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Ref: DF / SP/ PL-0710
Number: [REDACTED]
Email: david.fletcher@ceresproperty.co.uk
Date: 04 February 2026

Submitted via E-mail: paul.chaston@north-herts.gov.uk

Dear Mr Chaston,

Objection to 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

I write on behalf of my client, Hill Residential, to object to the above speculative outline planning application for residential development on the edge of Ickleford and in the Green Belt. Hill Residential are owners of Ickleford Flour Mill, which immediately adjoins the site to the south-east and has Outline planning permission for up to 71 dwellings, under planning application reference 17/01955/1.

Overview

Having regard to the Planning and Compulsory Purchase Act (2004), the proposals need to be considered in accordance with the Development Plan unless material considerations indicate otherwise. In this instance the North Hertfordshire Local Plan (2022), along with the Ickleford Neighbourhood Plan, provide the statutory planning policy basis upon which to determine the planning application, along with the National Planning Policy Framework (2024).

It is considered that the proposals are clearly contrary to the Adopted Local Plan and Ickleford Neighbourhood Plan. In addition, it is not considered that there are any material considerations, which would weigh in favour of the harm from the development.

Objection is raised to the scheme in respect of 5 principle matters:

1. Substantial harm to the Green Belt;
2. The proposal would add further growth to Ickleford village, which has already had substantial growth
3. The proposed density is inappropriate and out of character with the pattern of existing development in the village; and
4. The site has poor connectivity for pedestrians and cyclists.
5. The location of the LEAP and extent of developable area is inappropriate and needs further consideration.

Substantial Harm to the Green Belt

In accordance with paragraph 142 and 153 of the NPPF, the government attaches great importance to Green Belts and local planning authorities should ensure that substantial weight is given to any harm to the Green Belt.

The proposed development would cause clear and substantial harm to the openness and fundamental purposes of the Green Belt. By extending built form south of Turnpike Lane, it would erode the critical green gap separating Ickleford and Hitchin, undermining the physical and visual separation that prevents these settlements from coalescing. This gap is an integral part of the local landscape structure and currently makes a meaningful contribution to maintaining distinct settlement identities between the built up areas of Hitchin and Ickleford.

In this regard, the proposed development would result in significant urban sprawl and conflict with Green Belt purpose A) and it would result in significant encroachment into the countryside. It would also run contrary to Local Plan Policy NE2 (Landscape), which seeks to safeguard landscape character and specifically avoid settlement coalescence.

This position is reinforced by Ickleford Neighbourhood Plan Policy E1, which is a strategic policy in the Neighbourhood Plan and it requires development to maintain and respect the undeveloped gap between Ickleford and Hitchin. The Neighbourhood Plan highlights the continued separation of the two settlements as essential to preserving the parish's rural character and sense of place. The proposed development, by infilling part of this important open gap, would fundamentally compromise these policy objectives.

The applicant seeks to justify the principle of residential development on the basis that North Hertfordshire District Council do not currently have a 5 year housing land supply. However, the lack of 5 year housing land supply is not in this instance considered to outweigh the substantial harm caused by the proposals. Accounting for the conflict of the development with Green Belt purpose b), the proposals also cannot be considered to be Grey Belt development. In relation to the 5 years housing land supply position, it is noteworthy that a number of the strategic sites allocated in the 2022 Local Plan will be coming forward for delivery in the short to medium term, which is going to assist with improving the 5 year housing land supply position. At a local level, there are already a number of existing consented housing sites in the local area and this application is going to do little to boost housing supply.

Quantum of Growth in Ickleford

As part of the Adopted Local Plan (2022) Ickleford was identified to deliver 235 dwellings, which is a substantial requirement for a village of its size. Subsequent to the Adoption of the Local Plan, the adjacent brownfield site at Ickleford Mill obtained Outline Consent for 71 dwellings. In addition, four other sites not allocated within the Local Plan have also obtained consent/are currently being built out, which takes committed growth in Ickleford up to 348 dwellings. An expansion of a further 100 dwellings, would result in near to 450 dwellings being delivered in Ickleford, which is almost double the Local Plan requirement and represents disproportionate growth for a settlement of this size. This would undermine the Spatial Strategy of the Local Plan and also conflict with the level of growth identified within the Neighbourhood Plan.

Out of character and inappropriate density

The proposal is fundamentally out of character with the established settlement pattern of Ickleford. The site comprises open agricultural land forming a soft rural edge to the village, enclosed by mature vegetation and flanked largely by low-density residential pockets and historic rural features such as Ickleford Manor, which is also acknowledged by the Planning Statement. The surrounding built form is defined by modest clusters of dwellings, typically set within generous plots, and arranged in a manner that reflects the rural morphology of Ickleford. The introduction of up to 100 dwellings on this single parcel represents a significant intensification of higher density development that does not reflect or continue the grain, spacing, or rhythm of the existing village edge. Instead, it would introduce a suburban estate form, typical of a high density housebuilder, which is wholly at odds with the traditional and incremental pattern of development that characterises the village.

In this regard, the proposal is contrary to key policies of the Ickleford Neighbourhood Plan (made February 2024), which forms part of the statutory Development Plan and therefore must be given full weight in decision-making. Policy E2 (Protecting the Landscape) seeks to protect the natural landscape and local character of Ickleford and prevent visually intrusive development at the settlement edge. A scheme of up to 100 dwellings on this greenfield site would introduce a dense, estate type form that is wholly incompatible with these policies and out of keeping with nearby small scale schemes such as Lodge Court (5 dwellings) and Ickleford Manor (19 dwellings), described in the Planning Statement. In failing to respect the required density, grain, and layout principles, the proposal conflicts directly with the Ickleford Neighbourhood Plan's design policies and the community endorsed vision for the parish.

The rural character is described in the Neighbourhood Plan as:

"Although close to Hitchin, the village of Ickleford remains rural in character with a clear separate identity. Several factors contribute to this distinct rural character. These include a central village green, many other green spaces, numerous trees, space around buildings, rural lanes, a mixture of low-rise housing styles, and extensive well-used footpaths linking the settlement with the surrounding countryside."

The above description informs Policy E3 (Rural Character) which requires all development to reflect the village's rural identity, traditional form, and locally distinctive pattern of lower-density housing.

Furthermore, the proposal also conflicts with the density principles set out in the Ickleford Design Codes (Design Codes – March 2023), which also forms part of the approved Neighbourhood Plan and requires new development to reflect the surrounding character in terms of building spacing, plot size, and overall density. The Design Codes expects development at the rural edge to be lower density, with larger gardens, deeper building setbacks, and a landscape-dominant layout to ensure a gentle transition into open countryside.

The proposed scheme is located in Area Type D, which is described as

“...built areas in Ickleford are surrounded by Green Belt designated land. This area constitutes the underlying landscape base, essential to the character of the neighbourhood area.”

The density of existing development in Area Type D is between 0-5 dwellings per hectares. Whilst the Design Codes does allow for new development to have a maximum density of 20 dwellings per hectare, the net density proposed would be 40 dwellings per hectare (as confirmed on page 37 of the Design and Access Statement). This is double the density of the Design Codes. At a minimum, the density should be reduced substantially to nearer 20 dwellings per hectare, with a reduction in unit numbers to a maximum of 50 dwellings to accord with the Design Codes.

Poor connectivity for pedestrians and cyclists

The proposal fails to provide safe, convenient, and direct pedestrian connections to the wider footpath network and key village facilities. The Planning Statement itself acknowledges concerns raised during consultation about the lack of pedestrian connectivity and the absence of continuous footways linking the site to local services. While the applicant asserts that existing footways provide suitable access, this does not reflect the reality on the ground, where footpaths are fragmented, narrow, and in places absent entirely, particularly along Bedford Road and Turnpike Lane. This results in unsafe walking routes for future residents, especially school children and those walking to the village centre, thereby contradicting sustainable travel principles in Ickleford Neighbourhood Plan Policy SD3 (High Quality Design) and Local Plan Policy SP6 (Sustainable Transport).

The scheme also offers poor cycle connectivity, failing to integrate meaningfully with existing routes and the wider active travel network. The Planning Statement acknowledges local concerns about isolation and “poor access to amenities” for non-car users, yet the submitted Transport Statement does not propose any dedicated or segregated cycle infrastructure linking the development to the village or to Hitchin. Instead, cyclists would be expected to share narrow rural roads with vehicle traffic on the roads already described in pre-application feedback as congested and unsuitable for increased movement. This stands in direct conflict with the Neighbourhood Plan’s commitment to encouraging active travel and improving safe cycling connections, particularly along desire lines to local schools and the village centre.

The site is positioned adjacent to important natural assets, including the River Oughton corridor and surrounding woodland, yet the application does not provide meaningful links to the Public Rights of Way network that runs throughout the area. The Planning Statement notes the ecological sensitivity of the southern woodland and the River Oughton, but instead of using sensitive design to enable safe, low-impact pedestrian and cycle access to the countryside, the proposal effectively encloses the development and offers no clear outward connections. This

inward-looking layout is inconsistent with the Ickleford Design Code, which promotes permeability, legibility, and integration with existing paths to ensure new development enhances village-wide connectivity rather than isolates itself from it.

It is noted in this regard that the Illustrative Masterplan included within the Design & Access Statement shows indicative cycleway and pedestrian connections via the adjacent site at Ickleford Mill. These connections require provision of third party land and Hill Residential have not been approached by the applicants to secure the delivery of these routes.

North Hertfordshire Local Plan Policy SP6 (Sustainable Transport) requires new development to prioritise walking and cycling through safe, direct, and attractive routes. The NPPF (2024) also emphasises the need to reduce reliance on the private car and promote active travel. However, the Planning Statement's assertion that the site is "sustainable" because it is "within walking distance" of facilities, is not supported by adequate transport infrastructure. Without continuous footways, lighting, crossing points, or cycle lanes, the claimed sustainability is theoretical rather than real. As proposed, the development will inevitably generate high dependency on motor vehicles, undermining national and local policy objectives and failing to achieve the sustainable transport outcomes required by both the Local Plan and the Ickleford Neighbourhood Plan.

LEAP Location and Extent of Developable Area

The Parameter Plan submitted as part of the application identifies an indicative location for a LEAP towards the south of the site. This LEAP will be in close proximity to residential dwellings to be delivered as part of the adjacent Ickleford Mill development to the south. Accounting for the proximity to future residential amenity and the level change in this part of the site, it is considered that the location for the LEAP is inappropriate and should be re-located elsewhere within the site.

The Parameter Plan also proposes the developable area of the scheme to the east will immediately adjoin the boundary with this Ickleford Mill site. In this regard, there is a substantial level change between the site and the Ickleford Mill Site, with Ickleford Mill site set on substantially lower ground. Development in this location therefore has the ability to result in substantial overlooking and it is likely to have an overbearing impact upon the future residential dwellings on the Ickleford Mill site. As a minimum the parameter plan should be updated with the developable area set back away from the Ickleford Mill site. A similar arrangement to that proposed on the west boundary of the developable area would be appropriate.

Summary

In summary, the application should be refused on the basis of three fundamental and unresolved harms.

Firstly, the proposal would remove an important and tangible separation between Ickleford and Hitchin, directly conflicting with the core purposes of the Green Belt and leading to settlement coalescence. Therefore, no VSC exist to justify releasing the land from the Green Belt, and there are very strong reasons to refuse this speculative housing application. This, combined with the conflict with Policies NE2 of the Local Plan and E1 of the Neighbourhood Plan, amounts to a substantial conflict with both national and local planning policy, which should be given substantial weight in planning terms.

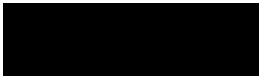
The site forms part of the strategic green corridor along the River Oughton, an area that Local Plan Policies NE1 (Strategic Green Infrastructure) and NE2 (Landscape) require to be conserved and enhanced. Allowing development here would erode, rather than protect, the landscape character these policies are designed to safeguard.

Secondly, the scale, density, and form of development proposed are wholly out of character with the established rural character and density of Ickleford and directly conflict with the Ickleford Neighbourhood Plan and Design Codes, which require lower-density, landscape-led development at the village edge. This is particularly the case given the substantial level of committed development in Ickleford.

Thirdly, the scheme fails to deliver safe and sustainable connectivity, offering inadequate pedestrian and cycle links and failing to integrate with the wider network, thereby undermining national and local sustainable transport policies. Taken together, these impacts represent clear and compelling grounds to refuse this speculative outline application.

I trust these matters will be taken into consideration to inform your recommendation.

Yours sincerely



David Fletcher
Partner

