balance being whether any adverse impacts “significantly and demonstrably” outweigh the benefits. Furthermore, the author fails to mention any benefits of the scheme at all and thus it is not clear how any conclusions on a balancing exercise (flat or tilted) can be reached in the absence of having conducted a balance.

Substantial harm to the Green Belt

There is no reference to the Applicant’s grey belt assessment submitted with the application and a fundamental error occurs in their conclusion that the scheme conflicts with purpose (b) of the Green Belt purposes. Purpose (b) is the prevention of neighbouring towns merging into one another. Given that Ceres Property use the word “village” 15 times in their letter and repeatedly reference Ickleford as a village, it is somewhat surprising that they have not realised that Ickleford is not a town.

The PPG clearly states:

Purpose B – to prevent neighbouring towns merging into one another

This purpose relates to the merging of towns, not villages.

Regardless, as set out in the Applicant’s assessment, the development does not bring the village of Ickleford any closer to Hitchin. Indeed, Hill’s site is closer to Hitchin than the built form on the application site.

There is also reference to Purpose (a) also however in this respect, the PPG states:

Purpose A – to check the unrestricted sprawl of large built up areas

This purpose relates to the sprawl of large built up areas. Villages should not be considered large built up areas.

Again, as acknowledged by Ceres Property, Ickleford is a village. Regardless, the Applicants report states:

“Ickleford is a village, not a town. There would be limited reduction in perceived openness as the land within the site is not widely visible to the public other than views from receptors either within or immediately adjacent to the site. The site is bordered by strong defensible boundaries on all sides, including a river along the southern edge, and development would not therefore increase susceptibility to unrestricted sprawl of any large built-up area (Town)”.

Reference is then made to Neighbourhood Plan policy E1 which deals with the separation gap between Ickleford and Hitchin. It is unclear as to whether Ceres Property have reviewed the plans / documents accompanying the application; however had they done so – they would clearly see that the development of the application site infills a gap off Turnpike Lane and brings development no closer to Hitchin with Hill's site being the closer of the two sites to Hitchin.

With regard to housing land supply, Ceres Property should be well aware of the way in which housing land supply is calculated and it is extremely disappointing to see reference to existing consents and future consents – all of which are already factored into the Council's own calculations when reaching a conclusion that they cannot demonstrate a five year housing land supply. Furthermore, to see both a planning consultancy and a housebuilder draw a conclusion that the provision of new housing in an area where there is an acknowledged shortfall in supply will “do little to boost housing supply” is frankly astonishing and runs counter to numerous appeal decisions; decisions by the Secretary of State and the direction of travel in the consultation draft NPPF 2025 where it is proposed to give “substantial weight” to the provision of new housing.

Quantum growth in Ickleford

At this stage, no harm (which cannot otherwise be mitigated) has been identified as a result of further growth in Ickleford. Again Ceres Property fail to acknowledge that the housing numbers; spatial strategy and settlement boundaries are all out of date and that the shortfall in supply very clearly demonstrates that the spatial strategy is not meeting current housing need. As a result it is self evident therefore that the Council cannot meet housing need within existing settlement boundaries and greenfield sites outside of settlement boundaries are required to come forward to meet current and future housing need.

Out of character and appropriate density

Given that the site infills a gap between existing developments and does not extend the settlement any further in any direction, it is unclear as to how a conclusion that the scheme is out of character with the settlement can possibly be reached. With regard to density, the application is for “up to” 100 homes with a maximum net density of 40dph – this hardly represents “a high density housebuilder” (to quote Ceres Property). Reference is then made to reducing the density to 20dph however as Ceres Property will be well aware, paragraph 129 of the NPPF sets out that land should be used efficiently and that planning policies should ensure that homes are not built at low densities and that applications which do not make efficient use of land should be refused. It is unclear how Ceres Property consider that a development at a net density of 20dph would represent an efficient use of land.

Again, reference is made to affording the Neighbourhood Plan “full weight” as it forms part of the Development Plan. This is fundamentally incorrect for reasons which have already been stated i.e. that in the absence of a five year supply of housing, the policies which are “most important” to the determination of the application are out of date. This does not mean they are afforded no

weight, but there is a need to assess the weight to be afforded to them and the weight should be reduced insofar as they pull against the grant of planning permission.

Poor connectivity for pedestrians and cyclists

Hertfordshire County Council (highway authority) have raised no objection to the application subject to conditions / obligations and this addresses all the concerns raised in this paragraph as clearly they correctly conclude there are no issues in this respect.

With regard to the points of connection between the Hill site and the application site, we are somewhat bemused by this point following our workshop earlier today, where it was confirmed to us that Hill are showing locations for connection points into our application site – we will therefore continue to show potential connection points between the two sites but clearly only to the boundary of our site. Comments were also made by Ceres Property in respect of the levels difference and whilst we do not consider this represents an issue, as you are aware, we were also advised this morning that Hill are looking at making changes to levels in any case.

Position of LEAP

The application is submitted in outline only however the illustrative masterplan clearly shows that the distance between the LEAP and the nearest homes on the Hill site is greater than the recommended buffer distances.

With regard to the relationship between the two sites, as stated above, the application is submitted in outline however regardless, even if development were up to the boundary of the application site, there is a road which runs around the edge of Hill site such that sufficient separation distances can be achieved. However this is a reserved matter item.

Summary

Dealing therefore with the 3 suggested reasons for refusal.

1. The suggested first reason goes straight to consideration of very special circumstances and does not address grey belt. A conclusion is drawn that no vsc case exists without reference to the benefits that the scheme can deliver; and the housing shortfall which exists in North Hertfordshire. In the absence of this consideration, it is unclear how any conclusions can be drawn on vsc.
2. This matter is addressed earlier, however the fact that Ceres Property advocate a development at a net density of 20dph on the site fails to grapple with the need to make efficient use of land.
3. With regard to sustainability / connectivity, we fundamentally disagree with the points raised and the conclusions reached are not supported by the highway authority who raise no objection to the application.

We trust this letter is of assistance to you when considering the points raised in the letter and we state again, the Applicants extreme disappointment that another housebuilder seeks to downgrade the importance of housing delivery when the scale of the housing crisis both locally and nationally is clearly understood.

Yours faithfully,



Kathryn Ventham
SENIOR DIRECTOR

cc Des Wicks - Hawridge Land
 Lewis O'Donoghue - Hawridge Land