

design & access statement

Greenbanks, London Road, St Ippolyts, Hitchin, Hertfordshire, SG4 7NJ

The demolition of an existing dwelling and other buildings, the construction of four dwellings and associated infrastructure, and changes to access.



On behalf of Bonnel Homes Ltd
Ref: BH/GB/das

Preliminaries

I have a BA (Hons) in Geography and an MSc in Urban and Rural Planning and I am a Chartered Member of the Royal Town Planning Institute.

The information and evidence in this Statement have been prepared and are given in accordance with the guidance of the RTPI and I confirm that the views expressed are my genuine professional opinions.

Brian Parker

BA MSc MRTPI

September 2026

MRP Planning

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Front Cover image: © Clarke and Barrett, August 2026

1 Introduction

1.1 The Planning Practice Guidance¹ explains that a Design and Access Statement (DAS)

“... is a concise report accompanying certain applications for planning permission and applications for listed building consent ... The level of detail in a Design and Access Statement should be proportionate to the complexity of the application, but should not be long.”

1.2 This DAS is considered sufficiently proportionate for the complexity of this minor scheme. It sets out the case for Permission to be Granted for the demolition of an existing dwelling and other buildings and the construction of four dwellings, with new access arrangements. The DAS assesses the principles that have informed the approach to the development and its access, and how national and local planning policy relate. The application is also informed by Pre-Application Advice from North Herts Council and Highways Pre-Application Advice from Hertfordshire County Council (attached as Appendices 1 and 2, respectively).

1.3 Because the Site is in the Green Belt, the DAS explains why the scheme is not ‘inappropriate development’ under National Policy.

1.4 Because the Site is close to a Grade II Listed Building, a Heritage Assessment is included in Section 5.

1.5 In addition to the National Validation Requirements, as set out in the Local Requirements Checklist (April 2026) for a scheme for between 1-9 dwellings, the application documents also include/exclude:

Required

- 15 – Tree Survey and Planting/Landscaping Plan - provided
- 16 – Sustainability Statement - provided
- 19 – Waste Management Details - provided
- 20 – Statutory Biodiversity Metric Calculations – provided

Required in most circumstances:

- 4 – Biodiversity Survey / Ecological Report – provided
- 8 – Site Archaeological Report – not required
- 9 - Preliminary Risk Assessment Contaminated Land – not required
- 10 – Noise Impact Assessment - provided
- 17 – Daylight and Sunlight Test – not required

Required in some circumstances:

- 1 – UU/S106 – not required
- 3 – Air Quality Assessment – not required
- 7 – Floor Risk Assessment / Drainage Strategy – not required

¹ What is a Design and Access Statement? Paragraph: 029 Reference ID: 14-029-20140306

- 11 – Open Space Assessment – not required

Please see the Plans and Reports Schedule for a full list of documents.

- 1.6 The DAS, together with the plans and reports which inform the Application, demonstrates that not only is the proposal for appropriate development in the Green Belt but also that it benefits from the presumption in favour of sustainable development.
- 1.7 Consequently, permission should be granted in accordance with local and national policy.

2 The Site and Proposal

2.1 The Application Site of c. 0.3 hectares comprises two distinct elements:

- an existing single-storey dwelling with established permission to construct:
 - a swimming enclosure (Ref: 25/01292/LDCP,
 - a side storey (Ref: 22/00084/FPH);
 - a Larger Home Extension (Ref: 25/00355/NCS); and
 - and an additional storey (Refs: 25/00896/PNAA);
- and
- part of a stable block and manege.

2.2 The established permissions are important because they qualify as “*fallback development*” as established by the Courts²: i.e. development with a reasonable prospect of being implemented and which, therefore, is a material consideration in a planning decision.

2.3 The context of the Site can be seen in the Location Plan and in Photo 1 below:

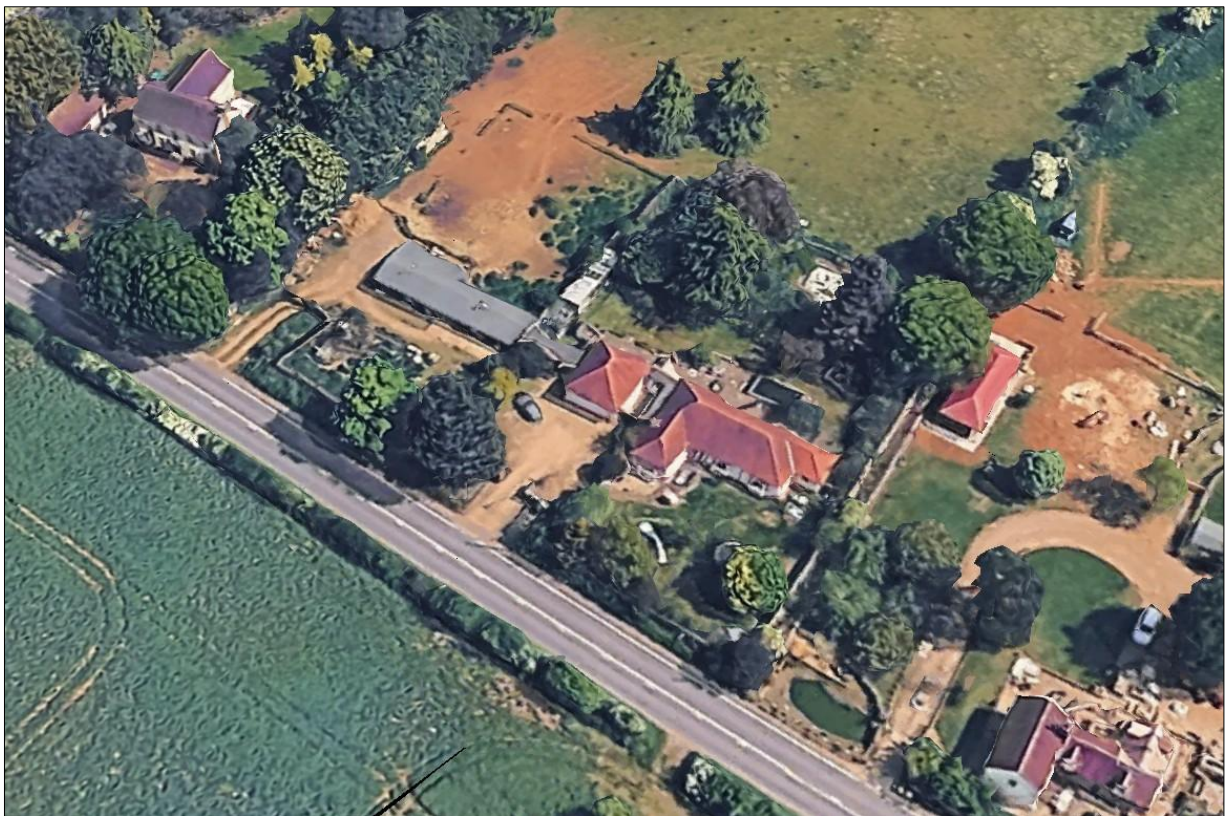


Photo 1: Aerial image of the existing Site, with stables to the left (grey roof) and the dwelling (red/orange roof) to the right. Peascod Hall can be seen in the bottom right of the photograph, some 25 metres from the Site boundary and separated by mature trees. Source: © Google Earth, 2026.

² Mansell v Tonbridge and Malling Borough Council [2017] EWCA Civ 1314 (08 September 2017) [in particular, 27]

- 2.4 The Site sits less than a kilometre south of the village of St Ippolyts which, itself, is less than a kilometre south of the town of Hitchin. The Site is accessed directly off London Road and sits c.230 metres north of bus stops served by the 304, 314 and 315 bus services. The poor state of these bus stops is addressed in paragraph 2.10 below.
- 2.5 The Site is immediately to the north of Peascod Hall, a Grade II Listed building that has been subject to redevelopment including, in 2014, a part 2-storey, part single-storey rear extension under Ref: 24/01459/LBC.

Scale, Layout and Appearance

- 2.6 The Proposal is demolish the existing buildings and to construct four detached houses (net gain of three), comprising 1 x 4 bedrooms and 3 x 3 bedrooms. Please refer to the Proposed Site Plan, Proposed Elevations and Proposed Floor Plans.
- 2.7 The Layout provides each dwelling with sufficient amenity space as well as parking and cycle/recycling storage. Visitor parking spaces are also provided.
- 2.8 Please also refer to the Proposed Street Scene and the Axonometric Plan drawings (Ref: W505A and W508, respectively) which demonstrates that the scale, design and appearance of the new homes is entirely in keeping with its rural location. The materials proposed are:
- Walls – soft red stock brickwork with areas of stained boarding at first floor level
 - Roofs – plain brown clay tiles
 - Windows – side hung casements with flat cut brick arched lintels and stone sub cills
 - Entrance doors – timber panelled with timber canopy and brackets
 - Dormers (where applicable) – led clad with lead cheeks
 - Rooflights (where applicable) – low profile conservation style
- 2.9 Finally, on appearance, as expressly requested by the Council's Pre-App (Appendix 1, p.7), a chimney is included on each new family home.

Access

- 2.10 The Proposal will require the existing access to be blocked off (and vegetation reinstated) and a new, safer and more suitable access to be created off London Road – please refer to the Site Access (© Woods Hardwick). Because of this, the red line of the Location Plan includes land under the control of the Highways Authority who has been included in Certificate B and sent a Notice 1.

- 2.11 In responding to a Pre-App in November 2025, Herts Highways considered this new access to be “*acceptable*”³. It also concluded that the Site is in a “*sustainable location*”: adding “... *the highways will seek upgrade (sic) the bus stops by providing a shelter and Kassel kerb*”⁴. The fact that the Highways Authority agrees that the Site is in a sustainable location makes the scheme compliant with aims of Policy TR3 of the NPPF and, in particular, the improvements to local public transport infrastructure complies with TR3 (1) (e).
- 2.12 The Proposed Site Plan also confirms that the 4-bed house will have 3 no. car parking spaces, whilst the three 3-bed houses will have 2 no. parking spaces each. There will be 3 no. visitor spaces. Each house will also have EV points and cycle storage.
- 2.13 From a review of publicly accessible Personal Injury Accident (PIA) data available on the Collision Plot website, whilst 5 slight accidents have occurred at the London Road junctions with both Brookend Lane and Sperberry Hill no incidents have occurred in proximity of the Site or its access.
- 2.14 Three additional homes will not generate significant amounts of movement and, so, a transport statement is not required (NPPF [TR6]). Because the scheme will not “*have a severe adverse impact on the transport network (in terms of capacity and congestion, including cumulative impacts), or an unacceptable impact on highway safety*”, then, in accordance with Policy TR6 (4), it should not be refused on highways grounds.

Landscaping

- 2.15 Please refer to the Arboricultural Report, the Soft Landscaping Plan and the Proposed Site Plan.
- 2.16 The Arboricultural Report explains (final bullet point of the Executive Summary) that “*Seven trees are to be removed for the development.*” Paragraph 5.1 explains that these seven trees comprise “*one U grade and six C grade trees*” – see Table 1 on Page 13 of the Report for further details.
- 2.17 The Report concludes (5.2)⁵ (my underlining) that “*with new plantings to be undertaken this will outweigh these works and produce a major positive impact to the site so long as the approved methods of work are adhered to. It is paramount that the works are supervised by the Project Arboriculturist to ensure no damage occurs to the tree stock.*”
- 2.18 The Soft Landscaping Plan demonstrates the extensive landscaping including the planting of new native species trees (rowan, field maple and hornbeam), native hedges (including hawthorn and plum), native scrubs (including dog rose and elder) and native shrubs (including juniper and witch hazel).
- 2.19 The layout deliberately helps to retain the large cedar tree to the rear as part of the Proposed Street Scene (see extract from Ref: W505A below – Fig 1.)

³ Email dated Friday 14th November – Appendix 2

⁴ Email dated Friday 14th November – Appendix 2

⁵ The reference to six trees in Paragraph 5.2 is clearly a typographic error and should read seven as per all other references in the Report.



Fig. 1 Extract from Proposed Street Scene in which the large cedar tree (centre) retains importance.

- 2.20 Because the proposal conserves the good quality trees, plants new native trees to mitigate the loss of poor-quality specimens and introduces new and entirely appropriate soft landscaping onto the Site, it is in full accordance with NPPF Policy N2 (1) (d).
- 2.21 Finally, the proposed hard landscaping is shown on the Proposed Site Plan and includes permeable sett paving to paths and parking area at the front of each house and natural stone paving to paths and terraces at the rear.

3 Planning Policy and Context

3.1 Paragraph 48 of the NPPF confirms that *“Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.”*.

3.1 The relevant element of North Herts Development Plan is the Local Plan 2011-31. The Site is not subject to a Made Neighbourhood Plan.

The Local Plan 2011-31

3.2 The most relevant Local Plan policies are:

- SP1 Sustainable Development in North Hertfordshire
- SP5 Countryside and Green Belt
- SP8 Housing
- SP9 Design and Sustainability
- D1 Sustainable Design
- HE1 Designated Heritage Assets
- T2 Parking

3.3 The November 2025 Housing Land Supply Update explains that the supply currently stands at 2.6 years. This means there is unmet housing need in the District under Policy S5 (1) (j) of the NPPF.

The NPPF

3.4 The current NPPF was published in August 2026, replacing previous versions which themselves replaced the previous range of Guidance Notes, and Policy Statements. Paragraph 3 of the NPPF states, amongst other things, that:

“The national decision-making policies in this Framework are a material consideration in making these decisions and should be read alongside the policies in the development plan.”

3.5 In a significant change to previous iterations, the NPPF introduces new National Development Management Policies which reinforce the concept of exemptions to *“not inappropriate”* development in the Green Belt and re-emphasise the presumption in favour of sustainable development.

Planning Practice Guidance (“the PPG”)

3.6 The PPG was published in March 2014 (with updates since). Crucially, the updates published in February 2025 provide detailed guidance on how applications in the Green Belt must now be assessed by decision-makers.

4 Appropriate Development in the Green Belt

- 4.1 The proposal qualifies as two different forms of appropriate development in the Green Belt: *“the ... redevelopment of Previously Developed Land”* (PDL) and *“the development of homes on Grey Belt land”*. Whilst its views on both forms of “not inappropriate” development were sought in the Applicant’s Pre-App Submission, the Council’s Pre-App Advice only addressed the latter (Appendix 1, pp.3-4). The following explains why the proposal qualifies under both exceptions.

The redevelopment of PDL that will not cause substantial harm to openness

- 4.2 Policy GB7 (1) (e) of the NPPF explains that:

“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”

would not be *“inappropriate development”*.

- 4.3 The Council’s Pre-App Advice chose not to deal with this issue of whether the Site was PDL and stated instead *“... it is down to you to justify why you think that the site would be PDL ...”*.

- 4.4 The Site comprises two elements, both of which qualify as PDL:

- a) a residential house and its garden including outbuildings and swimming pool – residential gardens are only excluded from the definition of PDL if they are *“in built-up areas”* (NPPF, Annex B: Glossary): because the Site is, quite clearly, not in a built-up area the house and garden qualify as PDL; and
- b) stable blocks and a menage – agricultural buildings are excluded from the definition of PDL but the keeping of horses/equestrianism is not part of the agricultural industry/food chain: this has been confirmed on countless occasions over the years, including by Inspector R Bartlett PGDip URP MRTPI in Planning Appeal Decision 3357453, June 2025 (attached as Appendix 2), which stated [6] (under an earlier NPPF):

“The site comprises an existing brick built stable block within part of a larger grass paddock. There is an existing gated access and an existing area of hardstanding. It is undisputed between the main parties that the site comprises previously developed land (PDL) as defined by Annex 2 of the Framework. Consequently, the change of use of the site to residential would only be inappropriate if it would cause substantial harm to the openness of the Green Belt. This test is slightly different and more relaxed than that set out in the previous version of the Framework, which required development, other than affordable housing, to not have a greater impact on the openness of the Green Belt than the existing development.”

- 4.5 The whole Site is clearly PDL and, therefore, the scheme qualifies as *“the redevelopment of previously developed land”*.

4.6 Thus, the final test is to consider whether that redevelopment will cause “*substantial harm to openness*”. That “substantial harm” is high hurdle has been confirmed in numerous decisions by LPAs, Planning Inspectors and the Secretary of State.

4.7 In an Appeal Decision in November 2025 (recommended by an Inspector and Approved by the Secretary of State), the Inspector set out the range of weight to be applied in the planning balance as follows (Appeal Ref: 3351904, at [17.1] (attached as Appendix 3)

“I ascribe weight in a sliding scale of limited, moderate, significant and substantial.”

4.8 Thus, it is reasonable to regard “*substantial*” as representing the highest bar in decision-making.

4.9 This is consistent with an Appeal Decision (Appeal Ref: 3296116), published in November 2022 (attached as Appendix 4), which concerned the redevelopment of PDL in the Green Belt near Braintree in Essex. Whilst noting that the scheme proposed an 80% increase in footprint and a 124% increase in built form [12], the Inspector explained [17]:

“It is important to note that the threshold for the proposal to be considered as inappropriate development is substantial harm. This is a high bar and the proposal clearly falls below it. The proposal is therefore ‘not inappropriate’ development in the GB. I do not, therefore, need to further consider issues in relation to GB development or make a determination on ‘very special circumstances’.”

4.10 That even large increases in built development may not generate “substantial harm” to openness was re-confirmed in an Appeal Decision for a Site in the St Albans District, published in October 2025 (attached as Appendix 6). In that Decision (Appeal Ref: 3365491) whilst the built footprint increased by at least⁶ 82% and the Gross Internal Area (GIA) by at least 143% [11], the Inspector concluded [17]:

“Overall, while there would be an increase in built development across the site as a whole, in my judgment the appeal scheme would cause moderate rather than substantial harm to the openness of the Green Belt. With regard to NPPF paragraph 154g) it would not therefore be inappropriate development.”

4.11 In this scheme, the increase in footprint and volume from the existing buildings to those proposed will be 61% and 72%, respectively, which is far less than either of the schemes referenced above. However, when the “fallback positions” are taken into account as they must be (see Paragraph 2.2 above), there will actually be a reduction in footprint of 12% and in volume of 10% - please refer to the separate Footprint Calculations, Volume Calculations and Calculations Breakdown Plan (Ref: W500A) included as Appendices 4-6.

4.12 By any reasonable measure, the proposal will cause “limited harm” to the openness of the Green Belt: i.e. less than the “moderate harm” ascribed by the Inspector in the St Albans Decision (see paragraph 4.10 above) and certainly far less than the “substantial harm” and, so, clearly qualifies as “not inappropriate” development under Policy GB7 (1) (e).

⁶ These were the Appellants’ figures: the Council argued the footprint increased by 141% and the GIA by 204%.

- 4.13 However, the proposal also qualifies as another form of appropriate development, too, as set out below.

Grey Belt land

- 4.14 Policy GB7 (1) (g) of the NPPF includes the concept of Grey Belt: land on which – subject to specific criteria – new housing would not be inappropriate development. The NPPF defines Grey Belt 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 policy GB2.

- 4.15 As set out above, the Site is clearly PDL. Whether or not the Council agrees – and there is no rational reason why it should not – by applying National Guidance⁷ it is clear that the Site does not strongly contribute to any of the purposes (a), (b) or (d) in Policy GB2.

Purpose A – to check the unrestricted sprawl of large built-up areas.

- 4.16 As the Site is not part of a large built-up area, its contribution to this purpose equates to “None”.

Purpose B – to prevent neighbouring towns merging into one another.

- 4.17 As this is the redevelopment of a PDL Site and because the nearest settlement is a village, the Site’s contribution to this purpose equates to “None”.

Purpose D – to preserve the setting and special character of historic towns.

- 4.18 Because it is so distant from any historic town, the Site’s contribution to this purpose equates to “None”.
- 4.19 Having established that the Site qualifies as Grey Belt land, the proposal must now be assessed against the relevant criteria of Policy GB7 (1) (g) (criterion [iv] does not apply because this is not a major scheme).

i. The development ... would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan

- 4.20 The PPG is less explicit in how this assessment is to be made, stating:

“In reaching this judgement, authorities should consider whether, or the extent to which, the release or development of Green Belt Land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way.”

- 4.21 It has been established that the Site’s contribution to Purpose (a), (b) and (d) is negligible. In respect of Purpose (c), because the Site is PDL, no further encroachment into the countryside will occur. In respect of Purpose (e), the scheme would not assist urban regeneration.

⁷ The assessment will be based upon National Guidance set out under the heading “How should the contribution land makes to the relevant Green Belt purposes be assessed?”

- 4.22 It must be noted that the Green Belt across North Hertfordshire covers 17,590 hectares⁸. At less than a half a hectare, the Application Site is equivalent to c.0.02% of *“the remaining Green Belt across the area of the plan”*.
- 4.23 Given the size of the scheme – actual and relative – and the particular circumstances described above, it would be irrational to conclude that the development of the Site could fundamentally undermine the five purposes (taken together) of the remaining Green Belt across the entire District.

ii - There is an evidenced unmet need for the type of development proposed.

- 4.24 Footnote 41 explains that *“in the case of applications involving the provision of housing, means the lack of a five year supply of deliverable housing sites”*: a situation which applies in North Hertfordshire.

iii - The development would be in a sustainable location, with particular reference to policy TR3 of this Framework.

- 4.25 The proposal is for 4 no. family homes (net 3) and, so, would not generate the *“significant amount of movement”* or *“significant adverse impacts”* referenced in Policy TR3 (1) (a) and (c), respectively. Policy TR3 (1) (e) is, however, very relevant and explains:

“In rural areas, opportunities to improve walking, wheeling, cycling and public transport and enhance the connectivity of an area should be taken where they exist and can be supported by the development proposed.”

- 4.26 As explained in paragraph 2.4 and 2.10 above, the bus stops which are less than 250 metres away, and are linked to the Site by a pavement on a level surface are in a state of disrepair.
- 4.27 Given the rural nature of the Site, the provision of EV points and the close proximity of bus stops, the Site is in a sustainable location. Crucially, this is the same conclusion arrived at by Herts Highways in its Pre-App response of November 2025 (see paragraph 2.10 above).
- 4.28 Consequently, the proposal also qualifies as appropriate development under Policy GB7 (1) (g), too.

Conclusion on appropriate development

- 4.29 Because the scheme is not inappropriate development, it is not harmful to the Green Belt and ‘very special circumstances’ are not required for permission to be granted.
- 4.30 Furthermore, because the scheme is appropriate development in the Green Belt, Policy S5 (5) explains that it:

⁸ Green Belt Assessment for East Herts, North Herts and Stevenage. Land Use Consultants Ltd, June 2026. Paragraph 2.4

“... should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework, and applying paragraph 2 of this policy (S5)”.

- 4.31 The rest of this Statement demonstrates, first, that the adverse effects are negligible and, so, clearly do not substantially outweigh the benefits of delivering additional dwellings during a persistent housing crisis and, secondly, that proposal does not fail to comply with one of the national decision-making policies which require it to be refused in specific circumstances.

5 Heritage Assessment

5.1 The PPG⁹ explains:

“In cases where both a Design and Access Statement and an assessment of the impact of a proposal on a heritage asset are required, applicants can avoid unnecessary duplication and demonstrate how the proposed design has responded to the historic environment through including the necessary heritage assessment as part of the Design and Access Statement.”

5.2 Policy HE5 (1) explains:

“Development proposals affecting heritage assets should be accompanied by an assessment of the significance of the assets affected (including any contribution made by their setting) and of the potential effect of the proposal on their significance. The level of detail should be proportionate to the assets’ importance and no more than is necessary to understand the potential effect of the proposal on their significance.

5.3 Policy HE5 (2) explains:

“Assessments of the potential effects of development proposals on the significance of heritage assets (including through effects on their setting) should identify whether proposals would be likely to:

- a. Have a positive effect, which is where the significance of a heritage asset would be enhanced, or better revealed; or*
- b. Have no effect on the significance of a heritage asset; or*
- c. Result in harm to the significance of a heritage asset, either from work affecting the asset itself or from development within its setting. The degree of harm should be identified: substantial harm would occur where the development proposal would seriously affect a key element of the asset’s significance; or*
- d. Cause the total loss of the significance of a heritage asset.”*

5.4 The level of detail in this Section is considered proportionate and sufficient to understand the potential impact of the proposal on the significance of the only Heritage Asset relevant to this application: Peascod Hall situated to the south of the Site.

Peascod Hall

5.5 As a Grade II listed building Peascod Hall is a Designated Heritage Asset. In a range of significance from ‘neutral’ for a building with no architectural or historical significance or value, to ‘very high’ for a heritage asset of outstanding universal value, a Grade II Listed Building can be considered to have ‘medium’ significance, alongside Conservation Areas and Grade II Registered Parks and Gardens but below Grade I and Grade II* buildings.

5.6 The Historic England list entry (1347426) for Peascod Hall states:

⁹ PPG Historic Environment Paragraph: 012 Reference ID: 18a-012-20190723

“Farmhouse, now a private house. C17 or earlier, early C18 brick front, C19 N wing. Timber frame roughcast, cased in red chequered brick on W and S, timber frame white weatherboarded N wing. Old red tile roofs, N wing of lower pitch. A small L-shaped house, set back from road, facing W. Older, 1 1/2-storeys, 2-cells, central entrance plan range with former external N gable chimney and very large open fireplace to rearwall chimney in S room. 2-storeys later N crosswing projects to W. W front has 2 gabled dormers at the eaves, central entrance, and 4 casement windows with cambered arches. Plank door. Rearwall heightened by 1M with 2 windows. Projecting gable of N wing has a flush 2-lights casement window to each floor. 2 similar windows on each floor on each side. Louvred shutters to front gable. Interior has axial chamfered beams, exposed joints in S room. Shouldered head to 2 recesses in back of large open fireplace.”

5.7 In 2024, the Council granted permission for *“Part two storey and part single storey rear extension incorporating rear porch canopy following demolition of existing rear elements”* to be made to Peascod Hall under applications 24/01458/FPH and 24/1459/LBC.

5.8 Because, unlike those proposals, this application will have no physical impact on Peascod Hall, the only potential impact is on its setting.

Potential Impact

5.9 The minor proposal is neither prominent nor intrusive and will result in very little, if any, change to the setting of Peascod Hall. Whilst the proposal is technically a change-of-use from one dwelling to four, the land use will remain residential and the dwellings will be of a traditional style entirely suited to the rural location.

5.10 Historic England’s ‘Zone of Visual Influence’ and ‘Zone of Theoretical Visibility’ methodologies¹⁰ provide guidance on how to establish which heritage assets are likely to be affected by a development proposal. The latter includes taking into account proximity and landscape artefacts such as trees and buildings. Given the distances between the Heritage Asset and the new dwellings and the intervening mature trees, it is reasonable to conclude that the proposal will have virtually no impact at all on Peascod Hall.

5.11 In a range from “major adverse” to “major beneficial”, the impact of the proposed development on Peascod Hall is neutral.

5.12 The harm to the significance of the impact is, therefore, neutral. Using the language of Policy HE5 (2) the proposal will **have no effect on the significance of the heritage asset or its setting.**

¹⁰ The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), Historic England December 2017 p.9.

6 Sustainable Development

- 6.1 The scheme clearly contributes to the achievement of sustainable development. Whilst noting that Paragraph 18 of the Framework acknowledges that the three objectives “*are not criteria against which every decision can or should be judged ...*”, this Section considers the sustainable credentials of this scheme against them.

Economic Objective

- 6.2 As the Site is already a residential curtilage and in a sustainable location on a bus route a short journey from St Ippolyts and Hitchin, and on Grey Belt land where development in the Green Belt is appropriate, it is clearly “*the right place*” for housing. The demolition of the existing house and buildings, the construction of four new family homes and the provision of associated infrastructure will create employment for a number and variety of local people and businesses, bringing money into the economy during the construction phase and thereafter through local spending and Council taxes.

Social Objective

- 6.3 The delivery of (net) three additional dwellings is obviously a clear and significant social benefit in a District with an evidenced unmet need for housing which tilts the balance firmly in favour of granting permission.

Environmental Objective

- 6.4 As demonstrated in Section 5 the proposal will have no effect on the “*historic environment*”.
- 6.5 The “*natural environment*” will be enhanced by a net gain in biodiversity and by the additional landscaping shown in the Soft Landscaping Plan.
- 6.6 The “*built environment*” will be enhanced by the construction of attractive new family homes appropriate to the character and appearance of the area.

Conclusion on Sustainable Development

- 6.7 The scheme clearly pursues the three objectives in a mutually supportive way so that net gains in each of them – albeit minor, considering the scale of the scheme – can be achieved. The proposal clearly represents sustainable development in a sustainable location (see paragraph 2.10 above), for which there is a presumption in its favour.

7 Local Plan Policies and Guidance

SP1 Sustainable Development in North Hertfordshire

- 7.1 In accordance with SP1a, the scheme makes use of previously developed land.
- 7.2 In accordance with SP1c (i), the scheme contributes to the unmet housing target in the Local Plan.

SP5 Countryside and Green Belt

- 7.3 In accordance with SP5c, the proposal is not for inappropriate development in the Green Belt.

SP8 Housing

- 7.4 The Council is failing to maintain a 5-year housing land supply as required by SP8d, which provides extra weight to the delivery of new housing on previously developed land.

SP9 Design and Sustainability

- 7.5 As set out in Section 2 above, in accordance with SP9a, the proposal is well designed and located and responds positively to its local context.

D1 Sustainable Design

- 7.6 In accordance with D1a, the proposal is a positive response to the Site's local context. The scale and nature of the scheme mean many of the criteria in D1b are not relevant. D1c, required the proposal to responds positively to the Design SPD. In June 2026 a new Design Code SPD was published. Whilst this applies to schemes of 2 homes or more, the 'use and application' section (p.9) explains: *"Codes will be applied proportionately on a case by-case basis, informed by the types of development and application being considered"*.
- 7.7 The nationally described space standards are exceeded in each new home.

HE1 Designated Heritage Assets

- 7.8 As set out in Section 5 above, the proposal will lead to a low level of less than substantial harm which is clearly outweighed by the benefits.

T1 Assessment of Transport Matters

- 7.9 Because the proposal will not lead to highway safety problems or cause unacceptable impacts upon the highway network, it is in full accordance with T1a.

T2 Parking

- 7.10 In Accordance with Appendix 4, the 4-bedroom house will have 3 no. parking spaces and the 3-bed house will have 2 spaces each. There will be 3 no. visitor spaces. Each house will also have EV points and cycle storage.

Sustainability SDP

- 7.11 The SDP [1.28] explains that *“whilst some of the sustainability principles contained in this SPD can be applied to all new developments regardless of size, some are only applicable to larger developments”*. For a minor scheme of 9 dwellings or fewer, applicants are required to submit a Sustainability and Energy Statement [1.26]. This is included immediately below and is considered proportionate for a scheme delivering 4 new (net 3) dwellings.

Sustainability and Energy Statement

- 7.12 The houses will all be highly energy efficient, eco-friendly traditionally built homes with 150mm insulation cavities to minimise heat loss and reduce space heating costs. It is proposed to reduce the use of concrete, minimise the disturbance of ground conditions, and use timber materials to reduce industrial emissions and offer the biggest opportunity for long-term carbon storage. The intention, therefore, is to design the houses with a focus upon thermally efficient, fabric-first construction, and adopt close-to-Passivhaus principals to include additional insulation, triple or high performing glazing with insulated frames, and excellent air tightness levels.
- 7.13 The orientation and pitch of the main roofs will allow for photovoltaic panels, whilst the orientation and design of the houses enable passive heating in winter while controlling over-heating in summer. Air source heat pumps are proposed in discreet locations and near plant rooms where possible, and electric car charging points are provided to each house.
- 7.14 It is currently assumed that the construction will be timber framed, offering an efficient method to minimise the impact on the environment, consolidate carbon, expedite erection time, and minimise disturbance using pre-fabrication. Floor build-ups allow for mechanical ventilation with heat recovery (MVHR). A natural, durable and sustainable palette of materials would be developed and incorporated.
- 7.15 In summary:
- Natural Cross Ventilation - Openable windows and skylights to both sides of the house to ensure airflow.
 - Solar Gains - Passive heating in winter and overheating in summer to the south facing facades will be considered.
 - Insulation / Fabric - The buildings will be timber framed, highly insulated and at least double glazed to passive standards.
 - Solar Panels – Will be considered.
 - Heat Recovery MVHR - will retain and re-use the buildings space heating with ventilation for comfortable living spaces. Excellent air tightness, achieved during the construction phase will contribute to low energy loss.
 - Heat Pumps - All houses will have low-noise air source heat pumps as shown on the drawings.

Materials and Waste

7.16 Where compatible with the approved design and economic viability, building materials will have a low environmental impact as identified by the BRE's Green Guide to Specification. The following principles will be followed:

- at least 50% of the timber used will come from a sustainable source as defined by the Forest Stewardship Council (FSC);
- local materials (within 35 miles) will be chosen in preference to equivalent materials sourced from further afield insulation will have a zero-ozone depletion rating;
- wherever possible aggregates used will be waste or recycled products;
- a waste management plan will prevent excessive materials being ordered and delivered to site and materials delivered to site will be used efficiently;
- materials which are redundant will be recycled wherever possible; and
- for when the houses are occupied, storage for domestic recycling bins is shown on the Proposed Site Plan Proposed.

Water Sensitive Design

7.17 Water use will be managed and minimised in the family home to achieve an estimated water consumption of no more than 110 litres per person per day, by incorporating the following features:

- thermostatic shower mixers will be fitted with flow restrictors to ensure the maximum water usage at the shower head does not exceed requirements;
- toilet cisterns shall be low volume and dual flush; and
- basin taps shall be monobloc spray head type.

Conclusion on Local Policies

7.18 The proposal responds positively to the relevant policies in the Local Plan and, proportionately, to the aims and spirit of the Design Code, which is clearly focussed on much larger schemes.

8 Conclusion

- 8.1 This Statement has demonstrated that the scheme is in accordance with the most relevant policies in the Council's Local Plan and is a positive response to the issues covered in the Pre-Application process.
- 8.2 It has also demonstrated that the proposal represents appropriate development in the Green Belt and sustainable development which makes effective use of land: precisely the sort of development promoted by the Government in its new NPPF.
- 8.3 The adverse impacts of the scheme are negligible and clearly do not substantially outweigh the benefits.
- 8.4 None one of the national decision-making policies which require it to refused in specific circumstances apply.
- 8.5 Consequently, in accordance with Policy DM3 (f), permission should be granted.

Brian Parker

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September 2026

Appendices

Appendix 1 – Pre-Application Advice with North Herts Council

Appendix 2 – Pre-Application Advice (and correspondence) with Hertfordshire County Council

Appendix 3 – Appeal

Appendix 4 – Footprint Calculations

Appendix 5 – Volume Calculations

Appendix 6 – Calculations Breakdown Plan Ref: W500A