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Royale Quarters Ltd

Planning Statement

Land off Danesbury Park Road, Codicote,
Welwyn, AL6 9SN

Date: 17/03/2026

Planning Statement

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1 Introduction

- 1.1 This Planning Statement has been prepared commissioned by the Applicant, Royale Quarters (SV) Ltd to accompany the full planning application made under Town and Country Planning Act 1990 (TCPA) Section 70 for the *“Change of use of land to residential static caravans (park homes), footpath extension, improved access points and associated landscaping and infrastructure”* in relation to Carden Gardens, Danesbury Park Road, Codicote, Welwyn, AL6 9SN (the site).
- 1.2 The Local Planning Authority (LPA) will be referred to as either the Council or North Herts Council (NHC).
- 1.3 In addition to this Planning Statement, the application is accompanied by the following documents:
 - Preliminary Ecological Appraisal ‘BG25.292 Cardens Gardens Preliminary Ecological Appraisal REV3’
 - Biodiversity Net Gain Report ‘BG25.292 Cardens Gardens Biodiversity Net Gain Report REV2’
 - Transport Statement
 - Noise Assessment ‘Carden Gardens Noise v2.0 160326’
 - Contamination Assessment ‘Tier 1 and Tier 2 Contamination Report_STX7068-R01-Rev_B’
 - Air Quality Report ‘10303r1 – Air Quality Assessment – Danesbury Park Road Codicote’
 - Plans
 - Location Plan ‘P379C26R Carden Gardens REV A – 06.02.2026_Location Plan’
 - Proposed Site Plan ‘P379C16R_REV B – 16.03.2026’
- 1.4 Section 2 summaries the characteristics of the site and surroundings where applicable. Section 3 addresses the planning history. Section 4 describes the proposed development. Section 5 briefly assesses the proposal against relevant policies. Section 6 comprise of the main assessment and overall conclusions are made in Section 7.



2 Site Context

Site and Surroundings

- 2.1 The application relates to Carden Gardens on Danesbury Park Road which measures approximately 0.8 hectares and situated adjacent to the A1(M).
- 2.2 The site comprises vacant land which has previously been a quarry but recently filled with materials. On its eastern end is hardstanding, a mobile office structure and other features supporting that operation..
- 2.3 The site has two access points constructed onto Danesbury Park Road, which is a private single-track road owned by Welwyn Brough Council, and provides access between the site and Potterheath Road – the adopted highway, to the east and comprises a 6.5m carriageway and a footpath to the east of the site.
- 2.4 The centre of Oaklands, Welwyn is approximately 1 mile away from the site with Welwyn being approximately 1.4 miles away. The village of Codicote is approximately 2 miles away.
- 2.5 The site is not subject to any environmental designations. According to the Policy Maps as part of the North Hertfordshire Local Plan 2011-2031 the site is within the Green Belt with the adjacent site being an allocated Gypsy and Traveller Site. DEFRA Magic Maps define the northwestern part of the site to be within the Built-up Area 2011.
- 2.6 According to the Environment Agency's flood mapping data, it has been determined the site is within Flood Zone 1 and does not suffer from significant surface water flooding other than a small section in the southwestern region of the site. Figure 1 and 2 shows the flood zone and surface water flooding respectively.



Figure 1: Flood Zoning¹

¹ <https://flood-map-for-planning.service.gov.uk/>





Figure 2: Surface Water Flooding²

Wider Site Context and Designations

- 2.7 Immediately adjacent to the site to the northeast is a gypsy and traveller site where the applicant's owners reside. It includes to caravan pitches. Across Danesbury Park Road – and in the wider vicinity – are a series of individual dwellinghouses and their respective gardens. To the south-west of the site is a residential mobile home site known as Woodlands Park Homes, and further south is Heath Lodge, a residential care site. Running south to northeast, along the eastern boundary of the site is the A1(M) motorway, albeit it is located on sunken ground as it runs under Pottersheath Road. As mentioned above, in the wider area are a series of residential properties along Danesbury Park Road, The Avenue and Danesbury Lane.
- 2.8 In Oaklands, there is a Premier Convenience Store and other services and facilities. It is a 10 minutes walk along Potterheath Road and Canonsfield Road to the Premier, along established pavements and footways. The Welwyn Village is also located 1.3km away to the south-westn and contains public houses, restaurants and other services and facilities.
- 2.9 The Governments DEFRA Magic Maps website has been used to acquire information regarding designations.
- 2.10 Mardley Heath which is situated northeast of the site and the other side of the A1(M) is classified as a RAMSAR, Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC) and Special Protection Area (SPA).

² <https://flood-map-for-planning.service.gov.uk/>



- 2.11 The nearest listed building is Paddock Cottage on Pottersheath Road which is approximately 160 metres away, although there is no known intervisibility with this site. There are no other listed buildings within the vicinity of the site.



3 Planning History

- 3.1 The planning history for the site and adjacent sites have been reviewed to determine the significance of the previous permissions.

The Site

- 3.2 In June 2011, an application (Ref: 10/02236/1) for the **“erection of horticultural building”** was dismissed at appeal after the lodging of a non-determination appeal. The inspector concluded the proposal would harm the Green Belt and would be contrary to advice given the advice in the former Planning Policy Statement (PPS2) on Green Belt. The report determined the proposal would harm the rural character and appearance of the area, conflicting with the North Hertfordshire Local Plan (1996).
- 3.3 In February 2014, permission (Ref: 14/00428/1EUD) was granted for **“the existing use of land, structures and portable buildings for agricultural purposes as shown on plans”**. The Council determined sufficient evidence had been presented to the LPA and on the balance of probability the use of land and the siting of ancillary moveable structures and buildings did not require planning permission for continued use in connection with agriculture.
- 3.4 In February 2016, an application (Ref: 15/01032/1) for the “erection of and retention of two yurts for egg packing centre and new staff quarters and dayroom. Erection of five chicken, duck and quail enclosures. Retention of shed for storage of log, straw and feed. Erection of three polytunnel chicken enclosures and one grain silo. Erection of 2 metre high chain link boundary fence and for the division of grazing areas” had a split decision. The two yurts for egg packing, new staff quarters and day room, and other associated facilities including enclosures and fencing were granted. The grain silo was refused on the basis it would cause harm to the Green Belt due to its scale, design, materials and position.
- 3.5 In March 2016, an application (Ref: 15/02051/1) for **“re profiling of disused quarry to allow grazing”** was refused due to the lack of preliminary risk assessment which may have considered the landfill history of the site and whether it posed a risk to controlled waters. The application therefore hadn't provided adequate information on the potential for pollution of controlled waters or other contamination as a result of the proposed operations.
- 3.6 An application for Planning in Principle (Ref: 23/00929/PIP) for the **“erection of four dwellings”** was refused in May 2023 on the grounds of inappropriate development in the Green Belt and would result in a materially greater impact on the openness, conflicting with one of the five purposes of the Green Belt.
- 3.7 It is noted that Environment Health did not object on air quality or land contamination grounds, and the highway authority indicates that it was beyond their remit to control.
- 3.8 In the officer's report, the following key points are relevant:
- The site was not found to be within a defined settlement boundary.
 - The site was found to be well contained.



- The site was not considered to be previously developed land, according to the definition at the time.
- The site was considered to be free from development at the time.
- A previous, individual assessment of the site's Green Belt credentials noted that it only makes a moderate contribution to the purposes of designated it as Green Belt land, although a more recent study indicated that a wider area, including land around the site, made a more significant contribution. The officer acknowledged that the 2016 report's considerations of the individual site are more relevant.
- The set back of the proposed uses would alleviate some of the loss of existing vegetation on site. Extensive proposals for landscaping would provide some mitigation for the site's current state of openness.
- The proposals were found to cause 'moderate harm' to the Green Belt, and there would be harm to the Green Belt and the proposed use was therefore inappropriate development.
- The site's location is recognised to be bound by residential uses on three sites and would tie into the prevailing residential character of the area. The officer concluded: *"it is my considered view that a residential land use of this site would be potentially more appropriate in this location than a commercial or general business use, given the close proximity of the site to other residential development which would potentially be less effected by the proposed use in comparison."*
- Indeed, it was acknowledged that the access to the site would not be well suited for its historic commercial use to due poor access for commercial vehicles.
- The provision of housing was given moderate weight, due to other factors, including other approved developments nearby.
- On character, the proposals were considered to be appropriate in their context, which would be sympathetic to the character and appearance of this area.
- There were recognised benefits of the scheme to bring this contaminated land back into use.
- The officer concluded that the proposals would conflict with the Green Belt for which very special circumstances did not exist at the time, as the benefits did not clearly outweigh the harm to the Green Belt and any other harm.

3.9 A copy of the Officer's Report is found in **Appendix 4**.

3.10 In response, the current application is significantly different, and it is also being provided under a materially different policy circumstance, as follows:

- The policy context has changed with the introduction of a new National Planning Policy Framework (NPPF, 2024). This indicates that land which only makes a moderate contribution towards the Green Belt may be deemed 'grey belt' which is appropriate development.
- The Council has a housing land supply shortfall and therefore additional housing sites are required.



- The proposals reflect the nature of the use of land to the south – which is also for retirement park homes – for which there is a demographic need that is not being provided elsewhere.
- The site has development on site, which the Council appears to have accepted as lawful. According to the new NPPF, it forms partly previously developed land.
- The previous proposal was for one and half storey dwellings, whilst this proposal is for movable single-storey, independent retirement living bungalow caravans.
- This proposal includes a footpath which enables safe access to green spaces as well as Oakland village where convenience facilities are within walking distance.

3.11 As we will set out in the following sections of the report, the applicant considers that planning permission can be granted for this current scheme in light of the changes of context between this scheme and the previous scheme's refusal, as summarised above.

Council Pre-Application Advice

3.12 The Applicant received pre-application (pre-app) advice (Ref: 24/02038/PRE) from Tom Rea, Senior Planning Officer at NHC. A copy of this is attached in **Appendix 5**.

3.13 On the 1st October 2025, sent email correspondence to outline amendments to the provisional layout supplied as part of the pre-app. It was deemed that the following was required:

- A footpath linking the site with Potterheath Road and Cannonsfield Road. This would provide the provision of pedestrian access to local facilities.
- To accommodate refuse collections and service vehicles. The roads should be at least 4.8m with a turning head.
- Visitor parking in accordance with the Council's Supplementary Planning Document (SPD) 'Vehicle Parking at New Developments (2011)' and Appendix 4 of the Local Plan. The dimensions of the parking spaces should be a minimum of 2.5m x 5m.
- The provision of cycle parking.
- A landscaping plan for the site and additional planting along the frontage of Danesbury Park Road.
- If a management office is required this should be marked on the plan.

Typical elevations and floor plans will be required.

3.14 Laister arranged for amendments, including the provision of a footpath, clarifications on the width of the internal road network, which is governed by caravan site licensing standards (the Government's Model Standards for Residential Caravan Parks), that vehicle parking was being increased and cycle parking accommodated. It was confirmed that landscaping would be provided throughout the site for the environment and BNG purposes, and there was no need for a management office as the site owners live adjacent to the site.

3.15 On 9th December 2025, Tom Rea determined that Herts County Council should be consulted to ask for a highways plan as Danesbury Park Road may be private. Tom also stated the potential location of the footpath long the frontage of Woodside Place and the



potential removal of two units near Danesbury Park Road to accommodate a site office and parking.

- 3.16 Tom Rea commented on the footpath again on the 15th December 2025 clarifying his thoughts on the positioning of it. It was determined that the footpath should run along the edge of the site along Danesbury Park Road and then exit to through the entrance of Woodside Place. Additional hardstanding would then be constructed on the boundary of Woodside Place along Pottersheath Road.
- 3.17 On 19th February 2026, correspondence between Tom Rea and Laister established the revised layout would be referred to the Waste team for them to assess. On 2nd March 2026, Tom Rea was consulted on more revisions to the layout. This included the following:
- The visitor parking needed to be increased to 8-10 spaces.
 - The provision of only 1 parking space per unit may be too little as the units are 2 bed.
 - Cycle parking needs to ideally be situated by the entrance/exit.
 - Details of landscaping and acoustic fencing should be provided. A landscape management plan is recommended however this could be conditioned.
 - The Waste team had not consulted on the location of the refuse however Tom was concerned about the width of Danesbury Park Road and accommodating a refuse vehicle. He suggested the site exit should be widened to accommodate the refuse vehicle pulling into the area to allow other road users to pass.
 - As Danesbury Park Road has a 30mph speed limit, the sightlines should therefore be 2.4m x 4.3m in both directions.
 - The boundary treatment to Danesbury Park Road needed to be determined.
 - If a site management office was going to be onsite it needed to be marked on the plan.
 - Low level bollard style lighting needed to be located on the layout.
- 3.18 On 5th March 2026, Tom Rea determined that as the site was going to be used as a retirement scheme 1 parking space per unit would suffice. He also clarified that in accordance with Appendix 4: Car Parking Standards on page 313 of the North Herts Local Plan the visitor parking needed to be increased from 4 spaces to 8-10 spaces.
- 3.19 The proposals therefore comply with all of the requirements set out by Tom Rea in the pre-application advice process including:
- Provision of a footpath for residents to safely access Danesbury Park Road.
 - Provision of at least 1 space per retirement home.
 - Provision of 8 no visitor parking spaces
 - A communal refuse location and confirmation that residents' individual storage bins are 30m from the main estate road upon which refuse vehicles could pass.
 - Vehicle tracking for a waste vehicle demonstrates sufficient routing through the circular main estate road. As such, Waste and Recycling Teams have the option to carry out individual collection or collection at the communal bin store.
 - Landscaping and acoustic fencing details shown on layout plan.
 - Visibility splays shown from both the entrance and exit to the site, demonstrating suitable and safe access can be achieved.



- 3.20 In pre-application advice terms, the scheme hereby submitted is deemed acceptable and it should be recognised that the applicant has worked tirelessly with the Council during the pre-application advice process to secure an appropriate scheme, having regard to the demographics of the intended occupants and the requirements for enhancing the environment and servicing the site.

Nearby Development

Woodlands Park Homes

- 3.21 In May 1974, permission (Ref: 74/00159/1) for the **“continued use of land as site for caravan”** was granted subject to 1 condition. The Condition stated “on the 31st December 1974 the use of the land for purposes for which this consent is granted shall be discontinued and all necessary works for the reinstatement of the land shall be carried out”.
- 3.22 In June 1978, an application (Ref: 77/01388/1) for the **“use of land as a mobile home park”** was refused. The Draft Structure Plan for the County of Hertfordshire proposed the retention of Green Belt. The LPA’s policy only permitted development which was essential to agriculture or was clearly needed for recreation or some other use appropriate in rural areas. The proposal failed to demonstrate it complied with the policy criteria or that there are exceptional or special reasons to set aside the presumption against it. The siting of a mobile home on the site would also detract from the rural character of the area and create a precedent and pressure for other sites in the locality resulting in a continuation and consolidation of the ribbon type development along Danesbury Park Road.
- 3.23 Permission (Ref: 80/00713/1) in April 1980 for the **“proposed storage of touring caravans”** was granted subject to 1 condition.
- 3.24 This site had submitted multiple applications for the replacement of park homes with dwellinghouses on the site however the majority of these were refused on Green Belt policies however in 2004, permission (Ref: 04/01644/1) for the **“conversion of generator/store room to 2 three bedroom dwellings, incorporating six dormer windows to rear roof slope and four dormer windows and two roof lights to front roof slope. 4 parking spaces and new access drive”** was granted subject to 4 conditions.
- 3.25 Permission (Ref: 05/01680/1) was granted in February 2006 for the “conversion of generator/store to 2 three bedroom dwellings with front entrance canopy, incorporating six dormer windows to front roof slope and four dormer windows and two rooflights to rear roof slope. 4 parking spaces and new access drive (as a variation to application number 04/01644/1 granted 17/12/2004)” subject to 5 conditions.
- 3.26 Subsequent to the refused permissions Green Belt policies have changed significantly to allow some development in the Green Belt area.

Heath Lodge

- 3.27 The planning history for this site will not be discussed as the context of the planning permission is different in terms of use. However, it is material to consider that the Council



granted planning permission for the conversion of the former hotel facility to a residential care home site, intensifying the residential use of the area.

- 3.28 This demonstrates the extent to which there are significant developments adjacent to the site, and the area forms a village community of albeit this is not recognised in the adopted Local Plan. It is arguably at a critical mass to enable local services and facilities to be suitably enhanced.



4 Proposed Development

- 4.1 The proposed development is for the *“change of use of land to residential static caravans (park homes), footpath extension, improved access points and associated landscaping and infrastructure”*.
- 4.2 The proposal provides for ‘static caravans’ falling within the statutory definition of ‘caravans’ according to the Caravan Sites and Control of Development Act 1960 (as amended) and the Caravan Sites Act 1968. The proposed layout would comply with the Government’s Model Standards for Residential Static Caravan Sites (published in 2008), which is the licencing standards for the internal arrangement of a caravan site, for its proper and safe operation. This includes suitable distance arrangements between caravans for fire safety reasons, parking and access details, etc.
- 4.3 The proposals seek to station static caravans on land with sufficient land to deliver a scheme that will deliver high-quality park home environment with adequate amenity and landscaping, having regard to its context, particularly the presence of large open spaces nearby, to which access is provided.
- 4.4 Detailed images of the caravans can be found in Appendix 3. Individual caravan styles and types will vary according to customer preferences and availability of park homes; however, the general appearance of the units can be found submitted with this application. It is noted that all park homes stationed on site will comply with British Standard BS:3632 for residential occupation.
- 4.5 The proposal seeks a change the use of the site to allow for residential park homes. The proposed layout submitted with the application shows a layout of 27 No. residential park homes. Each caravan will be constructed to BS3632 standards suitable for permanent residential occupation, and will sit on hardstanding (concrete) base and a chassis in the normal way found on the adjacent residential park home site. Each unit will have windows on three sides in the normal way, with the off-side elevation being a solid structure in the normal way.
- 4.6 There will be 15 No, units set out along a one way crescent shaped 4.0m wide estate road linked to 3 separate cul-de-sacs where the additional 12 No. units will be situated. Each unit will have individual refuse storage which will then be placed in a communal waste collection point adjacent to the park exit allowing the Council access to collect waste from a singular point. The collection point is less than 10m from the internal access road ensuring the proposal complies with the ‘Waste Storage and Collection Guidance for Developers’.
- 4.7 The park will have some green landscaping to create better living conditions for residents and to contribute towards biodiversity net gain (BNG) and general improvements to wildlife and habitats.
- 4.8 Each caravan will be provided with a single parking space and an electric vehicle (EV) changing point. The caravan will also be set within individual pitches which can be used



as private garden space. Each caravan pitch includes a small storage shed and cycle spaces.

- 4.9 The site will utilise the existing two access points on toe Danesbury Park Road, a private road to which access to the wider highway network is provided. These access points will be regularised by this application, for the avoidance of doubt.
- 4.10 As we set out below and elsewhere in this report, residential mobile homes fall within the definitions for 'affordable housing' set out in the NPPF (under criteria d) – other affordable routes to home ownership. This is considered to be a significant benefit in favour of the proposals.

The Benefits of Park Homes

- 4.11 The mobile bungalows are prefabricated offsite and taken to the site in two parks, these are bolted together to form a single unit. They are situated on pre-laid concrete pads and connect to all services. Due to this form of construction the units fall under the definition of 'caravans' within the Caravan Sites and Control of Development Act 1960 (as amended). The maximum dimensions of the units in this definition are 20m long, 6.8m wide and an overall height (measured internally from floor at the lowest level to the ceiling at the highest level) of 3.05m.
- 4.12 A residential park home is manufactured in a controlled environment as 'bungalow style accommodation' for permanent living. Park homes are covered by their own legalisation as 'mobile homes'. They are designed and constructed to British Standards (BS) 3632: Specification for Residential Park Homes.
- 4.13 BS3632 determined the products must meet the legal definition of a caravan as determined by the Caravan Sites Act 1968 (amended 2006). All homes have very high specifications for insulation and energy efficiency which can be equivalent or typically better than traditionally built homes.
- 4.14 Homes must achieve u-values of 0.35W/m K for the walls and floors, and 0.2W/m K for the roof. Doors and windows must have u-values greater than 1.6W/m K. The National Caravan Council operates an energy rating scheme for which each home must be assessed.
- 4.15 Residential park homes can be sited, serviced and occupied much quicker than traditional 'bricks and mortar' housing. They require limited groundworks, and the noise and general disturbance during the implementation/construction phase is much less as a large proportion of the construction work is undertake offsite. As a result, there is significantly less construction traffic reducing the impact of construction on the area.
- 4.16 Single-storey accommodation, in particular bungalow style dwellings are rarely provided in volume by housebuilders reducing the choice for those requiring specialist housing or preferring single-storey accommodation. The proposal therefore provides an increased choice for older persons or those with mobility issues, particularly those who wish to downsize but maintain independent low-maintenance living standards.



- 4.17 Park homes have a lifespan of more than 70 years and require less maintenance than traditional dwellings making them more attractive to the elderly.
- 4.18 Many councils consider some or all of this type of unit to meet the planning definition of 'affordable' housing (South Somerset, Selby, Four Oaks appeal, Wisteria Heights appeal). These units tend to be lower cost to the buyer than an equivalent size bricks and mortar home and they allow buyers to both release equity and to release their existing homes back into the housing market.
- 4.19 Modern park homes can be adapted over time to incorporate a range of features to meet the changing care needs of residents including wide access and wheelchair accessible doors, ramped showers with seats and grab rails, or alternatively a wet room, hoists and tracks, adjustable beds, lowered kitchen units, induction hearing loops and carer/nurse call systems.
- 4.20 With the evidence stated above, park homes clearly have a place in the market providing affordable housing whilst giving potential occupants/residents the ability to live independently.
- 4.21 The proposal would allow for other housing stock to be freed up as many of the retired/semi-retired persons who would live in the proposed units are currently living in traditional dwellings. These properties could potentially therefore be reutilised. This is also a significant benefit, given the housing crisis in the UK and the housing supply shortfall in NHC's administrative area.

Environmental Benefits

- 4.22 The proposed development would deliver an increase in habitat units as well as hedgerow units. This amounts to a significant environmental and biodiversity enhancement, and corresponding landscape enhancements, and as such a significant benefit in favour of the proposal.

Transportation Benefits

- 4.23 As part of this submission, a transport statement has been prepared.
- 4.24 Retirees are most likely to travel outside of peak times, placing less demands on the transport network than those who are working and need to be at their place of work during peak times.
- 4.25 In addition, an integral part to the is to construct a footpath within the site which runs along the western boundary. At the current exit is of Woodside Place, the footpath will exit the site and run adjacent to the public highway around the junction of Danesbury Park Road and Pottersheath Road. This will then finish where there are clear sight lines to allow pedestrian to cross Pottersheath Road and join the opposite footpath that is already in situ. This will provide sustainability enhancements to the site, providing residents with access to significant important open spaces as well as the ability to walk to local services (e.g. the convenience store nearby) by foot.



Local Economic Benefits

- 4.26 The proposal will secure both short-term construction related economic benefits and long-term economic benefits from the permanent residential occupants of the site. The residents of the site will spend monies in local shops and services which will continue to ensure the site's contribution to the economic well-being of North Herts continues.
- 4.27 Laister considers that the proposals will deliver significant benefits which should weigh heavily in favour of granting planning permission for the scheme.



5 Planning Policy Context

- 5.1 Any proposed development must be judged against the relevant Development Plan and other government planning policy and guidance. Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2003 together require that planning applications should be determined in accordance with the statutory Development Plan unless material considerations indicate otherwise. For the purposes of this application the Development Plan comprises of the North Hertfordshire Local Plan (2011–2031). This plan together with other relevant policies are reviewed below, before being considered in the following section where applicable.

Development Plan

North Hertfordshire Local Plan 2011–2031

- 5.2 **Policy SP1: Sustainable Development in North Hertfordshire** – Part (c) determines permission should be granted where an appropriate mix of homes, jobs and facilities contribute towards the Local Plan (LP). New high-quality developments should respect and improve their surroundings. The North Hertfordshire environment in terms of its biodiversity, landscape, heritage assets and green infrastructure (GI) should be protected and mitigation measures to reduce the impact of development should be secured.
- 5.3 **Policy SP3: Employment** – “The Council will proactively encourage sustainable economic growth”.
- 5.4 **Policy SP5: Countryside and Green Belt** – Part (a) explains *“the Council supports the principles of the Green Belt and recognise the intrinsic value of the countryside”*.
- 5.5 Development in the Green Belt will only be permitted where it would not result in inappropriate development or where very special circumstances have been demonstrated.
- 5.6 **Policy SP7: Infrastructure Requirements and Developer Contributions** – Developments must make provision for infrastructure to accommodate additional demands both on-site and off-site. This includes the provision of facilities and infrastructure for new residents, addressing the cumulative impacts that might as a result of multiple developments and mitigate adverse where appropriate.
- “The Council requires robust evidence to be provided where developers consider viability issues upon impact upon the delivery of key infrastructure and/or mitigation. The evidence will be used to determine whether an appropriate and acceptable level of contribution and/or mitigation can be secured”*.
- 5.7 **Policy SP8: Housing** – The Council must *“maintain a five-year housing land supply and target completion of 20% of new homes over the plan period on previously developed land”*.



- 5.8 Under category f), it confirms that the Council will support a range of types and sizes, particularly measured against targets. This includes the affordable housing targets and those providing smaller homes (criteria i. and ii.).
- 5.9 **Policy SP9: Design and Sustainability** – Well-designed developments will be supported by the Council where they are located appropriately and respond positively to the locality.
- 5.10 The Council supports the Government’s technical standards for the size of new homes, water efficiency and in specified circumstances, accessibility.
- 5.11 **Policy SP10: Healthy Communities** – Healthy, inclusive communities for residents should be maintained. New physical and GI should be created to protect and enhance healthy lifestyles.
- 5.12 **Policy SP11: Natural Resources and Sustainability** – Proposals for renewable and low carbon energy developments in appropriate locations.
- 5.13 The Council supports developments that ensure provisions for sustainable drainage systems (SUDs) and appropriate measures.
- “Consideration must be given to the potential or actual impact of land contamination and supports proposals that involve remediation of contaminated land”.*
- 5.14 **Policy SP12: Green Infrastructure, Landscape and Biodiversity** – Biodiversity networks should be protected, enhanced and managed to ensure measurable BNG. The Council states the landscape character, scenic beauty and locally sensitive features must be respected.
- 5.15 **Policy CGB1: Rural Areas beyond the Green Belt** – Permission will be granted where there is a proven need for community facilities, services or affordable housing in an appropriate area and where a modest proposal for rural economic development or diversification is provided.
- 5.16 **Policy CGB2a: Exception Sites for Affordable Housing in the Green Belt** – Permission will be granted for sites adjoining Category A villages and beyond the built core of Category B villages. However Part (b) explains that it must be proven that there are *“no reasonable alternate, suitable and available sites:*
- i. within the defined boundaries of the relevant Category A settlement or the built core of the relevant Category B village; or*
- ii. otherwise within a reasonable travelling distance (by various modes) of the location where the need has been identified;”*
- c) “The proposal would meet relevant criteria of Policy HS2, particularly in relation to need, affordability and retention of dwellings;
 - d) The proposed development would not have a substantial adverse impact on the openness or general policy aims of the Green Belt; and
 - e) The public benefit of the proposal outweighs any harm that might arise against these aims.”



- 5.17 As we'll set out in the following section, the proposals comprise affordable housing according to the latest definitions of the NPPF (category d). It is also noted that the site makes a moderate contribution to the Green Belt, and following the introduction of 'grey belt' principles in the new NPPF, the site is grey belt for Green Belt purposes.
- 5.18 **Policy T1: Assessment of Transport Matters** – Permission will be granted where:
- "Development will not lead to safety problems and cause unacceptable impacts upon the highway network."*
- 5.19 Mechanisms to secure necessary sustainable transport measures and improvements to the existing highway network are secured in accordance with Policy SP7.
- 5.20 Suitable Transport Statement, Transport Assessments and/or Travel Plans along with supporting documents are provided where required.
- 5.21 **Policy T2: Parking** – Parking for residential developments has to be provided in accordance with minimum standards set out in Appendix 4 of the LP.
- 5.22 Proposals should take any relevant Supplementary Planning Documents (SPD), strategies or advice into account. Proposals should also identify how they are providing parking demands and illustrate proposed parking will be safe and its design and layout will function to a satisfactory manner.
- 5.23 Variations of these standards will only be considered where it has been demonstrated accessibility, type, scale, mix and use of the development justify such variations.
- 5.24 **Policy HS2: Affordable Housing** – Permission for new homes will be granted provided affordable housing is provided in accordance with targets the Council sets. For developments of 25 or more dwellings should provide 40% affordable housing and should be delivered onsite unless robustly justified. Housing needs to be affordable for local people where rents or prices are linked to the open market.
- 5.25 The size, type and tenure of any affordable housing meets the Council's expectations that 65% of the affordable housing will be rented and 35% other forms of affordable housing. Affordable housing in the area must include the identified needs as determined by the local authority housing register data, neighbourhood plans (NP), and any settlements. An appropriate mix of housing should be accommodated across the whole site.
- 5.26 **Policy HS3: Housing Mix** – Permission for new homes will be granted provided an appropriate range of house types and sizes are provided. Proposals should take account of the overall targets of the plan and the findings of the most up-to-date evidence including the most recent Strategic Housing Market Assessment (SHMA), the Council's Self Build Register and other relevant evidence of housing need. The location and accessibility should also be taken into account as well as the recent completions, existing permissions and sites that are within the five year housing supply (5YHLS).
- 5.27 Proposals should also provide a density, scale and character that is appropriate to its location and surroundings.



- 5.28 **Policy HS4: Supported, sheltered and Older Persons Housing** – Permission will be granted for use Classes C2 and C3 where good access to local services and facilities, access to public transport, on-site landscaping, amenity space and car parking are provided.
- 5.29 This policy does not recognise that residential static caravans can also form older persons housing, even though there are residential park home sites in the Council area (including adjacent to the application site).
- 5.30 **Policy D1: Sustainable Design** – Permission will be granted where developments respond positively to the local context, incorporate SUDs, reduce energy consumption and waste, future proof for changes in technology. Residential schemes should meet or exceed the nationally described space standards and optimal water efficient standards.
- 5.31 **Policy D4: Air Quality** – Proposals should give consideration to the potential or actual impact on local air quality, during both the construction phase and as a result of its final occupation and use. Appropriate levels of mitigation need to be proposed to minimise emissions to the atmosphere and their potential effects upon health and the local environment. An air pollution impact assessment should be carried out where required to determine the impact on the local air quality of the development.
- 5.32 **Policy NE1: Strategic Green Infrastructure** – Permission will be granted where developments create new strategic infrastructure and is accompanied by a plan for its long-term management. Developments must also have suitable mitigation or appropriate replacement to address adverse impacts on the strategic GI network.
- 5.33 **Policy NE2: Landscape** – Permissions where respect the sensitivities of the relevant landscape character and have regard to the guidelines for the built development and landscape management. Proposals must not cause unacceptable harm to the character and appearance of the surrounding area or landscape character where the site is located.
- 5.34 **Policy NE4: Biodiversity and Geological Sites** – Permissions which appropriately protect, enhance and manage biodiversity in accordance with the hierarchy and status of designations will be granted. Developments should deliver BNG and geodiversity to contribute to ecological networks.
- 5.35 **Policy NE6: New and Improved Open Space** – Permission will be granted that make provision for open space having regard to standards.
- 5.36 **Policy NE8: Sustainable Drainage Systems** – Permissions that use appropriate SUDs methods to reduce the risk of flooding and provide amenity benefits. With the aim of mimicking natural processes and following the SUDs hierarchy.
- 5.37 **Policy NE10: Water Conservation and Wastewater Infrastructure** – Permission will be granted where “adequate foul water treatment and disposal already exists or can be provided in time to serve the development”.
- 5.38 **Policy NE11: Contaminated Land** – Permission for land affected by contamination where a contamination land risk assessment is submitted as part of the application. Appropriate mechanisms are in place to reduce the risk to an acceptable level.



- 5.39 **Policy IMR1: Five Year Housing Land Supply** – To identify and update the annual supply of specific deliverable sites sufficient to provide five years' worth of housing the Council will deliver a total housing requirement of 13,000 net dwellings over the period of the plan on a stepping basis. The Council's 5YHLS will be measured against housing requirement targets. Between April 2024 and 2031, the Council must provide 1,120 dwellings per annum.
- 5.40 Any shortfall in housing delivery will be added from the plans start date to spread it evenly over the remaining period of the plan, to the calculation of the requirement.
- 5.41 The Council should ensure the supply of specific, deliverable sites including a buffer is in line with national planning policy.
- 5.42 Monitoring housing completion and permissions on an ongoing basis ensures the housing trajectory is based upon robust and up-to-date information and assumptions.

Other Considerations

National Planning Policy Framework (NPPF) (December 2024)

- 5.43 The Government published a new version of the NPPF in December 2024, and forms a material consideration in determining planning applications. Policies of the Development Plan may be considered to be out of date or carry less weight where they are in conflict with the NPPF.
- 5.44 Paragraph 8 refers to achieving sustainable development and the three overarching objectives: economic, social and environmental.
- 5.45 Paragraph 11 states plans and decisions should apply a presumption in favour of sustainable development. For decision making development proposals should be approved in accordance with an up-to-date development plan. *"Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date granting permission unless:*
- 5.46 The application of policies in the Framework that protect areas of assets of particular importance provides strong reason for refusing the development proposed; or
- 5.47 Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole".
- 5.48 Paragraph 20 states strategic policies should set out overall strategy for the pattern, scale and design quality of places and make sufficient provision for homes (including affordable housing), infrastructure, community facilities and the conservation and enhancement of the natural, built and historic environment.
- 5.49 Paragraph 63 states within the "context of establishing need, the size, type and tenure of housing needs for different groups in the community should be assessed and reflect in planning policies". These groups should include those who require affordable housing, housing for older people and people with disabilities.
- 5.50 Paragraph 67 states "as part of the 'Golden Rules' for Green Belt development set out in paragraphs 156-157 of this Framework, a specific affordable housing requirement (or



requirements) should be set for major development involving the provision of housing, either on land which is proposed to be released from the Green Belt or which may be permitted on land within the Green Belt. This requirement should:

- 5.51 Be set at a higher level than that which would otherwise apply to land which is not within or proposed to be released from the Green Belt; and
- 5.52 Require at least 50% of the housing to be affordable, unless this would make the development of these sites unviable (when tested in accordance with national planning practice guidance on viability)".
- 5.53 Paragraph 78 states LPAs "should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirements set out in adopted strategic policies are more than five years old".
- 5.54 In relation to transport, Paragraph 116 states that "*development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network*" would be severe.
- 5.55 Paragraph 143 to 160 addresses the Government's policy with regards to Green Belt matters.
- 5.56 Paragraph 143 states "Green Belt serves five purposes:
 - 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*".
- 5.57 Paragraph 148 states "*where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site's location is appropriate with particular reference to paragraphs 110 and 115 of this Framework. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary*".
- 5.58 Paragraph 153 states LPAs "*should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness*⁵⁵".
- 5.59 Footnote 55 associated with this paragraph states "*other than in the case of development on previously developed land or grey belt land, where development is not inappropriate*". "*Inappropriate development is, by definition, harmful to the Green Belt and should not be*



approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations".

5.60 Paragraph 154 states "development in the Green Belt is inappropriate unless one of the exceptions apply which include:

- c) The extension or alterations of a building provided that it does not result in disproportionate additions over and above the size of the original building.*

The replacement of a building provided the new building is in the same use and not materially larger than the one it replaces.

- g) Limited infilling or partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.*

Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. This includes:

- iv. The re-use of buildings are of permanent and substantial construction".*

5.61 Paragraph 155 states the "development of commercial and other development in the Green Belt should also not be regarded as inappropriate where:

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 proposed⁵⁶".

5.62 Footnote 56 associated with Part (b) states:

"Which, in the case of applications involving the provision of housing, means the lack of a five year supply of deliverable housing sites, including the relevant buffer where applicable, or where the Housing Delivery Tests was below 75% of the housing requirement over the previous three years".

5.63 Paragraph 156 states "where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, the following contributions ('Golden Rules') should be made:

Affordable housing reflects either. (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below.

Necessary improvements to local or national infrastructure.

The 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 onsite provision or through access to offsite spaces".



- 5.64 Paragraph 157 states *“before development plan policies for affordable housing are updated in line with paragraphs 67–68 of this Framework, the affordable housing contribution required to satisfy the Golden Rules is 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%. In the absence of a pre-existing requirement for affordable housing, a 50% affordable housing contribution should apply by default. The use of site-specific viability assessment for land within or released from the Green Belt should be subject to the approach set out in national planning practice guidance on viability”*.
- 5.65 Paragraph 158 states *“a development which complies with the Golden Rules should be given significant weight in favour of the grant of permission”*.
- 5.66 Paragraph 187 explains that policies and decisions should contribute to and enhance the natural and local environment. They should prevent development causing unacceptable risk or adversely affecting unacceptable levels of soil, air, water or noise pollution or land instability. Where possible development should improve the local environment conditions.
- 5.67 The Annex 2: Glossary section of the NPPF defines ‘affordable housing’ as *“housing for sale or rent, for those whose needs are not met by the market and which complies with one or more of the following definitions include”*:
- c) Discounted Market Sales Housing** namely housing that is sold *“at a discount of at least 10% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households”*.
 - d) Other Affordable Routes to Home Ownership** *“is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through market. It includes shared ownership, relevant equity loans, other low cost home for sale (at a price equivalent to at least 20% below local market value)”*.

Draft NPPF (December 2025)

- 5.68 The draft NPPF 2025 was released for consultation in December 2025. Limited weight or consideration will be given to this draft as this suggests the general trajectory of planning policy remains similar to the emerging Local Plan (eLP). The Government has confirmed that a final version of the NPPF will be issued by June 2026.
- 5.69 GB6: Control of Development in the Green Belt
- 5.70 Paragraph 2 states *“inappropriate development is, by definition, harmful in the Green Belt and should not be approved except in very special circumstances. Such circumstances do not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposed development, is clearly outweighed by other considerations. In making this assessment, substantial weight should be given to the harm to the Green Belt which would be caused, including harm to its openness”*.
- 5.71 GB7: Development which is not appropriate in the Green Belt



- 5.72 Paragraph 1 (e) states *“the redevelopment of previously developed land (including a material change of use to residential or mixed-use including residential), which would not cause substantial harm to the openness of the Green Belt”*.
- 5.73 Paragraph 1 (g) states: *“Development where all of the following apply:*
- i. the development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
 - ii. there is an evidenced unmet need for the type of development proposed⁵⁰;*
 - iii. the development would be in a sustainable location, with particular reference to policy TR3 of this Framework⁵¹; and*
 - iv. In the case of major development involving the provision of housing, the development proposed complies with policy GB8;*
- h. Development for housing and mixed-use development which would:*
- i. be within reasonable walking distance of a railway station capable of providing a high level of connectivity to services and employment⁵²;*
 - ii. be physically well-related to a railway station or a settlement within which the station is located;*
 - iii. be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure;*
 - iv. not prejudice any proposals for long-term comprehensive development in the same location;*
 - v. in the case of major development, comply with policy GB8.”*
- 5.74 Policy GB8 refers to the Golden Rules and applies to ‘major development’ (that which is over 1ha or over 1,000 gross internal floorspace created), which, for the avoidance of doubt, does not apply to this application.
- 5.75 It is clear that there is support for limited release of Green Belt land which is identified as ‘grey belt’ for the purposes of providing housing where there is an unmet need, subject to meeting specific criteria set out in the NPPF.

Housing for Older and Disabled People (June 2019)

- 5.76 The Government’s guidance on Housing for Older and Disabled People defines specialist housing for older people to include ‘age-restricted general market housing’ (Paragraph: 010 Reference ID: 63-010-20190626; Revision date: 26 June 2019). *“This type of housing is generally for people aged 55 and over and the active elderly. It may include some shared amenities such as communal gardens, but does not include support or care services.”*
- 5.77 The proposals fall squarely within this category.
- 5.78 The guidance is also clear how Local Planning Authorities should assess planning applications for such types of housing:



“What factors should decision makers consider when assessing planning applications for specialist housing for older people?”

*“Decision makers should consider the location and viability of a development when assessing planning applications for specialist housing for older people. Local planning authorities can encourage the development of more affordable models and make use of products like shared ownership. **Where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need.**”*

(Paragraph: 016 Reference ID: 63-016-20190626; Revision date: 26 June 2019)

- 5.79 As we will set out below, there is clearly an identified unmet need for specialist homes for older persons, including for independent communal living.

Stevenage and North Hertfordshire Strategic Housing Market Assessment (SHMA) Update 2023

- 5.80 In addition to the NPPF, there are other factors which can be considered material considerations. This includes provision of a particular type of housing which is related to a particular demographic which is not readily being served by other forms of housing which is being provided. This is relevant in this case as the proposal is for residential park homes for retirees, and therefore serves as homes for older persons. We set out below the projects in relation to the demand for such types of homes, which is clearly growing.
- 5.81 The report determined that according to the sub-national population projections (SNPP), the population is suggested to increase to 153,400 by 2031.

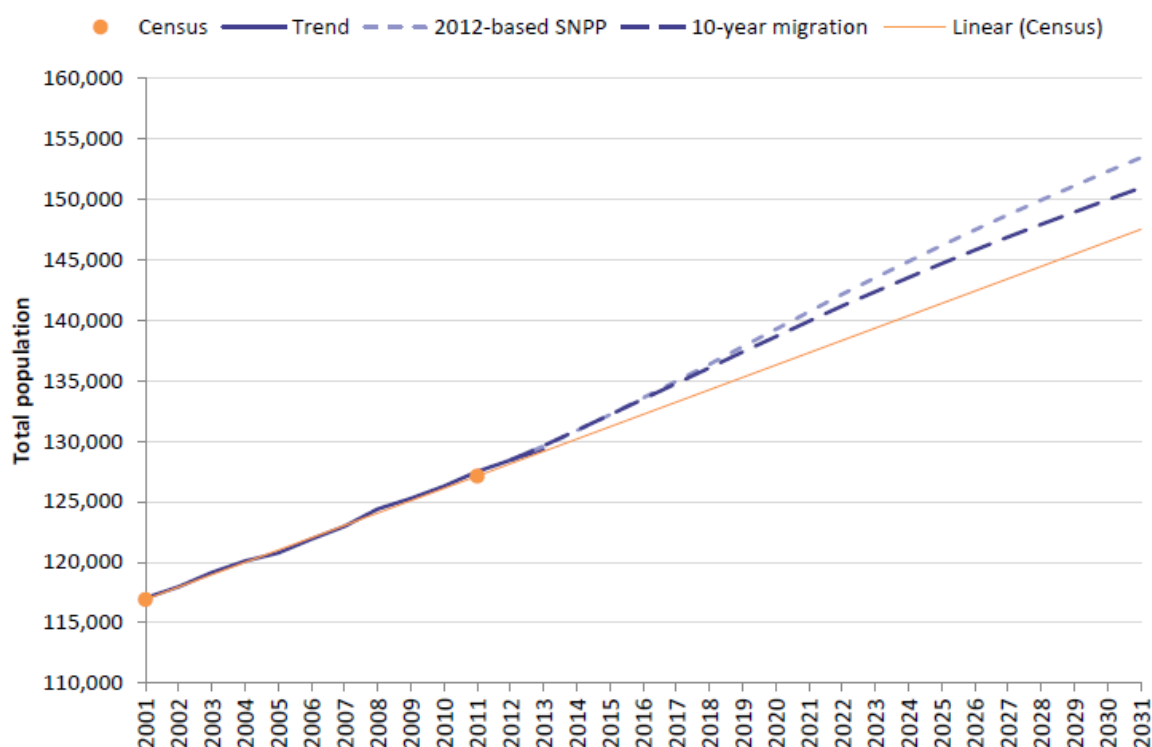


Figure 3: North Hertfordshire Population Projection.³

- 5.82 The North Hertfordshire SHMA identified a need for 5,400 affordable homes over the 20-year period of the LP. In order to achieve this, it is important to understand the economic viability of such developments to determine the amount of affordable housing that individual schemes are able to deliver.
- 5.83 In the 2023 Update, the summary as regards to Older Persons and Adapted Homes states:
- “24. If current rates of dedicated older persons housing provision were to continue, a further 398 specialist older person dwellings would be required in North Herts and 238 dwellings would be required in Stevenage. However, using aspirational national models the figure could be as high as 2,399 units in North Herts and 845 units in Stevenage, but we do not recommend this approach.*
- 25. In July 2022, the government issued their response to a consultation run in 2020 on the future of accessibility standards. Previously, local authorities were required to assess the need to M4(2) accessible homes in their local area and develop policies to deliver these the properties. The government are now proposing that all homes be delivered to M4(2) standard and therefore this evidence is no longer required.*
- 26. However, local authorities are still required to assess the need for the higher M4(3) standard which covers the need for wheelchair adapted and adaptable homes. The minimum need for M4(3) dwellings in North Herts is 430, which is 5.5% of the total need and in Stevenage the figure is 250 dwellings or 4.9% of the total housing need.”*
- 5.84 At Paragraph 2.6, it states: *“Overall, for North Herts, the projected growth in the older population is almost the same as the total population growth. The growth in the older person (60+) population is 6,517 persons, and this is offset by a growth of younger persons (under 60) of just over 100 persons from a total growth of 6,640 persons. This includes an increase of 2,739 persons aged 80 or over.”*
- 5.85 It is clear that there is an ever growing need to provide accommodation for older persons, due to demographic change. Figure 1 reflects this change, where the light purple bars show the growth in older persons in the area by 2031:

³ Source: [chrome-extension://efaidnbmnnnibpcajpcgclefindmkaj/https://www.north-herts.gov.uk/sites/northherts-cms/files/HOU4%20Stevenage%20and%20North%20Herts%20SHMA%20Update.pdf](https://efaidnbmnnnibpcajpcgclefindmkaj/https://www.north-herts.gov.uk/sites/northherts-cms/files/HOU4%20Stevenage%20and%20North%20Herts%20SHMA%20Update.pdf)



Figure 12: Population projections 2022-31 by 5-year age cohort for North Herts (Source: ONS 2018 based sub-national projections)

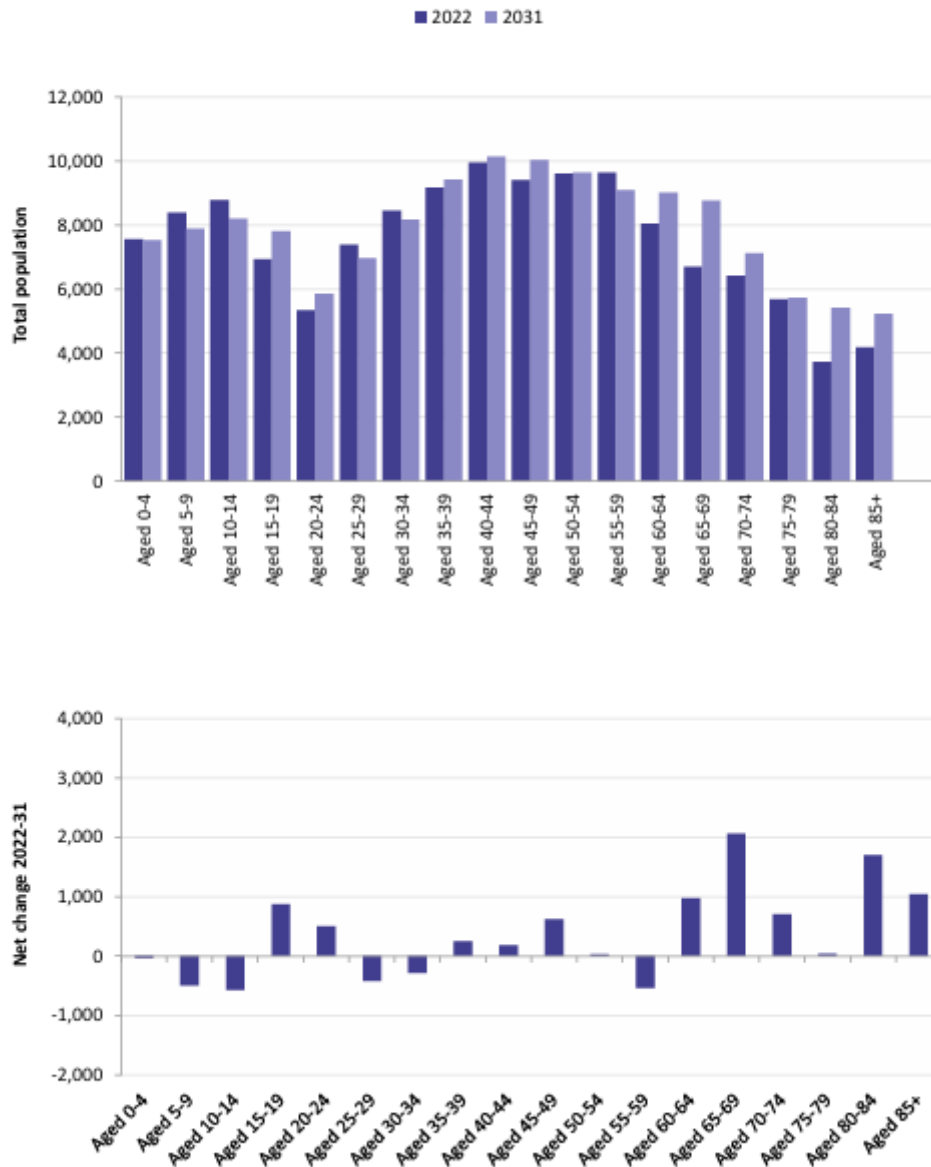


Figure 4: North Hertfordshire Cohort Projections

5.86 This is reflected in housing types being required going forward, which are found in Figure 14, as follows:



Figure 14: Total projected households for 2022 and 2031 and summary of 9-year change by household type and age of household representative for North Herts (Note: Figures may not sum due to rounding. Source: ORS Model)

Year	Household Type	15-24	25-34	35-44	45-54	55-64	65-74	75-84	85+	TOTAL
2022	Single person	280	1,730	2,180	2,270	2,160	2,000	3,840	1,970	16,400
2022	Couple without children	200	1,450	1,250	3,460	6,600	4,970	2,070	740	20,700
2022	Families with child(ren)	410	2,430	6,730	5,590	1,300	210	50	30	16,800
2022	Other households	70	580	360	290	630	390	610	250	3,200
2022	TOTAL	1,000	6,200	10,500	11,600	10,700	7,600	6,600	3,000	57,100
2031	Single person	270	1,660	2,310	2,330	2,000	2,120	4,260	2,350	17,300
2031	Couple without children	220	1,250	1,100	3,050	6,520	6,260	2,700	1,010	22,100
2031	Families with child(ren)	500	2,360	7,040	6,390	1,690	330	80	60	18,500
2031	Other households	60	660	380	180	670	490	820	340	3,600
2031	TOTAL	1,100	5,900	10,800	12,000	10,900	9,200	7,900	3,800	61,500
Change	Single person	-10	-60	+130	+60	-160	+120	+420	+370	+900
Change	Couple without children	+20	-200	-150	-410	-70	+1,290	+630	+270	+1,400
Change	Families with child(ren)	+90	-60	+310	+800	+390	+120	+30	+20	+1,700
Change	Other households	-10	+80	+20	-110	+40	+90	+210	+90	+400
Change	TOTAL	+100	-200	+300	+300	+200	+1,600	+1,300	+800	+4,300

Figure 5: North Hertfordshire Cohort Household Change Projections

- 5.87 For all cohorts 65+, there is an increase in households, which directly translates into an increase in the need for homes for older persons.
- 5.88 It goes further, from an affordability perspective, Figure 50 indicates that there is an overall affordable housing need of 6,877 to 2031.
- 5.89 Whilst it is unfortunate that Section 6 of the report did not consider park homes as specialist older person housing (for independent living) and only looked at homes with forms of care, when such forms of housing already exist in the area, it is clear that the number of persons 75 or older in North Herts is expected to increase by 3,032 by 2031 (Figure 69). That naturally results in a demographic demand for all types of housing for older persons.
- 5.90 In a scenario where there is a shortfall of housing supply at present (see below), it is clear that the Council is not providing sufficient homes for older persons, including for independent low-cost, affordable housing that is offered with park homes. There is a clear demographic need. We will come to this point later in this report.

North Herts Council Housing Strategy 2024-2029

- 5.91 The North Herts Housing Strategy published in March 2024 states the vast majority of growth is expected to come from increases in older population with people aged 80-84 increasing by 43%. By 2031, the projected increase in population for those aged 65 and over is expected to account for 23% of North Herts' population.
- 5.92 According to the Council's LP provisions include specialist housing for the elderly including bungalows and smaller homes.



Five Year Housing Land Supply

- 5.93 In November 2025, North Herts Council published the 'Five-Year Housing Land Supply Update' in which explain the need, as determined by the NPPF 2024, the rules for demonstrating a five-year housing land supply had changed.
- 5.94 The NPPF 2024 requires councils to identify and update yearly a supply of specific deliverable sites sufficient to meet a minimum five years' worth of housing against the adopted strategic housing requirement. This supply must include a 5% buffer to ensure choice and competition or 20% where there has been insufficient under delivery over the previous three years.
- 5.95 According to the LP the total figure of housing required by the Council within the district between April 2025 and March 2030 is 6,976 dwellings. This figure includes the assessed housing need annual rate, the annual shortfall and the 5% buffer.
- 5.96 The total supply of deliverable housing identified by the Council for the five year period is 3,629 dwellings. This means there is a deficit of 3,347 dwellings over the period of 2025/26 – 2029/30. Concluding this, the Council determined they can only demonstrate a 2.6 year supply.
- 5.97 According to the new standard method the housing requirement within the district between April 2025 and March 2030 is 5,215 dwellings. This figure includes the assessed housing need annual rate, the annual shortfall and the 5% buffer.
- 5.98 As stated above, the total supply of deliverable housing identified by the Council for the five year period is 3,629 dwellings. This means there is a deficit of 1,586 dwellings over the period of 2025/26 – 2029/30. Concluding this, the Council determined they can only demonstrate a 3.3 year supply.
- 5.99 There is presently a housing supply shortfall and the presumption in favour applies. This also applies with regards to grey belt policies.
- 5.100

Need to Provide Retirement Housing

- 5.101 As discussed earlier in this report, the Council has a need to identify housing sites as it currently cannot provide sufficient sites to provide the required 5YHLS set out in government policy. In addition to finding sites for all forms of housing, there is a specific need to provide housing for the elderly.
- 5.102 There is an identified critical national and local need to meet the needs of a rapidly growing number of older people. This need is identified in national planning policy, guidance, and reports, and not least born out in research released by the Office for National Statistics (ONS), in part informed by the 2021 Census.
- 5.103 The ONS stated that in mid-2022 there were 1.7 million people aged 85 and older, making up 2.5% of the population. Projections show that by mid-2047 this figure will nearly double



to 3.3 million, representing 4.3% of the UK's population⁴. The “number of people of ‘pensionable age’ is also projected to increase by 25.5% to 15.1 million” therefore the percentage of people of pensionable age is projected to increase⁵.

5.104 In a local context, based on the 2021 Census detailed by ONS, people aged between 54 and 60 has increased by 3,100, a 13.3% increase.

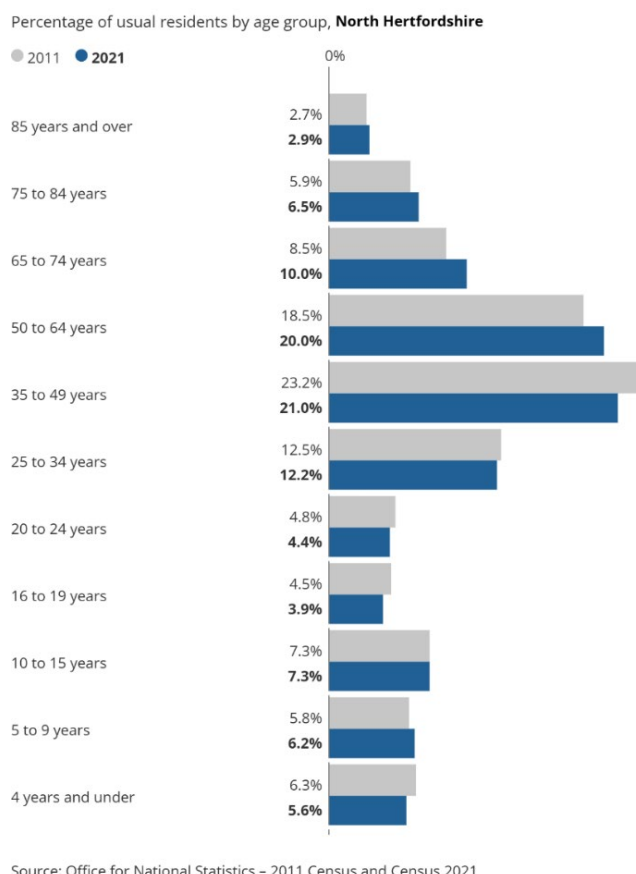


Figure 6: Percentage of Residents in North Herts.⁶

5.105 Given the evidence above, there is a substantial need to supply significantly more affordable accommodation catered to the needs of the elderly which is presently not being delivered at the scales required. The Council have determined that provisions for specialist housing within the LP have been made however given that their 5YHLS is below 5 years there is evidence to suggest that these provisions are not adequate to accommodate the aging population.

5.106 The proposal will seek to provide specialist housing for elderly persons providing independent living for those who need high quality, low maintenance, detached housing with private garden space and parking.

⁴ Source :

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/nationalpopulationprojections/2022based>

⁵ Source :

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/nationalpopulationprojections/2022based>

⁶ Source: <https://www.ons.gov.uk/visualisations/censusareachanges/E07000099/>



Biodiversity Net Gain Requirements

- 5.107 Under the Environment Act 2021, all full planning applications other than those for very minor development are required by statute to provide a 10% BNG over and above the current ecological situation of an application site, in the first instance via on site delivery, or if that is not possible, via off-site options (e.g. purchasing credits).
- 5.108 Any land dedicated to such purpose will be required to be preserved as agreed with the Council for a minimum of 30 years, secured via a legal agreement or some other form of mechanism. The effect is that it places a further onus on those making planning applications, increases costs for applications and delivery, and reduces the land available for higher value purposes.



6 Assessment

- 6.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, applications for planning permission should be determined in accordance with the provisions of the Development Plan unless material considerations indicate otherwise.
- 6.2 The NPPF sets out a presumption in favour of sustainable development which is seen as a golden thread running through both plan making and decision taking. In terms of application decisions this means approving development proposals that accord with the development plan without delay and where the development plan is absent, silent or relevant policies are out of date, granting permission unless adverse impacts significantly outweigh the benefits.
- 6.3 This section sets out the key issues and assesses the application proposals against the relevant national and local planning policies and the material considerations that weigh in the planning balance.
- 6.4 Firstly, considering the principle of development and the benefits, and secondly the relevant technical matters having regard to the site context and development management policies referred to in Section 5:
- Principle of Development
 - Affordable Housing
 - Transport
 - Air Quality
 - Contamination
 - Noise
 - Ecology
 - Design and Landscape

The Principle of Development

- 6.5 We first examine the principle of development. There are two aspects to the principle: the need for the development and its location, including within the Green Belt. We discuss each in turn below.

The Need for the Development

- 6.6 The application area is within the North Hertfordshire, under the North Herts District Council. As referred to in the previous section of the report, the 'Five-Year Housing Land Supply Update' (November 2025) document sets out that the required minimum supply of housing cannot presently be provided. The Council is therefore required to find additional sites for the provision of housing. There is clearly a need for housing and therefore the principle of providing housing as proposed with this application is acceptable.
- 6.7 In addition to this, we have established in the previous section of the report that not only is there a demand for the provision of housing in general, there is a specific need to



provide housing for older persons, due to demographic change occurring within North Hertfordshire. It is clear from the ONS and SMHA data that in all cohorts aged 60+ are growing in the local area, and this is driving a demand for more homes geared towards elderly persons. Alongside homes provided with care, there is an increase in demand for age-restricted market and affordable homes for elderly persons, particularly homes which retain independent living standards. Whilst specialist care-based accommodation also needs to be provided, it is critical to meet the demographic needs of fitter and active elderly persons, by providing step-free, individual bungalow-style homes which are low-cost and require limited maintenance, and which offer some outdoor space. This type of accommodation is geared towards elderly persons who remain in the family home, which now is underutilised, and are unsure whether to down-size as they do not want their standard of living to be lost with any change. It is therefore necessary to offer an attractive alternative – a space within a like-minded community where elderly persons can feel that they have not compromised on their standards of living. Park home style developments offer this exact choice – bricks and mortar based retirement homes tend to be constructed at higher densities (eg. apartments, flats, etc) which fail to provide an area of amenity and a degree of separation and independence that park homes can offer. Indeed, many active elderly persons are attracted to park home developments as they are able to retain a small “right-sized” garden space which reflects how they used to live in their family home, and makes the transition to retirement homes more attractive.

- 6.8 The provision of necessary homes for retired persons weighs significantly in favour as it matches demand and reflects the supply shortfall that exists.
- 6.9 This delivers a significant benefit to communities as it will assist with elderly persons moving to accommodate better suited to their needs, and freeing up existing, larger family homes for new families to then acquire and make their home. It provides a rejuvenation of communities, in that new families return to areas which no longer have school children, reviving schools, etc. These are benefits which weigh favourably in terms of our client's proposals.
- 6.10 Alongside a housing supply shortfall, there is a shortfall in the provision of homes for the elderly. As such, there is a presumption in favour of the provision of homes for the elderly. The need for the development has therefore been demonstrated. As such, the housing policies of the Development Plan appear to be out of date and development for housing should be approved unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

Locational Considerations

- 6.11 The proposal looks to provide residential park homes in a sustainably located position near Oaklands on the southwestern side of the district. The hamlet as identified above and within the supporting Transport Statement, offers a number of key services and facilities that would be conveniently accessible to future occupants of the site.
- 6.12 Although the proposal is within the Green Belt, the development would comply with both Policies SP3 and SP8 by creating housing within the area. Developing the site would not be



result in inappropriate development as the adjacent site comprises park homes and the site to the north-east comprises the owners' property. The site could therefore be classified as an infill site therefore complying with Policy SP5.

- 6.13 The proposed development's contribution of bungalow style units of residential occupation comply with Policy HS3 by adding to the variety of housing stock. The provision of bungalow style accommodation will help to address concerns where the limited provision of bungalows means there is reduced choice for people who either require or prefer this type of accommodation, including older persons. The proposed use of the units amounts to an alternative route to home ownership and is therefore compliant with the definition of affordable housing – see discussion below. Appropriate private space, garden space, residential facilities, and parking spaces are provided within the proposed development.
- 6.14 There are other considerations, primarily that the Council is unable to demonstrate a 5YHLS, and the presumption in favour applies.
- 6.15 Turning to national guidance the NPPF's key objective is to support the achievement of sustainable development through the planning system, recognising the need to secure gains in the overarching objectives (economic, social and environmental).
- 6.16 In respect of new residential occupation of the site, there is a requirement for the provision of new housing of the right type, in the right location, and at the right time, and that development should contribute to protecting and enhancing our natural, built and historic environment, as well as fostering a well-designed and safe built environment with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being (Paragraph 8, NPPF).
- 6.17 Chapter 5 of the NPPF sets out the Government's objective of boosting the supply of housing and delivering a range of property types to meet local needs. North Herts District Council cannot demonstrate a 5YHLS, it is important to recognise that the NPPF is clear that the five-year housing land supply is a minimum requirement, and a requirement which must be maintained (Paragraph 78, NPPF). There is no maximum housing land supply limit, and with regard to the Government's objective of significantly boosting the supply of housing, no less weight should be attributed to the delivery of sustainable housing developments in such circumstances, particularly where there is an identified need.
- 6.18 The site is considered to be in a sustainable location by virtue of its siting within walking distance of public transport and access to the services and facilities in the neighbouring towns. The proposed development will promote opportunities to use more sustainable modes of transport, such as walking, cycling and public transport, utilising existing pedestrian links and public transport links.
- 6.19 It also comprises partly previously developed land, operating as a commercial poultry site and which hardstanding exists over a portion of it. It has been previously acknowledged that the proposal to introduce residential uses on the site are acceptable in light of the commercial use of the site historically, which is not well-suited to the area. Indeed, Alex Howard stated in his officer's report: *"It is considered that the location and proposed land*



use of the proposal would be reasonably appropriate, given the existing residential development that bound the site on three sides and the material considerations surrounding the previous commercial uses and associated impacts by comparison. A residential development in this location is considered more appropriate than previous commercial uses, given the sites context and constraints.” He also stated: *“Whilst it is my considered view that a residential land use on this site would be potentially more appropriate in this location than a commercial or general business use...”* His recommendation to refuse the application was based on the harm to the Green Belt, which we discuss below in respect of the current proposals.

6.20 The report indicated that the site, being located outside of the defined settlement boundary, is contrary to Policy SP2 and significant weight against that conflict was applied. However, as noted above and below, there are several significant factors which remove this conflict:

- The housing supply shortfall that exists in the area, for which housing sites need to be provided. Without unallocated sites such as this site, it will be impossible for the Council to address the housing supply shortfall.
- Furthermore, none of the recent sites which have been developed specifically cater for the provision of older persons homes, a growing demographic which is not being addressed. This places more emphasis on sites which are seeking to address demographic shortfalls in housing supply.
- The site is surrounded by residential on three sides, and this inherently means that the site is infill between residential uses.
- The proposals comprise affordable housing – see below.
- Changes to the NPPF policy with regards to ‘grey belt’ matters, which makes this site suitable in that regard – see below.

6.21 Laister therefore concludes that the site is reasonably sustainable for the purposes of using the site for residential purposes. In principle, the residential use of the site is acceptable and complies with the relevant policies.

Green Belt Considerations

6.22 We now turn to Green Belt Matters. Since the previous refusal, which deemed a proposal for four residential dwellings as inappropriate development in the Green Belt, for which special circumstances did not exist to demonstrably outweigh the harm, the Government has issued new guidance on Green Belt matters. They have introduced the ‘grey belt’ which comprises sites which are poorly performing in Green Belt terms. This is defined as previously developed land or other land which does not contribute to three purposes of designating land as green belt (check unrestricted sprawl, prevent towns from merging and preserve the character of historic towns). Proposals on land which qualify for grey belt are not inappropriate development (NPPF Para 153 and footnote 55). We discuss this in detail below.



Grey Belt Review

- 6.23 The site is not allocated for development within the LP however it could be considered as grey belt given the nature of the site. The definition of Grey Belt was introduced with the NPPF 2024 and is defined in Annex 2: Glossary of the NPPF:
- 6.24 *"For the purposes of plan-making and decision-making, 'grey belt' is defined as 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. 'Grey Belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development".*
- 6.25 The development of the site does not contribute towards the three purposes of Paragraph 143 stated above. The proposal would not create unrestricted sprawl, nor would it cause the coalescence of neighbouring towns (it does not abut any towns). Lastly, the site is not situated within a historic town therefore this purpose does not apply to the site. In light of this, the site should be considered as Grey Belt.
- 6.26 The proposed site can easily meet the requirements for allocation as 'Grey Belt'
- 6.27 In NPPF Paragraph 155, there are four additional tests where proposals comprise housing or other commercial development. The proposals meet those requirements without doubt.
- 6.28 The development will not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area. As set out in the housing refusal from 2023's delegated report, the site was specifically assessed in the July 2016 version of the Council's Green Belt Review (ref: 206). This concluded that the site only makes a moderate contribution to the Green Belt purposes. Its loss from the green belt would not, therefore, undermine the Green Belt of the area of the plan, given its scale (being minor development) and its limited contribution to the Green Belt.
- 6.29 Indeed, the officer in the delegated report also stated: *"However, there is a realistic prospect that the resultant development could lead to some redeemability of the site to its present state of openness, owing to a robust and extensive landscaping scheme which is principally a consideration for the technical details stage."* We agree with this conclusion; the proposals put forward presently are for single storey units – not one and half storey dwellings – and there is a proposal for extensive landscaping along its boundaries, and within the site, both the 'redeem' itself in terms of openness considerations but also to deliver biodiversity net gain. The first test is therefore passed.
- 6.30 The second test is whether there is a demonstrable unmet need for the type of development proposed. This is clearly set out above, where there is a housing supply shortfall and there is a growing need for housing for the elderly. This test is passed.
- 6.31 The site would form a sustainable location – this is clear given the site is currently and historically used for commercial purposes and that use was considered unsuitable. The current proposals incorporate sustainability enhancements, including a new footpath. The proposals incorporate appropriate parking and access arrangements, including the



provision of cycle storage for each individual caravan occupant, along with visitor cycle spaces. It replaces an unsustainable commercial use, and the submitted transport report demonstrates that there will not be significant impacts on highway safety or the transport network. It is clear that this test has been passed.

- 6.32 Finally, the 'Golden Rules' test are met. As set out below, the scheme can be considered to be affordable housing according to the NPPF definition (category d) – alternative affordable routes to home ownership). As discussed above, there will be proportionately necessary improvements to local infrastructure, including the provision of a footpath. If the Council considers other infrastructure is necessary, that will be discussed during the negotiation of the application.
- 6.33 As regards to public open space provision, in this location, there is already significant public open space, in the form of Mardley Heath. A relevant contribution can be provided to enhance this, should this be deemed necessary to comply with the Grey Belt considerations, which would enable the enhancement of the Wood for the public. This would be improving existing green spaces accessible to the public and ensure compliance with Grey Belt policies.
- 6.34 Paragraph 157 is also complied within, in the whole of the proposals are for affordable homes – see below.
- 6.35 The proposals are therefore 'Grey Belt' and in accordance with NPPF Paragraph 158, should be given significant weight in favour.
- 6.36 Even if the Council found that the proposals were not found to comprise Grey Belt, the Council has already concluded that the harm to the Green Belt by proposals would be moderated by the fact that the site does not comprise significantly important Green Belt land. As a result, the harm to the Green Belt is moderate by way of inappropriateness, given the site's historical use as a commercial poultry operation, the presence of hardstanding and mobile structures, and its immediate character, which is to be surrounded by housing on three sides and a motorway on the fourth.. As set out below, the other harm is minimal.
- 6.37 There are significant benefits in favour of the scheme, including:
- the provision of housing where there is a severe shortfall;
 - the provision of significant (in its context) affordable housing;
 - the provision of housing geared towards the elderly, which in turn frees up underutilised;
 - the remediation of contaminated land
 - significant biodiversity enhancements
 - the replacement of an unsuitable commercial use
- 6.38 There are no identified harm with the proposal, and there are significant benefits in favour of the scheme. It is clear that the benefits significantly and demonstrably outweigh the harm to the Green Belt and any other harm, and very special circumstances exist in favour of the proposed development, if the proposals are not found to be Grey Belt (which we



doubt is the case). This is because the other considerations outweigh the resulting harms to the Green Belt and other harm.

Other Considerations

Affordable Housing

- 6.39 As part of this planning statement, Laister have prepared an affordable housing addendum (**Appendices 2 & 3**) that analyses the cost of park homes as compared with traditionally built bungalows in the locality. This report investigates pre-owned and new park homes compared to bungalows, all within a 10-mile radius of the site. As the Council will see from that evidence, there is a significant price differential between park homes (both new and existing) and bungalows in the area. Even comparing the most expensive park homes available on the market at present (valued at £375k), it is priced 21% lower than the cheapest bungalow available, which is priced at £475k.
- 6.40 We consider park homes to be a form of affordable housing and therefore comply with the NPPF 'Glossary' (which can be found on Page 70) definition of affordable housing in conjunction with part d) on other affordable routes to home ownership. This is because the median price equivalent of a new park home is approximately 53.6% of the local market value of 2-3 bedroom traditionally built bungalow. Furthermore, such a comparative difference would likely remain in perpetuity given that a park home will generally have a lower market value than a traditional bricks and mortar build property.
- 6.41 The research further demonstrates that the proposed development therefore is also in accordance with the Inspector's consideration and ultimate decision of the appeals at Wisteria Heights/Shripney Gardens, Bersted, (refs. APP/C3810/C/19/3222033 & APP/C3810/W/18/3214487) which stated *"...mobile homes can be considered to offer an affordable route to home ownership. Moreover, they accord with the aims of the NPPF to address the needs of groups with specific housing requirements, particularly the elderly and those requiring single storey accommodation. A financial contribution towards off site affordable housing provision is therefore not justified in this instance"*.
- 6.42 This is further supported by an appeal at Broadfields Nursery, Braintree (Appeal Ref: APP/Z1510/W/25/3366289) which states *"...the inherent affordability associated with mobile homes of this type adequately offsets the need for a related contribution"*.
- 6.43 The proposed development represents sustainable development which would provide with much needed older persons housing, assisting the Council in meeting its requirements.
- 6.44 As demonstrated within the application submissions there is an ongoing need for older persons housing in the area, to which the proposal will contribute towards. Park homes represent a form of low-cost housing, filling a void in the housing market whereby people can remain in independent mainstream housing, where otherwise such might not be an affordable option.
- 6.45 The proposed units at the site would provide single storey adaptable detached properties for older persons, marketed at a price equivalent to at least 50% below local market value



of comparable detached bricks and mortar properties offering a similar level of detached residential accommodation. This in line with definition of affordable housing as set out within the Annex 2: Glossary of the NPPF, Paragraphs (d). As such, the proposals represent 100% affordable housing for older persons and no additional affordable housing contribution should be required.

- 6.46 Given this information, it is considered that our client's proposals comply with Local Plan Policies SP8 and CGB1 with regards to the provision of affordable housing, as well as specifically Policy CGB2a. The site forms an exemption site in terms of providing a form of affordable housing in the Green Belt within reasonable distance of the location of where needs are identified, and within reasonable distance of services and facilities. It also will not have a substantial adverse impact on the Green Belt and there is clear public benefit which outweighs and moderate or slight harm to the Green Belt, as identified above.
- 6.47 The provision of affordable housing in compliance with Development Plan policies and other considerations weighs significantly in favour of granting planning permission for the scheme.

Transport

- 6.48 The proposal includes a Transport Statement ensuring the proposal complies with Policy T1. The Transport Statement found the proposed access would provide appropriate visibility and geometry to accommodate the scheme. The adjoining road network has a good safety record and sufficient capacity to accommodate the increased activity. The development therefore would not result in a severe cumulative impact on the surrounding area. The proposal is in accordance with the NPPF ensuring permission should be granted.
- 6.49 The scheme provides the correct amount of parking in accordance with the Council's Parking Standards and complying with Policy T2. These parking spaces are illustrated on the proposed layout (**Appendix 2**). This includes individual parking spaces for each unit plus 8 visitor spaces within the site for any visitors, which the pre-application advice received indicates would be acceptable given the demographics of the proposed development.
- 6.50 Access from this site connects to Danesbury Park Road which is unadopted. Danesbury Park Road provides vehicular access onto Pottersheath Road which, at the junction is 60mph however the junction is at the edge of the hamlet of Pottersheath therefore vehicles are likely to be slowing down as the speed limit through Potterheath is 30mph.
- 6.51 The nearest bus stops to the site are located on Great North Road and Ardley Hill which are approximately 0.6 miles away from the site. There are two bus routes that service those stops. The 301-bus route which travels between Welwyn Garden City and Stevenage and, the 400-bus route which travels between St Albans and Stevenage.
- 6.52 The closest train stations are Knebworth (approximately 2.1 miles away) which can be accessed via the 301-bus route. Welwyn North (approximately 3.1 miles away) to the south can either be accessed using the Great Northern railway (via Knebworth) or alternatively by using the 301-bus route and a short walk.



- 6.53 In terms of pedestrian access, the proposals incorporate a footpath which links the site to Pottersheath Road, whereby footpaths already exist provide connections to nearby open space as well as local services and facilities – including convenience shopping nearby. This represents a sustainable location within its context, something which was previously identified by the officer in the refusal of the proposed residential dwellings.
- 6.54 It is noted that the site was previously granted planning permission for a commercial poultry operation, which has significant transport impacts, which would be removed with this approved scheme. Having regard to its historical use, the limited impact arising from the proposed use (as compared with its historical use), and the sustainability enhancements through the provision of the footpath, it is considered that the proposals are therefore acceptable in transport terms.

Air Quality

- 6.55 In undertaking an Air Quality Assessment the potential and actual impacts on air quality during both construction and final use and occupation has been considered. Mitigation to minimise emissions and their potential effects on the health and local environment has been proposed. This therefore ensures that the proposal complies with Policy D4.
- 6.56 The assessment determined that during the construction phase of the development there is the potential for air quality impacts as a result of fugitive dust emissions from the site. Site-specific dust control methods including a Construction Environmental Management Plan (CEMP) were subsequently determined. Following the implementation of these the potential air quality impacts are predicted to be '*not significant*'.
- 6.57 During the operational phase of the proposed development there is potential for road traffic exhaust emission impacts. However, due to the low number of trips generated, the road traffic exhaust impacts are also predicted to be '*not significant*'.
- 6.58 The proposal has the potential to expose residents to elevated levels of pollution. Dispersion modelling was undertaken to predict the concentrations as a result of emissions from the highway network. The results showed that the concentrations were below the relevant Air Quality Objectives (AQOs) and Concentration Target across the development. In terms of air quality it is therefore deemed suitable for the site to be developed and air quality cannot be considered as a constraint from a planning perspective.
- 6.59 This aligns with the previous conclusion reached by officers as regard to the refused application for 4 residential dwellings on the site, where Environmental Health did not raise any objections from an air quality perspective.
- 6.60 The proposals are therefore acceptable in this regard. This carries moderate weight in favour.

Contamination

- 6.61 The proposals incorporate park homes and infrastructure. Unlike bricks and mortar or other traditional forms of housing, foundations are not required and no piling or deep



excavations are proposed. Any works are superficial and limited to the provision of hardstanding bases sitting within the topsoil of the site. The deepest parts of the development are the water infrastructure (potable and foul water pipes and connections), which are not considered to be particularly intrusive.

- 6.62 To comply with Policy NE11, a Tier 1 and Tier 2 Contamination Assessment was undertaken to assess whether developing the site could pose an unacceptable risk to human health or the environment. As explained below, an appropriate investigation took place and subsequent mitigation was proposed, all of which comply with the LPs policy on air quality.
- 6.63 As part of the assessment, Conceptual Site Models (CSM) were run to evaluate potential issues onsite, including pollutant sources, pathways and receptors. The Preliminary Risk Assessment (PRA) did not highlight any Potential Contamination Linkages (PCL) that could pose a significant possibility of harm under the current land use.
- 6.64 In terms of the proposed development, a minimal risk approach applied, PCLs were identified which required further consideration. The potential for Made Ground deposits and the unknown history of the site posed a wide range of contaminants. Intrusive works were recommended to determine whether any remedial measures were necessary. No radon measures were required and the site was unlikely to be at risk of vapour or ground gas intrusion based on the development proposal. The report determined that consideration should be given to construction operatives during sub-surface works; it was therefore recommended that intrusive fieldworks included a limited gas monitoring regime to further refine the risk.
- 6.65 A Tier 2 Generic Quantitative Risk Assessment (GQRA) was then undertaken to consider the findings from the Tier 1 PRA. The CSM was updated and identified PCLs which exceeded the low-risk threshold and required further investigation, mitigation or remediation.
- 6.66 The GQRA found the Made Ground/quarry backfill requires both remediation and mitigation. For the proposed residents, Polycyclic Aromatic Hydrocarbons (PAH) are a concern therefore both mitigation and remediation are required in the form of clean soil cover over all soft landscaping areas, geotextile membrane and gravel surface or full site strip and the introduction of a capping layer across the site.
- 6.67 There are concerns over potential contamination that construction workers may be exposed to therefore during construction good working practices should be adhered to which should include asbestos awareness training and a watching brief during enabling works/earthworks.
- 6.68 Elevated organic contaminants within the Made Ground were also identified, as a result, drinking water infrastructure will need to be installed using protective barrier pipes for drinking water.
- 6.69 A Remediation Strategy must be established to detail the measures to be undertaken as well as the Verification Plan for all necessary works. Once all investigations and remedial works are completed, a Verification Report will be required.



- 6.70 With the previous refusal for residential dwellings on the site, the officer recognised that there would be a benefit to remediating the land, although the benefit is limited. As such, the proposals are therefore acceptable and attract moderate weight in favour.

Noise

- 6.71 Paragraph 187 of the NPPF ensures new developments are not adversely affected by noise pollution; therefore a Noise Assessment has been undertaken. This predominantly looks at the effects of noise from the A1(M). The report determined there is a low to medium risk of noise in the western area of the site (furthest from the A1(M)). On the eastern boundary adjacent to the A1(M) the noise levels pose a medium risk.
- 6.72 The report concluded that noise mitigation needs to be provided to provide suitable accommodation. This is in the form of an acoustic fence along the eastern boundary with a short return along the northern and southern boundaries. The fence will be close-boarded with a minimum density of 10kg/m³ and a minimum height of 2.1m above the ground level of the adjacent park home plot ensuring the windows of the park homes are screened from road traffic.
- 6.73 It is noted that there are no known concerns raised by residents of the adjoining park home site, which is subject to similar levels of noise from highway infrastructure located adjacent to both sites. In the previous refusal for residential dwellings on site, it was noted that Environmental Health raised no noise concerns arising from the location of the site adjacent to the motorway. Given the applicant has formally demonstrated that it can be made acceptable with acoustic fencing, the proposals are considered acceptable.
- 6.74 Indeed, the assessment determined that provided mitigation was put in place there would be no adverse impacts on residents and the proposal would comply with the requirements of the NPPF. This attracts no weight in the planning balance as there will be no material harm, but it is also not a benefit, but something necessary to achieve the development.

Ecology

- 6.75 Preliminary Ecological Assessment (PEA) was undertaken to establish the likelihood of the site supporting protected species. This found that the central part of the site comprises previously cleared land with small amounts of vegetation. The southern part of the site had some overgrown vegetation and patches of modified grassland, whilst the northern portion comprised primarily a gravel driveway.
- 6.76 The report concluded that a CEMP should be included to safeguard a priority habitat deciduous woodland from the impacts associated with construction.
- 6.77 There is a requirement for the development to be sympathetic to the value of breeding birds and any potential impacts on them, their eggs and their young. Therefore clearance of the site should be undertaken at appropriate times of the year.
- 6.78 Soft landscaping was proposed to seek to enhance the site with native planting to improve biodiversity.



- 6.79 The deciduous woodland adjacent to the site has the potential for roosting bats. Reasonable avoidance measures are recommended in conjunction with the CEMP to protect the woodland and prevent any negative impacts on habitats. It is recommended to enhance the habitats that bat boxes are erected.
- 6.80 The site has low suitability for foraging and commuting bats however adjacent offsite habitats had a greater potential to support them. As a result impacts on these habitats should be mitigated. Again, reasonable avoidance through the use of the CEMP will ensure the negative impacts are reduced.
- 6.81 Appropriate precautions should be employed before and during construction works to prevent harm to badger species. Pre-works checks should be undertaken within three months prior to the onset of construction related activities. Exposed excavations to be left overnight should be covered or include means of escape for animals and pipework should be capped to prevent badgers gaining access. Should evidence of badgers be detected during the construction phase, all works should cease and advice should be taken from an ecologist.
- 6.82 The rough grassland and deadwood onsite were considered to be highly conducive to finding species of reptiles. It is recommended that suitable habitat patches are subjected to a full reptile presence /absence survey at an appropriate time of year.
- 6.83 The report found that hedgehogs may use the site for foraging and commuting purposes. Reasonable avoidance measures should be followed including capping pipework, ensure construction works are performed during daylight hours and covering excavations overnight and provide an escape route for animals if they fall.
- 6.84 In order to comply with the statutory regime for Biodiversity Net Gain, a Biodiversity Net Gain Report has been undertaken to assess the current biodiversity habitat and value of the site and provide guide requirements to meet the mandatory 10% net gain requirements.
- 6.85 The proposed development results in an overall BNG of +0.47 'Biodiversity Units' which is a 42.3% increase. The new proposed enhancements more than achieve the statutory requirements and result a significant net environmental benefit in favour of the proposals, from a biodiversity point of view. The proposal clearly complies with Policy NE4.
- 6.86 To ensure habitat creation and target conditions the assessment states a Habitat Management Monitoring Plan (HMMP) is required to safeguard habitats for 30 years post construction.
- 6.87 It is noted that previously, the Council did not raise concerns regarding any ecological matters, and with the additional information, it can be demonstrated that the site remains compliance from an ecological perspective.
- 6.88 The proposals are therefore acceptable from an ecological perspective.
- 6.89 The provision of significant gains on the environment – including provision of Biodiversity Net Gain – attracts significant weight in favour.



Design and Landscape

- 6.90 Residential caravan sites for retired persons provide some private amenity space within each pitch but this is proportionate to meeting the needs of the intended occupants. The typical occupant is someone who remains fit and active, and is seeking to retain independent living standards who are typically looking for a low maintenance garden so it is not too much of a burden on the elderly, but retain a similar level of lifestyle as what one has with living in a family home (from where the intended occupants are likely to downsize). The residential pitches seek an appropriate balance between providing a reasonable pitch size without removing the benefits to elderly persons who are looking for detached bungalow style units without the added burden of maintaining large garden spaces.
- 6.91 It also complies with Residential Static Model Standards set out by the Government and controlled by caravan site licencing arrangements, particularly regarding fire safety, etc.
- 6.92 In addition, it should be noted that the elderly who wish to live on residential park home sites typically prefer their suburban or rural setting, affording some privacy to each occupant without comprising social benefits of living in a community. This is particularly relevant to those who are downsizing from a larger underutilised family home, given they are likely to already benefit from some private amenity/garden space and would like to retain some of that for their own private purposes, such as gardening or hosting guests.
- 6.93 In terms of the design of the units, images are provided within **Appendix 3** which show the quality of the interiors. In line with the nature of the neighbouring caravan park, the exact style of caravan which is ultimately installed will depend on customer tastes, availability of units, etc. Given the proposals are for a use of land, it is our view that sufficient information has been provided for the Council to understand the proposals.
- 6.94 It is also noted that the site is well-contained, as referred to by the officer with regards to the recent previous refusal. It is further enhanced through the provision of additional landscaping shown on the submitted layout plan, and the retention of an existing close boarded fence along Danesbury Park Road.
- 6.95 The proposed landscaping will improve the design of the area, providing amenity green space within the site, complying with Policies D1 and NE6. This reflects the BNG information ensuring an enhancement in landscaping and habitats will create a high-quality environment on-site. This is clearly a benefit that weighs in favour of the proposals. In our view, this attracts moderate positive weight.
- 6.96 As regards to wider amenity space, residential standards for caravan sites normally requests 10% of the ownership be dedicated to amenity and recreational space. However, it is acknowledged that this standard may not be required where there is already significant open space nearby. In this case, the community around the site already benefits from direct access to significant woodland areas, which contain trails and access points. As such, it is the applicant's view that providing amenity space on site would be redundant, and simply drive up the costs of the development without providing a corresponding benefit. Indeed, as part of the scheme, the footpath connection



incorporated into the application provides a safe and secure route to the public open space nearby, facilitating and encouraging residents to respectively explore the nature and green spaces nearby.

Whether the proposals comprise sustainable development?

6.97 In terms the of three strands of sustainable development expressed within the NPPF the proposals would provide the following benefits against each objective:

Economic

6.98 The provision of housing will generate some economic activity in its construction. It will also support local services and facilities through direct spend by residents of the new development, supporting local businesses. There will be some economic benefits.

6.99 Indirectly, the proposals will most likely lead to the release of underutilised family homes which will in turn bring working aged families into the area, who will support the local economy.

6.100 As such, there are some economic benefits that weigh in favour.

Social

6.101 The social benefits of delivering much needed housing are clear and widely publicised. The proposed residential park home site would result in development of a single storey nature, often overlooked in major housebuilding schemes, providing residential accommodation often more appealing to older age groups of adults who would normally prefer 'bungalow' type of accommodation.

6.102 The residential proposal will provide adequately sized private gardens and suitable separation distances between the proposed park homes providing appropriate levels of indoor and outdoor amenity that would allow for a good standard of living environment.

6.103 The development will provide landscaping and open green space, creating opportunities for walking and exercising. This in turn provides opportunities for social interaction and promoting an active and healthy lifestyles benefiting both mental and physical health and well-being.

6.104 The proposal will result in the residential occupation of up to 27 No. residential park homes. These represent an affordable form of housing, contributing towards the 5YHLS requirement and in ensuring that a sufficient amount of land comes forward for housing in line with Chapter 5 of the NPPF, to meet local housing needs.

6.105 There will be significant social benefits that weigh in favour.

Environmental

6.106 The proposed scheme looks to bring forward residential occupation of high-quality designed units which utilise sustainable construction methods and materials. The proposal will be providing high quality landscaping, carefully positioned and proportioned



to enhance the application area which is key to ensuring a sensitive design to the development. The proposals will deliver substantial gains in biodiversity, which should weigh significantly in favour in light of the degraded environment that exists on site through its historical uses, including as a quarry. There are significant environmental benefits from the proposal which should weigh in favour.

6.107 Laister concludes that the proposals comprise sustainable development according to the NPPF definitions.



7 Conclusions

- 7.1 This Planning Statement has been prepared by Laister Planning Limited to support a full planning application for *“change of use of land to residential static caravans (park homes), footpath extension, improved access points and associated landscaping and infrastructure”* at Carden Gardens, Danesbury Park Road, Codicote, Welwyn, AL6 9SN.
- 7.2 The proposals comprise 27 residential park homes, on partly developed and derelict land. The homes will only for retirees.
- 7.3 The proposals would contribute towards meeting the housing demand and sustaining the Council's housing land supply going forward. Park homes represent an affordable form of housing consistent with the definition as set out within the NPPF and as a result the proposal will bring forward much needed affordable and adaptable housing that contributes to meeting the needs of the people within the area.
- 7.4 This would result in both significant social and economic benefits, through the provision of new affordable homes, meeting an identified need, in a sustainable location and providing appropriate facilities. It provides high quality single storey residential accommodation, of sustainable construction, which would provide for a good standard of living for future occupants.
- 7.5 The proposals are located on grey belt land – the relevant tests and the golden rules have been met. As such the proposals should gain significant weight in favour. If the Council did not consider that the site was grey belt, the proposal's other considerations outweigh the limited harm to the Green Belt and other harm (if any exists) when considering the site's contribution the Green Belt and its historical use. As such, very special circumstances exists which warrant the proposal's approval.
- 7.6 Within the submission we demonstrate that there would be no significant adverse impacts on the built or natural environment. No technical issues have been found which would suggest that planning permission should not be granted. The site can promote sustainable modes of transport and incorporate relevant infrastructure to support this. The site will deliver enhancements and contribute towards biodiversity net gain, air quality, noise, transport and a reduction in contamination, as well as improve the overall design of the site. These all weigh in favour of supporting the scheme.
- 7.7 The proposals demonstrate an accessible layout with appropriate parking provision and manoeuvrability within the site to ensure that the development would not result in any significant adverse impacts on the safety and convenience of highway users.
- 7.8 In light of the above factors, it is considered that the proposal accords with the provisions of the NPPF and the LP in that it represents a sustainable form of development with no unmitigable major adverse impacts. Consequently, the planning balance weighs in favour of the application which should therefore be approved by the LPA.



Appendices



Appendix 1: Planning History Summary

Application Ref.	Description	Decision	Date
The Site			
10/02236/1	Erection of horticultural building.	Appeal Dismissed	June 2011
14/00428/1EUD	The existing use of land, structures and portable buildings for agricultural purposes as shown on plans.	Granted	February 2014
15/01032/1	Erection of and retention of two yurt for egg packing centre and new staff quarters and dayroom. Erection of five chicken, duck and quail enclosures. Retention of shed for storage of log, straw and feed. Erection of three polytunnel chicken enclosures and one grain silo. Erection of 2 metre high chain link boundary fence and for the division of grazing areas.	Split Decision	February 2016
15/02051/1	Re profiling of disused quarry to allow grazing.	Refused	March 2016
23/00929/PIP	Erection of four dwellings.	Refused	May 2023
Woodlands Park Homes			
74/00159/1	Continued use of land as site for caravan.	Granted	May 1974
77/01388/1	Use of land as a mobile home park.	Refused	June 1978
80/00713/1	Proposed storage of touring caravans.	Granted	April 1980
04/01644/1	Conversion of generator/store to 2 three bedroom dwellings with front entrance canopy, incorporating six dormer windows to front roof slope and four dormer windows and two	Refused	October 2004



	rooflights to rear roof slope. 4 parking spaces and new access drive.		
05/01680/1	Conversion of generator/store to 2 three bedroom dwellings with front entrance canopy, incorporating six dormer windows to front roof slope and four dormer windows and two rooflights to rear roof slope. 4 parking spaces and new access drive (as a variation to application number 04/01644/1 granted 17/12/2004).	Granted	February 2006



Appendix 2: Proposed Site Layout





Key:

	Park Home
	Parking
	Visitor Parking
	Storage Shed
	Refuse Storage
	Refuse Collection Point
	Gabion Retainment Wall
	Acoustic Fencing
	Pedestrian Footpath
	Electric Vehicle Charging Point
	Assembly Point
	Fire Point
	Low Level Bollard Lighting

Job: Carden Gardens
Danesbury Park Road, Welwyn
AL6 9SN

Title: Masterplan

Plan Number: P379C16 - 13 - REV A

Checked by: JH

Scale: 1:500@A2

Date: 16.03.2026

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park designs

0116 385 3000
www.park-designs.co.uk



Appendix 3: Images of Proposed Park Homes

























Appendix 4: Copy of the Delegated Report Ref: 23/00929/PIP



DELEGATED FILE NOTE

CASE OFFICER: ...Alex Howard.....

APPLICATION REFERENCE	BRIEF DESCRIPTION OF DEVELOPMENT	APPLICATION SITE
23/00929/PIP	Erection of four dwellings	Cardens Gardens Danesbury Park Road Welwyn Hertfordshire AL6 9SN

Submitted Plan Nos

TIN 460 SUR 001 TIN 460 PA 001 BRI 617 T01A

SP2	Settlement Hierarchy and Spatial Distrib
SP5	Countryside and Green Belt
SP9	Design and Sustainability
D1	Sustainable design
SECN12	Achieving well-designed places
SECN13	Protecting Green Belt Land

2.0 **Site History**

2.1 Extensive site history. Applications of relevance are as follows:

2.2 **15/01032/1** - Erection of and retention of two yurts for egg packing centre and new staff quarters and dayroom. Erection of five chicken, duck and quail enclosures. Retention of shed for storage of log, straw and feed. Erection of three polytunnel chicken enclosures and one grain silo. Erection of 2-metre-high chain link boundary fences and for the division of grazing areas.

Decision

Split

2.3. **14/00428/1EUD** - The existing use of land, structures and portable buildings for agricultural purposes as shown on plan received on 12th March 2015

Granted

2.4 **10/02236/1** - Erection of horticultural building.

Refused – Appeal Dismissed

3.0 **Representations**

3.1 **Site Notice and Neighbour Consultation** – Responses received from 41 Danesbury Park Road and 62 Woodlands Park Homes (summary):

The site was used as an illegal dumping ground by the previous owner, who used to light bonfires and cause explosions that shook the properties opposite. Digging up the site for this proposal could expose these toxic materials.

Danesbury Park Road is unadopted and would be damaged by the construction vehicles required to facilitate this proposal. Queries over who takes responsibility for this road and that its ongoing maintenance should be considered.

Additional traffic from occupiers of the proposed dwellings would affect the current road use.

Safety concerns.

Potential displacement of wildlife that inhabit the site.

Concerns over parking on the road and obstruction this would cause.

3.2 Codicote Parish Council – Object to the development on the following grounds (summary):

The site is within the Green Belt.

The roads are not being upgraded to facilitate the additional traffic.

Codicote already has four large housing developments either being built/nearly starting.

There is no increase in amenities and associated infrastructure to cope with this.

There is no affordable housing provision included.

3.3 Hertfordshire County Council Highways – Beyond their remit to control with conditions.

3.4 Environmental Health (Noise) – No objection to the principle of development, but request that a robust Noise Impact Assessment be submitted as part of the next stage, should it proceed.

3.5 Environmental Health (Air Quality) – No objection subject to conditions.

3.6 Environmental Health (Land Contamination) – No objection subject to conditions.

4.0 Planning Considerations

4.1 Site and Surroundings

4.1.1 The site is situated approximately 1.3km to the northeast of the town of Welwyn. The site fronts onto Danesbury Park Road, beyond which lies low density residential housing to the north. The site is well contained being bound to the northeast by an existing residential gypsy caravan site and to the southwest by the Woodland Park Homes site, as well as being bound to the southeast by the A1(M). The site is allocated as within the Metropolitan Green Belt in the Local Plan.

4.1.2 The site has previous history of being a quarry and has been utilised for the disposal of unregulated waste/unauthorised fly tipping of large quantities of waste. The site is currently comprised of rough grass/vegetation with mature trees forming the boundary with Danesbury Park Road. The site previously operated as a commercial poultry farm with the planning history supporting that fact.

4.2 Proposal

- 4.2.1 The application seeks permission in principle for the erection of four dwellings. The application is supported by an indicative site layout plan and street scene elevation, ground investigation report, topographical survey and tree survey. The supporting Planning Statement states that the proposal would be a low-density development of one and a half storey dwellings.

4.3 **Key Issues**

- 4.3.1 Planning Practice Guidance (PPG) explains that permission in principle is an alternative way of obtaining planning permission for housing led development as part of a two-stage procedure. Permission in principle, at the initial stage, is limited to the consideration of location, land use and the amount of development which, in the event of an approval, would leave the remaining matters to be considered in a technical detail's application.

Planning History

- 4.3.2 The site has a rich planning history with varying applications for different forms of development. The two applications from 2014 and 2015 were for the use of the site as a commercial poultry farm. In my opinion, given the different type of development associated with these applications and the current proposal, there is no relevance or transferable precedent to support this application. The 2010 application for a large horticultural building was refused and dismissed at appeal, on the basis that whilst this type of development would not be inappropriate development in the Green Belt by definition, The Inspector concluded that it was not to be used for such purposes, would have a harmful impact on openness, and there were no very special circumstances to clearly outweigh this harm. In my view, this is relatively transferable because the Inspector found that a single 18.0m x 8.0m building was harmful in the Green Belt, which is less built form when compared to the amount of development proposed under this application.

Principle of Development in the Green Belt

- 4.3.3 The site is located within the Green Belt, where in accordance with Policy SP5 of the Local Plan and Section 13 of the NPPF, new buildings are regarded as inappropriate development unless they comply with certain exceptions outlined in paragraphs 149 and 150 of the NPPF. Whilst the site has had development on it in the past, which has been evidenced by the supporting Planning Statement, the site is not considered to be previously developed land. In my view, this proposed development would not comply with any of the exceptions under the aforementioned paragraphs and as a result, is considered to be inappropriate development in the Green Belt.

Impact on Openness

- 4.3.4 The next step is to consider the proposed development's impact on openness. It is acknowledged that the in-principal considerations of this application are such that detailed elevation and layout plans are not included. The application is supported by an indicative site layout plan and a street scene elevation, which allows for a limited assessment of the proposals impact on openness in my view.

- 4.3.5 The site is presently free from built form and can be characterised as an overgrown area of land with various low/high level vegetation/trees across it. The boundary of the site fronting Danesbury Park Road comprises the most mature trees which screen the majority of the site from view and as a result, contribute to the openness of the site and immediate locality. The erection of four dwellings, notwithstanding the indicative site plan and street scene elevations, would have considerable volume and mass associated to them compared to the existing sites character. As a result, the new buildings would be a fundamental change to the openness of the Green Belt in this location. This physical presence of new buildings where there currently is none, would significantly reduce the openness of the Green Belt in a spatial and visual sense.
- 4.3.6 The North Hertfordshire Green Belt Review (July 2016) assessed this site against its overall contribution to the Green Belt. Ref:206 Land at Danesbury Park Road appraises the site as 'makes a moderate contribution to Green Belt purposes', whilst acknowledging that the site is bounded by development on three sides. The North Hertfordshire Green Belt Review (Update 2018) further considers this site but in the context of a far larger area compared to the 2016 review. Ref:6 'area bounded to the east of the district boundary' is appraised to have a 'mixed' visual and physical impact on openness, a moderate contribution to safeguarding the countryside and significant contribution to the overall purposes of the Green Belt. Whilst the 2018 update places greater significance behind the contribution of this site to the openness of the Green Belt, it is acknowledged that the 2018 review considered a far larger area of Codicote to arrive at that view, compared to the 2016 review which focused primarily on the site in question. Therefore, it is considered reasonable in this instance to give greater weight to the site-specific appraisal carried out under the 2016 review, which concluded that the site makes a moderate contribution to the openness and purposes of the Green Belt.
- 4.3.7 It is acknowledged at this stage that the indicative site layout plan/street scene elevation does show 1.5 storey dwellings set back from the highway, which is considered to be a low density relative to the size of the site. Moreover, the plans indicate the retention of several large trees/hedgerows, as well as additional planting, on the frontage with the highway, which would to some extent alleviate the loss of existing vegetation on site and by extension, the potential impact on openness. These matters cannot be considered in detail within this application, as they are such that would be dealt with under the technical details stage. However, there is a realistic prospect that the resultant development could lead to some redeemability of the site to its present state of openness, owing to a robust and extensive landscaping scheme which is principally a consideration for the technical details stage.
- 4.3.8 As such, taking the above considerations into account, it is considered that the scheme would result in moderate harm to the openness of the Green Belt. The site was specifically appraised in 2016 and considered to make a moderate contribution to Green Belt purposes and openness, which would be impacted by the erection of buildings where there currently is none.
- 4.3.9 Paragraph 138 of the NPPF states that the Green Belt serves five purposes. The Green Belt Review (July 2016) assessed this site against these purposes, concluding that as the site was not within a defined settlement boundary, it is contributing to the countryside. Therefore, is it considered that the proposal would conflict with one of the purposes under paragraph 138 (c), which is 'to assist in safeguarding the countryside from encroachment'.

- 4.3.10 In conclusion, it is considered that the proposed development constitutes inappropriate development in the Green Belt, as it does not comply with any of the exception criteria set out under paragraphs 149 and 150 of the NPPF. Moreover, the moderate contribution that the site makes to the purposes and openness of the Green Belt would be impacted by the erection of buildings where there currently is none. Lastly, the proposal would conflict with one of the five purposes of the Green Belt as set out under paragraph 138 of the NPPF, which seeks to safeguard the countryside from encroachment. This should be attributed substantial weight.
- 4.3.11 Paragraph 147 of the NPPF states that *“Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”*. The applicant has put forward an argument for very special circumstances as part of the submission, which will be considered in this part of the report and summarised at the end.

Location/Land Use

- 4.3.12 The site is located outside of any defined settlement boundary under Policy SP2 of the Local Plan. The site is less than 2km from Welwyn due south, which is within Welwyn/Hatfield. The site is bounded by forms of residential development on three sides, with a Gypsy and Traveller site immediately to the north, the Woodland Park Homes site to the south, and low-density properties occupying large plots to the west. The site is also bounded by the A1(M) due east.
- 4.3.13 It is considered that, as the site is bounded on three sides by residential development and a motorway on one side, the proposed residential use of this site would tie in the prevailing residential character of development on Danesbury Park Road, which comprises low-density properties occupying large plots on the opposite side of the highway.
- 4.3.14 Moreover, the applicant has considered the past and existing use of the site within the submitted Planning Statement. The site has operated as a quarry, landscape garden business and commercial poultry enterprise in the past, where the extent of built form occupying the site to facilitate these uses has been of low quality. Whilst the site is presently vacant of any use, it is my considered view that a residential land use of this site would be potentially more appropriate in this location than a commercial or general business use, given the close proximity of the site to other residential development which would potentially be less effected by the proposed use in comparison.
- 4.3.15 Further to this point, the site is not easily accessible for large commercial vehicles that would be required for its past commercial uses. The type of traffic that would be associated with residential development, such as private and delivery vehicles, would be smaller and more appropriate to the site's surroundings. That said, the site is vacant and has been for some time, so limited weight should be given to its historic commercial use and the benefit of housing over this.
- 4.3.16 However, the site is located outside of a defined settlement boundary contrary to Policy SP2 of the Local Plan, where the policy states that housing development will be delivered within the adjusted settlement boundaries. This is fundamentally non-compliant with Policy SP2 of the Local Plan and should be given significant weight in my opinion.

Moreover, the Parish Council have objected to the proposal on the basis that Codicote already has four large housing developments either being built or nearing this stage, whilst there are no planned increases in amenities and associated infrastructure to cope with this. Any local housing need will arguably be delivered on these four allocated sites, which weakens the need for the proposed development to meet the districts housing requirements in this area. This should be given moderate weight in my view.

Amount of Development/Character and Appearance

- 4.3.17 Policy D1 of the Local Plan states that planning permission will be granted provided that development responds positively to the site's local context in addition to other criteria. Policy SP9 of the Local Plan further considers that new development will be supported where it is well designed and located and responds positively to its local context. These considerations are echoed in Section 12 of the NPPF
- 4.3.18 The site currently comprised of rough grass/vegetation with mature trees forming the boundary with Danesbury Park Road, which can be described as overgrown and untidy in my view. The residential properties directly opposite are low-density, detached dwellings occupying spacious plots that are set back from the highway.
- 4.3.19 The proposed development, whilst indicative at this stage, would be a low-density scheme of one and a half storey dwellings, set back from the highway with substantial rear gardens. In my opinion, the general layout and amount of development is considered appropriate in this context. A low-density housing scheme of 4 units would be sympathetic to the character and appearance of existing properties on the other side of Danesbury Park Road.
- 4.3.20 Therefore, it is considered that the amount of development proposed in this application would not harm to the character and appearance of the area. The general layout and density of development would be sympathetic to and positively respond to the sites local context, in accordance with Policies SP9 and D1 of the Local Plan, as well as Section 12 of the NPPF.

Other Matters

- 4.3.21 The fundamental argument put forward by the applicant to support the case for very special circumstances is centred around the previous uses of the site and the associated issues that have arose. The following arguments have been made by the applicant in this regard:

"Historically, the site was part of a former quarry and deep excavations are still present within the site. The site was later used for a landscape garden business and subsequently a poultry farm. It is understood that the site has also been utilised for the disposal of unregulated waste and the site continues to be subject to unauthorised fly tipping of large quantities of waste despite efforts by the owner to keep the land secure.

In its current vacant state, the site has also become vulnerable to fly tipping. The photos below demonstrate recent deposits of waste along the north-eastern boundary which the applicant has been unsuccessful in preventing and which has become a negative feature and source of nuisance.

The abandoned areas of quarry, the infilling of the site with potentially unregulated waste and the current unauthorised misuse of the site as outlined above, create a damaged, undesirable and problematic site which already has an adverse impact on the openness and effectiveness of the Green Belt at this location and the character and appearance of this otherwise attractive area.

Further, the natural surveillance and control associated with the land being returned to beneficial occupation post-development will remove the otherwise continuing potential for nuisance through trespass and fly tipping.

This would be in accordance with paragraph 145 of the NPPF which sets out that, once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, including to improve damaged or derelict land.

Taking into account the national policy advice concerning Green Belt land as briefly set out above and the location and context of the site as well as its current state, it is clear that there would be no adverse impact on the openness of the Green Belt as a result of the proposed development and that very special circumstances exist in this case to allow for the proper remediation and restoration of a damaged and derelict site, facilitated by the development of the site for small scale residential development which would be more compatible with the surrounding development and would increase the value of the Green Belt at this location”.

- 4.3.22 The previous uses of the site have seen it become a derelict area of land with a high probability of contamination issues. These concerns are well known to the Council through various investigations by Environmental Health and complaints from neighbouring properties. Under normal circumstances, these matters would be considered under the technical details stage following this permission in principle. However, the argument put forward by the applicant is such that the remediation and restoration of this site, facilitated by the proposed development, would improve damaged or derelict Green Belt land, in accordance with paragraph 145 of the NPPF. In my opinion, this speaks to the principle of development in the Green Belt which can therefore be considered within this permission in principle application to support the argument made by the applicant for very special circumstances.
- 4.3.23 The Council's Environmental Health Team have formally responded to this proposal, stating that there is no objection to the proposal subject to a pre-commencement condition that ensures a robust and comprehensive contaminated land ground assessment and remediation plan is submitted prior to the submission of the technical detail's stage/commencement of the development. As such, it is considered that the proposed remediation of this site is acceptable subject to the above considerations.
- 4.3.24 Therefore, given the extensive history of this site for unregulated and unauthorised uses that have caused significant concerns with respect to contaminated land, it is considered that the remediation of this site would bring some benefits, such as dealing with a longstanding issue that neighbouring residents have commented on under this application (impact of toxic materials/explosions that have occurred on this site would be mitigated) and improving damaged or derelict Green Belt land, in accordance with paragraph 145 of the NPPF. I consider that these matters should be given moderate weight.

4.4 Conclusion

Very Special Circumstances

- 4.4.1 The NPPF attaches great weight to the importance of Green Belts, stating that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. The NPPF advises that substantial weight should be given to any harm to the Green Belt, and that very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

The proposed development is considered to be inappropriate development in the Green Belt, as it does not comply with any of the exception criteria set out under paragraphs 149 and 150 of the NPPF. Moreover, the site was appraised under the North Hertfordshire Green Belt Review (July 2016) to make a moderate contribution to the purposes and openness of the Green Belt, which would be impacted by the erection of buildings where there currently is none. Lastly, the proposal would conflict with one of the five purposes of the Green Belt as set out under paragraph 138 of the NPPF, which seeks to safeguard the countryside from encroachment. This should be given substantial weight in my opinion.

It is considered that the location and proposed land use of the proposal would be reasonably appropriate, given the existing residential development that bound the site on three sides and the material considerations surrounding the previous commercial uses and associated impacts by comparison. A residential development in this location is considered more appropriate than previous commercial uses, given the sites context and constraints. However, the site is located outside of a defined settlement boundary contrary to Policy SP2 of the Local Plan, where the policy states that housing development will be delivered within the adjusted settlement boundaries. This should be given significant weight in my opinion.

Moreover, the Parish Council have objected to the proposal on the basis that Codicote already has four large housing developments either being built or nearing this stage, whilst there are no planned increases in amenities and associated infrastructure to cope with this. Any local housing need will arguably be delivered on these four allocated sites, which weakens the need for the contribution of the proposed development to meet the districts housing requirements in this area. This is a material consideration and should be given moderate weight in my view.

The amount of development, whilst indicative at this stage, would be a low-density scheme of four one and a half storey dwellings, set back from the highway with substantial rear gardens. A low-density housing scheme of 4 units would, in my opinion, be sympathetic to the character and appearance of existing properties on the other side of Danesbury Park Road. It is further considered that the amount of development proposed in this application would not harm to the character and appearance of the area. The general layout and density of development would be sympathetic to and positively respond to the sites local context, in accordance with Policies SP9 and D1 of the Local Plan, as well as Section 12 of the NPPF. This should be attributed moderate weight in my opinion.

Lastly, given the extensive history of this site for unregulated and unauthorised uses that have caused significant concerns with respect to contaminated land, it is considered that the remediation of this site would bring some benefits, such as dealing with longstanding concerns that neighbouring residents have voiced under this application (impact of toxic materials/explosions that have occurred on this site would be mitigated) and improving damaged or derelict Green Belt land, in accordance with paragraph 145 of the NPPF. It is considered that these matters should be given moderate weight.

Overall, the matters that can be considered under a permission in principle application, which are location, land use and the amount of development, have been assessed in this report. In my opinion, the harm occasioned by the development by reason of inappropriateness, as well as the harm to openness and the purposes of the Green Belt, can be given substantial weight in accordance with the NPPF. Moreover, the site is not located within a defined settlement boundary under Policy SP2, which can be given significant weight. It is also acknowledged that Codicote has four large housing sites currently being delivered, which would meet local housing need and as a result, weakens the contribution/need of this proposal towards local housing need.

Whilst it is my considered view that a residential land use on this site would be potentially more appropriate in this location than a commercial or general business use, and that the general amount of development would be sympathetic to and positively respond to the site's local context, this should be given moderate weight. The remediation of the site that would improve derelict Green Belt land would attribute some benefits and moderate weight. Accordingly, it is considered that the harm to the Green Belt by reason of inappropriateness, as well as to openness and the purposes of the Green Belt, is not clearly outweighed by the material considerations put forward. There are no very special circumstances to justify the proposal as a result.

5.0 **Recommendation**

5.1 That permission in principle be **REFUSED** for the following reason:

1. The application site is within an area designated in the North Hertfordshire Local Plan as Green Belt, within which there is a presumption against inappropriate development, unless very special circumstances can be demonstrated. In the view of the Local Planning Authority, the proposal does not comply with any of the exemption criteria set out under paragraphs 149 and 150 of the NPPF. Furthermore, it would result in a materially greater impact on openness and would conflict with one of the five purposes of the Green Belt. As such, in the opinion of the Local Planning Authority, the harm to the Green Belt by reason of inappropriateness, as well as to openness and the purposes of the Green Belt, is not clearly outweighed by the material considerations put forward and as a result, very special circumstances have not been demonstrated. As such, the proposal would not accord with the provisions of Policy SP5 of the North Hertfordshire Local Plan 2011 - 2031 or with the provisions of Section 13 of the NPPF.

Proactive Statement:

Planning permission has been refused for this proposal for the clear reasons set out in this decision notice. The Council acted proactively through positive engagement with the applicant in an attempt to narrow down the reasons for refusal but fundamental objections could not be overcome. The Council has therefore acted proactively in line with the requirements of the Framework (paragraph 38) and in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Signed  Anne McDonald Determining Officer	Development Management North Hertfordshire District Council Council Offices Gernon Road Letchworth Herts SG6 3JF
Date: 13 June 2023	

Appendix 5: Copy of Pre-Application Advice Request (Ref: 24/02038/PRE) with Tom Rea



Appendix 6: Affordable Housing Addendum

Research into new park home within a 10-mile radius of the suite returned 4 results, therefore these results have been used for the purposes of this report. The research revealed the median selling price of 2-3 bedrooms new park homes is £284,475 based on the sample research result.

	Table 1: Selling Price of New Park Homes (2-3 Bedrooms) within 10-miles of the Application Site		
Location	Price (£)	Price/Sq. M	No. of Bedrooms
Hatfield, Hertfordshire, AL9	£259,000	£4,355.87	2
The Grove, Woodside, Slip End, Bedfordshire, LU1 4LP	£309,950	£4170.48	2
Brickhill Farm Homes, Half Moon Lane, Pepeprstock, Luton, Bedfordshire, LU1	£375,000	£4,485.11	2
Stopsley, Mobile Home Park, St. Thomas's Road, Luton, Bedfordshire, LU2	£140,000	£2,656.55	3
Mean:			£270,987.50
Median:			£284,475



Research into pre-owned park home within a 10-mile radius of the suite returned 23 results. As only 4 results were found for the new park home, 4 results have been used for this research. The research revealed the median selling price of 2-3 bedrooms pre-owned park homes is £242,500 based on the sample research result.

	Table 1: Selling Price of Pre-Owned Park Homes (2-3 Bedrooms) within 10-miles of the Application Site		
Location	Price (£)	Price/Sq. M	No. of Bedrooms
Burnham Green Road, Welwyn, AL6	£235,000	£3,566.01	2
Tollsworth Way, Puckeridge, Ware	£250,000	£2,717.39	2
Woodside Lane, Hatfield, Hertfordshire, AL9	£310,000	£3,9972.32	2
Woodside Lane, Hatfield, AL9	£160,000	£2,898.55	2
Mean:			£238,750
Median:			£242,500



Research into traditionally built bungalows within a 10-mile radius of the suite returned 130 results. As only 4 results were found for the new park home, 4 results have been used for this research. The research revealed the median selling price of 2-3 bedrooms pre-owned park homes is £612,500 based on the sample research result.

	Table 1: Selling Price of Bungalows (2-3 Bedrooms) within 10-miles of the Application Site		
Location	Price (£)	Price/Sq. M	No. of Bedrooms
The Avenue, Welwyn, Hertfordshire, AL6	£1,100,000	£4,841.55	3
Wentworth Road, Hertford	£625,000	£5,924.17	2
Hawthorn Close, Harpenden, Herts, AL5	£600,000	£6,289.1	2
Bedford Road, Hitchin	£475,000	£2,898.55	2
Mean:			£700,000
Median:			£612,500

In summary, the research on Rightmove.co.uk on the 5th February 2026 reveals the following key point: The median selling price of 2-3-bedroom traditionally built bungalows is £612,500, a difference of £328,025 against the median new park home price (£284,475). When considering how much cheaper the cost of the median park home is compared to the median traditional detached bungalow, the difference is approximately 53.6% ((£328,025/£612,500) x 100).



Appendix 6: Affordable Housing Addendum Evidence

New Park Homes				
Address	Price	No. Bedrooms	Distance	Web URL
Hatfield, Hertfordshire, AL9	£259,000	2	7.37 miles	https://www.rightmove.co.uk/properties/154868465/#/?channel=RES_NEW
The Grove, Woodside, Slip End, Bedfordshire, LU1 4LP	£309,950	2	10.01 miles	https://www.rightmove.co.uk/properties/155106575/#/?channel=RES_BUY
Brickhill Farm Park Homes, Half Moon Lane, Peppercroft, Luton, Bedfordshire, LU1	£375,000	2	9.78 miles	https://www.rightmove.co.uk/properties/170258342/#/?channel=RES_NEW
Stopsley Mobile Home Park, St. Thomas's Road, Luton, Bedfordshire, LU2	£140,000	3	9.42 miles	https://www.rightmove.co.uk/properties/160782992/#/?channel=RES_NEW
Pre-Owned Park Homes				
Address	Price	No. Bedrooms	Distance	Web URL
Burnham Green Road, Welwyn, AL6	£235,000	2	1.82 miles	https://www.rightmove.co.uk/properties/163207541/#/?channel=RES_BUY
Tollsworth Way, Puckeridge, Ware	£250,000	2	9.65 miles	https://www.rightmove.co.uk/properties/169340459/#/?channel=RES_BUY
Woodside Lane, Hatfield, Hertfordshire, AL9	£310,000	2	7.59 miles	https://www.rightmove.co.uk/properties/86825697/#/?channel=RES_BUY
Woodside Lane, Hatfield, AL8	£160,000	2	7.58 miles	https://www.rightmove.co.uk/properties/167979113/#/?channel=RES_BUY
Bungalows				
Address	Price	No. Bedrooms	Distance	Web URL
The Avenue, Welwyn, Hertfordshire, AL6	£1,100,00	3	0.18 miles	https://www.rightmove.co.uk/properties/161841305/#/?channel=RES_BUY
Wentworth Road, Hertford	£625,000	2	6.68 miles	https://www.rightmove.co.uk/properties/171883052/#/?channel=RES_BUY
Hawthorn Close, Harpenden, Herts, AL5	£600,000	2	6.39 miles	https://www.rightmove.co.uk/properties/163690592/#/?channel=RES_BUY
Bedford Road, Hitchin	£475,000	2	8.56 miles	https://www.rightmove.co.uk/properties/170351288/#/?channel=RES_BUY



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