



**LAND EAST OF BEDFORD ROAD AND
NORTH OF THE PRIORY SCHOOL, HITCHIN**

PLANNING STATEMENT

December 2025

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I. Introduction

This Planning Statement accompanies the submission of an application for planning permission to create 50 no. one, two, three and four bedroom houses and apartments plus associated landscaping, open space, roads, drainage and other infrastructure on the land to the east of Bedford Road and north of The Priory School, Hitchin.

The application is an update to a scheme submitted in late 2022 that was recommended for refusal by the case officer but withdrawn before it could be determined. The changes to national guidance on development in the Green Belt that were published in December 2024 have been combined with a review of the draft reasons for refusal, with the scheme substantially revised to bring it in line with national and local planning policies, as well as retaining those elements which were previously found to be acceptable. The new application demonstrates that the site is grey belt and the creation of new homes is not inappropriate in the Green Belt, as well as showing the outstanding issues such as flood risk, trees and planning obligations to mitigate the impact of the scheme have been successfully addressed.

The context, parameters and the proposed scheme for the development of the site are described in detail in the Design and Access Statement, while this statement sets out the justification for the scheme from a planning perspective, including a review of applicable planning policies, a note on the principle of development for residential use in the grey belt and a summary of the reports and assessments submitted in support of the proposed scheme. This statement confirms that the proposed scheme is sustainable development and is designed in compliance with national policy on development in the Green Belt that is not inappropriate, the statutory development plan and all key material considerations, meaning that the application for planning permission should be approved without delay.

2. Site context

Location

The application site is a broadly rectangular plot of unused land with an area of 1.76 hectares (4.35 acres). It was previously used as a paddock and for grazing and is still predominantly grassland, with hedges and trees on the boundaries that are believed to be remnants of former field boundaries. There is currently no formal vehicle access, although a gated entrance in the north western and south western corners are currently used for maintenance purposes. The site is relatively flat, with an almost imperceptible slope down to the northern boundary.

The site is enclosed by Bedford Road to the west, with houses on the opposite side of the street that face towards it, while behind them the suburban area on the north western side of the town stretches away to the west and south west. To the south and east of the site are the grounds of The Priory School, with the school buildings to the south east, the car park for the school to the south and to the east, behind a barrier of mature trees, a football pitch with an artificial surface. To the north, stables, a paddock and a training arena sit between the site and the River Oughton, with a small group of houses beyond that which fills the majority of the gap between Hitchin and Ickleford.

Accessibility

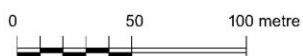
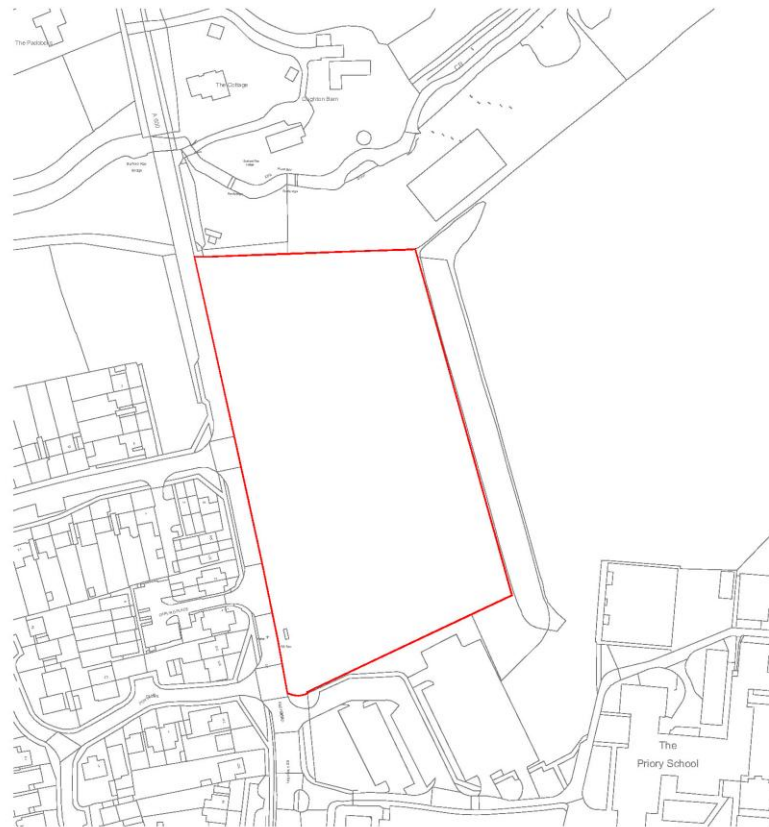
The whole of Hitchin is within five kilometres of the application site – the distance within which cycling is deemed by LTNI/20 to be the preferred transport mode – while there are bus stops immediately outside the site that enjoy a frequent service comprising three buses per hour to and from the town centre. There are footways to both sides of Bedford Road that connect to the services and facilities in the surrounding area.

Local services and facilities

The character of Bedford Road is generally residential and there is a network of footpaths in the vicinity of the site that make short journeys on foot the most obvious mode of transport. In addition to the bus stops immediately outside the site and the entrance to The Priory School alongside, within 1500 metres of the site are two primary schools, two early years/nurseries, two convenience stores, a pub, the parade of shops at John Barker Place (containing a supermarket and a hot food takeaway), the local centre at Redhill Road (containing a Post Office, three newsagents/convenience stores, a pharmacy, a butcher, a baker, a betting shop and three hot food takeaways) and the Hitchin Swimming and Leisure Centre. The town centre is within two kilometres, which equates to a 30 minute journey on foot or seven minutes by cycle.

Agricultural land classification

The Natural England Agricultural Land Classification map for the eastern region (reference ALC008, last updated November 2011) shows the site as Grade 3 (good to moderate), matching the status of most of the land that surrounds the built-up area of Hitchin.



Project:
**Bedford Road
Hitchin**

Description:
Location Plan

Date:
September 2025

Drawing number:
ACD01-PL-01

Drawing Scale:
1/1250 @ A2

Revision:
00

www.jcndesign.co.uk

Plot Date - September 10, 2025

Location plan submitted with the application for planning permission (not to scale).

Planning history

The site has a very limited planning history, with two requests for pre-application advice made prior to the submission of an application for planning permission to create 53 homes in late 2022 (application reference 22/03040/FP). The application was withdrawn before it could be determined, although the case officer had written up a report to the 26 October 2023 meeting of the Planning Control Committee recommending that it be refused. The proposed reasons for refusal were that the scheme would be inappropriate development in the Green Belt, it would detract from the open character of the area, would not deliver a net gain in the biodiversity value of the site, did not address the potential impacts of flooding, contained insufficient information on the existing trees and did not secure the provision of affordable housing and other planning obligations. This application seeks to address these issues at the same time as re-using elements of the proposal that were previously found to be acceptable.

3. Planning context

Section 38 of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to determine an application for planning permission in accordance with the development plan unless material considerations indicate otherwise. The statutory development plan for the Hitchin area of North Hertfordshire is:

- National Planning Policy Framework
- National Planning Practice Guidance
- North Hertfordshire Local Plan 2011 – 2031

The National Planning Policy Framework and National Planning Practice Guidance are material considerations in the determination of an application for planning permission, along with the council's suite of supplementary planning guidance notes.

National Planning Policy Framework

The National Planning Policy Framework (NPPF) was updated in December 2024 and all planning policies at the local level should be in accordance with it. However, where policies pre-date the framework, the relationship between national and local planning policy is fluid, with the level of weight given to policies being dependent on their consistency with the NPPF: in short, the better the policy reflects the NPPF, the greater the weight that it will be given. *Paragraph 231* confirms that the policies in the framework are material considerations in the determination of applications for planning permission but *paragraph 232* clarifies that existing policies should not be considered out-of-date simply because they were adopted prior to the publication of the NPPF.

Presumption in favour of sustainable development

Achieving sustainable development means that the planning system has three overarching objectives that need to be pursued in mutually supportive ways so that net gains can be secured across each of the objectives, which are described in *paragraph 8* as:

- Economic* – helping to build a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity.
- Social* – supporting strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations, and by fostering a well-designed and safe built environment.
- Environmental* – contributing to protecting and enhancing our natural, built and historic environment, including making effective use of land; helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change.

To pursue sustainable development in a positive way, *paragraph 10* states that at the heart of the NPPF is a presumption in favour of sustainable development, which is explained in *paragraph 11*. At the decision-taking stage this means approving applications for planning permission that accord with an up-to-date development plan without delay, or where the policies which are most important for determining the application are out-of-date, granting planning permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits of the scheme when assessed against the policies in the NPPF taken as a whole. When considering adverse impacts against benefits, particular regard is given to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes.

Paragraph 39 goes on to confirm that decision-makers at every level should seek to approve applications for sustainable development where possible and that local planning authorities should approach decisions on proposed development in a positive and creative way. *Paragraph 48* highlights that decisions on applications should be made as quickly as possible while *paragraph 40* and *paragraph 137* promote the use of early engagement and pre-application discussions to resolve potential issues at a preliminary stage and to consider design quality throughout the evolution and assessment of individual proposals.

To support central government's objective of significantly boosting the supply of homes, *paragraph 61* states that it is important for a sufficient amount and variety of land to come forward where it is needed and that the overall aim should be to meet an area's identified housing need, including an appropriate mix of housing types. *Paragraph 62* clarifies the methodology to be used to calculate the number of homes that are needed, and that this number is a minimum, implying that delivering a significant boost means that the figure should be exceeded. *Paragraph 124* goes on to confirm that planning decisions should promote effective use of land in meeting the need for homes, at the same time as safeguarding and improving the environment and ensuring safe and healthy living conditions.

Paragraph 71 notes that mixed tenure sites can provide a range of benefits, including creating diverse communities and allowing scheme to be built out quickly, and that decisions should support this approach. A potential mix of tenures is defined, including a combination of ownership and rental tenures, as well as housing designed for specific groups and plots for self-build or custom build.

Green belt and grey belt

Openness and permanence are deemed to be essential characteristics of the Green Belt in *paragraph 142*, with *paragraph 145* noting that boundaries should only be altered where there are exceptional circumstances. *Paragraph 146* provides context, confirming that such circumstances include instances where a local planning authority cannot meet its need for homes, but that any review should not alter the extent of the Green Belt if doing so would fundamentally undermine the purposes of the remaining Green Belt. The five purposes of the Green Belt are defined in *paragraph 143* as:

- a) To check the unrestricted sprawl of large built-up areas
- b) To prevent neighbouring towns merging into one another
- c) To assist in safeguarding the countryside from encroachment
- d) To preserve the setting and special character of historic towns
- e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Paragraph 153 makes clear that in the determination of an application for planning permission, substantial weight should be given to any harm to the Green Belt, including harm to its openness. It also states that inappropriate development is harmful to the Green Belt and should not be approved except in very special circumstances, with *paragraph 154* explaining that any development in the Green Belt is inappropriate unless it is one of eight exceptions that includes buildings for agriculture or forestry, outdoor sports and recreation, works to or the replacement of existing buildings, and limited infilling either in villages or on previously developed land. However, *paragraph 155* counteracts this by finding that the development of homes in the Green Belt should not be regarded as inappropriate where all the following apply:

- a) The scheme would use grey belt land and would not fundamentally undermine the purposes of the remaining Green Belt
- b) There is a demonstrable unmet need for the type of development proposed, with footnote 56 confirming that this includes where there is the lack of a five year supply of deliverable housing sites
- c) Development would be in a sustainable location with particular reference to reducing the need to travel and prioritising sustainable transport modes
- d) Where the development meets the “Golden Rules”

Grey belt is defined in the glossary to the NPPF: “land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b) or (d) in paragraph 143”. *Paragraph 156* sets out the “Golden Rules” for housing sites in the Green Belt where an application for planning permission is made, requiring that the following contributions be made:

- a) Affordable housing which reflects the policy set out in paragraph 157
- b) Necessary improvements to local or national infrastructure
- c) Provision of new, or improvements to existing, green spaces that are accessible to the public – new residents should be able to access good quality green spaces within a short walk of their home, whether through on-site provision or through access to off-site spaces.

Provision of affordable housing in part (a) of paragraph 156 is clarified by *paragraph 157*, which delivers an interim position until local plan policies are updated to reflect the potential for sites to be developed using the grey belt designation: the affordable housing contribution to satisfy the Golden Rules must be 15% above the existing affordable housing requirement, up to a cap of 50%. This is backed up by *paragraph 67* and a separate affordable housing standard for land either released from the Green Belt or where planning permission on Green Belt land is granted.

Further guidance on part (c) of paragraph 156 is provided by *paragraph 159*, which notes that improvements to green spaces required as part of the Golden Rules should contribute positively to the landscape setting of the development, support nature recovery and meet local standards for green space provision where they exist, or where they do not, meet relevant national standards on accessible green space and urban greening.

Paragraph 158 confirms that a development which complies with the Golden Rules should be given significant weight in favour of the grant of planning permission.

Guidance on detailed design

Paragraph 131 states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve and that good design is a key aspect of sustainable development, creating better places in which to live. *Paragraph 135* sets out six standards where planning policies and decisions should ensure that developments:

- a) Function well and add to the overall quality of the area, over the lifetime of the development.
- b) Are visually attractive as a result of good architecture, layout and landscaping.
- c) Are sympathetic to local character, including the surrounding built environment and landscape setting, while not discouraging innovation or change.
- d) Establish a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.
- e) Optimise the potential of the site to accommodate an appropriate amount and mix of development, supporting local facilities and transport networks.
- f) Create places that are safe, inclusive and accessible, with a high standard of amenity and where crime and disorder does not undermine the quality of life or community cohesion.

Paragraph 139 confirms that permission should be refused for development that is not well designed but that, conversely, significant weight should be given to outstanding or innovative designs that promote high levels of sustainability or help raise the standard of design in an area so long as they fit in with the overall form and layout of their surroundings. Decision-making should support development that makes efficient use of land, as set out in *paragraph 129*, taking account of the need for different types of housing, the availability of land suitable to accommodate it, market conditions and viability, availability and capacity of infrastructure and services (both existing and proposed), scope to promote sustainable travel choices, the desirability of maintaining the character and setting of an area versus promoting regeneration and change, and the importance of securing well-designed, attractive and healthy places.

Paragraph 130 makes clear that it is important that sites are not developed at low densities and that the use of land is optimised. *Paragraph 117* notes that applications for development should give priority first to pedestrian and cycle movements, followed by facilitating access to high quality public transport and maximising the catchment area for bus and other public transport services. In parallel, *paragraph 96* encourages the creation of healthy, inclusive and safe places, including the promotion of social interaction through street layouts that allow for easy pedestrian and cycle connections and through the active street frontages, and enabling and supporting healthy lifestyles through the provision of safe and accessible green infrastructure and through layouts that encourage walking and cycling.

Care is also needed to contribute to and enhance the natural and local environment, with *paragraph 187* noting that decision making should recognise the wider benefits from natural capital and ecosystem services (including trees and woodland), the need to provide net gains for biodiversity, the requirement for new development to avoid contributing to and being put at risk from unacceptable levels of soil, air, water or noise pollution, and the benefit of remediating and mitigating despoiled, degraded, derelict and contaminated land. Securing measurable net gains for biodiversity via planning policies is also mentioned in *paragraph 192*. In addition, *paragraph 136* seeks the inclusion of trees in urban areas, identifying that they make a contribution to the character and quality of urban environments, as well as mitigating and adapting to climate change. It requires that new streets be tree-lined and that opportunities are taken to incorporate trees elsewhere in new developments, as well as ensuring that existing trees are retained wherever possible.

Early, proactive and effective engagement is supported by *paragraph 137* and it states that design quality should be considered throughout the evolution and assessment of individual proposals. Reference is also made to early discussions about the design and style of emerging schemes, which is important for clarifying expectations and reconciling local interests and commercial requirements, and to working closely with those affected by proposals to evolve designs to take account of the views of the community. *Paragraph 138* encourages local planning authorities to use tools and processes for assessing and improving the design of proposed schemes, which should be used as early as possible in the evolution of schemes.

Planning Practice Guidance

The NPPF is backed up by the Planning Practice Guidance (PPG), an online resource of planning guidance in the form of questions and answers, intended to simplify the suite of separate documents that it replaced. It is actively managed and updated as soon as ministerial statements or a new central government position is issued.

The PPG on design includes a section stating that local authorities are advised that design can be considered at an early stage to “assist community engagement” and “provide a framework for the preparation and submission of reserved matters proposals”. Guidance is also provided on how to ensure post-consent design quality is maintained as schemes progress towards completion.

The PPG on Green Belt expands on the NPPF to provide much deeper guidance on grey belt, including applications for planning permission on grey belt land, identifying sustainable locations and the Golden Rules. Chapter 4 of this statement considers the PPG in more detail.

National Design Guide

In January 2021, central government updated the inaugural National Design Guide (NDG) that sits alongside the PPG on design. The government said the new guide “illustrates how well-designed places that are beautiful, enduring and successful can be achieved in practice”. According to the guide, it is intended to underpin paragraph 139 of the National Planning Policy Framework, which states that permission should be refused for development of poor design. The guide summarises the government’s priorities for well-designed places in the form of ten considerations:

- 1) Context – the guide states that good design enhances the surroundings.
- 2) Identity – good design will be attractive and distinctive.
- 3) Built form – a coherent pattern of development will deliver places that are walkable and make efficient use of land with an amount and mix of development and open space that optimises density.
- 4) Movement – well-designed places should be accessible and easy to move around.
- 5) Nature – good design should see nature enhanced and optimised.
- 6) Public spaces – should be safe, social and inclusive so that the public realm feels safe, secure and attractive for all to use.

- 7) Uses – sustainable places should include a mix of uses that support everyday activities, including to live, work and play. Developments should be “mixed and integrated” and neighbourhoods need to include an integrated mix of tenures and housing types that reflect local housing need and market demand.
- 8) Homes and buildings – well-designed homes and buildings will be functional, accessible and sustainable.
- 9) Resources – well-designed places and buildings will be efficient and resilient and they will conserve natural resources including land, water, energy and materials.
- 10) Lifespan – developments should be made to last.

North Hertfordshire Local Plan 2011 – 2031

The Proposals Map shows the site on the northern edge of Hitchin but outside the settlement boundary, with the school to the south and east and the houses on Burford Way to the west inside the town – the site appears as a “bite” into an otherwise consistent northern boundary of the built-up area. Furthermore, by being outside the town, the site becomes part of the Green Belt that circles Hitchin although it and the surrounding land are not shown to be subject to any other planning policy designations. *Policy SP5: Countryside and Green Belt* pre-dates the introduction of the grey belt in the 2024 version of the NPPF but is otherwise consistent with national policy, noting that the preparation of the plan included a review of the green belt boundaries (as discussed in Chapter 4 of this statement) and that development proposals in the Green Belt will only be permitted where they would not result in inappropriate development or where very special circumstances have been demonstrated. Further Green Belt policies can be found in Chapter 6 but the site becoming grey belt means that they do not need to be considered by the proposed scheme.

Hitchin is placed at the top of the settlement hierarchy in *Policy SP2: Settlement Hierarchy and Spatial Distribution* and has a role to play in the delivery of 13,000 new homes between 2011 and 2031. In parallel, the promotion of sustainable transport modes is a key element of *Policy SP6: Sustainable transport* and part (b) identifies that the council will encourage development in locations which enable sustainable journeys to be made to key services and facilities, providing that the parking standards are met (part e) and applicants demonstrate the safety and sustainability of their proposals (part f). *Policy SP8: Housing* confirms the level of housing growth and re-iterates the national requirement to maintain a five-year housing land supply, as well as confirming that a range of housing tenures, types and sizes will be delivered through a roughly even split between properties that are smaller (one and two bedrooms) and larger (three or more bedrooms), subject to any up to date assessment of housing needs.

The policy also notes the provision of affordable housing but more details are set out in *Policy HS2: Affordable housing*, with a target of 40% provision that is modified by the level set for grey belt sites in paragraph 157 of the NPPF, on-site provision required unless robustly justified, a 65/35 split between rented and other tenures, and delivery through a registered provider. *Policy HS3: Housing mix* also supplements Policy SP8 but is less prescriptive with regard to the range of house types and sizes, requiring that they take into account the overall targets of the plan, up to date evidence (such as the Strategic Housing Market Assessment), the location

and accessibility of the site and schemes on other sites, including the ongoing delivery of a five-year supply of new homes. The policy also states that planning permission will be granted if the scheme would provide a density, scale and character that is appropriate to its location and surroundings. *Policy HS5: Accessible and adaptable housing* requires that at least half of the new homes are designed in accordance with Part M4(2) of the Building Regulations and that 10% of the affordable housing meets the wheelchair user standard in Part M4(3).

Policy SP1: Sustainable development in North Hertfordshire follows the direction set by the NPPF and notes that the plan supports the principles of sustainable development. It also confirms that the council will maintain the role of key settlements and grant planning permission for proposals that deliver homes that contribute towards the targets in the plan, create high-quality development, provide the necessary infrastructure and secure mitigation measures to reduce their impact. Mitigation measures are secured by *Policy SP7: Infrastructure requirements and developer contributions*, with both on-site and off-site measures supported as necessary to ensure that no unreasonable burdens are placed on the existing community or the existing infrastructure. The council considers good design to be a key aspect of sustainable development and *Policy SP9: Design and Sustainability* finds that there will be support for new development where it is well designed and located and responds positively to its local context. A wider set of rules are listed in *Policy D1: Sustainable design* and it reads:

“Planning permission will be granted provided that development proposals:

- a) Respond positively to the site’s local context;*
- b) Take all reasonable opportunities, consistent with the nature and scale of the scheme, to:

 - i. create or enhance public realm;*
 - ii. optimise the potential of the site by incorporating Sustainable Drainage Systems (SuDS);*
 - iii. reduce energy consumption and waste;*
 - iv. retain existing vegetation and propose appropriate new planting;*
 - v. maximise accessibility, legibility and physical and social connectivity both internally and with neighbouring areas;*
 - vi. future proof for changes in technology and lifestyle;*
 - vii. design-out opportunities for crime and anti-social behaviour; and*
 - viii. minimise the visual impact of street furniture and parking provision;**
- c) Have regard to the Design SPD, and any other relevant guidance;*
- d) Within Letchworth Garden City have regard to the Letchworth Garden City Design Principles contained in Appendix 5; and*
- e) For residential schemes, meet or exceed the nationally described space standards and optional water efficiency standards.”*

Only part (d) of the policy is not applicable to the proposed scheme and further details of the response to the policy are set out in the Design and Access Statement submitted in support of this application for planning permission.

Consideration of the impact of new development starts with *Policy SP11: Natural resources and sustainability* and meeting the challenges of climate change and flooding, followed by protection of green infrastructure, wildlife sites and other open space through *Policy SP12: Green infrastructure, landscape and biodiversity* and protection of the green infrastructure network (including avoiding the loss, fragmentation, severance or negative impacts) through *Policy NE1: Strategic green infrastructure*. Conversely, *Policy NE2: Landscape* finds that planning permission will be granted for proposals that respect the sensitivities of the landscape character area and do not cause unacceptable harm, taking account of mitigation measures. Submission of an ecological survey and delivery of a net gain for biodiversity is required by *Policy NE4: Biodiversity and geological sites*, although the adoption of the plan pre-dates the statutory requirement to secure a 10% net gain in the biodiversity value of the site.

Unacceptable impacts on the highway network are ruled out by *Policy T1: Assessment of transport matters*, which also adds a requirement for applications to be supported by Transport Statements, Travel Plans and details of how the scheme would be served by public transport, deliver direct and convenient routes for pedestrians and cyclists, and be integrated into existing networks. A separate requirement to consider emissions from the scheme and, by implication, from the traffic it generates, is set out in *Policy D4: Air quality* and, in a related manner, any impact on existing neighbours or where neighbouring land uses could have a negative effect on the amenity of the new homes are considered by *Policy D3: Protecting living conditions*. Protecting future residents from flooding and consideration of overland flow routes is addressed by *Policy NE7: Reducing flood risk*, including a requirement to submit a Flood Risk Assessment that considers the lifetime of the development, climate change impacts and safe access and egress.

Elements of the detailed design are picked up by later policies. These include support for the delivery of new open space to meet the needs of the proposed scheme through *Policy NE6: New and improved open space*, mimicking natural drainage patterns and processes as far as possible in *Policy NE8: Sustainable drainage systems* and a cross-reference through *Policy T2: Parking* to the minimum standards for car parking set out in Appendix 4 of the plan. The latter sets minimum levels for car parking and cycle parking, defines the minimum internal dimensions for a garage if it is to count as a parking space and applies a flexible requirement for unallocated parking spaces for visitors that relates to the number of garages within the scheme.

Supplementary planning guidance

The council has a suite of supplementary planning guidance, with some retained from the previous Local Development Framework and others prepared more recently to expand on policies in the adopted local plan.

The *Design Supplementary Planning Document* was published in July 2011 but remains relevant in determining whether a proposed scheme delivers the high quality, beautiful and sustainable buildings and places required by paragraph 131 of the NPPF by considering local circumstances: urban design principles are applied to examples in the district. A set of design principles for Hitchin are set out in section 4.2, although they focus on the historic centre and are not always directly applicable to a site on the edge of the post-war suburbs. Also attached to the Local Development Framework was the *Vehicle Parking at New Development Supplementary Planning Document* (September 2011) and this has been retained as an expansion beyond Policy T2 in the current local plan, providing guidance for non-residential development.

The *Developer Contributions Supplementary Planning Document* (January 2023) sets the context for mitigating potential impacts of development, including the delivery of affordable housing (reiterating local plan policies on mix and design) and open space within the proposed scheme and funding for a range of services and facilities, including recycling and waste management, expansion of education facilities from early years to 6th Form and youth projects, healthcare improvements (based on a standard formula for each of acute healthcare, mental healthcare and community healthcare, plus the cost of expanding GP provision), indoor sports, arts and culture, libraries and community facilities.

Sustainability Supplementary Planning Document (adopted September 2024) reflects that the council passed a climate emergency motion in May 2019 to assert a commitment towards climate action beyond current government targets and international agreements, followed by the declaration of an ecology emergency in July 2023. The SPD considers eight themes and sets targets ranked as bronze, silver and gold for the assessment of the proposal in a Sustainability and Energy Statement that forms part of the application for planning permission: it is expected that applicants will select several themes on which to achieve higher sustainability levels (silver or gold).

Neighbourhood planning

Hitchin is not subject to the designation of a Neighbourhood Plan Area, therefore there are no local level policies that need to be addressed as part of this application for planning permission. However, it should be noted that the River Oughton, just to the north, marks the southern edge of the designated Ickleford Neighbourhood Plan Area and that the plan was “made” in March 2024.

Five-year housing land supply

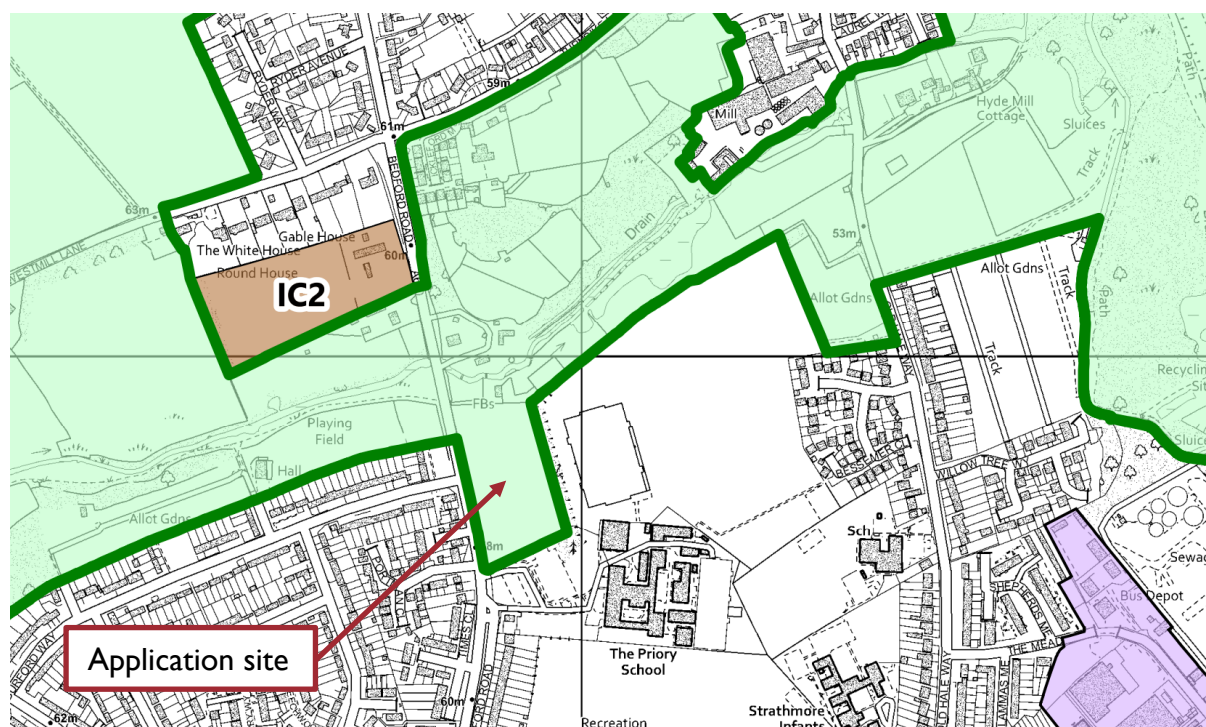
As noted above, the National Planning Policy Framework requires that a sufficient amount and variety of land must come forward where it is needed so that central government's objective of significantly boosting the supply of new homes is supported. Where the local planning authority cannot demonstrate a five-year supply of deliverable housing sites, the presumption in favour of sustainable development applies and planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

The most recent *Five-Year Housing Land Supply Update* (November 2025) identifies a total requirement for housing delivery in the district at 6,976 dwellings for the period 01 April 2025 to 31 March 2030, with a deliverable supply for the same period standing at 3,629 dwellings. As such, there is a deficit of 3,347 dwellings and this equates to a land supply which stands at 2.6 years, making the local plan's policies on housing land supply out of date: part (d) of paragraph 11 of the NPPF is engaged and the presumption in favour of sustainable development must be applied, with particular regard given to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes – this is sometimes described as a “tilted balance”.

4. Principle of development: Green Belt and grey belt

The *North Hertfordshire Local Plan 2011 – 2031* designates the application site as part of the Green Belt that circles Hitchin. Bedford Road and the residential streets to the west and the grounds of the school, including the playing fields, to the south and east are within the extent of the built-up area of the town and are therefore outside the Green Belt. The small gap between Hitchin and Ickleford, following the valley of the River Oughton, is also designated as Green Belt, although the separation between the two settlements is particularly narrow where the recent Cala Homes development at Burford Grange faces the existing houses on Burford Way and the grounds of the former Ickleford Mill mark the edge of the river where it runs past the playing fields of The Priory School.

As such, the site appears as a “finger” of Green Belt that projects into the town, breaking the relatively consistent edge formed by the houses in Burford Way and the playing fields of the school. The land to the west of Bedford Road forms part of the Oughtonhead Common Local Nature Reserve and also includes a children’s nursery, playing fields and allotments to the south of the river. On the east side of the main road and immediately to the north of the site, land in residential use is “washed over” by the Green Belt – three houses and associated stables, paddocks and a horse exercise area sit either side of the river and are accessed directly from Bedford Road.



Extract from the Map B inset (Hitchin, Letchworth Garden City and Baldock) to the Proposals Map of the adopted local plan, annotated with the location of the site and showing the extent of the Green Belt to the north of Hitchin, including the application site and the river valley within the Green Belt and the built-up areas of Hitch and Ickleford, the school playing fields and the residential allocation currently being developed by Cala Homes (reference IC2) excluded.

Background

The extent of the Green Belt across the district was reviewed during the preparation of the current local plan, with the findings set out in the *North Hertfordshire Green Belt Review* (July 2016). The report brings together a series of consultations carried out in 2013 and 2014 and is divided into two parts: an assessment of the current Green Belt, villages in the Green Belt and development sites in the Green Belt, followed by an assessment of potential additions to the Green Belt. The review concluded that the Green Belt between Hitchin and Ickleford and to the north of Ickleford made a moderate contribution to the purposes of the Green Belt and the submission draft of the local plan proposed that the northern edge of the urban area of Hitchin be redrawn so that the grounds of The Priory School and the application site were within the town, excluding them from the Green Belt.

This made the application site “white land” and, following public consultation and consideration by a meeting of the Full Council, this change became the district council’s preferred approach and was included in the draft plan which was submitted to the Secretary of State in June 2017. Following the examination of the plan, the Inspector’s proposed modifications in 2019 (reference MM391) recommended that the council “remove the land east of Bedford Road that is not part of the Priory School” – it is understood that this recommendation was made because the application site had not been promoted was considered to not be available for development, meaning that the Inspector’s view was that there is no “need” to remove the site from the Green Belt. The school grounds, however, were excluded, leaving the application as an anomaly in the boundary of the town and as a parcel of Green Belt which is enclosed by urban land on three sides.

The previous application for planning permission (22/03040/OP) sought to demonstrate that the proposal delivered the very special circumstances required to justify inappropriate development in the Green Belt. It started with a review of the review of the Green Belt from the preparation of the new local plan, showing that the site was found to have a low contribution to restricting sprawl and has no relationship with the setting of a conservation area or historic town and the gap between Hitchin and Ickleford would not be reduced if the site were developed, as well as questioning whether the contribution towards safeguarding the countryside is correctly assessed. The conclusion was that the site did not provide a strong Green Belt function and that this was supported by the decision of the council’s planning policy team to exclude it from the Green Belt.

The very special circumstances needed to justify inappropriate development in the Green Belt were spread across a wide range of issues, including housing need, a backlog in delivery against the allocations in the local plan, the sustainability of the site, the district council’s support for removal of the site from the Green Belt, the length of time taken to prepare the local plan and the creation of a simplified boundary. The case officer for the application did not agree and recommended that the application for planning permission be refused, with the reasons for refusal including that the scheme would constitute inappropriate development in the Green Belt.

Assessment of grey belt status

The Planning Practice Guidance on Green Belt (last updated 27 February 2025) confirms that an “assessment of Green Belt will (alongside other considerations) inform the determination of applications which involve reaching a judgement as to whether proposals utilise grey belt land and whether development of the site would fundamentally undermine the purposes of the remaining Green Belt across the plan area” (reference ID 64-009-20250225). The guidance sets out three areas of evidence that should be considered where a local plan or an assessment of the Green Belt does not identify grey belt sites, which are:

- Whether the site contributes strongly to Green Belt purposes (a), (b) and (d)
- Whether the application of policies to areas and assets of particular importance provide a strong reason to restrict development
- Whether development of the site would fundamentally undermine the purposes of the remaining Green Belt across the plan area

This is a similar list to that provided for a Green Belt assessment during the preparation of a local plan, with guidance provided on how to assess the purposes of the Green Belt, including setting standards for the contribution to the purposes as “strong”, “moderate” or “weak or none” (ID 64-005-20250225). This assessment is therefore also applied to the proposed scheme.

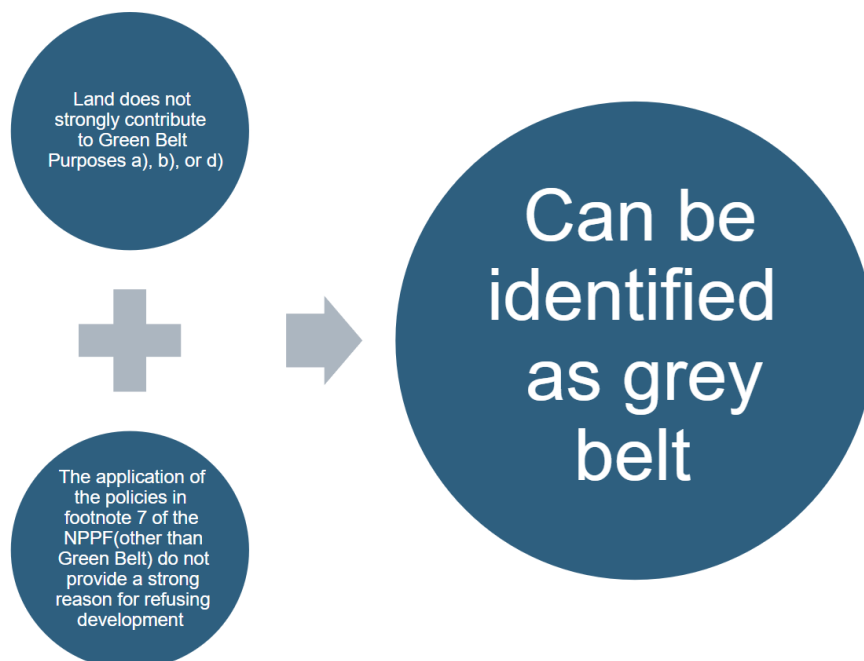
Purpose (a) is to check the unrestricted sprawl of large built-up areas, but sites that make only a weak or no contribution include those that are adjacent to or near to a large built-up area but are largely enclosed by significant existing development. The application site is enclosed by the town on three sides, with Bedford Road and residential streets to the west and the grounds of The Priory School to the south and east, therefore it meets both criteria that define it as having a weak or no purpose with regard to checking the unrestricted sprawl.

Purpose (b) is to prevent neighbouring towns merging into one another, and the guidance makes clear that the purpose relates to the merging of towns, not villages. Areas that contribute weakly include those that do not form part of a gap between towns, or if they form part of a gap, do not make a contribution to visual separation. Bedford Road crosses the gap between Hitchin and Ickleford, but the latter is not a town: the purpose relates to maintaining the separation between bigger settlements, such as Hitchin and Letchworth, further to the east, therefore it can be argued that the application site makes no contribution to purpose (b). It should also be noted that the local plan allocated residential development to the nearly complete Cala Homes site at Burford Grange, substantially closing the Green Belt gap between Ickleford and Hitchin, and this reduction in separation by around a third of the total width (as shown on the extract from the Proposals Map on page 18) was considered acceptable by the district council’s review of the Green Belt and supported by the Inspector at the examination of the draft plan, demonstrating that gap between the settlements has already been found to have limited value with regard to purpose (b). For the sake of completeness, it should also be highlighted that the position of the application site and its enclosure on three sides by the existing built-up area of Hitchin ensures that it cannot form part of the gap between Hitchin and Ickleford, and is unable to make any contribution to the visual separation. The latter point is explored in more detail in the Landscape and Visual Impact Assessment submitted as part of the application for planning permission.

Purpose (d) is to preserve the setting and special character of historic towns, but the site has no direct connection to the historic core of Hitchin – it is remote from the centre of the town and separated from it by the post-war suburbs on the north side of the town, meeting the features in the guidance that define the contribution as weak or none: “have no visual, physical, or experiential connection to the historic aspects of the town”.

Footnote 7 of the NPPF is also relevant, seeking to protect areas or assets of particular importance by restricting the scale, type or distribution of development. The footnote defines these areas as habitat sites, Sites of Special Scientific Interest, Local Green Space, National Landscape, National Park, Heritage Coast, irreplaceable habitats, designated heritage assets and areas at risk of flooding or coastal change, while the guidance confirms that the current designation as Green Belt should not be considered. The site is not part of or close to any of these designations: the Proposals Map from the local plan shows the land without any designation (other than Green Belt) and the reports and assessments submitted with the application for planning permission confirm that the site does not flood and does not contain any habitats that are valuable for wildlife or that are irreplaceable. As such, there are no parallel and strong reasons for refusing or restricting development through footnote 7.

At best, the application site makes a weak contribution to purpose (a) and no contribution to purpose (b) or purpose (d), meaning that it can be clearly understood and not making to a strong contribution to all three. Furthermore, the application of the policies in Footnote 7 of the NPPF do not provide a strong reason for refusing development. Combined, as shown in Figure I of the Planning Practice Guidance on Green Belt (below), the site can be identified as grey belt.



The third bullet point remains and consideration must be given to whether development of the site would fundamentally undermine the purposes of the remaining Green Belt across the plan area. The guidance defines this as assessing if “the release or development of Green Belt Land would affect the ability of all remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way” (ID 64-008-20250225). The preparation of the adopted local plan and the findings of the 2016 *North Hertfordshire Green Belt Review* have already reviewed the extent and purposes of the Green Belt, excluding the application site from the Green Belt and therefore concluding that it does not have any effect on the ability of the balance of the Green Belt to serve all five purposes. The site forms a projection of the Green Belt into the built-up area of Hitchin and therefore has little relationship with the land subject to the same designation immediately to the north (as discussed above) or to the wider Green Belt that circles the town – development on the site would not result prevent the balance of the Green Belt from checking the potential sprawl of Hitchin or safeguarding the countryside from encroachment, would not result in Hitchin merging with Letchworth or Stevenage, would not change the setting of the historic core of the town, and would not prevent the re-use of urban land. The latter point is also discussed in the preceding chapter and will be revisited below: the district council can only show a housing land supply at 2.6 years, therefore urban sites are not delivering enough new homes to meet the demand.

Paragraph 155 and inappropriate development

The Planning Practice Guidance makes clear that where a site is judged to be grey belt and does not fundamentally undermine the purposes of the remaining Green Belt in the plan area if developed, there are still wider considerations that remain relevant to an application for planning permission. This includes paragraph 155 of the NPPF and the four points where the development of homes, commercial and other uses in the Green Belt should not be regarded as inappropriate, which are:

- The development would utilise grey belt land and would not fundamentally undermine the purposes of the remaining Green Belt across the area of the plan
- There is a demonstrable unmet need for the type of development proposed
- Development would be in a sustainable location, with particular reference to reducing the need to travel (paragraph 110) and prioritising sustainable transport modes (paragraph 115)
- Where the development meets the “Golden Rules” in paragraphs 156 and 157

The two parts of the first bullet point have already been confirmed above, meaning that the requirement is met.

The second bullet point is subject to footnote 56 and it confirms that for applications involving the provision of housing, “demonstrable unmet need” means the lack of a five-year supply of deliverable housing sites. As set out in the preceding chapter, the district council’s most recent *Five-Year Housing Land Supply Update* (November 2025) identifies a total requirement for housing delivery in the district at 6,976 dwellings for the period 01 April 2025 to 31 March 2030 and a deliverable supply for the same period standing at 3,629 dwellings, equating to a land supply for only 2.6 years. As such, the requirement of the second bullet point is met.

The guidance provides a useful steer on how a sustainable location should be identified (ID 64-011-20250225), clarifying that the assessment should be determined in light of local context and site-specific considerations, with consideration given to opportunities to maximise sustainable transport solutions. Paragraph 110 of the NPPF notes that significant development should be focussed on locations which are (or can be made) sustainable through limiting the need to travel and offering a genuine choice of transport modes. Paragraph 115 adds further detail, seeking to ensure that sustainable transport modes are prioritised, safe and suitable access for all users can be achieved, the design of the streets and parking areas reflect current national guidance, and any significant impacts on the transport network or on highway safety can be mitigated.

The Transport Assessment submitted with the application for planning permission considers these matters and demonstrates that the site is in a sustainable location, including showing the key services and facilities that are within walking and cycling distance of the site at Table 3.1 and destinations that can be reached using buses from the stops immediately outside the site on Bedford Road at Table 3.2 – the site is served by three buses per hour in each direction. Chapter 4 of the assessment confirms that the proposed access design meets the required standards and includes connections for pedestrians and cyclists, that improvements to the bus stops are included in the scheme, that the required level of car parking provision is delivered, that emergency vehicles and refuse freighters can enter the site, turn and leave in a forward gear, and that trip generation will not have any adverse impact on the transport network. With regard to the latter point, the number of vehicle trips in the morning and evening peaks is so small that it falls within the day-to-day variation in traffic levels and is described as “imperceptible”. As such, the application demonstrates that the requirement of the third bullet point is met.

The Golden Rules in the fourth bullet point are set out at paragraph 156 of the NPPF and split into three sub-points, which are:

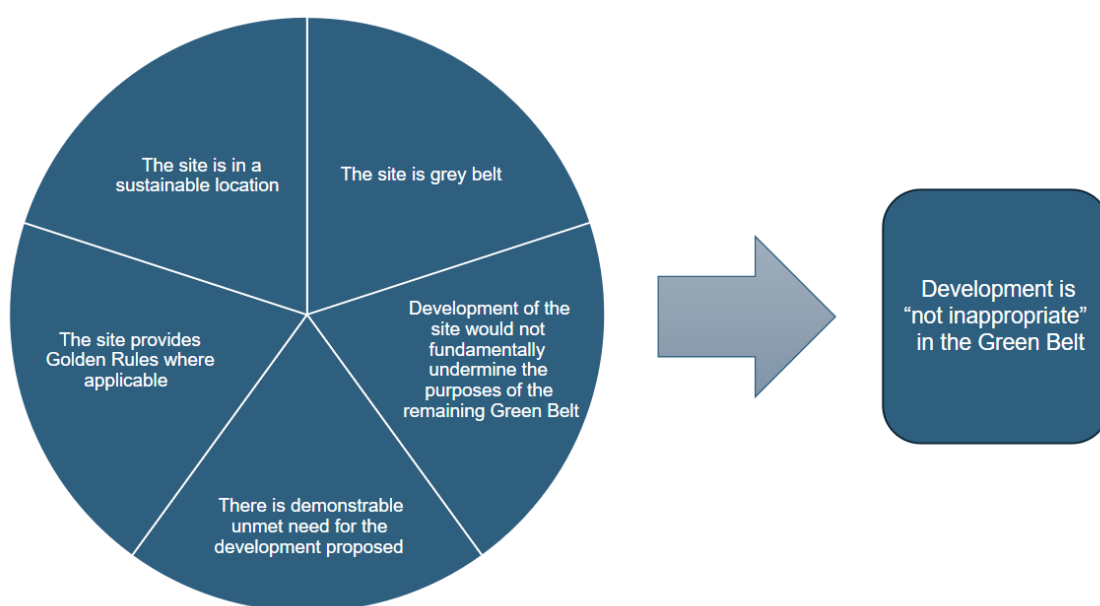
- Affordable housing which reflects the policy set out in paragraph 157 because the adopted local plan pre-dates the current version of the NPPF and has no policies to set the level of affordable housing provision on sites released from the Green Belt
- Necessary improvements to local or national infrastructure
- Provision of new, or improvements to existing, green spaces that are accessible to the public so that new residents are able to access good quality green spaces within a short walk of their home

The proposed scheme includes 25 new homes designated as affordable housing from the total of 50 dwellings, equating to 50% provision. Current local plan policy (*SP8: Housing* and *HS2: Affordable housing*) requires 40% provision while paragraph 157 of the NPPF requires the proposed provision to be 15% above the existing requirement subject to a cap of 50%, therefore the maximum of 50% is proposed and the level of affordable housing provision meets the Golden Rule.

Heads of Terms for planning obligations are set out later in this statement and reflect the measures that were sought as part of the previous application for planning permission to develop the site (22/03040/FP) and set out in the case officer's report to the 26 October 2023 meeting of the Planning Control Committee. Full details will be agreed during the consideration of the new application and will be secured by a Section 106 Agreement attached to the planning permission, ensuring that the second Golden Rule is met.

The Planning Practice Guidance provides five routes to consider for contributions to accessible green space (ID 64-012-20250225) and the proposed scheme includes an area of public open space at the northern end of the site, alongside the entrance road. A detailed landscaping scheme forms part of the application for planning permission and it shows that the new facility meets the standards set by the guidance: it is well-designed and therefore will be safe, visually stimulating and attractive, and meets the needs of the community that it will serve. It is expected that a resident-controlled management company will be responsible for maintenance in perpetuity, but it will be available for the whole community to use without any restrictions. The provision is also in accordance with the further guidance provided by paragraph 159 of the NPPF, contributing positively to the landscape setting of the development (it creates a transition from the built-up area to the river valley) and supporting nature recovery (the land will be managed in perpetuity for its amenity value and has a role in securing the statutory net gain in biodiversity value). On-site provision means that the scheme delivers the provision needed to meet the third Golden Rule.

This means that the proposed residential development on the site is not inappropriate in the Green Belt: the site is grey belt, development would not undermine the purposes of the remaining Green Belt, there is a demonstrable unmet need for new homes, the site is in a sustainable location and the three Golden Rules are met. Figure 2 from the guidance (below) shows that paragraph 155 of the NPPF is engaged and that paragraph 154 is not applicable.



Conclusion

The adopted local plan designates the application site as part of the Green Belt, although it is an anomalous finger that projects into the built-up area of Hitchin so that it is enclosed by development on three sides that is excluded from the Green Belt. There is also built development to the north, with three houses and associated stables, paddocks and a horse exercise area that form part of the small gap that separates Ickleford from Hitchin, but the adopted plan also removed land in the gap from the Green Belt to make way for the construction of new homes at Burford Grange. The previous application for planning permission to create new homes on the site (reference 22/03040/OP) sought to make a case for very special circumstances to justify inappropriate development in the Green Belt, but it was not successful and the case officer's committee report recommended that the application be refused. The most recent update to the National Planning Policy Framework and the introduction of grey belt land within the Green Belt has changed the circumstances surrounding the recommendation of refusal. If the site can be shown to be grey belt, it is possible for residential development to be not inappropriate, and this applies to the application site.

The application site is grey belt. Assessment of the site needs to address three areas of evidence and it is clear that it does not contribute to purposes (a), (b) and (d) of the Green Belt and that there are no areas or assets that need to be protected, securing the definition as shown in Figure 1 of the Planning Practice Guidance on Green Belt. Furthermore, development of the site would not undermine the purposes of the remaining Green Belt that circles Hitchin: as a small area of land that projects into the built-up area of the town, it has little relationship with the remainder of the Green Belt in the area.

Paragraph 155 of the NPPF sets out four requirements where the development of homes, commercial and other uses should not be regarded as inappropriate in the Green Belt. This application for planning permission shows that all four requirements are met: the site is grey belt and does not undermine the purposes of the remaining Green Belt, there is a demonstrable unmet need for new homes because the district council cannot show a five-year housing land supply, the site is in a sustainable location, and the proposed scheme meets the Golden Rules. With regard to the latter, the application proposes that 50% of the new homes are designated as affordable housing, will contribute to improvements to infrastructure through planning obligations, and includes an area of new green space at the northern end of the site that will be accessible to the wider community. The proposed scheme is in compliance with the five points shown in Figure 2 of the Planning Practice Guidance on Green Belt, meaning that the creation of 50 new homes is shown to be "not inappropriate" in the Green Belt.

It is important to note that even if development is not inappropriate in the Green Belt, it does not remove the land from the Green Belt and it does not require that planning permission be granted. Other policies and considerations still apply, including the adopted local plan and the National Planning Policy Framework, and the reports and assessments submitted to address other issues as part of the application for planning permission are described in the Design and Access Statement and the following chapters.

5. Proposed scheme

Use and amount

This Planning Statement accompanies the submission of an application for planning permission to create 50 no. one, two, three and four bedroom houses and apartments plus associated landscaping, open space, roads, drainage and other infrastructure on the land to the east of Bedford Road and north of The Priory School, Hitchin. The whole site will be in residential use or uses ancillary to the creation of the new homes.

In accordance with the Golden Rules, 25 of the new homes are designated as affordable housing and this equates to 50% of the scheme. The mix of accommodation for the affordable housing was discussed with the district council's housing team at the pre-application stage and is broadly based on their requirements, while market research has led the proposed provision of homes for sale on the open market.

Accommodation	Number		
	Private sale	Affordable housing	Total
1 bedroom apartment	0	3	3
2 bedroom apartment	0	8	8
2 bedroom house	2	9	11
3 bedroom house	16	5	21
4 bedroom house	7	0	7
Total	25	25	50

Concept and built form

The main point of access to the site is at the northern end of the frontage to Bedford Road, in the same position as the previous application for planning permission – there was no objection from Hertfordshire County Council in their role as the highways authority and it was not included in the reasons for refusal drafted by the case officer. A new area of public open space sits to the north of the road as a buffer against the open land to the north and the estate road heads towards the eastern side of the site so that new homes can be placed with their gardens running up to the existing trees that mark the edge of the school and with a generous offset between the buildings and the existing landscaping. The road splits in two so that both spurs can return to the Bedford Road frontage: the road that runs through the middle of the site serves detached houses that create a new street scene while the southern route provides access to a pair of blocks of apartments. A landscaped edge to the street is proposed, with a tree-lined swale required as part of the surface water drainage scheme and the private drives setting the new homes back from the edge of the road. Footpath links provide short cuts for pedestrians, encouraging residents to walk for shorter journeys.



Extract from the Development Layout (drawing number AC001-OP5-PL-02, not to scale), showing the proposed built form and the new homes facing outwards to the public realm on the north and west sides of the site, the relationship with the existing trees to the east and the opportunity to place larger buildings on the south side where the neighbouring use is the entrance to the school. Road access is from the northern end but footpath links provide a shorter and more attractive route for pedestrians.

Scale

All proposed buildings are two storeys tall and split into detached or semi-detached houses and the two small blocks of apartments: in response to the character of the northern side of Hitchin, a distinctly suburban form of development is proposed. Across a gross site area of 1.76 hectares (4.3 acres), 50 new homes equates to a density of development at 28.4 dwellings per hectare (11.6 dwellings per acre). The site can be split into two parts, with a lower density frontage to Bedford Road where the new homes are set back from the street behind the landscaped strip created by the new drainage swale to reflect the spacious setting of the main road into the town from the north, and a higher density area enclosing the estate road where it follows the eastern and southern boundaries to serve the interior of the site. However, a consistent appearance is proposed and it is not intended that the two scales are expressed by a change in materials.

Public and private space

Throughout the site, the relationship between public and private space is clear and well defined: the public open space and the surface water drainage infrastructure on the northern edge, the estate roads and the frontage to Bedford Road are the public realm. Any land that is hidden from the public realm by being behind buildings or garden walls, or that is accessed by turning off the streets, is private. The change from the public realm to private areas is marked by the form of the buildings that enclose the space and no private areas can be accessed directly from the public realm. Furthermore, the private amenity space to the rear of each new home will be protected by a lockable gate.

The landscaping and front gardens to the houses facing Bedford Road respond to the “green” feel of the main street, reflecting that it is tree-lined in part and that towards the outer edges of the town, the houses are generally set back from the street and create a wider public realm. The site has a role to play in defining the entrance to the built-up area of the town, framing the relatively straight arterial route. Within the site, the density of development means that there is room for low level planting and hedging to be used to mark the boundary between the public street and the private space to the front of houses. The front gardens are intended to be semi-private, indicating where the entrance to each house is positioned whilst providing a buffer between the house and the road. All houses are provided with private gardens to the rear, separating the properties from one another where back-to-back or back-to-side relationships are proposed, avoiding the creation of un-neighbourly relationships and prevent any overlooking of habitable rooms.

The classic cul-de-sac form favoured by the Secured by Design process has been used, with a single point of vehicle access and a central street spurring off to serve the houses on the Bedford Road frontage. The boundaries between public and private areas are made clear, minimising opportunities for anti-social behaviour and making it easy to see anyone that strays from the public realm, thereby helping to reduce the fear of crime. The streets are relatively straight and have well-defined corners so that there are views through to make destinations easy to find and to offer glimpses of the adjoining landscaping, enhancing surveillance of the public realm. On the northern side, care has been taken to ensure that the built form and landscaping on the edge of the built-up part of the site creates an inviting, pedestrian-friendly environment for users of the new public open space.

Appearance

The proposed scheme seeks to create a consistent form and appearance across the site, reflecting the existing suburban areas across the north side of Hitchin. However, the appearance will use traditional shapes, such as pitched roofs and projecting porches, combined with modern materials that use the minimum of energy and resources in their production. The buildings will be constructed in accordance with the current standards and regulations to meet the required levels of quality, safety and energy efficiency.

A carefully considered palette of facing bricks, roof tiles and surfacing is proposed to be employed, enlivened by projecting elements, a varied roofscape, door canopy detailing and variations in plan form to respond to the layout of the site, using materials with a reduced environmental impact wherever possible. Common details for elements such as doors, canopies and boundary treatments are also employed to create a uniform backdrop against which the landscaping and public realm can be highlighted. As such, the scheme seeks to define its own character, responding to its position where Bedford Road meets the edge of the built-up area and making clear that the new homes are a later addition to the suburban area to the north and north west of the historic town centre: it is expected that the appearance of the scheme can help create and define a sense of place.



Extracts from the drawing showing the proposed street scenes, showing the new frontage to Bedford Road that will be set back behind new landscaping on the edge of the main road (top) and the greater density of development for the houses within the centre of the site (bottom).

Palette of materials

Brick	Red brick Buff brick
Cills	Cast stone, Portland
Roof tile	Forticrete Gemini, Sunrise Blend Forticrete SL8, Slate Grey
Front doors	Hardwood, painted Black, Ruby Red, Fir Green or Larkspur Blue Hardwood, natural stain
Windows and French doors	White uPVC
Rear doors, fascias and soffits	White uPVC
Rainwater goods	Black uPVC

Landscaping

A detailed Landscape Strategy has been prepared, sitting alongside the Design and Access Statement that describes the evolution of the site layout and the appearance of the new homes. It follows a similar process of assessing the opportunities and constraints presented by the site and then establishing the design considerations that form the basis of the hard and soft landscaping schemes.

The hard landscaping scheme places a focus on high quality materials that are appropriate for a suburban location, with warmer and natural hues used so that the private and semi-private areas can be distinct from the tarmac roads in the public realm. The planting palette for the soft landscaping uses native species to compliment the countryside to the north, including extensive planting of nectar-rich flowering shrubs and perennials to add to the biodiversity value of the existing species-poor grassland, while native shrubs and grasses will be blended into the shrub planting will lead to a more natural look. Wildflowers and grasses suited to damp conditions will be used in the swales and attenuation basin, matching the character of the public open space as a wildflower meadow.

A Landscape Specification and Management Plan is submitted as part of the application for planning permission, confirming how the proposals to enhance the frontage to Bedford Road and to lay out the open space on the northern edge of the site will be delivered and maintained in perpetuity.

Extract from the proposed soft landscaping scheme, showing the contrast between the delivery of low maintenance and drought resistant planting beds to the front of the new homes and the detailed designs for the frontage to Bedford Road and the new area of public open space at the northern end of the site. Thirty five new trees will be planted on the street frontage, more than compensating for the need to fell the poor quality and self-seeded trees that stand in the position of the proposed drainage swale. A more structured appearance is proposed for the public opens pace, where the trees will define the edges and leave space for a figure-of-eight walking route.

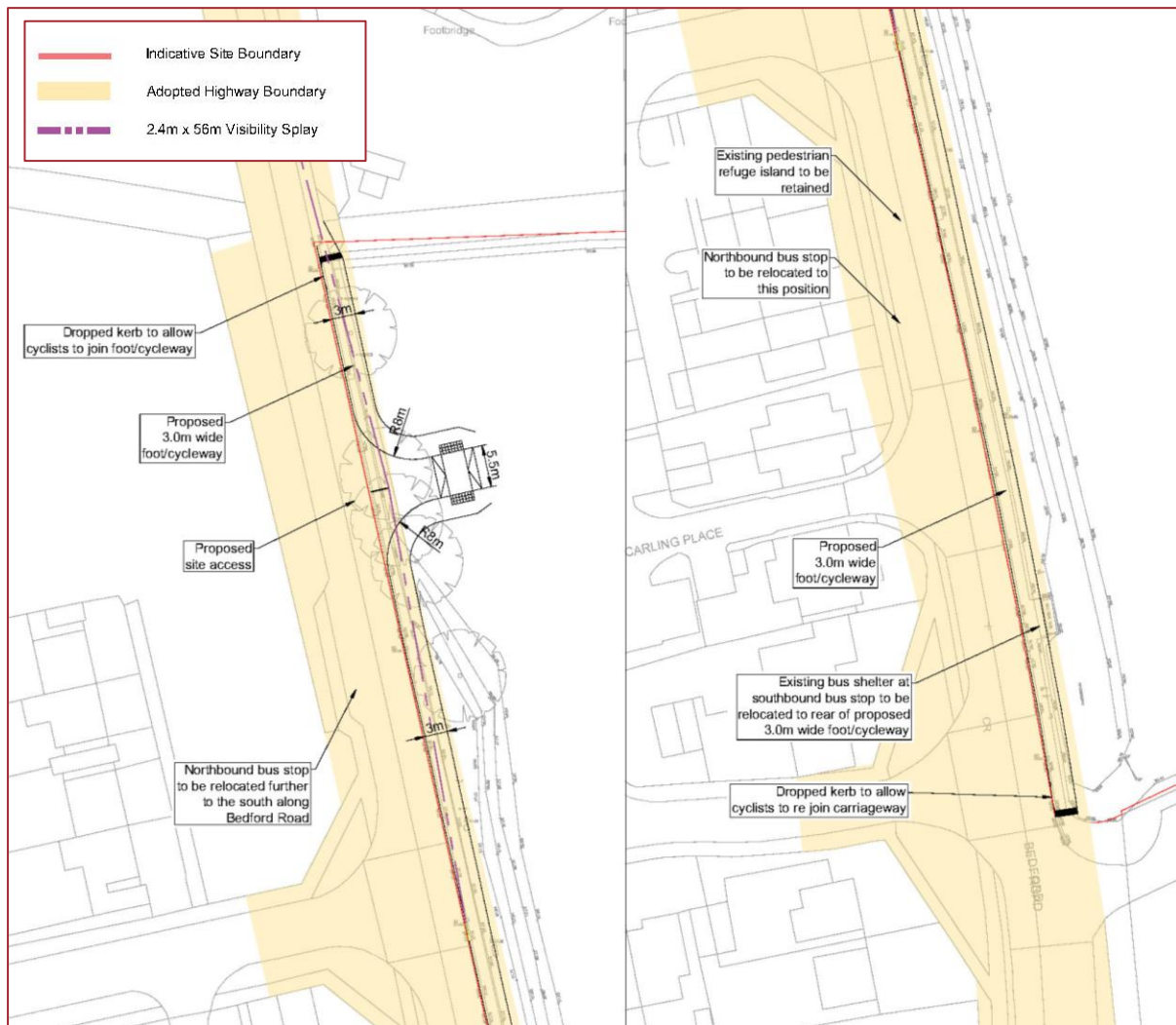
Access

The design of the detailed scheme for the third phase has been undertaken in line with current best practice contained in BS8300:2018 (Design of an accessible and inclusive built environment) and Building Regulations Approved Document M (2016 edition). It is the intention of the applicant that everyone can enjoy the proposed development with no discrimination and no barriers.

Vehicle access retains the design that was agreed with Hertfordshire County Council in their role as the highways authority during the consideration of the previous application for planning permission, using a priority junction with Bedford Road close to the north western corner of the site. The road into the site measures 5.5 metres wide with 8.0 metre radius kerbs at the junction to accommodate the swept paths of a 12.2 metre long refuse freighter. Pedestrians and cyclists are given priority, with a raised table crossing point provided, set back so that a car turning into the site from Bedford Road can wait for a pedestrian while being clear of the main carriageway.

The existing footway on the street frontage to Bedford Road is proposed to be upgraded into a 3.0 metre wide shared footway and cycleway – also agreed with the county council as part of the previous scheme – to accommodate the anticipated level of pedestrian and cycle trips, to add space for groups of children walking to and from the school, and to provide an off-road alternative for cyclists travelling uphill towards the town centre. Widening the path will also require that the bus stop and shelter are repositioned and upgraded. Pedestrian links into the site are provided where the internal roads run to the boundary, offering short cuts to make walking and cycling more attractive than using a car for a short journey.

Inside the site, the main street is 5.5 metres wide, with a 2.0 metre wide footway to both sides. Traffic flows will be below 2000 vehicles per day, accommodating a 20 mph speed limit and delivering a safe environment for on-street cycling in accordance with Figure 4.1 of LTN 1/20. Car parking provision is in accordance with the district council's standards, including unallocated spaces on the street for visitors and deliveries, while secure cycle parking is provided in the rear gardens of the new homes and through a secure store on the ground floor for the blocks of apartments.



Extract from the drawing showing the proposed site access and enhancements to the frontage to Bedford Road, including the creation of a new cycleway so that cyclists heading uphill from the River Oughton do not need to mix with traffic (no off road facility of proposed for cyclist heading downhill, who will be moving faster).

6. Other planning considerations

Even though residential development has been shown to be not inappropriate in the Green Belt and the presumption in favour of sustainable development applies, neither changes the status of the development plan as the starting point for decision making. As such, this application for planning permission also demonstrates that the proposed scheme is in accordance with all relevant policies and is supported by a group of reports and assessments.

Affordable housing statement

Details of the proposed provision of affordable housing, set at 50% of the total number of new homes in accordance with the Golden Rules, are set out in the following chapter.

Air quality assessment

The assessment of air quality is split into two parts, with the potential impact from construction activities considered before the impact of vehicle emissions. The former comprises a qualitative assessment of dust levels and shows that appropriate mitigation measures through management of the construction stage can reduce the impact of dust soiling and particulate matter to a negligible level. With successful mitigation, the likelihood of nuisance dust episodes at receptors adjacent to the application site is considered to be low.

For vehicle emissions, the predicted NO₂ concentrations are considered to be negligible for all modelled receptors while the concentrations for particulate matter are also modelled to be negligible. As such, within the context of the potential impacts of the proposed scheme, air quality is a low priority.

Arboricultural impact assessment and tree survey

The majority of the site is open grassland but the boundaries are marked by a variety of young and semi-mature trees, mainly comprising broadleaf species. Impacts on the trees are limited because the layout has been designed to offset the construction activity from the existing landscaping and protection measures can be implemented, although a limited number of trees need to be felled to make room for the proposed scheme. Root protection areas are plotted on the impact assessment and care has been taken to ensure that development does not occur in these areas, with particular emphasis on ensuring that there is no harm to the substantial tree belt on the eastern boundary that will separate the new homes from the existing football pitches.

The tree survey found that there are no Category A trees within or alongside the site, relatively few ranked at Category B and the majority designated Category C, reflecting that there has been no long term management of the landscaping and that this has left the trees in a poor condition. The two main areas where it is necessary to remove trees is at the site entrance (three trees and a section of hedge) and along the frontage to Bedford Road where the sustainable drainage infrastructure will follow the edge of the widened footway (eleven trees). However, and not addressed by the tree survey, the scheme also proposes that the felled trees are replaced and that there will be a net gain in tree coverage when the scheme is complete – the number of trees within the site will increase by more than 50.

Archaeology

With no change in circumstances since the submission of the previous application for planning permission (22/03040/FP), the November 2022 Archaeological Desk Based Assessment is submitted with this application. It confirms that the site is not within a locally defined area of archaeological significance and that the proposed development for residential use will not impact any designated archaeological assets. Any remains that are present are not considered to be a material design constraint or consideration.

Disturbance of the ground is expected to be widespread but shallow, predominantly through ploughing for agricultural use, leading to an expectation for the likelihood of survival of archaeological remains ranked as “good”. However, the site is considered to have a low potential for archaeological remains, apart from the Palaeolithic, later Prehistoric and as a rural landscape in the Roman, Saxon and Medieval periods where the potential is found to be low to moderate. The report concludes that because it is unlikely that remains greater than low significance are present, further investigation works can be secured through a condition attached to the planning permission.

Biodiversity net gain

The application site predominantly comprises neutral grassland with modified grassland, bramble scrub, individual trees and native hedgerows, equating to 14.62 habitat units and 1.03 hedgerow units. The proposed scheme includes a comprehensive landscaping scheme but the majority of the site will be in residential use, meaning that it will include 4.27 habitat units and 1.81 hedgerow units – a net loss of 10.35 habitat units (a percentage change of -70.31%) and a net gain of 0.79 hedgerow units (a 76.54% improvement).

As such, it is expected that off-site provision will be needed to secure the mandatory 10% net gain in value. The Biodiversity Net Gain Assessment (Appendix 7 to the Ecological Impact Assessment) sets out the recommendations for the habitats needed to meet the trading rules, with the procurement of habitat units to be secured by the standard condition attached to the planning permission and the delivery of a Habitat Management and Monitoring Plan if on-site provision will also be incorporated.

Contamination and remediation

The application site has remained as open land subject to various phases of enclosure for arable and pastoral use throughout its mapped history, therefore no contamination is anticipated. As such, it is expected that a condition can be attached to the decision notice that secures an investigation and, if necessary, remediation measures should unexpected contamination is found during the construction of the new homes.

Ecology

The application for planning permission is supported by an Ecological Impact Assessment, building on the ecological surveys undertaken during the summer of 2025 to identify the important ecological features and confirm the mitigation measures that will address the impacts. The assessment establishes the ecological baseline, identifies and describes all potentially significant ecological effects, sets out the mitigation measures required to ensure compliance with legislation and to address significant ecological effects, shows how mitigation measures will be secured, assesses the significance of any residual effects, identify appropriate enhancement measures and sets out the requirements for post-construction monitoring.

The baseline conditions were identified to be valued for site level only for all areas apart from off-site habitats, where the proximity of the River Oughton and its potential to support fish and water vole gives it a local level value. However, the effects of the proposed scheme on designated sites and the off-site habitats is found to be negligible as a result of the mitigation measures – provision of suitable alternative natural greenspace for the former and careful management of the construction process for the latter. Management measures at the construction stage are also the key mitigation to protect the hedgerows, maintain the existing habitats for breeding birds and to protect badgers, with permanent minor benefits identified. Other mitigation measures will require a condition to be attached to the planning permission, including a scheme to translocate the small population of reptiles, a lighting scheme that is sensitive to roosting and foraging bats and provision of “hedgehog holes” within the boundary fences.

Energy and sustainability

A detailed Energy Strategy has been prepared to outline the preliminary specification for the scheme and the predicted performance in relation to SAP, the methodology used for assessing compliance with Part L of the Building Regulations. The design of the new homes will be considered in more detail at the working drawings stage, after planning permission has been granted, but the scheme has been designed with a “fabric-first” approach to minimise the demand for energy: the calculated Dwelling Fabric Energy Efficiency (DFEE) for all house types is well within the Target Fabric Energy Efficiency (TFEE) standard.

The most appropriate low carbon or zero carbon technology is investigated and air source heat pumps are specified, making the whole scheme entirely fossil fuel-free and zero carbon ready, as well as delivering significant reductions in both primary energy use and carbon emissions. The response to the district council’s Sustainability SPD is discussed below and against the Optimising Passive Design and Fabric Performance checklist, the scheme delivers some aspects of the Silver standard and is assessed to achieve a very strong Bronze score.

Flood risk and surface water drainage

Historic mapping from the Environment Agency does not show any record of the application site being subject to flooding, with the site located in Flood Zone 1 – that is, the land has an annual probability of flooding is less than 1 in 1000 (less than 0.1%). However, a route for surface water to flow across the site from south (Bedford Road and the school access) to north (River Oughton) has been identified and this therefore needs to be addressed as part of the scheme to develop the site.

A swale on the southern boundary will intercept the surface water flow path from outside the site, with the flow diverted along the western boundary through a swale that runs parallel to Bedford Road, passing through two culverts before being discharged in the open space at the northern end of the site. The water will leave the site as it does at present, with a small bund to be added on the boundary to mimic the existing pattern of off-site flow as closely as possible. A French drain is added to the eastern boundary in case there is any need to intercept flow from the east of south east.

As such, the new homes would remain safe and would not increase the risk of flooding elsewhere up to and including a 1 in 100 year floor event, including a 40% allowance for climate change.

Landscape and visual impact

The proposed scheme has already been shown to not be inappropriate development in the Green Belt, therefore a Landscape and Visual Impact Assessment is needed to demonstrate that the scale of development is appropriate on the edge of the built-up area of Hitchin. The site has a gentle fall from south to north (approximately two metres over a distance of 175 metres) and while it is a remnant of a former network of fields between Hitchin and Ickleford, it is now enclosed by the built-up area of the town. The site is enclosed by mature vegetation and this this be retained in full except on the Bedford Road frontage where a new landscaped edge to the street is proposed to be created.

The landscape effects of built development are found to be slight/moderate as a result of the low sensitivity to change for the landscape receptors. The magnitude of change is considered to be medium but the new homes will not be uncharacteristic of the edge of the town and the retention of existing landscaping has an important role to play in addressing the impact of two storey houses. There is capacity for new built development because of the mix of ages and styles in the surrounding buildings, with an effect on the townscape character judged to be slight/moderate and neutral. The effect on the scheme on the local landscape character is deemed to be slight/moderate, mainly due to the Green Belt designation and even though there is no impact on a conservation area, scheduled ancient monument or listed building, while the effect on the wider landscape is assessment as slight due to the negligible magnitude of change. The assessment considers the cumulative effects of the scheme and concludes that there is a slight/moderate and neutral cumulative landscape effect and a slight and adverse visual effect, with the latter to be expected when an open field is replaced by a street of new homes.

Noise

Two potential sources of noise have been considered: Bedford Road to the west and the football pitches to the east, with the noise survey undertaken when the latter was being used. However, the Noise Assessment found that existing noise levels were dominated by road traffic noise and that noise from the pitches falls below the Sport England guidance, is no greater than the surveyed level before the pitches were constructed, and will cause no adverse impact on the new homes.

A SoundPLAN model has been prepared to understand how the road noise affects the proposed scheme, which was designed to use the houses as a barrier that protects the amenity of their gardens, with the houses facing towards Bedford Road so that the gardens are to the east. This means that the rooms facing Bedford Road would exceed the target noise levels (which is not unusual on a main road in an urban area) and the fenestration must be designed to provide mitigation – standard thermal double glazing with 4-12-4 construction achieves the requirement. As such, the internal and external noise levels will be in accordance with the guidance provided by BS 8233:2014, the site will be suitable for residential use, and noise from road traffic will not cause unacceptable impacts for future residents.

Statement of Community Involvement

A comprehensive community consultation process has informed the preparation of the proposed scheme, including proactive engagement with local residents and key stakeholders. This included an in-person consultation event on 11 October 2025, with responses to the matters discussed set out in the Statement of Community Involvement. The applicant is committed to ongoing engagement as the project progresses and will update all interested parties during the consideration of the application for planning permission.

Sustainability

In response to the Sustainability SPD and the council's guidance on the standards required to meet their vision and objectives to mitigate the adverse impact of climate change, a Sustainability Statement is submitted in support of the application for planning permission. The eight sustainability themes are assessed against the council's benchmarks for the theme, with a score of Bronze, Silver or Gold awarded – Bronze represents compliance with current policies and the Building Regulations and while applicants are not expected to score Gold in all areas, there is an expectation that individual themes will be selected where the scheme can excel.

The proposed scheme scores five Bronze, one Bronze+ and two Silver standards, although hidden within these overall results are subsections where the scheme was found to excel: in nineteen individual assessments, only seven sit at the minimum requirement while eight score Silver and two achieve the Gold ranking.

Transport Statement

The Transport Statement submitted in support of the application for planning permission is split into sections and considers the baseline of the existing network, opportunities for sustainable travel, the details of the proposed layout and the impact of trip generation from the new homes. With the site identified as grey belt, it is important to demonstrate that it is in a sustainable location, that the need to travel is reduced and that sustainable transport modes are prioritised, and the third chapter (“Site Accessibility”) provides an overview in terms of walking, cycling and public transport. Table 3.1 lists the key services and facilities that are within walking distance of the site, with bus stops, schools and shops all within a 15-minute radius of the site. The site is served by three buses per hour in each direction and destinations from the stops immediately outside the site on Bedford Road are listed in Table 3.2, while the whole of Hitchin is within five kilometres of the site, the distance within which that cycling is deemed to be the preferred transport mode by LTN 1/20. In short, and combined with the assessment of the surrounding area in the Design and Access Statement, the Transport Statement has an important role to play in successfully demonstrating that the site meets one of the requirements for determining that it is not inappropriate development in the Green Belt.

The statement also considers trip generation, forecasting 44 two-way trips in the morning peak and 30 two-way trips in the evening peak. In the context of Bedford Road and the surrounding highway network, it is found that the number of vehicle movements generated by the new homes would be imperceptible to existing road users because it would be within the daily variation in traffic flows. It is also noted that active travel infrastructure is suitable to accommodate the number of users anticipated from the proposed scheme, although a travel plan is proposed (to be secured through a condition) to provide residents with the information needed to make better choices when choosing sustainable travel options.

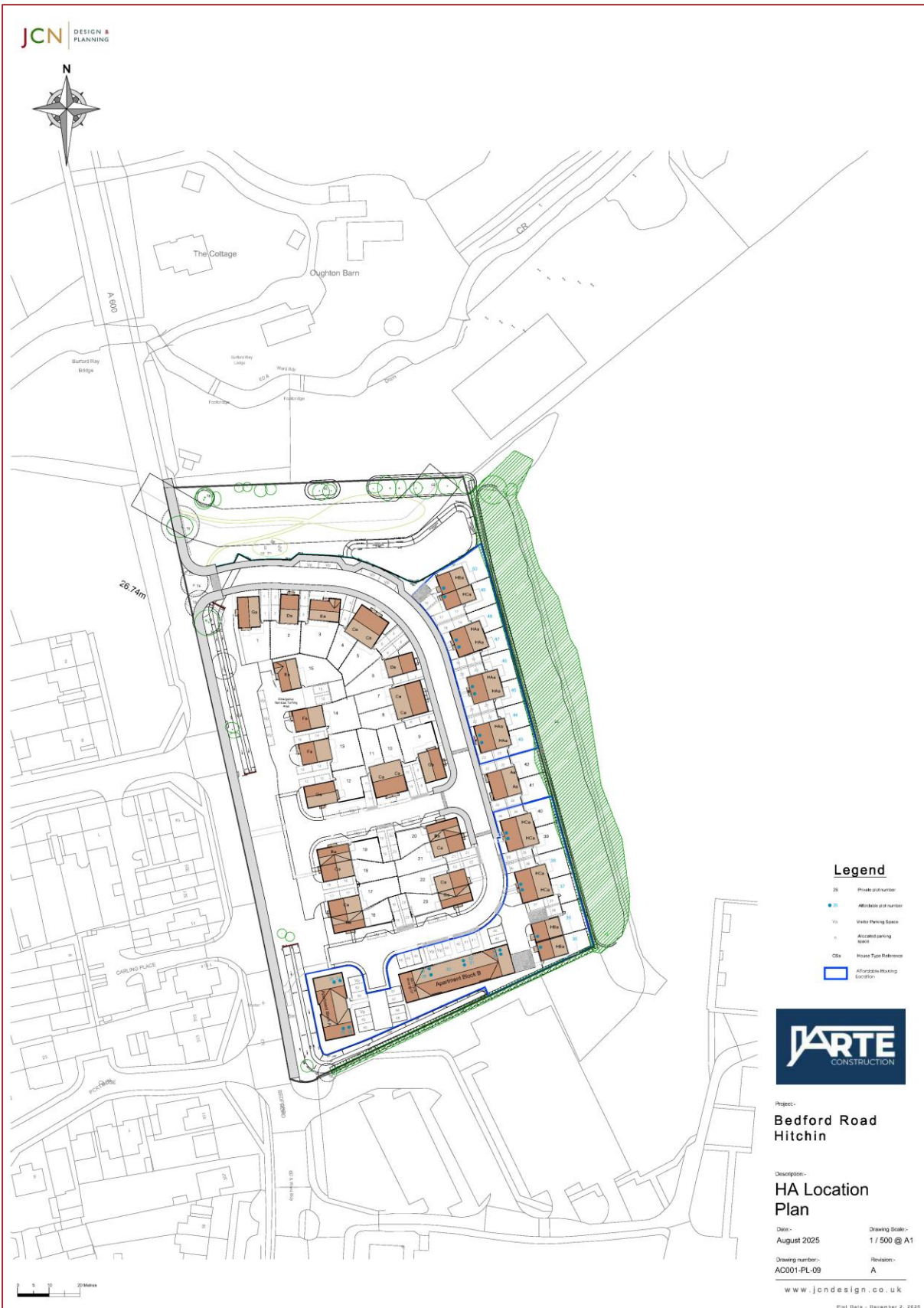
7. Affordable housing statement

Provision of affordable housing is secured by local plan policies *SP8: Housing* and *HS2: Affordable Housing* as modified by the introduction of the Golden Rules in the National Planning Policy Framework – the local plan policies require 40% provision while paragraph 157 of the NPPF requires the proposed provision on grey belt land to be 15% above the existing requirement subject to a cap of 50%, therefore the maximum of 50% is proposed and the level of affordable housing provision meets the Golden Rules, as described in Chapter 4 of this statement.

On-site provision is sought by Policy HS2 and it also confirms that planning permission for new homes will be granted provided that the size, type and tenure of the affordable housing meets a tenure split of 65% rent to 35% intermediate tenures, addresses the housing needs of the area and meets the standards set by Policy HS3. It is expected that the provision of affordable housing will be secured by a Section 106 Agreement attached to the planning permission.

The affordable housing is distributed across the proposed scheme and is located on plots 24 to 40 and 43 to 50, as shown on drawing AC001-PL-09 on the following page. The mix of accommodation for the affordable housing proposed as part of this application for planning permission is:

Name	Type	Accommodation	Floor area (m ²)	Number		
				Rent	Shared Ownership	Total
1B Flat	Apartment	1 bed, 2 person	51.7	2	1	3
2B Flat	Apartment	2 bed, 4 person	70.8	6	2	8
Type HA	House	2 bed, 4 person	80.0	0	6	6
Type HB	House	2 bed, 4 person (wheelchair)	100.6	3	0	3
Type HC	House	3 bed, 5 person	93.8	5	0	5
Total				16	9	25



8. Planning obligations

A set of planning obligations were agreed as part of the previous application for planning permission (22/03040/FP), addressing the requirements of paragraphs 56 to 59 of the National Planning Policy Framework and part (a) of *Policy SP7: Infrastructure requirements and developer contributions* in the local plan so that the potential impacts of the proposed scheme are properly considered and mitigation is delivered where it is required. It is expected that updated or expanded obligations will be agreed as part of the consideration of this application for planning permission, taking account of the three tests set out in paragraph 58 of the NPPF and ensuring that development of the site remains viable.

At this stage, it is anticipated that the same planning obligations will be sought, addressing the following broad headings and secured by a Section 106 Agreement attached to the planning permission for the development of the site:

- Affordable housing, comprising on-site provision fixed at 50% of the total number of new homes in accordance with the Golden Rules
- Primary education – financial contribution for improvements to local schools
- Secondary education – financial contributions for improvements at The Priory School
- Special educational needs and disabilities (SEND) – financial contribution to deliver places for pupils aged 2 to 19 years
- Youth services – financial contribution to the delivery of services in Hitchin
- Library – funding for improvements to Hitchin Library
- Waste services – financial contribution to improvement works at Letchworth Recycling Centre and funding for the new North Transfer Station at Baldock
- Delivery of the on-site open space, including a specification for ongoing maintenance and control through a management company
- Sustainable transport – funding for improvements to services and infrastructure to encourage active travel and travel by public transport
- Provision of residential travel packs

It is intended that a draft of the legal agreement will be submitted in support of this application for planning permission before it is presented to the council's Planning Committee.

9. Summary and conclusion

This application for planning permission proposes to create 50 no. one, two, three and four bedroom houses and apartments plus associated landscaping, open space, roads, drainage and other infrastructure on the land to the east of Bedford Road and north of The Priory School, Hitchin. The scheme has been designed to take account of the opportunities and influences presented by the overall site, addressing the issues identified by the technical reports and studies prepared in support of the application: these reports and assessments confirm that the proposed scheme does not lead to any negative impacts, identified matters can be successfully mitigated and that the proposed scheme is sustainable development.

The application for planning permission addresses the three overarching objectives of the planning system, using land that is available for development to deliver a residential scheme that will meet the needs of present and future generations and support a strong and vibrant community, supporting economic growth by creating new homes and jobs during the construction stage, and contributing to enhancing the natural environment by delivering a new area of public open space and a biodiversity net gain within a scheme that mitigates and adapts to climate change, including addressing flood risk caused by overland flow. Furthermore, this statement demonstrates that the presumption in favour of sustainable development must be applied because part (d) of paragraph 11 of the National Planning Policy Framework (NPPF) is engaged: the adopted local plan's policies on housing land supply are out of date because the council cannot demonstrate a five-year supply of deliverable housing sites. This means that planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, and this application confirms that there are no adverse impacts that cannot be successfully mitigated.

This statement also demonstrates that residential development on the site would not be inappropriate in the Green Belt: the site is grey belt (it does not contribute to purposes (a), (b) and (d) of the Green Belt) and would not fundamentally undermine the purposes of the remaining Green Belt around Hitchin, there is an unmet need for residential development because the council cannot show a five-year supply of deliverable housing sites, the site is in a sustainable location and the scheme meets the Golden Rules. With regard to the latter, the application proposes that 50% of the new homes are designated as affordable housing, will contribute to improvements to infrastructure through planning obligations, and includes an area of new green space at the northern end of the site that will be accessible to the wider community.

Furthermore, the proposed scheme will comply with all relevant development management policies in the North Hertfordshire Local Plan 2011 – 2031 (adopted November 2022), addressing the four applicable points in Policy D1: Sustainable design and picking up elements that are specific to the site in Policies SP8 (housing mix), HS3 (density, scale and character), HS5 (standards for accessibility and adaptability), SP11 (meeting the challenges of climate change), NE2 (landscape), NE4 (ecology and biodiversity gain), D3 (amenity of the neighbours and new residents), NE7 (reducing flood risk) and T2 (parking). The application also addresses the Sustainability SPD, achieving two Silver, one Bronze Plus and five Bronze scores to demonstrate that the proposal exceeds the minimum standards set by planning policies and the Building Regulations.

The proposed scheme is a suitable, available and achievable site for residential development, therefore it is deliverable (as defined in Annex 2 of the NPPF) and the applicant can confirm that construction works will begin in the short term, as soon as the necessary approvals are in place. The proposed scheme comprises sustainable development and should be considered favourably in light of the presumption in favour of sustainable development for the following reasons:

- i. The creation of new homes on the site has been shown to be in a sustainable location for development, reducing the need to travel and prioritising sustainable transport modes in line with paragraphs 110 and 115 of the NPPF and local plan policy T1.
- ii. Delivering 50 new homes, including 25 designated as affordable housing, will play a role in meeting the target of delivering 6,976 dwellings between 01 April 2025 and 31 March 2030. The council's supply of deliverable housing sites currently stands at 2.6 years and the "tilted balance" is engaged: there is an unmet need for the type of development proposed.
- iii. Development of the site will not cause any harm to land that is subject to statutory designation, including those intended to protect landscape, wildlife or heritage assets.
- iv. Development of the site will not harm the character of the surrounding area and will deliver multiple benefits in addition to boosting the supply of new homes, including management of overland flow through a sustainable surface water drainage scheme, a new area of publicly accessible open space and a net gain in biodiversity value through a comprehensive soft landscaping scheme and off-site enhancements.
- v. The proposed scheme responds to the influences and opportunities presented by the site, as required by local plan policies SP9 and D1 and described in the Design and Access Statement. There are no significant constraints imposed by the site that will restrict the delivery of new homes and the proposed mix of accommodation follows the direction set by local plan policies SP8 and HS3. Furthermore, the scheme has been designed so that it delivers the latest standard for residential design, efficiency measures that reduce the consumption of energy and water, management of surface water, protection of trees, an appropriate edge to the river valley that will remain part of the Green Belt and improvements to Bedford Road.
- vi. The proposed scheme exceeds the minimum standards set by the Sustainability SPD, delivering a scheme that is zero carbon ready and achieving silver standard for sustainable travel and conserving water.
- vii. The site has been shown to be grey belt and the proposed scheme is not inappropriate development in the Green Belt, as defined by paragraph 155 of the NPPF. It meets the Golden Rules (paragraph 156 and 157) and will include a set of planning obligations secured by a Section 106 Agreement attached to the planning permission that will mitigate the potential impacts of the increased population on local services and facilities, as required by paragraph 56 of the NPPF and local plan policy SP7.

The proposed scheme is consistent with national and local planning policy, will make efficient use of land available for development, create a high quality scheme with a strong sense of place and deliver new homes in a sustainable location at a time when the council cannot show a pipeline of deliverable housing sites. This application for planning permission to create 50 no. one, two, three and four bedroom houses and apartments plus associated landscaping, open space, roads, drainage and other infrastructure comprises sustainable development and the presumption in favour of it applies. The council's policies on housing land supply are out-of-date therefore part (d) of paragraph 11 to the National Planning Policy Framework is engaged and there are no adverse impacts that would significantly and demonstrably outweigh the benefits, therefore planning permission should be granted without delay.