

18 September 2026

Naomi Reynard
Planning Department
North Herts Council
Gernon Road
Letchworth Garden City
SG6 3JF

Dear Naomi,

25/03080/HYA|Hybrid application for a residential-led development comprising residential (Use Class C3), educational use (Use Class F1), a community hub (Use Class F2/ Use Class E) with associated new internal roads, access, parking, cycling infrastructure, landscaping and other associated infrastructure. Full application comprises the construction of vehicle access and an active travel link via Mendip Way, with associated landscaping and drainage works. The outline application, for which all matters are reserved except means of access, comprises the erection of up to 640 dwellings (Use Class C3), a site for a primary school, further land reserved for educational use (Use Class F1), a site for a community hub (Use Class F2/ Use Class E), with associated infrastructure. (As amended). | GA2, Land North-East Of Great Ashby Stevenage Hertfordshire

Great Ashby Community Council (GACC) maintains its OBJECTION to the above application for the reasons detailed in our previous submissions together with our response to the recent amendments submitted by the Applicant.

To date, GACC has submitted the following documents:

1. **Ecology Cover Letter (9 March 2026), Report (9 March 2026) and Corrigenda (13 March 2026) prepared by Denis J Vickers BSc(Hons), FLS, CBiol, MRSB, MCIEEM Consultant Ecologist/Chartered Biologist;**
2. **Representation (18 February 2026) prepared by Harwood Savin Planning Solutions;**

We now submit the following for your consideration:

3. **Ecology Response to the Applicant's Consultation Reply (14 September 2026) prepared by Denis J Vickers BSc(Hons), FLS, CBiol, MRSB, MCIEEM Consultant Ecologist/Chartered Biologist (submitted separately);**
4. **Our additional comments below.**

Green Belt Land (including land previously removed from the Green Belt)

GACC refers to the report ***Green Belt Assessment For East Herts, North Herts and Stevenage*** prepared by LUC in June 2026 on behalf of the councils named in the title (available online: [Green Belt Assessment](#)). We note that the current Local Plan designated sites are excluded from the report, and the author's comments are submitted in draft form for North Herts Council with the NH detailed analysis removed from the document. Nevertheless, the document is a useful indicator of the features which contribute to the classification of Green Belt.

It is our understanding that the updated Planning Practice Guidance (PPG) requires Green Belt assessment be re-applied to the application site itself at the point of determining the planning application due to the inclusion of Green Belt land and the land previously removed from Green Belt.

For GA2, we understand this means the Council must reassess its current contribution to Green Belt purposes (a), (b) and (d) under NPPF paragraph 143.

When considering how the site contributes to preventing sprawl of Stevenage/Great Ashby and maintaining the settlement gap, the GA2 site is adjacent to Stevenage/Great Ashby (ie. a large built-up area); free of existing

development (ie. it is open countryside); it is lacking strong physical features that contain development; and development is likely to create an 'incongruous pattern' of outward expansion.

Development at this site would breach the strong and protected ancient woodland boundary to the urban settlement. The ancient woodlands are a natural delimiter and prevent urban sprawl. Additionally, they shield the historic settings of Tile Kiln Farm, Dane End Farm, The Thatched Cottage at Warren's Green, and the farm buildings at Friends Green Farm, all of which are Grade II listed.

The proposed Mendip Way Access Road fragments the woodland buffer with a significant gap allowing urban sprawl from Stevenage/Great Ashby to the GA2 site and in the land beyond.

Similarly, the development of the proposed Merrick Close active travel link again opens up an informal minor recreational woodland path into a surfaced urbanised path/cycle route through the ancient woodlands.

The proposed development reduces the separation between Stevenage and the rural settlements to the north, and there is currently a strong visual connection with the open countryside surrounding the site; the site being central to the long sweeping views of the rural area as typical of the descriptors given by the character area designations. This current proposal fails to provide strong planting at the site boundary to screen the main development from the green belt, rather the Applicant states that sections have been left open purposefully.

There is strong reason for restricting development on this site: GA2 is a site of county-level importance for protected species and biodiversity, as highlighted within the mass of indisputable ecological evidence detailing the high population and rarity of protected species. The joint HCC/NHC intention to strengthen the area as set out within Local Nature Recovery's targeted nature recovery actions is further proof that the site is already known to NHC as a site of significance. The insufficient and unsatisfactory mitigation measures proposed by the Applicant so far, including those in the current amendments, fail to address the ecological issues identified with the proposed development. Further, development of this site destroys areas of ancient woodland, an irreplaceable habitat, and fragments and encompasses others. To approve this development as currently presented would, in our view, risk an ecological disaster. NHC must assess whether releasing or developing GA2 would fundamentally undermine all five Green Belt purposes across the plan area, including whether the remaining Green Belt could still effectively fulfil its designated functions.

In respect of decision making, the PPG also confirms that where the location is not, and cannot be made, sustainable, and that major housing on land released from the Green Belt must contribute to accessible green space and active travel under the Golden Rules.

GACC believes that the inclusion of areas of BNG within the site boundary, as introduced in iterations of the application, encroaching further into the Green Belt than that specified within the Local Plan, may be a strong indication that the Local Plan allocated site as specified was unlikely to meet the accessible green space condition.

The Applicant's intention to fence off the ancient woodlands; the proposed planting directly adjacent to the ancient woodlands to prevent public entry; and the huge swales and SUDs across the site, removes a significant area of the site from being counted as truly accessible green space. Similarly, the areas of BNG are not wholly accessible; the tree planting at Dane End Farm is for all intent and purpose, off site and only protects this one asset rather than protect the bordering green belt. The public pathway/cycleway doubling as the Emergency Access cuts across the area of BNG, which we assume is otherwise intended to be inaccessible to the public.

Taken together, these requirements mean GA2 cannot rely on historic removal or allocation: it must undergo a full, updated Green Belt reassessment, and on that basis the proposal appears to us to fail to meet the PPG tests when considering the rationale from the LUC approach.

GACC requests NHC confirm an updated Green Belt reassessment is planned/completed and the resultant information is publicly disclosed for reasons of transparency.

Application Site Boundary Inconsistencies

There are inconsistencies between the application site boundary across documents/drawings submitted:

- Some documents show the site boundary includes the wildlife corridor linking from Great Ashby Bridleway 12 up toward Brooches Wood, and adjacent to the edge of Ryders Hill and Cleveland Way, others do not;
- Some documents show inclusion of an area of Brooches Wood, where others do not;
- Some documents show inclusion of the woodland between Tile Kiln Wood, when others do not;
- It is unclear from the drawings whether the boundary footpath Weston 044 is inside or outside the site boundary.

It is not clear what is specifically being proposed as the site boundary, and it is confusing whether surveys and plans include or exclude these areas of confusion.

Please can NHC ensure that the Applicant's submission is clear and consistent with data provided which is relevant to the intended proposed site?

Tree Preservation Orders

In multiple plans within the Applicant's submission, there is reference claiming that no Tree Protection Orders (TPOs) are located on or near to the site.

GACC believe this is not correct and we provide a selection of references (2417, 2422, 2432, 2433, 2436, 2440, 2444, 2445, 2446, 2449, 2449, 2463, 2464, 2466, 2467, 2469, 2470, 2472 and 2474) located on discs attached to trees within the site boundary which we believe relate to protected trees.

GACC requests NHC interrogate their TPO database for full details and ensure the Applicant works with the NHC Tree Officer to consider the impact of development on the protected trees.

Emergency Access

GACC requests clarification from NHC on the extent of the full planning permission sought for the Emergency Access.

The drawing supplied shows the emergency access routes across the proposed area of BNG, through a hedgerow, and along the site boundary between the school/reserved education sites and then into the development alongside the hedgerow linking Longdell Wood with New Spring Wood.

It would appear that this route requires a 7m gap (3m plus 0.5m each side, plus a 3m width of short grass for equestrian traffic) to be created in the existing hedgerow adjoining and perpendicular to Warrensgreen Wood. It is unclear if the intention is to utilise the existing footpath Weston 044 for the route. The application describes this Emergency Access route as an additional active travel route, a cycle path and footpath, suitable for equestrians.

Clearly, there is an interdependency between the access point and the subsequent route through the site, for which specific detail has not been provided. In approving planning permission for the emergency access point, it would seem other reserved matters become immovable. This is not transparent and NHC should not permit this to happen.

Please can NHC confirm whether full permission is sought for just the access point?

Or alternatively, does full permission extend to the inclusion of the entire route through the development, including the upgrade of the Weston 044 footpath and any potential highway works on Warrensgreen Lane?

Mendip Way Access Road

Our previous comments remain valid. We acknowledge the further work on lighting in relation to the ecology of the access road. We refer you to the additional GACC ecology response attached and prepared by Denis Vickers on behalf of GACC.

School Sites

The Local Plan statements for GA2 provide for a secondary provision, which it was understood could be achieved through the use of the reserved educational land. At Scoping stage, the Applicant proposed that a school field could extend from this site into the Green Belt. However, the plan now appears to have an emergency access/potential bridleway of width 7m running between the education sites and the site boundary, preventing possible extension from the education sites to land beyond the current site boundary.

Please can NHC justify how can a secondary school, as required in the Local Plan specification, and currently lacking in Great Ashby, could feasibly be achieved at a later date?

Merrick Way Active Travel

Our previous comments remain valid. We refer you to the additional GACC ecology response attached and prepared by Denis Vickers on behalf of GACC.

We remain concerned that this is not a safe route and leads directly onto a close with no pavement.

The Applicant refers to document DL05 Rev E in support the Merrick Way Active Travel Link.

The document fails to provide the level of detail required to assess impacts on residential amenity, safety, and the Ancient Woodland. The Planning Statement confirms that the existing PRow would be widened from 2m to 3m and resurfaced with permeable asphalt on a no-dig base, with vegetation clearance of 1–1.5m and installation of new fencing. This is an uneven path with raised tree roots and it is unclear how this will be overcome without damage.

The constrained 2m entrance, described as “unavoidable”, appears contrary to LTN 1/20 requirements for inclusive active travel. We note that the drawing states that a section of ‘dilapidated fencing’ at the entrance within Merrick Close would be removed. It is unclear if the fencing facing onto the private driveway within Merrick Close is also considered dilapidated (as it is coded with the same colour on the drawing). Of importance, the plan does not state that the fencing will be replaced. While this may informally resolve the 2m width constraint, this would be unsafe and completely unacceptable for the existing residents of Merrick Close.

The lighting in this area is of significance, and this should not be a reserved matter. There is a difficult balance between the lighting needed for people’s safety at night, the ecology of this sensitive area and the lighting exposure to the existing residents of Merrick Close, who currently live on a dark woodland edge.

In the absence of full technical detail, a completed alignment, and woodland-edge impact assessment, the Merrick Close access cannot be considered safe, deliverable, or policy-compliant.

We request NHC insist on:

- **a specific arboricultural impact assessment,**
- **lighting specification (this should not be a reserved matter due to the ecological sensitivity of the area),**
- **construction methodology,**
- **ecological information and mitigation specific to this sensitive woodland edge. The Applicant states there are hazel dormice in boundary woodland and hedgerows but they have not been specific as to where,**
- **full technical details on the proposed travel link,**
- **this area is rich in bat numbers and species; there needs to be specific detail provided.**

Public Rights of Way

The public rights of way framework plan has been altered to show potential re-routing of the public rights of way across the access road and within the development.

We note that a potential 15m re-routing of the current footpaths as shown in the diagram. This could have an unnecessary negative impact for the hedgerows and woodlands within the development. The PRoW network within Great Ashby is used by residents and visitors as a means of sustainable travel and for recreational use via connected woodland walks, promoting enjoyment and healthy living. If the footpaths simply become integrated into the estate roads, the recreational value of the footpaths will be lost and we request that more thought is given to provide the community with a quality right of way network.

Bus Service

The Applicant has proposed a new 30-minute bus service. Our understanding is that for sustainable travel to have a chance of success a frequency of 15-20 minutes is minimum.

Correspondence with Arriva has been provided and one email shows a bus route attachment, which appears to be an old version of the SB7 timetable with a GA2 stop added.

Originally, the SB7 bus service took approximately 12-15 minutes to travel into the centre of Stevenage. The service was very unreliable with the non-arrival of planned buses causing passengers to have to wait a further 20 minutes for another bus or find an alternative means of travel to complete their journey. Then a few years ago, the service was rerouted to include other areas of Stevenage and the journey time increased to about 24-25 minutes. Passengers continue to report the non-arrival of buses, but now the service runs less frequently and they wait for an additional 30 minutes for another bus. A new timetable came into effect at the beginning of September resulting in buses scheduled every 45 minutes and an approximate 33% reduction in the weekday service. It is not difficult to see that this makes the bus an unattractive travel method.

The Applicant explicitly writes that the SB7 route is a fallback option. Arriva has degraded the bus service for the SB7 route and this cannot therefore be considered an effective sustainable travel option for GA2.

There does not appear to be a route map for the proposed SB12 service showing how this route would negotiate round GA1 and GA2 using the existing GA roads and the Mendip Way accessing GA2.

The Applicant states that the cost contributions would be shared with the GA1 Roundwood development. This is not an acceptable position. The Roundwood developer has submitted a viability report and asked to reduce its s106 contributions by more than half.

As this Application must provide sustainable travel, we request NHC ensure that the bus service is scoped and formally agreed with in full with Arriva prior to the determination of this application. We would further ask that this information is made available for public scrutiny.

Sustainable development/ Active Travel

The *Hertfordshire COMET: TN 07 – Pattern of Travel across Hertfordshire* (Sept 2015) report shows Hertfordshire's travel patterns at that time were dominated by car use, even for short trips and even where rail exists. Public transport was often too slow or poorly connected, cycling underused, and major corridors carry heavy car flows. The document states that significant transport improvements were needed to reduce car dependency and support sustainable growth.

In the 10 years since, car dependency still remains. *Hertfordshire's Traffic and Transport Data Report 2025* shows that only 2.3% of trips are cycled, bus use remains 18% below pre-pandemic levels, and 60% of all journeys are made by car, with residents identifying improved public transport and better walking infrastructure as the key measures needed to reduce car dependency.

The GA2 proposal fails to provide the conditions required for realistic sustainable travel. There are no bus frequency commitments, lengths of shared cycle routes, no safe or continuous active travel network from the site to key locations such as Stevenage Town Centre and the Railway Station. The lack of investment in infrastructure in the existing Great Ashby development at outset is now a major constraint to sustainable development beyond Great Ashby. Key links such as Merrick Close are currently unmodelled, the lighting issue is unresolved, and it is ecologically constrained. The traffic modelling shows multiple junctions operating over capacity, with RFC values exceeding 1.0, delays up to 150 seconds, and queues up to 49 vehicles, directly contradicting Policy T1's requirement to avoid severe residual impacts. In this context, GA2's claims of delivering 'high levels of sustainable travel' are aspirational but unsubstantiated and inconsistent with both county-wide evidence and national policy (NPPF 104–112). The scheme therefore cannot be considered sustainable.

Further, Paragraph 8 of the NPPF highlights:

achieving sustainable development has three overarching objectives – an economic, a social and an environmental objective, which are interdependent and need to be pursued in mutually supportive ways:

- ***an economic objective – to help build a strong, responsive and competitive economy;***
- ***a social objective – to support strong, vibrant and healthy communities; and***
- ***an environmental objective – to protect and enhance our natural, built and historic environment.***

This proposed development does not currently satisfy these overarching objectives:

- no employment or income-generating economy, when currently this land supports food generation and employment within the rural economy;
- proposed high-density housing with suggestion to provide less than the minimum required parking;
- no onsite healthcare or secondary education;
- no retail provision;
- no commitment to a bus service which provides a frequency needed to possibly realise this form of sustainable travel;
- a failure to adequately address the points raised by multiple consultees, including multiple ecologists, on the harm to protected species, ancient woodlands and conservation of the environment;
- an unacceptable impact on the current residents in Great Ashby with unresolved displaced parking and a further burden on already congested roads, should this development proceed as proposed.

This list could continue, and we request NHC require robust proof that the points raised by consultees and the public are properly addressed before determination.

Amended Transport Plans

GACC acknowledges the further modelling completed by WSP which has identified failing junctions. We feel that key junctions have been missed from the modelling: the St Albans Link Road and the Guilford Road junctions with Great Ashby Way are congestion points.

The WSP traffic modelling shows:

- RFC values above 1.0 (over-capacity)
- Delays up to 150 seconds
- Queues up to 49 vehicles
- Multiple LOS F failures in the AM peak

GACC feels this modelling shows an over-optimistic situation, and fundamentally the modelling is flawed by the use of the Applicant's predicted vehicle movement statistics for both the GA1 and GA2 developments, which assumes residents will travel sustainably.

GACC request the modelling is reproduced assuming the traffic outflow from the GA1 and GA2 sites are comparable to the existing GA traffic generation figures.

With reference to Section 3.26 Parking Standards, Table 3.1 denotes the number of the number of parking spaces required for each property size. In the following section 3.27, it states:

It should be noted that during the scoping discussions, HCC advised that the above-mentioned document is dated and parking provision must be agreed with North Hertfordshire District Council (NHDC) on a case by case basis. It may be the case that fewer parking spaces than required by the standards are provided, if it is agreed that a suitable level of accessibility by more sustainable modes is available.

With respect, NHC has acknowledged that mistakes were made with the parking provision in the existing Great Ashby development and we ask that NHC refuse to accept a reduction in its Standards which risks future poor living conditions.

Parking in Great Ashby

The Applicant states:

Based on the busiest day of the parking surveys - Saturday 21.01.2023, the TRO and Parking Provision drawing was prepared. The drawing illustrates the location of the cars parked during that day. The cars are shown in the drawing in green and red - the green-coloured cars would not be affected by the proposed TRO along Mendip Way, while the red-coloured cars would require relocation. Based on the information contained in the parking surveys, those affected cars can be safely relocated on the other side of the Mendip Way and Whernside Drive, as shown by pink-coloured cars in the drawing. Therefore, as it can be seen on the drawing, all affected cars could be relocated within the near distance in a safe manner.

The parking courts are privately owned. It is not reasonable to assume that vehicles can move from on-street parking to the parking courts. Some displaced cars have been relocated to bends in the road which does not seem appropriate.

Please can NHC insist the parking data is recollected and reanalysed without use of the parking court data and taking into account the predicted loss of parking spaces due to the TROs already indicated for the GA1 Roundwood development.

Monitor and Manage

Our previous comments remain valid. GACC are not in favour of a Monitor and Manage approach. This leaves residents without a voice as to the preferred solution to the displaced parking.

Construction

Should this application be approved, GACC requests that construction traffic is prevented from travelling to and from the site during school drop off and pick up times. Further, we request that construction workers are prevented from parking in residential streets and are required to park on the development site.

Kind regards,

Great Ashby Community Council