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Date : 19th May 2026

**FAO: Brian Parker**

Dear Sir / Madam,

**Pre Application Advice : Demolition of existing dwelling and other buildings and construction of 4 dwellings and associated infrastructure  
Greenbanks, London Road, St Ippolyts, Hitchin, Hertfordshire, SG4 7NJ**

I refer to your request for pre-application advice regarding the aforementioned site; I am writing to you following an assessment of the supporting documents submitted and a site visit.

I would emphasise that this document does not constitute a formal determination and is without prejudice to any subsequent planning application.

The following assessment is based upon the following submitted details:

- Application form
- DAS
- Existing and proposed floor and elevation plans

For your information the relevant government guidance and policies from the development plan are as follows:

**North Herts Local Plan 2011 - 2031**

**Policy SP1: Sustainable development in North Hertfordshire**

**Policy SP2: Settlement Hierarchy and Spatial Distribution**

**Policy SP6: Sustainable Transport**

**Policy SP7: Infrastructure requirements and developer contributions**

**Policy SP8: Housing**

**Policy SP9: Design and Sustainability**

**Policy SP10: Healthy communities**

**Policy SP11: Natural resources and sustainability**

**Policy SP12: Green Infrastructure, landscape and biodiversity**

**Policy T1: Assessment of Transport matters**

**Policy T2: Parking**

**Policy D1: Sustainable Design**

**Policy D3: Protecting living conditions**

**Policy NE2: Landscape**

North Herts Council, PO Box 7075, Manchester, M28 8JX

Policy NE4: Biodiversity and geological sites  
Policy NE7: Reducing flood risk  
Policy NE8: Sustainable drainage systems  
Policy NE11: Contaminated land

## **2.2 National Planning Policy Framework**

Section 5 – Delivering a sufficient supply of homes  
Section 8 – Promoting healthy and safe communities  
Section 9 – Promoting sustainable transport  
Section 11 – Making effective use of land  
Section 12 – Achieving well-designed and beautiful places  
Section 14 – Meeting the challenge of climate change, flooding and coastal change

## **2.3 Supplementary Planning Documents**

Vehicle Parking at New Developments SPD - November 2011  
Design SPD - July 2011  
Sustainability SDP - September 2024

### **Planning history**

88/00460/1 - Erection of single storey side extension – Granted Conditional Permission on 21/04/1988.

84/00292/1 - Retention of existing building for use as private gymnasium and childrens playroom – Granted Conditional Permission on 08/03/1984.

83/01310/1 - Retention of building in association with the use of the land for agriculture – Refused on 24/11/1983.

81/00868/1 - Retention of single storey buildings and their use, together with adjoining land as builders yard involving storage and office facilities – Refused on 18/06/1981.

81/00867/1 - Retention of single-storey building for use as storage of agricultural equipment used on site, poultry-house and hobby room – Granted on 31/07/1981.

76/00282/1 - Extension to living accommodation double garage and formation of vehicular access – Granted Conditional Permission on 01/07/1976.

22/00084/FPH Single storey side extension to link existing garage to main dwellinghouse, replace existing front elevation link attached garage door with a window, insertion of dormer windows to the front and rear and rooflights to side roofslope following the raising of the garage roof height to facilitate conversion of garage into an annexe. (Amended plans received 23/03/22). **Conditional Permission**

**25/00355/NCS** Single storey rear extension with the following dimension:  
Length as measured from rear wall of original dwelling - 8 metres **GRANTED**

**25/00896/PNAA** Enlargement of detached bungalow by the construction of an additional storey to result in an overall height of 7.66 metres. **Prior Approval Given**

**25/00901/LDCP** Erection of swimming enclosure over existing outdoor swimming pool **REFUSED**

**25/01292/LDCP** Erection of swimming enclosure over existing outdoor swimming pool **APPROVED**

### **Site**

Greenbanks is a single storey detached dwelling situated on London Road to the south of St. Ippolyts. The application site is situated within the Green Belt.

### **Proposal**

Pre-application advice is sought for a residential development of 4 dwellings with associated parking, landscaping and ancillary works following demolition of the existing.

The Proposal is to demolish the existing buildings and to construct four dwellings (net gain of three), comprising two detached houses (1 x 3 bedrooms and 1 x 4 bedrooms) and two, 3-bedroom semi-detached family homes. The 4-bedroom house will qualify as a self-build.

Each new home will have 2 no. parking spaces and there will be 4 no. visitor spaces. Each house will also have EV points and cycle storage

### **Principle of Development**

The site is located outside the settlement boundary of St Ippolyts, a Category A village and south of Hitchin. The Site sits less than a kilometre south of the village of St Ippolyts. The Site is accessed directly off London Road and is approximately 230 metres north of bus stops served by the 304, 315 and 315 bus services. There is also a footpath that runs along London Road all the way to Hitchin (approximately 2 km distance).

The site is also within the Green Belt, which is covered by Policy SP5 of the Local Plan and Section 13 of the NPPF.

The agent has outlined that they believe that the proposal would comply with part g exemption criteria of inappropriate development under paragraph 154 of the NPPF which states.

*g) limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.*

The supporting DAS with this pre-application also states that the site is considered to be 'Grey Belt'. This matter will be considered in detail at this stage.

Grey Belt is defined in the NPPF as *"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"*.

The first step is to consider whether the site has a strong contribution towards purposes (a), (b) and (d) of the Green Belt, which are:

*a) to check the unrestricted sprawl of large built-up areas; Moderate contribution*

The site and the wider context area lies close to a small urban area but also near enough to a large built-up area, Hitchin to contribute to preventing its sprawl. The site is situated in a small cluster of houses and the wider context has no physical features in reasonable proximity strong enough to restrict and contain development. Large development could increase the urbanising impact on adjacent open land because of the intensity of the proposed development.

*b) to prevent neighbouring towns merging into one another; I would conclude that the site and surrounding area would have a moderate contribution*

The site lies within the gap between Hitchin and Stevenage as previously identified. There is limited urban-related development within the vicinity of the site. The site is only a small area within the wider gap between settlements. The proposed development would likely have only a minor effect on the visual separation between the towns given that the site lies between a small cluster of other residential properties. While the loss of separation between Hitchin and Stevenage would slightly weaken the gap, the contained nature of the site and limited numbers proposed would limit the impact on the wider gap.

*C – Assist in safeguarding the countryside from encroachment: I would conclude that the site and surrounding area would have a moderate contribution*

I would suggest that the proposed development on this site within the wider area would not significantly increase urban influence on surrounding open land given the limited proposed numbers of dwellings. Strong boundaries would be required to be shown and implemented at submissions to limit further development that may cause encroachment into the wider setting.

*d) to preserve the setting and special character of historic towns; Weak/No contribution*

The Site does not form part of the setting of a historic town nor does it currently form part of the setting of a historic town which would contribute to its heritage significance.

In my view it can be considered that the proposed development site does not make a strong contribution to Green Belt purposes A, B or D within the larger context, and therefore does have potential to be considered Grey Belt land. However, areas or assets referred to in NPPF Footnote 7, either within or connected to the site, may provide strong reasons to

restrict or refuse development. As such, the site can only be provisionally identified as Grey Belt land until further specialist assessment work has been undertaken.

The next step is to consider whether it would be inappropriate development under the parameters of paragraph 155 of the NPPF. This states as follows:

*155. The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:*

*a. 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;*

The purposes of paragraph 155, given the size of the site relative to the remaining Green Belt across the area of the plan and the fact that there is existing residential development neighbouring the sites, the development would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan.

*b. There is a demonstrable unmet need for the type of development proposed;*

Though the Local Plan is still within its date range of 2011 – 2031, the Council does not have a 5-year supply of deliverable housing land (5YHL). In The Five-Year Housing Land Supply Update dated November 2025 (pages 17-19) it concludes that we can demonstrate a five-year land position of 2.6 years against our adopted housing requirement. This figure falls below the five-year requirement. Therefore, the Council does not have a 5-year supply of deliverable housing land (5YHL). Therefore, there is a demonstrable unmet need for residential development.

*c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and*

As stated, the site is outside St Ippolyts settlement. There are services within Hitchin such as shops, schools, leisure facilities etc, however future occupiers would still have to travel to Hitchin or Stevenage by car for wider services.. There are public transport modes in close proximity.. Paragraph 110 of the NPPF states the following:

*“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making”.*

There is an existing footpath linking the site to St Ippolyts and onto Hitchin, however, given the distance to Hitchin I would expect there would be a reliance of occupiers on private cars. However, in the light of NPPF 110, I would be amenable to considering a case that you are able to make relating to sustainable transport solutions as part of any future application for planning permission.

*d. Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below.*

*156. 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:*

- a. affordable housing which 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;*
- b. necessary improvements to local or national infrastructure; and*
- c. 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*

The 'Golden Rules' as set out in paragraph 156 - In line with the definition for Major Development in the NPPF, whilst the number of dwellings is only for 4 which is below the 10 dwelling minimum, the site appears to be under the 0.5ha minimum to be considered a major development. Therefore the Golden Rules would not apply.

The agent has stated that through consultation with Highways that there is a case for improvements to local infrastructure for example the bus stop to the south of the site, I would encourage to discuss with Herts Highways further in a pre-app whether this would be viable. Given the proposal is for 4 dwellinghouse it fall under the requirements to seek contributions.

Overall, it is considered that the site may meet the definitional criteria to be considered Grey Belt. However, assessing the site against the criteria under paragraph 155 of the NPPF, I note that there is access to nearby public transport modes and facilities within St Ippolyts, but given the distance from Hitchin I would expect the development would lead to future occupiers relying upon private vehicles for the majority of trips into Hitchin or Stevenage for various services.

Paragraph 153 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. '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"*.

Given the level of information submitted at this time, I am not convinced that the proposal would constitute Very Special Circumstances that would outweigh the harm to the Green Belt by reason of inappropriateness, as well as any other harm including the resulting impact on spatial and visual openness which would occur given the site is currently open and largely free from development. If you consider that the scheme and associated benefits did constitute Very Special Circumstances that clearly outweighed the harm to the Green Belt, and any other harm, then this would be for you to justify in any future submission.

### **Character and appearance, layout, size, scale and design**

Design is central to good planning. The achievement of high quality, sustainable design is required by Government guidance. Planning policies should promote high quality, inclusive design in layouts and buildings in terms of function and impact. Design which does not make the most of opportunities to improve the character and quality of an area should be refused. Policy SP9 (Design and Sustainability) considers that good design is a key aspect of sustainable development and that proposals will be supported if the development is well designed and located and responds positively to its local context.

The proposal would result in new residential development following demolition of the existing dwelling and outbuildings, which would change its character and appearance significantly through a form of urbanisation. It should be noted that any floorspace trade off would need to be justified, which calculations showing existing and proposed.

Development proposals must respond positively to the sites local context and be in-keeping with the character and appearance of the area. The four dwellinghouses proposed are two storey in a U shape layout with one shared access (existing)

In terms of character, London Road consists of predominantly of two storey dwellings with a mixture of architectural forms and materials. The immediate neighbours predominantly have a gable roof forms with dormers, I do not find the proposed design to be harmful in this regard. I consider that the proposed design would be distinctive yet sympathetic within the street scene. Given the traditional, semi-rural character, I would also suggest the inclusions of a chimney on each dwelling.

As the dwellings do not benefit from a garage / covered storage, consideration should be given to ensure that cycle storage areas could also incorporate the storage of garden tools and other outdoor household items.

Whilst the layout and massing and appearance of the dwellings are only indicative at this stage, the scale, form, design and materials pallet should reflect local context.

Any subsequent application should be supported by a full Design and Access Statement and Planning Statement and street view plans showing proposed development alongside neighbouring properties to assess context.

### **Amenity of Future Occupiers/Neighbours**

Paragraph 130 (f) of the NPPF states that “*decisions should ensure that developments... create places that are safe, inclusive and accessible and which promote health and wellbeing, with a high standard of amenity of future and existing users*”. This is largely reflected in Policies D1 and SP9 of the Local Plan. A criterion of Policy SI2 is that appropriate noise mitigation measures, to potentially include insulation and appropriate orientation of living spaces, should be provided. The main noise generating development in the vicinity of the application site is that of London Road. A Noise Assessment Report must be submitted with any future application. The Council’s Environmental Health Officer would

be consulted and consider the proposed mitigations, which would be given significant weight, in line with LP Policy SI2.

The layout of the scheme exemplifies that all dwellings will have access to suitably sized private amenity space. The orientation of the dwellings would see them all benefit from acceptable levels of daylight/sunlight. The dwellings should be designed to meet or exceed the Nationally Described Space Standards.

Local Plan policy D3 Protecting Living Conditions states that:

*“Planning permission will be granted for development proposals which do not cause unacceptable harm to living conditions. Where.....the living conditions of an existing development would be affected by a proposed use, the Council will consider whether there are mitigation measures that can be taken to mitigate the harm to an acceptable level. If the Council is not satisfied that mitigation proposals would address the identified harm, development proposals will not be permitted.”*

Given the distances between the scheme and its proposed boundaries treatment, the flat topography of the site, and the scale and layout, it is not considered that this proposal will give rise to any materially adverse harm upon the reasonable living conditions and well-being of neighbouring dwellings. Careful consideration should be given to window placement to limit overlooking and harm to loss of privacy.

### **Access, Parking and Highways**

Local Plan Policy T1 Assessment of transport matters states that planning permission will be granted provided that:

*“a) Development would not lead to highway safety problems or cause unacceptable impacts upon the highway network”.*

Policy T2 states that planning permission will be granted provided that:

*“a) Parking for residential development is provided in accordance with the minimum standards set out in Appendix 4 of this Plan”.*

Hertfordshire County Council application as a statutory consultee. They would assess the impact of the proposals on the local road network and assess the acceptability would be consulted on any formal planning of the new access. The Highway Authority do offer pre-application services.

The Council's residential parking standards are for dwellings with 2 or more bedrooms to have a minimum of two parking spaces. Council minimum cycle parking standards are for 1 secure covered space per dwelling, with none if a garage or secure area is provided within the curtilage of each dwelling. The dwellings would need to have cycle parking in sheds or their own garages.

Visitor parking provision requirements in the Local Plan are between 0.25 and 0.75 spaces per dwelling (rounded up to nearest whole number) with the higher standard being applied where there are no garages in the schemes and the lower standard applied where every dwelling in the scheme is to be provided with a garage.

The dwellings will need to provide suitable levels of parking for future occupiers and their visitors, in accordance with the details set out in Appendix 4 of the Local Plan. Moreover, the scheme will need to provide suitable levels of cycle parking in accordance with the aforementioned guidance. These should be demonstrated on any future proposed plans.

## **Landscaping**

Policy NE1 of the Local Plan advises that proposals would be granted so long as they do not cause unacceptable harm to the character and appearance of the surrounding area taking account of any suitable mitigation measures necessary to achieve this, are designed and located to ensure the health and future retention of important landscape features and have considered the long-term management and maintenance of any existing and proposed landscaping.

Details of landscaping should be provided in any subsequent submission, given the dense trees/vegetation that exist on the site's boundaries and the amount of new soft planting or hard landscaping, such as fences/walls etc, which would be provided as part of this development. Consideration of the proposed removal of current trees and retained landscaping and any perimeter screening planting should be considered in future applications where that planting would benefit the amenity of the occupiers of future and that of adjoining premises.

Full Tree survey reports should be submitted to show retained and felled trees and vegetation. It would also be advised to submit Tree Retention methodology and safeguarding. Replanting trees following any felling would be encouraged.

## **Biodiversity and Ecology**

Local Plan Policy NE4 states that planning permission will only be granted for development proposals that appropriately protect, enhance and manage biodiversity and that all development should deliver measurable net gains for biodiversity amongst other factors. Any future planning application would need to address the biodiversity loss of the garden area and provide a net gain for biodiversity. Consideration would also need to be given to the potential for the outbuildings to accommodate bats and birds.

Any future planning application should be supported by an ecological appraisal. This would indicate any potential protected species interest on the site. Should such an interest be found it may be necessary to undertake further surveys to determine the level of use. The results of these surveys and details of proposed mitigation would need to accompany an application.

There is now a mandatory requirement to deliver 10% Biodiversity Net Gain as such a completed Statutory Metric calculation will need to be provided. This should be informed by the biodiversity baseline as determined in the ecological appraisal. It is apparent that some of the vegetation/hedgerow on the western boundary have been removed. Where this is the case a metric calculation will need to be based on pre-degradation taken as 30th January 2020.

In addition to 10% BNG in habitat terms it is also recommended that opportunities for species enhancements are also considered such as the inclusion of integrated bat, bird and bee bricks and hedgehog holes in fences supporting species integration and connectivity.

## Drainage and flood risk

The site is in Flood Zone 1, therefore the proposed development is not considered to be at risk of flooding from waterways. The key material consideration is therefore whether the development would be able to provide acceptable drainage that would not result in detrimental surface water flooding inside and outside the site.

## Waste

Bin blight is a common and on going issue in all new developments. You may be aware that the Council has recently changed its bin collection. Since 01/05/25 each house now has four wheelie bins and a food caddy to store on plot which is a large land space for each plot to accommodate. The collection service has also been changed with effect from 01/08/25. Please see this graphic for details:



### Considerations when planning waste and recycling provision -

For houses, waste collection is a kerbside service; therefore, residents must be able to take their bins to the kerbside for emptying. Bins must be accessible to crews directly from the kerbside, without pulling distances.

Adequate off-street storage must be provided for bins, and storage areas need to have sufficient space for all necessary waste and recycling containers.

Storage areas should be conveniently located with easy access for residents - residents should not have to take their waste and recycling more than 30 metres to a bin storage area or take their waste receptacles more than 25 metres to a collection point, (usually kerbside) in accordance with Building Regulations Approved Document H Guidance.

### Vehicular access -

We currently operate several different-sized vehicles. The majority that we operate at present are 26 tonnes with a 6x2 chassis. The chassis configuration differs between vehicles, but the largest turning circle is on our mid-steer vehicles.

Typical maximum dimensions are as follows:

- Width: 2,500mm (without mirrors)
- Height: 3,400mm (without hazard beacons)
- Turning circle: 22,800mm
- Overall length: 12,100mm (from front to rear of bin lift)

All roadways should be constructed to facilitate waste collections prior to occupation. This is particularly important to consider when waste collections occur from the rear of properties or from a different street from the main entrance to the properties.

You should show all bin store details and locations on any future submission for completeness.

### **Climate Change Emergency**

On 21 May 2019, the Council passed a Climate Emergency motion which pledged to do everything within the Council's power achieve zero carbon emissions in North Hertfordshire by 2030. As one of the first councils to pass this motion, NHDC is leading the way on climate action. This declaration asserted the Council's commitment toward Climate Action beyond current government targets and international agreements. Climate action has been a long-term corporate priority area for the Council, and has been pursued through our objective to Prosper and Protect North Hertfordshire:

This objective informs our commitments to:

- ☐ Green space provision.
- ☐ Representing the Climate Change interests of North Hertfordshire residents on county and regional plans, policies and aspirations.
- ☐ Supporting initiatives that increase the energy efficiency of residents' homes, reduce resource waste, and increase our sustainability for the longer term.
- ☐ Protecting our physical heritage.
- ☐ Finding environmentally sustainable solutions to the challenges

Along with the inclusion of EV charging points which are now a requirement on all new dwellings, other mitigation should be considered in order to make a positive contribution to the mitigation of the climate emergency in line with the new Sustainability SPD. This might be achieved through layout and design of the proposed dwellings, maximising solar gain where possible. This would be seen as a positive attribute of any scheme alongside the inclusion of renewable energy technology. A detailed Energy Assessment will be required in any subsequent planning application, identifying which sustainable measures will be incorporated into the scheme. Please refer to our Sustainability SPD.

## **Formal Planning application**

If this proposal were to proceed to the application stage, please ensure that you have referred to our validation check list to ensure that all the needed information and documents are submitted for consideration. Our validation checklist can be found on this link:

[Submit a planning application | North Herts Council \(north-herts.gov.uk\)](https://www.north-herts.gov.uk)

## **Conclusion**

In conclusion, the principle of development of this site could be justified to meet both PDL and grey belt given its location just outside the settlement of St Ippolyts. However, it is down to you to justify why you think that the site would be PDL and grey belt and the proposed development would not harm the openness of the green belt.

Any subsequent planning application should be supported by a robust and comprehensive Design and Access Statement, Planning Statement, Landscaping Plan/Details, Tree Survey, Bio-diversity Net Gain Statement, and an Energy Statement, Details of all bin and bike stores. Consultation with the Highway Authority is encouraged to ensure the proposed access is acceptable in highways terms.

Any advice given by Council Officers for pre-application enquiries does not constitute formal response or decision of the Council with regards to future planning permission or consents.

Kind regards

**Melissa Tyler**

**Senior Planning Officer**

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