

LAND TO THE NORTH EAST OF DUNCOTS CLOSE ICKLEFORD

PLANNING, DESIGN, ACCESS & HERITAGE STATEMENT

CONSTRUCTION OF 9 NEW HOMES

APRIL 2025

1.0 INTRODUCTION

- 1.1 This application seeks full planning permission to enable the construction of 9 new high quality homes on land north east of Duncots Close in Ickleford.
- 1.2 The application site is allocated for residential development for 9 new homes under Policy IC1 of the adopted North Hertfordshire Local Plan and the application is submitted in this context.
- 1.3 The Applicant, Peter David Homes Limited (PDHL), is a small / medium sized local housebuilder who will build and sell the homes and so retains a direct interest in ensuring that the development is well designed and of the highest quality.
- 1.4 This submission follows two rounds of pre pre-application discussions. The first (reference 23/01559/PRE), took place in September 2023 and sought to establish some principles and clarify policy issues ahead of further design development and refinement. The second (reference 24/02557/PRE), dated 16 January 2025 included a more detailed draft layout and individual house design proposals. The content of and the response to the pre-application advice received is discussed in Section 3.
- 1.4 This statement explains how the proposals respond to Policy IC1, the identified opportunities and constraints presented by the site and all other detailed policy matters required by the adopted development plan. It is set out as follows:

Section 2.0 : Site Description & Context

Section 3.0 : Background History & Previous Pre-application

Section 4.0 : Relevant Planning Policy

Section 5.0 : Analysis

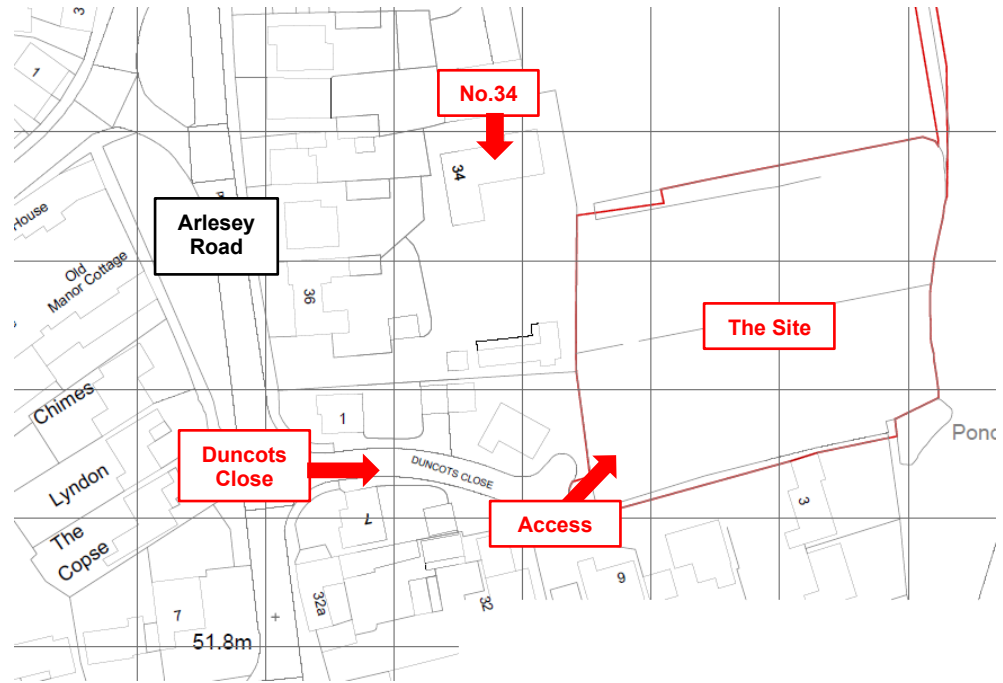
Section 6.0 : Conclusions

2.0 SITE DESCRIPTION & CONTEXT

2.1 The application site is located to the east side of the village and is set in behind Arlesey Road to the north east of Duncots Close as shown opposite.

2.2 It is broadly of rectangular form with the southern and the southern part of the western boundary adjoining Duncots Close. The northern portion of the western boundary adjoins the curtilage of No.34 Arlesey Road a residential property set behind the main frontage and constructed following the grant of planning permission in 2001.

2.3 To the north and east the boundaries are well screened by mature trees and hedges with paddock and countryside land beyond. The land north and east remains within the Green Belt.

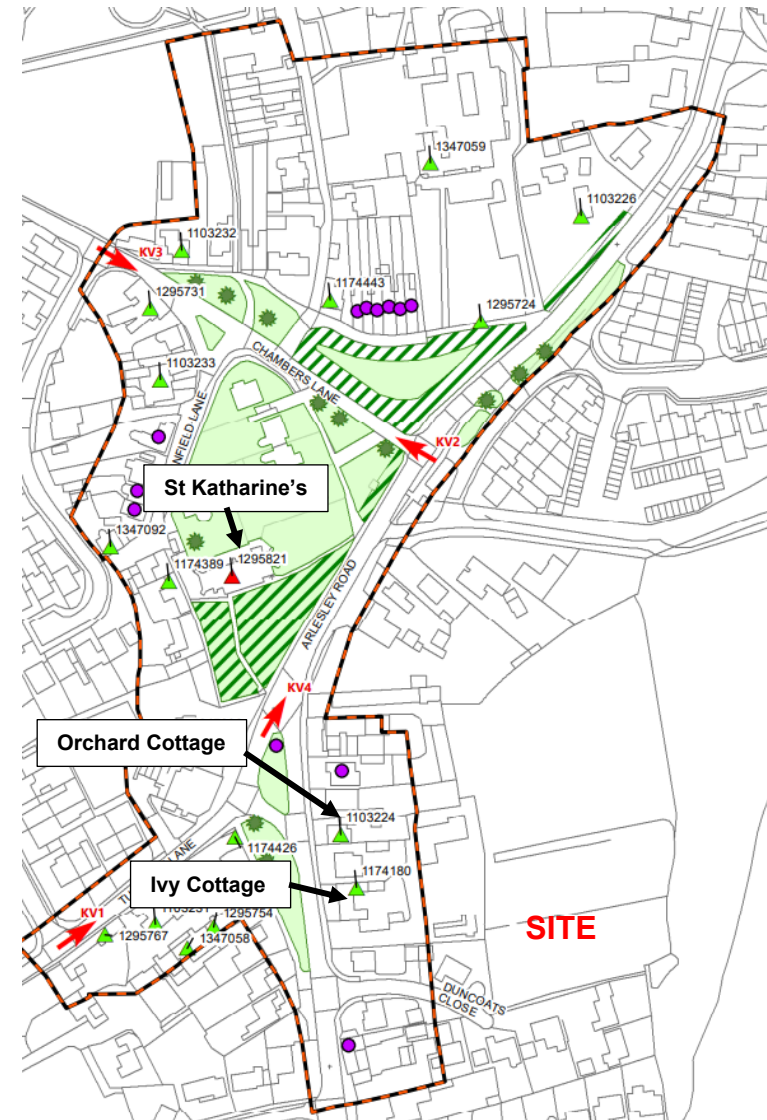


Site location plan extract showing site context

2.4 The site lies outside of the village conservation area the boundary of which runs along the rear of the houses which front Arlesey Road. No.34 Arlesey Road is also excluded and so provides a buffer between the site and the Conservation Area.

2.5 The Conservation Area Map showing its boundary, the location of nearby listed buildings and the defined 'significant views' is reproduced on the following page.

- 2.6 As will be noted, within the section of Arlesey Road which runs to the immediate west of the site there are two listed buildings and two buildings noted as contributing to the quality of the Conservation Area. The two properties sitting at the front of Duncots Close facing Arlesey Road lie within the Conservation Area boundary but the remainder of the close is excluded.
- 2.7 The listed buildings (No.36, Ivy Cottage and No.40, Orchard Cottage) are both grade II residential properties. The rear of Ivy Cottage lies approximately 50 metres from the western boundary of the application site.
- 2.8 As will be noted, the site does not lie close to or within the general setting of the 'Important Views' shown with the red arrows on the plan. As discussed further below, as a result of the existing village development and intervening trees there are few if any views possible of the site from Arlesey Road.
- 2.9 The most important listed building (Grade I) is St Katharine's Church which is located approximately 135 metres from the north west corner of the site on the north west side of Arlesey Road. The church is set well back from the Arlesey Road and separated from it by the area annotated on the Conservation Map as a significant area of trees and open space (dark green hatching). The following photographs show views from the church in the direction of the site and from Arlesey Road toward the two listed properties.



Policies map extract with site annotation added



View from the church grounds looking south east



View from the front door of the church looking south east



View showing Ivy Cottage



View showing Orchard Cottage

- 2.10 Duncots Close was constructed in the late 1990's with a dwelling on each side of the access facing out onto Arlesey Road and a cul-de-sac layout beyond.



View into Duncots Close from Arlesey Road



View within the cul-de-sac.

- 2.11 The houses are a mix of one and a half and two storey scales and utilise a variety of materials including red brick, tiles and render and are articulated with gable features and porches, canopies and dormers as shown above. Access to the site is proposed to be taken through Duncots Close to the right of No.1 as highlighted in the picture above (right).

- 2.12 No.34 Arlesey Road which directly adjoins the site is also of mainly brick construction as shown opposite but incorporates a rendered gable projection and timber boarding which adds interest and quality.



No.34 Arlesey Road

- 2.13 The site itself is paddock land associated with No.34 Arlesey Road. As shown opposite the land is very well maintained and whilst not formally 'residential garden' is tended to by the owner to a similar level with regular grass cutting as shown opposite.
- 2.14 The site is of limited ecological value having been well maintained grassland for a number of years. It is not the subject of any ecological or other environmental designations.



View looking south across the site to Duncots Close

3.0 BACKGROUND HISTORY & PRE-APPLICATION

Local Plan Promotion & Allocation

- 3.1 The Council's online records system does not show any planning application history associated with the site. It is however relevant to review the background to the sites promotion, assessment and so allocation for development in the adopted local plan.
- 3.2 Firstly the site was assessed as part of the Strategic Housing Land Availability Assessment (SHLAA) process in 2016 along with a large number of other potential sites. It was noted as having potential for development with the summary comment stating:

“Small, undeveloped paddock plot to rear / side of existing residential properties. Site boundaries well defined by existing planting. Possibility to take access from Duncots Close”

- 3.3 The suitability of the site was debated as part of the Matter 11 session at the Local Plan Examination in Public. In defending the allocation against objections the Council's hearing statement commented as follows:

“Site IC1

18.Site IC1 is a small infill site at the south-east of Ickleford for an estimated 9 additional homes. It makes a small contribution to overall housing needs. It is bounded to the south and west by the existing village. The eastern boundary is defined by a well established tree line. There is some planting along the northern edge though reinforcement may be required.....

*20.The SHLAA also recognises the presence of the nearby Ickleford Conservation Area and two listed buildings on Old Hale Way. A Heritage Assessment of Ickleford has been conducted to inform the approach to site allocations (NHE5). This identifies that heritage assets **do not represent a fundamental constraint to development and that, with appropriate guidance, development of this site will not impact upon key assets (pp.10-11)**. For effectiveness, an additional site-specific criterion is proposed to minimise impacts upon the Green Belt and heritage assets. This is shown in Appendix A.*

*21.A fundamental ecological constraint on this site is considered **highly unlikely**. A survey will be required at planning application stage to confirm the lack of interest or inform any requirements for compensation.....*

22. The Housing and Green Belt Background Paper summarises the reasons for the selection of site IC1 (HOU1, Appendix 2, p.61) identifying that the site-specific criteria allow for appropriate mitigation of potential impacts.”

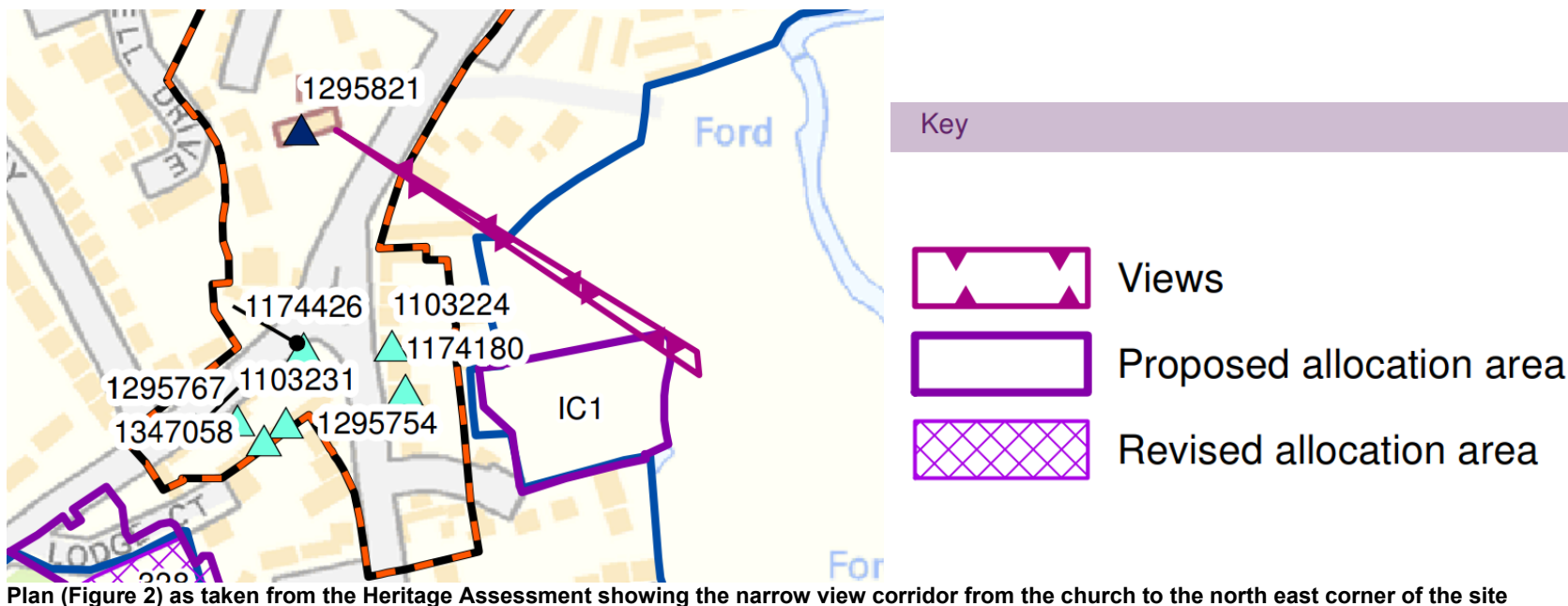
- 3.4 The Heritage Assessment referenced in the Council's Hearing Statement is available to view in the evidence base documents section of the examination library. We highlight the following relevant extracts:

“Site IC1

*Significant trees on the boundary of this site contribute to views of Ivy Cottage from the Arlesey Road by providing a planted backdrop to the building, as shown in Plate 4, Appendix A. **The site to the rear of grade II listed Orchard Cottage has been developed, as has the property to the rear of the modern house between Ivy Cottage and Orchard Cottage. These existing buildings shield the development site from view from within the conservation area,** and again view over the lower scale, generally 1 ½ storey buildings fronting onto the Arlesey Road, provide views of trees in the backdrop of houses. Views south east from Arlesey Road provide a glimpse of the north east boundary of the proposal site, and the mature trees at the north east corner of the site through gaps between buildings on the street frontage. These views and buildings are outside the conservation area, but can be seen from within the conservation area, especially in elevated locations adjacent to St Katherine's Church.*

*This site fits with **an existing pattern of modern development to the rear of properties south of the proposal site.** Analysis of views suggests that the north east corner of this site is visible in views south east from the church, **however most of the site is shielded by existing buildings and planting.** Subject to the preservation and enhancement of planting and screening, including ensuring the north east corner of the proposal site stays free of development, **the development of the proposal site would not impact upon views from within the conservation area from the church.** At present the proposal site provides a planted backdrop to the grade II listed Ivy Cottage. The development of this site in a way which preserves and adds to existing greenery would not impact upon the setting of this listed building.*

*The development of this site will not significantly impact upon heritage assets. **Figure 2 Appendix B shows the primary view from the church towards the proposal site which shows the north east corner of the site is visible from the church.** Plate 5, Appendix B contains a photograph of this view showing the open character of the buildings outside the conservation area that enable the proposal site to be seen as trees above the rooftops of buildings to the south side of Arlesey Road. **The proposal site is significantly distant to the rear of grade II listed Ivy Cottage, 33m behind the building that it will not appear in views of the listed building from the main road.***



- 3.5 As is clear, the view from the church that is referenced is very narrow, set between existing buildings and only 'clips' the very north eastern edge of the site i.e. it does not represent a material constraint. The narrow view is primarily of a mature tree and hedge screen which is proposed for retention and so would not be impacted by site development.
- 3.6 The assessment also notes the sites separation from the Conservation Area and the fact that the intervening development set behind Arlesey Road provides an effective screen.
- 3.7 In the context of the above analysis the examining Inspectors Report stated:

“417.Immediately to the north of Hitchin, three allocations are proposed in Ickleford. Site IC1 is a small area of grassed, flat open land bounded by dwellings on two sides and is expected to deliver nine dwellings. Considering its size, its relationship to existing properties here, and given that it would be contained within the general built envelope of the village, I agree with the Green Belt Review Update that the harm to the Green Belt would be limited.....”

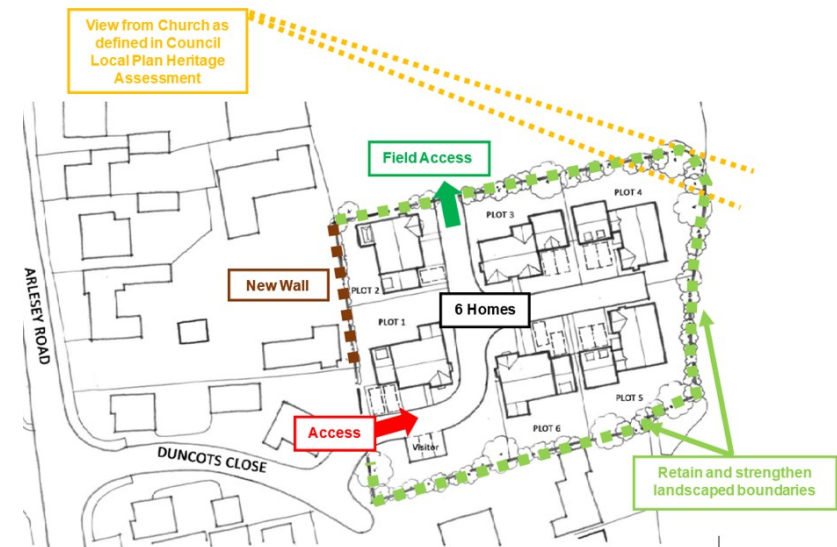
Pre-Application Discussions June 2023 – September 2023 Reference 23/01559/PRE

3.8 The initial pre-application submission was lodged with the Council in June 2023. A site meeting was held with formal written feedback provided in September 2023. At that time the proposals were high level and included the indicative layout opposite with six larger homes (4 and 5 bedrooms), with access shown from Duncots Close.

3.9 House type plans and elevations were not provided at this stage. In the remainder of this section of the statement we set out the pre-application comments provided and in each case explain how the advice is either incorporated or addressed as part of the updated proposals.

3.10 The pre-application comments received are summarised briefly below:

- The principle of the development would be supported in the context of Policy IC1 – the site is a sustainable location for new houses.
- At least two of the larger plots should be subdivided to provide semi-detached dwellings to aid mix and variety.
- The maintenance access road to the northern land would need to be better designed.
- The position of visitor parking would require further consideration.
- Vehicle tracking for refuse and other larger vehicles would need to be considered.



Initial pre-application indicative layout

Pre-Application Discussions November 2024 – January 2025 Reference 24/02557/PRE

3.11 The points raised as part of the initial 2023 pre-application discussions were considered and the layout updated accordingly with the following amendments:

- The maintenance access to the northern land was removed. Two visitor parking spaces were provided in that area with landscaping behind as suggested.
- The unit mix was improved to provide a pair of two bedroom semi-detached homes and a pair of 3 bedroom semi-detached homes in addition to the detached units as requested. On plot parking was also reduced and designed in accordance with Hertfordshire County Council requirements.
- The visitor parking strategy and area surrounding it was revisited / removed.
- The access from Duncots Close was realigned slightly to the east and the internal access road tracked to ensure that a Herts County Council refuse vehicle can enter the site turn and leave in forward gear.



Second Pre-app Layout

- 3.12 The remainder of this section of the statement reviews the pre-application advice received and how the current application has responded. The pre-application advice is reproduced in italics followed by the Applicants comments in each case.

“Sustainability

*.....Please refer to and **address our recently adopted Sustainability SPD.**”*

- 3.13 This is addressed in Section 5 of this statement.

Layout and Access:

*.....It is considered that the site would result in potential grey areas for land ownership and maintenance, **in particular adjacent to the visitor bays between Plots 3 and 4, and adjacent to Plot 2.** Furthermore, it is recommended that a fence or other hard landscaping feature be introduced **between Plots 7 and 8 to clearly demark each garden. An application would need to clarify the ownership of the land between plots 3 and 4 to ensure its maintenance,** Any management plan for the maintenance of these public areas would be required to be robust to ensure no land becomes overgrown and unsightly once occupied.*

- 3.14 These matters are addressed in the application layout as follows:

- The open space behind the visitor bays between Plots 3 & 4 will be retained in the ownership of the site management company. The management company will be responsible for the internal site roads, visitor parking and areas of landscaping which are not within individual house curtilages. This will ensure that the space does not become a ‘grey area’. Each property owner will become a member of the management company and so contribute towards the ongoing upkeep of the communal areas.
- The parking bays to the side of Plot 2 have been relocated as was suggested so that they now lie to the west side of Plot 9.
- The area between Plots 7 and 8 will include sustainable drainage infrastructure and again will be managed by the site management company. The landscaping scheme proposes hedging to demark the edge of the front boundaries of the plots.

*Some concern is raised regarding the proximity of dwellings to their boundaries, and the subsequent **inability for occupants to access their rear gardens without going through their houses**. This would be vital for storing bins out of sight of the public realm, and for retrieving bicycles and other equipment that would normally be located in a garden shed. **It is recommended that access either be provided through garages, with sufficient space internally for this to occur, or for a path to be provided to the side/rear of each property. At the minimum, a 1-metre-wide passageway would be required.** Furthermore, the proximity of No. 1 to the western boundary is considered to result in an unacceptably cramped form of development, and it is therefore requested that this pair of dwellings be situated further east to mitigate this concern. Furthermore, by **relocating the parking bays from the side of Plot 2 to the side of Plot 9, sufficient space can potentially be achieved to allow for rear garden access for Plots 1 and 2.** This would allow for the verge adjacent to No. 2 to be removed and to mitigate potential maintenance concerns. The visitor space to the southern boundary, adjacent to Plot 9 and access directly from the main access is not considered to be well sited and **it is recommended that this space be moved elsewhere within the site due to its isolated location from dwellings and its tight nature.** The western boundary treatment for Plot 9 is considered to be objectionable as a fence and would be better suited as a brick wall to provide some interest and to improve the appearance of this part of the site when entering from Duncots Close*

3.15 These matters are all addressed in the application layout as follows:

- Plots 1 and 2 have been moved to the east with a side access now available to Plot 1. The rear garden of Plot 2 is accessed from east side.
- All other Plots now benefit from either side access or access through their garages. An explanatory detail is included as part of the accompanying drawing package.
- As noted above the visitor parking bays have been relocated from the side of Plot 2 to the side of Plot 9.
- The single visitor space that was shown to be accessed directly from the entrance along the southern boundary has been relocated.
- The side boundary treatment for Plot 9 has been changed from a fence to a high quality brick wall.
- Buffer planting has been included to the eastern side of the site to separate the domestic gardens from the boundary.

*The slivers of land to either side of Plot No. 8 is considered to be a poor design choice and would not be usable for residents. A potential solution is to **the relocate Plot 8 to the east, allowing for side access to the western boundary.***

- 3.16 The access to Plot 8 is now located to the west side as suggested.

*To the front of Plots 7 and 8, the road extends well beyond the driveways for each dwelling and is therefore considered to provide an unnecessarily large area of hardstanding. **It is requested that this is amended out,** unless this space is designed to create a suitable turning head, if necessary.*

- 3.17 The road has been amended and now is the minimum length to allow a reversing vehicle coming off the Plot 7 driveway to turn and leave in forward gear.

***No details of bin and cycle stores has been provided.** Therefore, a strategy to detail the storage of these within the garage or within a garden shed is required.*

- 3.18 An 'external works' drawing is included with the application package and shows all bin and cycle storage locations.

Appearance:

..... the overall appearance of the dwellings is acceptable and would be consistent with local design. It is unclear why a false window is proposed within the flank gable of Plot 3, and it is therefore requested that this is omitted.

- 3.19 The false window to Plot 3 has been removed as suggested.

Hard and Soft Landscaping:

Plans appear to show tarmac continuing from Duncots Close into the application site, a point raised in my previous response. This is welcomed and is considered to improve consistency from the site to Duncots Close. As discussed earlier, a landscaping scheme that can result in clear governance and responsibility for occupants across the site would be welcomed. The landscaping scheme should also reinforce planting along all boundaries, as required by the allocation criteria for the site.

3.20 A full landscaping scheme is included with the application package.

Scale:

When considering housing mix, some concern is raised regarding the scale of dwellings and their response to policy. Ickleford Neighbourhood Plan policy SD2 requires that for developments comprising 3-10 dwellings and without the need to provide affordable housing, the size and mix of dwellings should respond to up to date information of local housing need. The Ickleford NP, advises “The Housing Needs Survey suggests that up to 2031 34% or more of homes provided on a site should be 1–2-bedroom homes, with 60% 3 bedroom and the remaining 6% should be 5 bedrooms”.....

3.21 The proposed mix and justification for it is discussed in detail in Section 5. However in brief summary we would highlight the following points at this point in the statement.

- The Housing & Green Belt Background Paper for the District Local Plan suggested that the need for new homes should be split broadly as 30% small (1 and 2 bed units) and 70% larger (3 plus bed units).
- The current North Hertfordshire Local Plan Policy (HS3) seeks a good mix of units based on an up to date understanding of local needs. However, it states that *on most suburban and edge of settlement sites, applicants should make an initial assumption of 60% larger and 40% smaller homes....”*
- When the Ickleford NP was prepared it had sought to include a requirement that 33% of all new homes on sites of between 3-10 units should be 1 and 2 bed with 33% 3 bed leaving 33% to be 4 bed plus. The Examiner rejected this commenting that it would:
 - Be overcomplicated;
 - Difficult to apply;
 - Could impact site delivery;
 - Fall disproportionately on smaller sites

- The NP Policy as finally made does not therefore include this requirement. Rather the policy simply states that the size and mix should respond positively to most up to date information but 1-3 bed units will be particularly supported.
- In the Plan period to 2031 the housing need arising in Ickleford to meet Ickleford's local needs was 209 homes. As a result of early completions and commitments approximately 180 have been delivered leaving only 29 further homes to meet the need. However, the District Local Plan allocates 199 new homes in Ickleford (allocation IC1 – IC3). As only 29 of these homes are required to specifically address needs in Ickleford 170 will be contributing to the wider housing need in the district.
- It is clear that across the three allocated sites there will be far more 1, 2 and 3 bedroom dwellings delivered than required to meet the identified needs of Ickleford.

3.22 In summary the mix proposed in this application (2 x 2 bed and 2 x 3 bed, (44%) and 3 x 4 bed and 2 x 5 bed (66%)) is considered appropriate delivering a good mix including smaller and larger homes.

Impact Upon Heritage Assets:

*The site allocation provides criteria seeking to retain views from the Grade I Listed Church in Ickleford, not permitting development within the north-eastern corner of the site. **I consider that the position of dwellings suitably meets this criterion.** Separation to nearby Listed Buildings and to the Conservation Area is considered to be sufficient to mitigate prospective harm to these assets.*

3.23 The application proposal retains development away from the north east corner of the site as noted as appropriate by the Council in the pre-application response.

*The allocation criteria require the undertaking of an archaeological survey prior to the development. The DAS advises that Minerva Archaeology have been appointed to provide a desk-based assessment of archaeological assets within the site and that negotiations are ongoing with Hertfordshire Archaeology to conclude whether trial trenches are needed, and whether this can be done at the pre-determination or pre-commencement stage. **This is welcomed but will need to be confirmed should any planning application be received.***

- 3.24 Discussions with Hertfordshire Archaeology concluded that some invasive on site archaeological work would be required. However the Officer confirmed that this could either be undertaken up front or as a post decision, pre-development condition.

Standard of Amenity for Future Occupiers

Sufficient internal floor space would be provided to meet the nationally prescribed space standards for each dwelling type and size. Sufficient built in storage is not demonstrated on floor plans and would need to be shown on any subsequent planning application.

- 3.25 All dwellings exceed minimum size and space standards.

*Concern is raised with regards the proximity of Plot 3 to the western boundary, and particularly **its windows to the 1.8m high brick wall** that this dwelling would be adjacent to. It is recommended that the window or plot layout be amended to improve the relationship between the dwelling and this boundary treatment.*

- 3.26 These comments have been addressed as discussed during the pre-application meeting. The following points are highlighted:

- The internal layout has been designed such that at ground floor level the outlook is primarily to the north and east.
- The window to the west facing elevation is a secondary window for additional light only rather than primary outlook. However, it has been located further south in the elevation where the distance to the western wall is more generous. The window is within the utility room area and so provides light to what is a non-habitable space.

Neighbour amenity

The proposal seeks to set the proposed dwellings away from windows and amenity spaces serving neighbouring properties. Comments raised regarding the reposition of Plots 1 and 2, away from the western boundary are considered to mitigate potential harm to the amenities of this neighbouring dwellings on Duncots Close. Plots 8 and 9 may allow for some overlooking towards Duncots Close, and therefore, the reinforcement of this southern boundary may provide some mitigation for these neighbours. Plot 3 would be adjacent to a stable block and would allow for some modest views towards the dwelling to the north-west of the site. This is acknowledged, however, given the lack of first floor side windows, and due to the proposed separation distance, I do not consider that this would be significant.

3.27 The relationships of the houses with neighbouring dwellings remain as considered acceptable during pre-application discussions.

Parking and highways

*Sufficient parking would be provided throughout for each dwelling, and visitor parking would be sufficient to meet the requirements of the Parking at New Developments SPD. **The acceptability of the access is unclear, particularly given the proximity of Plot 1's driveway to this new entrance. Impacts to Duncots Close and the safe operation of the highway when occupied and during the building phase would need to be clarified with a highways consultant or by utilising the Hertfordshire Highways pre-app service.***

3.28 The proposals have been assessed and developed in consultation with Highway Consultants Stomor. The layout is considered appropriate in these respects and tracking drawings are included to demonstrate how refuse and other larger vehicles are able to enter the site, turn and leave in forward gear.

Landscaping, trees and biodiversity

*Policy NE4 requires all new developments to deliver measurable net gains of biodiversity and therefore, **any future application must include an ecological survey of the site with demonstratable measures being put in place to provide a net gain in on-site biodiversity. Turning to national policy, the development is required to deliver a minimum of 10% of BNG and would not fall within any of the exemptions for the delivery of BNG.***

The development would result in a net loss of 60% of BNG on site, the metric incorporates incorrect information given that the site is designated as being of strategic significance and would therefore require a greater level of BNG delivery..... The matter of BNG delivery may be resolved by providing an off-site contribution, however, on-site contributions would be strongly preferred as part of the delivery of this development.

3.29 In response to the matters raised we highlight the following:

- The application is accompanied by an ecological assessment survey as required.
- The application is also accompanied by an updated BNG assessment and net gain proposals for enhancement.
- The net loss has been significantly reduced to -24.31% through the provision of on-site proposals.

3.30 As may be appreciated, the site is allocated for development in the local plan to provide 9 new homes. Regardless of the size and / or layout of the development proposed, existing undeveloped space on what is a greenfield site will as a matter of fact be taken up by this development.

3.31 Whilst it would be the Applicants strong preference to deliver the 10% net gain on site, this is impossible. Significant work has however been undertaken to deliver as much as possible within the application site and so minimising the offsite requirements. This is discussed further in Section 5.

.....the loss of the large tree to the eastern boundary runs contrary with the criteria set by allocation IC1. To consider the loss of the tree, an updated BNG metric needs to be provided to ensure all information is up to date..... insufficient detail has been provided to appropriately address the loss of this tree and its impacts upon the landscaping buffer surrounding the site.

3.32 The tree referenced lay outside of the application site. It had suffered significant storm damage with limbs dropping over the eastern site boundary into the application site. This notwithstanding the Application now includes additional tree planting along the sites eastern boundary and also along the eastern boundary of the paddock land to the north of the proposed new housing area.

.....NE4 is not considered to be complied with given the lack of a 12m buffer between dwellings and the surrounding boundary to deliver complimentary habitat around wildlife sites.

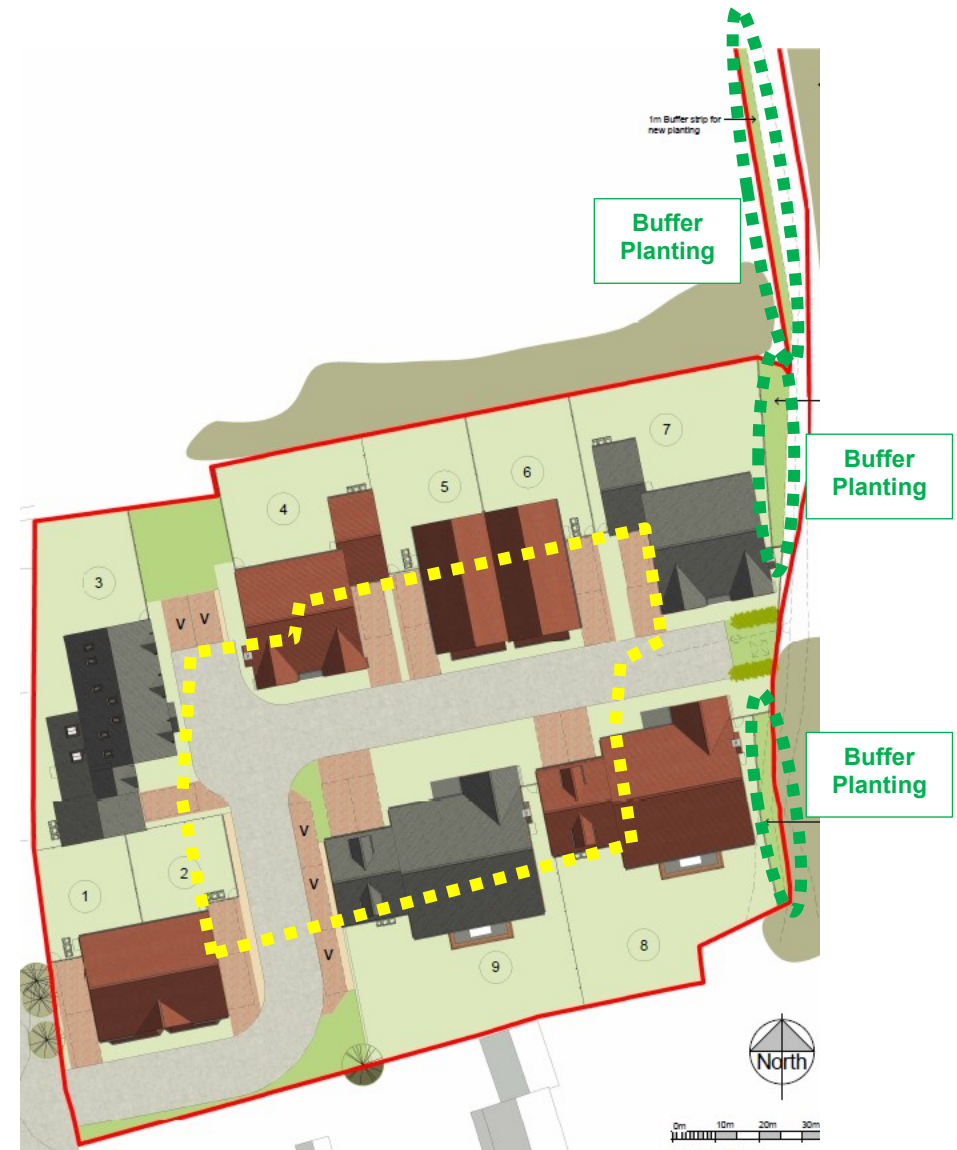
3.33 The Council's Ecology Officer has noted that in the absence of a Local Nature Recovery Strategy for Hertfordshire the Hertfordshire Ecological Network mapping will be used to determine 'strategic significance'. The area around Ickleford is considered part of a strategic zone. This is now reflected in the BNG calculations. The site itself however is not designated as a site of nature conservation importance nor are there any designated sites adjoining the application site. There is a non-statutory LWS within approximately 50m of the application site, to the east and separated from it by a grassland field.

3.34 The 12 metre buffer is said to be required to provide complementary habitat around such sites. In this case no sites exist and the PEA which has been undertaken does not consider 12m buffer planting necessary in this regard.

3.35 As discussed with the Council's Ecology Officer the site is small in scale and as demonstrated opposite by the dashed yellow line, if the development area available was brought in from the boundaries by 12 metres only a small area in the centre of the allocated site could be developed. This would be wholly inconsistent with the 9 dwelling allocation estimation and clearly not a reasonable approach in circumstances where there are no adjoining wildlife sites.

3.36 However, a buffer corridor has been introduced to the east side of the site as highlighted opposite. This separates the domestic gardens from the ditch area where adjacent to Plots 7 and 8 and then delivers a new approximately 100 metre planted corridor along the field boundary to the north, again as highlighted opposite.

3.37 These changes respond positively to the pre-application advice that has been provided.



Site layout with 12metre line overlaid and showing proposed eastern buffer

*A pond exists to the south-eastern corner of the site, and links to an existing ditch, allowing for drainage. The works to create a suitable SUDs scheme are considered to be detrimental to the ecological assets on site, and therefore **it is recommended that an on-site SUDs scheme to intercept water flows would be better and would result in the addition of assets of BNG interest.***

3.38 The 'pond' referenced is again not within the application site but lies to the south eastern edge. As explained in the accompanying PEA it is generally dry and offer little or no ecological potential. However, the comments received have been considered and the scheme has been amended to address the concerns as follows:

- The drainage connection to the eastern ditch site has been moved further along the eastern boundary such that it would not impact the 'pond' in any way i.e. water from the site would exit and run northward away from the dry pond area.
- A new above ground drainage swale is proposed to the north of the site to link to an existing connection to the River Purwell to the north. As part of this a new planted strip is included which has the effect of enhancing the biodiversity value generated at the site.

4.0 RELEVANT PLANNING POLICY

National Planning Policy Framework (NPPF) December 2024

- 4.1 The NPPF provides the governments guidance on the way in which the planning system should approach the delivery of sustainable new development. We highlight the following aspects.
- The purpose of the planning system is to achieve sustainable development (p.7)
 - Local Planning Authorities should approach decisions on proposed development in a positive and creative way so that application for sustainable development can be approved wherever possible. (p.38)
 - Planning conditions should be used in order to enable permission to be granted where possible rather than simply seeking to refuse development which could be made acceptable. (p.55&56)
 - Planning decisions should promote the effective use of land in meeting housing requirements. (P.124)
 - Planning decisions should support development that makes efficient use of land. (P.129 & 130)
 - Planning decisions should ensure that developments will function well and add to the quality of an area, are visually attractive, sympathetic to character and maintain or establish a sense of place. (p.135)

The North Hertfordshire Local Plan November 2022

- 4.2 The NHLP was adopted in November 2022. The following policies are highlighted as those most directly relevant to this proposal:

Policy IC1: Land off Duncots Close

Ref	Local Housing Allocations and site specific policy criteria	Dwelling estimate
Policy IC1	Land at Duncots Close	9 homes
	• Address existing surface water flood risk issues through SUDs or other appropriate solution; • No built development in north-east corner of site to protect views from Grade I listed church;	
	• Retain and reinforce planting along site boundaries to minimise heritage and Green Belt impacts; • Archaeological survey to be completed prior to development; and • Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery.	

Policy SP9: Design and Sustainability

The Council considers good design to be a key aspect of sustainable development. We will:

- a) Support new development where it is **well designed and located and responds positively to its local context**;*

Policy HS2: Affordable housing

Planning permission for new homes will be granted provided that:

a) Affordable housing is i. provided in accordance with the following targets subject to viability:

Size of site (gross dwellings) Target percentage of dwellings to be affordable **11 – 14 dwellings 25%**

Policy HS3: Housing mix

Planning permission for new homes will be granted provided that:

a) An appropriate **range of house types and sizes are provided**

Policy D1: Sustainable design

Planning permission will be granted provided that development proposals:

a) Respond positively to the **site's local context**;

b) Take all reasonable opportunities, consistent with the nature and scale of the scheme, to:

i. **create or enhance public realm**;

ii. optimise the potential of the site by incorporating **Sustainable Drainage Systems (SuDS)**;

iii. **reduce energy consumption and waste**;

iv. **retain existing vegetation** and propose **appropriate new planting**;

v. maximise accessibility, legibility and physical and social connectivity both internally and with neighbouring areas;

vi. future proof for changes in technology and lifestyle;

vii. **design-out opportunities for crime** and anti-social behaviour; and

viii. minimise the visual impact of street furniture and parking provision;

c) Have regard to the Design SPD, and any other relevant guidance;

- d) Within Letchworth Garden City have regard to the Letchworth Garden City Design Principles contained in Appendix 5;
- e) For residential schemes, **meet or exceed the nationally described space standards** and optional water efficiency standards.

Policy D3: Protecting living conditions

Planning permission will be granted for development proposals which do not cause unacceptable harm to living conditions

Policy T2 Parking

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**;

(Appendix 4 requires a minimum of 2 vehicular spaces per 2 or 3 bed dwelling and 1 covered cycle space per dwelling if the dwelling does not benefit from a garage.)

Policy NE1: Strategic green infrastructure

Planning permission will be granted provided that development:

- a) Protects, **conserves and where possible enhances** the strategic green infrastructure network;
- b) Avoids the **loss, fragmentation, severance** or negative impact on the function of the strategic green infrastructure network;

- c) Creates new strategic green infrastructure where appropriate and is accompanied by a plan for its long-term maintenance and management; and
- d) Has suitable mitigation measures or appropriate replacement to satisfactorily address adverse impacts on the strategic green infrastructure network.

Policy NE2: Landscape

Planning permission will be granted for development proposals that:

- a) Respect the sensitivities of the **relevant landscape character area** and have regard to the guidelines identified for built development and landscape management;
- b) Do not cause unacceptable **harm to the character and appearance of the surrounding area** or the landscape character area in which the site is located, taking account of any suitable mitigation measures necessary to achieve this;
- c) Are designed and located to ensure the **health and future retention of important landscape features**; and
- d) Have considered the **long-term management and maintenance of any existing and proposed landscaping**.

Policy NE4: Biodiversity and geological sites

*Planning permission will only be granted for development proposals that appropriately protect, enhance and manage biodiversity in accordance with the hierarchy and status of designations and features listed in Policy SP12. **All development should deliver measurable net gains for biodiversity and geodiversity**, contribute to ecological networks and the water environment, and/or restore degraded or isolated habitats where possible.*

Policy NE7: Reducing flood risk

Planning permission for development proposals will be granted provided that (as applicable):

- a) Development is located **outside of medium and high-risk flood areas (flood zone 2 and 3)** and other areas affected by other sources of flooding where possible;

Policy NE8: Sustainable drainage systems

Planning permission for development will be granted provided that:

- a) The **most appropriate sustainable drainage solution is used** taking into account technical, viability and design issues to reduce the risk of surface water flooding, enhance biodiversity, water quality and provide amenity benefits;
- b) It aims to **mimic the natural drainage patterns** and processes as far as possible; and
- c) Drainage solutions follow the **SuDS hierarchy**

Policy NE11: Contaminated land

Planning permission for development affecting or affected by contaminated land will be granted provided that:

- a) A contaminated land study / contaminated land risk assessment **is submitted as part of the application**;

Policy HE1: Designated heritage assets

Planning applications relating to Designated heritage Assets **or their setting** shall be accompanied by a Heritage Assessment/Justification Statement that:

- i. Assesses **the significance of heritage assets, including their setting**;
- ii. Justifies and details **the impacts of any proposal upon the significance of the designated heritage asset(s)**; and
- iii. Informs any necessary measures to **minimise or mitigate against any identified harms**.

5.0 **ANALYSIS**

The Principle of the Development

- 5.1 As the Council is aware, the application site is allocated for residential development under Policy IC1 of the adopted North Hertfordshire Local Plan. The policy assesses the site as being suitable to accommodate 9 dwellings in principle.
- 5.2 As noted as part of pre-application discussions, a development of 9 new homes can be supported in principle as being in accordance with the IC1 allocation.

Dwelling Mix

Existing Context & Character

- 5.3 The Council takes a design led approach when assessing the suitability of new development proposals. Whilst the “dwelling estimate” for the site as set out in Policy IC1 is 9 new houses it is also necessary to have regard to Policies SP9 and D1 that make clear that new development should respond to the existing context and character of an area.
- 5.4 In this respect and as demonstrated in Section 2, the area surrounding the site is low / medium density primarily made up of larger detached homes set within reasonably generous plots. The application proposals therefore complement and reflect the existing mix and character of the development in this area.

Relevant Development Plan Policy

- 5.5 The North Hertfordshire Local Plan includes Policy HS3 which seeks to ensure that new developments provide an appropriate range of housing taking account of the overall targets in the plan, the findings of the Council’s Strategic Housing market Assessment, the sites location, recent completions and existing permissions and the character and type of the surrounding development.

5.6 The supporting text to the policy explains that:

“8.20 The majority of completions since 2011 have been for smaller units whilst some of the sites identified through this Plan are specifically anticipated to focus upon small homes and / or flats.”

8.21 On most suburban and edge-of-settlement sites, applicants should therefore make an initial assumption of 60% larger (3+ bed) and 40% smaller (1 or 2 bed) homes to ensure an overall mix is achieved.....”

5.7 When considering this Policy the Local Plan Inspector commented in his report as follows:

*“521.....In terms of housing type and size, the Council’s housing and Green Belt background paper says that combining the housing North Hertfordshire Local Plan 2011 - 2031, size requirements across both market and affordable tenures would suggest a broadly **30:70 split between the provision of smaller and larger units in the future.**”*

522.Policy SP8 supports a broadly even split between smaller (one and two bedroom) and larger (three bedrooms and more) properties, for both market and affordable homes. This is not entirely consistent with the housing and Green Belt background paper’s conclusion.....

*523.**Paragraph 8.19 of the Plan points out that the majority of completions since 2011 have been for smaller units and some sites allocated in the Plan are specifically anticipated to focus on smaller homes.** Paragraph 8.20 indicates that some ‘balancing up’ may be required – it says that **on most suburban and edge of settlement sites, applicants should make an initial assumption of 60% larger and 40% smaller homes to ensure an overall mix is achieved. Taken together, I consider the approach here to be justified and effective.***

5.8 The Ickleford Neighbourhood Plan was made in 2024. Policy SD2 states that on sites of between 3-10 dwellings the size and mix of dwellings should respond positively to the most up to date information available on local housing needs. It does not specify a set mix that must be followed. A proposal to specify housing mix had been included within the examination version of the plan. This sought 33% of all new homes as 1 and 2 bed units, 33% as 3 bed units and then 33% as 4 plus bed units.

5.9 The Examiner did not accept that this version of the Policy was sound and instructed the changes resulting in that which was eventually included in the plan. The Examiners report states:

*“7.43as drafted, **it is over-complicated and will be difficult to apply through the development management process.** In addition, there is **no information in the policy about its potential impact on the delivery and/or delivery of new housing.** In addition, the effect of **the policy is likely to fall in a disproportionate way on smaller sites.**”*

*7.44 In these circumstances I recommend that the policy is recast so that its focus is on ensuring that the mix of house types reflects the most up-to-date information available on local housing need **and offers specific support to the development of smaller homes (1-3 bedrooms).** This will allow developers to respond to the relevant information at the time that planning applications are submitted. The recommended supporting text and general nature of the policy will be less restrictive than that proposed in the submitted policy. In addition, the modified policy will not create any direct tensions with Policy SD3 of the Plan which seeks to deliver high quality designs. I also recommend consequential modifications to the supporting text.*

5.10 In summary in terms of Policy:

- The Housing & Green Belt Background Paper for the District Local Plan suggested that the need for new homes should be split broadly as 30% small (1 and 2 bed units) and 70% larger (3 plus bed units).
- The current Local Plan Policy (HS3) seeks a good mix of units based on an up to date understanding of local needs. It states that *on most suburban and edge of settlement sites, applicants should make an initial assumption of 60% larger and 40% smaller homes....”*
- When the Ickleford NP was prepared it had sought to include a requirement that 33% of all new homes on sites of between 3-10 units should be 1 and 2 bed with 33% 3 bed leaving 33% to be 4 bed plus. This proposal was not supported on the basis that it was overcomplicated, would be difficult to apply, would potentially impact delivery and would fall disproportionately on small sites such as this application site.

- The NP Policy as finally made does not therefore include this requirement. Rather it simply states that the size and mix should respond positively to most up to date information and that 1-3 bed units will be particularly supported.

Housing Requirements in Ickleford

5.11 The Ickleford Housing Need Study (August 2021) as prepared by AECOM advises:

*“13. North Hertfordshire District Council has fulfilled that requirement by providing Ickleford **with an indicative figure of 209 dwellings to be accommodated within the Parish area by the end of the Plan period**..... when looking at the Annual Monitoring Data, since 2016 (the same year as the publication of the emerging Local Plan which includes the figure of 209) **there have been 34 completions in the Parish.***

*14. **As of April 2020, 146 dwellings had been committed (gained planning permission). This is primarily to be delivered on one site at land to the east of Bedford Road and west of Old Ramerick Manor Bedford Road known as allocation site LS1, which is set to deliver 144 dwellings.....***

*16. Therefore, **this provides a residual requirement of a of 29 dwellings** (209-34-146) to be provided over the plan period when excluding completed dwellings and those under construction.....*

5.12 The District Local Plan contains three allocated sites within Ickleford that are in addition to those already committed:

IC1 – The application site ‘Land off Duncots Close’	9 homes
IC2 – Burford Grange Bedford Road	40 homes
IC3 – Land at Bedford Road	150 homes

5.13 Given these allocations will result in the deliver of 170 homes beyond the remaining 29 specifically required for Ickleford the Ickleford NP does not make any allocations for new housing and save for 29 of the 199 allocated homes thee district plan allocated sites are now primarily assisting in meeting wider district needs rather than those within Ickleford specifically.

Mix provided by committed development

- 5.14 Since the preparation of the Neighbourhood Plan and the AECOM housing needs survey, planning permission was granted on 6 February 2023 in respect of the allocated site IC2 (Burford Grange 19/01106/FB), for the construction of 48 dwellings with associated access, parking, private and public amenity space and associated works.
- 5.15 Of the 48 units permitted, 15 of these were 2 bed homes and 3 were 3 bed homes. In addition at the committed east of Bedford Road and west of Old Ramerick Manor, some 42 units are to be 1 and 2 bedroom and 33 to be 3 bedroom homes.
- 5.16 The allocated IC3 site does not yet have permission but is estimated likely to deliver approximately 150 homes as allocated. Clearly this site will include a reasonable mix of homes including a number of 1, 2 and 3 bed units.
- 5.17 Finally, and again since the August 2021 needs assessment was published planning permission was granted on 11 March 2024 on land at Ickleford Mill (17/01955/1) for up to 71 dwellings. The permission is in outline so no dwelling mix is fixed but it will clearly again deliver a reasonable mix including 1, 2 and 3 bed homes.
- 5.18 In summary, because of the committed development within Ickleford it is clear that local needs and the local desire for smaller units will be more than met in the plan period.

Response to Policy HS3 of the Local Plan and SD2 of the Neighbourhood Plan

- 5.19 The application proposal responds to and complies with Policy HS3 as follows:
- A reasonable range and mix of housing is proposed including two smaller 2 bedroom semi-detached units and two 3 bedroom semi-detached units.

- The proposal reflects the sites edge of settlement location and the character, scale and form of the surrounding development.
- Regard has been had to the recent completions and commitments which exist in the Ickleford area and will deliver more than sufficient housing to meet local needs.

5.20 The application responds to the final, adopted version of Policy SD2 of the neighbourhood plan as follows:

- The size and mix of the development proposed responds to the information provided in the AECOM needs assessment and the requirements in Ickleford having regard to existing permissions, commitments and allocated development that is coming forward.
- The proposal includes two 2 bed and two 3 bed units (44%) which Policy SD2 notes will be particularly supported.

5.21 It is respectfully submitted that there is no justification to require a more constrained or prescriptive dwelling mix at this site based upon current policy requirements, the permitted and committed housing coming forward in the area and the scale, character, location and nature of the site.

Policy IC1

5.22 The Policy that allocates the site for development (IC1) includes five specific criteria that must be addressed:

- i Surface water flood risk issues are addressed through a sustainable drainage solution for the site.
- ii That there is no built development within the north east corner of the site that could interrupt views from the church.
- iii Boundary landscaping retained and strengthened.
- iv An archaeological survey is completed prior to development.
- v A detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery.

5.23 This submission fully addresses each aspect as follows:

Sustainable Drainage

- i. A sustainable drainage solution has been developed for the site in accordance with the surface water drainage hierarchy by consultants Stomor. On site testing has confirmed that the ground conditions are not suitable for infiltration methods due to the high groundwater table observed.

It is therefore proposed to convey surface water flows from the site via a new ditch / swale to the north east of the site linking to an existing tributary of the River Purwell located approximately 90m from the north east corner.

The accompanying report demonstrates how the development can be effectively drained, and the amount of storage required to avoid flooding within the site during all storms up to and including the 1 in 100-year storm event plus a 40% allowance for climate change.

No Built Development to North East Corner

- ii. As previously agreed the development would have no adverse impact upon the view corridor from the church.

Boundary Landscaping – Retain and Strengthen

- iii. A full landscaping scheme for the site is included with this application. In addition to the draft proposals presented at the pre-application stage an additional planting strip associated with the proposed sustainable drainage scheme is also now included.

Archaeology

- iv. An Archaeological Assessment of the site has been prepared and submitted with this application.

The report has been discussed with Hertfordshire Archaeology prior to submission. It has been agreed that the report is appropriate and that future invasive archaeological work can be carried out post decision and pre-commencement.

Detailed Drainage Strategy

- v. As noted above a detailed drainage strategy is provided. This demonstrated how surface water from the site would be directed to the River Purwell via a new channel to the north east of the site.

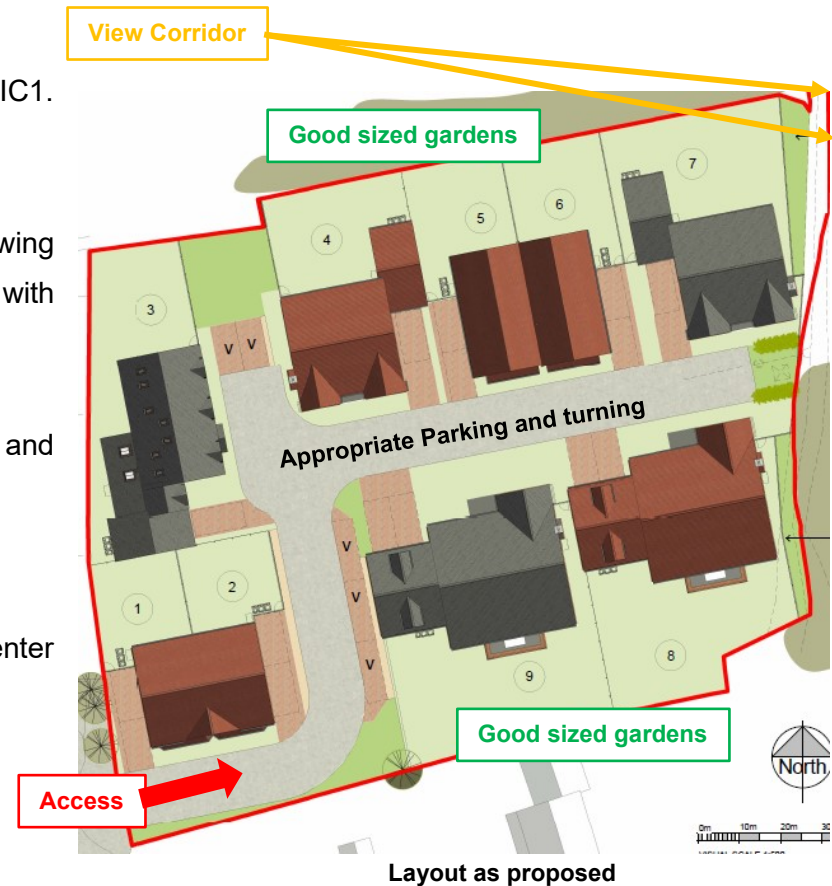
5.24 The application package therefore fully addresses all aspects of Policy IC1.

Layout, Design, Scale & Appearance

5.25 As described in Section 3, the proposed site layout has developed following initial high level then subsequent, detailed pre-application discussions with the Council.

5.26 The site is broadly rectangular and there are number of fixed constraints and opportunities that drive the proposed layout. In summary these are:

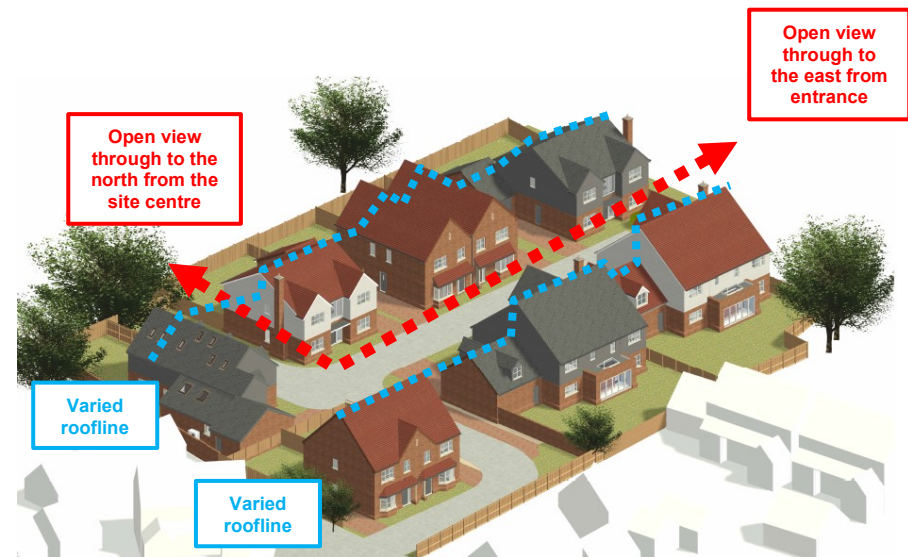
- The vehicular access to the site enters from the south west corner.
- It is necessary to ensure that refuse and other larger vehicles can enter the site turn and leave in forward gear.
- Access to maintain the land to the north is required.
- There is a heritage view corridor to the north east to be respected.
- There are boundary trees and hedges to be avoided.



- 5.27 In addition to these fixed constraints there has also been a desire to provide a high quality spacious layout. All homes meet minimum space standards, all include on plot parking and in some cases garaging. Generous rear gardens are included and the houses are well spaced avoiding overlooking and any overbearing relationships.
- 5.28 It is considered that the layout works well in terms of ensuring a high standard of amenity is retained for existing neighbours and the future residents of the development.
- 5.29 The proposed dwelling mix is discussed earlier in this section. In terms of overall scale officers pre-application advise was to reflect that which is characteristic of the location. A review of the built development within the surrounding area confirms that most existing dwellings range from one and a half to two storeys in height. There are no obvious two and a half storey or three storey homes in this area.
- 5.30 Given this existing character and as a result of the edge of settlement location it is considered appropriate to follow this general scale and retain the dwellings at two storey only.
- 5.31 Elements of one and a half storey built form are also proposed with rooms provided over garages to add a variation in height and a visual stepping as shown on the following page.
- 5.32 In addition, the roof forms have been carefully considered with gables added to add interest and reduce overall massing and so further soften the visual impact of the development.
- 5.33 It is considered very unlikely that the dwellings would be visible to any material extent from Arlesey Road to the west with the existing built form which faces Arlesey Road largely screening the site from view.

5.34 Scale is not however simply a matter of height. Rather the overall footprint and massing of the proposed built form can influence the perception of scale. Large blank facades and a lack of space around the buildings can lead to a development which appears cramped and out of scale with the particular site resulting in 'overdevelopment'. Care has been taken to avoid that here. As demonstrated in the 3D perspective opposite the layout would appear spacious and retain views past and through the built form to the countryside beyond with good sized gardens providing space to the site boundaries.

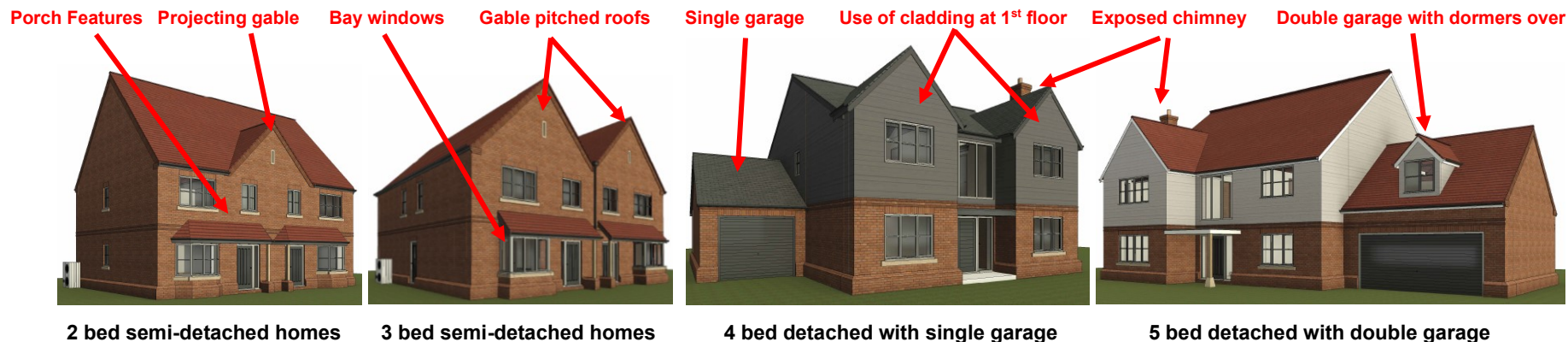
3D perspective annotated to demonstrate consideration of scale and openness



- 5.35 The applicant in this case is a local Hertfordshire housebuilder and has delivered a number of high quality small and medium sized residential developments within North Hertfordshire, East Hertfordshire Central Bedfordshire and the surrounding area. The company approaches each development with the objective that when driving past the site ten years after it is completed, it will have stood the test of time, appear of a high quality and matured into its context.
- 5.36 The company generally retains an ongoing relationship with the purchasers of its homes and so has developed its product on the basis of direct feedback in terms of aspects that have worked well and elements of design which could be improved further.
- 5.37 A key aspect which has become clear through numerous developments is a desire for homes to have 'kerb appeal', the house must 'look good', have a quality feel and incorporate variety and importantly when viewed from the rear (where owners spend most of their time) should be as attractive as it is from the front.

5.38 As explained in Section 3, whilst render can be an attractive finish initially it has the potential to deteriorate, stain and so diminish the quality of the house. The proposal therefore seeks to utilise red brickwork as the primary materials pallet with panelling at first floor level on some plots. Roof materials would be varied using an artificial slate tiles in grey or red as shown on the accompanying house type details and materials schedule. Contextual features such as projecting gables, exposed chimneys, brick plinths, stone cills, dormers, bay windows, roof overhangs and quality facias all assist in providing interest and breaking up the facades. The details are carried through to the rear elevations as demonstrated below.





5.39 It is considered that the proposals would deliver a high quality appearance that would complement the existing character of this area.

Access Parking & Tracking

5.40 The application is supported by a Transport Statement prepared by Stomor Highway Consultants. This explains that the site lies within a sustainable location, with access to local bus stops and facilities within an easy walking or cycling distance.

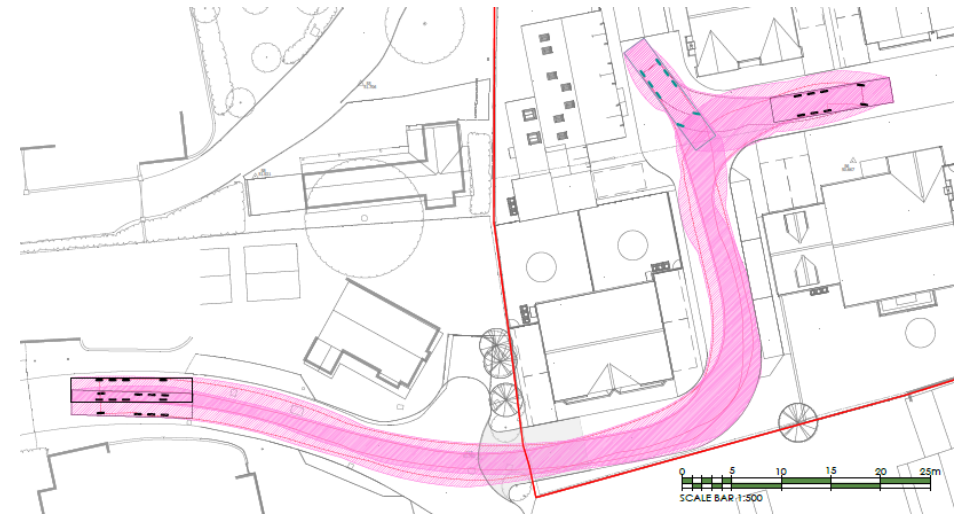
5.41 As noted above the site is accessed from Duncots Close with an extension of the existing shared surface proposed.

5.42 Parking is to be provided in accordance with Council standards and so Policy T2 of the Local Plan. Each of the proposed dwellings has at least two parking spaces including garages. Five visitor parking spaces (0.6 per dwelling) are also provided.

5.42 EV charging and secure cycle parking facilities are also provided.

5.43 Refuse vehicle tracking has been provided for the site, as shown in Drawing ST-3472-700 (extract opposite). This demonstrates that a 12.205 metres refuse vehicle can appropriately access the site using the proposed crossover arrangement and turning using the turning head located within the site.

5.44 Stomor conclude that with reference to paragraph 116 of the National Planning Policy Framework (NPPF), the likely residual cumulative impact of the development is not considered to be 'severe' and so there are no highway grounds to resist the grant of planning permission in this case.



Refuse tracking drawing extract

Impact on Site Neighbours

5.45 Local Plan Policy D3 requires that new development has regard to and protects the living conditions of existing and proposed neighbours. In this regard care has been taken to ensure appropriate separation distances between the existing and proposed houses and in term of window positions.

5.46 In particular it is highlighted that the design of Plot 3 ensures that there would be no first floor habitable room windows to the north or west sides to ensure that the privacy of No.34 Arlesey Road is maintained.

5.47 More generally window positions are set away from windows and amenity spaces of neighbouring houses. With good sized gardens provided for the houses, the spacing is generous and would not result in any overbearing or enclosing impacts for neighbours.

Ecology, BNG & Landscaping

Ecology

- 5.48 ELMAW Consulting has undertaken a Preliminary Ecological Assessment (PEA) of the site. This explains that the site is largely dominated by managed grassland, with some small areas of scrub.
- 5.49 There are no 'Priority Habitats' within the site and the PEA concludes that the proposed development would not have significant adverse impact on any important habitats.
- 5.50 There are also two apple trees within the site. One of these includes an open rot hole, and cavity within its trunk that has been noted as providing an opportunity for use by both nesting birds and as a Potential Roosting Feature (PRF) for bats. The report comments that anecdotal evidence indicates this feature is used by nesting starlings precluding its use as a summer bat roost. Winter endoscope inspections of the cavity found no evidence of bat hibernation, but confirmed its use by grey squirrels.
- 5.51 It therefore recommends mitigation measures during construction to protect nesting birds and mammals.

BNG

- 5.52 The BNG metric calculates the site's baseline habitats to be worth 1.70 Habitat Units. As with any small site of the nature of the application site, through development of the land there will be a biodiversity net loss.
- 5.53 Responding to the pre-application comments provided by the Ecology Officer and Local Plan Policy NE4 the Applicant has worked with ELMAW Consulting to minimise the on-site loss and deliver as much of the offsetting net gain on site as possible. This has reduced the estimated on site loss of -60% at pre-application stage to the current position which is a loss of -24.13%. This enhancement from the pre-application position is greater than initially apparent as the Strategic Multiplier highlighted by the Ecology officer has been utilised in the updated calculations.

- 5.54 This has been achieved through the creation of a new drainage swale to the north east of the main body of the site. This is to be planted with good condition wildflower planting and 30 new Alders.
- 5.55 A new native hedgerow comprising wildlife-beneficial species and measuring approximately 12m in total will be planted as part of the soft landscaping proposals for the site. This provides a +100% biodiversity net gain in terms of hedgerow habitat.
- 5.56 In order to achieve a +10% BNG overall, 0.63 Habitat Units will need to be delivered through the purchase of BNG credits.
- 5.57 More generally ecological enhancements specifically for species will be included within the site including bird nest boxes, cavity bat tubes and hedgehog pop-holes in rear garden fences.

Landscaping

- 5.58 As shown opposite a site landscaping scheme has been developed by Liz Lake Associates. This includes the planting of new specimen trees, street trees, new hedging, ornamental planting and new lawned garden spaces. The proposals demonstrate how the site would provide a high quality landscape setting for the new homes proposed in accordance with Local Plan Policy NE2.



Site Landscape Proposals

Flooding & Drainage

- 5.59 The application is accompanied by a Flood Risk & Drainage Statement prepared by consultants Stomor. This confirms that the site is located with Flood Zone 1 and so not at risk from flooding from rivers or other water courses.
- 5.60 In accordance with Policy NE8, a sustainable drainage scheme has been developed to mimic natural greenfield run off rates and following the SuDs hierarchy. The hierarchy requires consideration of surface water drainage solutions firstly looking to utilise infiltration methods, then watercourses, then public sewer network.
- 5.61 The accompanying strategy explains that the site is currently greenfield with no impermeable area whilst the proposed development will have a hardstanding area of 0.217ha. Site investigation work has identified that infiltration is not possible in this case due to the high groundwater table observed.
- 5.62 A review of historic mapping has highlighted that there was a former ditch system which conveyed flows from the eastern boundary of the site to the River Purwell. However, this system has been removed from the land located between the site and the river.
- 5.63 It is therefore proposed to convey flows to an existing tributary of the Purwell located approximately 90m to the north of the site through the provision of a new above ground drainage channel / swale as shown on the submitted drainage plan.
- 5.64 The proposal can accommodate the required 1 in 100-year storm event plus a 40% allowance for climate change.

Sustainability & Energy Statement

- 5.65 Local Plan Policy D1 'Sustainable Design', states that new developments must seek to include measures which reduce energy consumption. The Council's recently adopted Sustainability SPD notes at paragraph 1.26 that for minor developments of less than 10 dwellings applicants should provide a Sustainability and Energy Statement for review by Officers as part of the application process. This is the purpose of this section of this Statement. It follows and is based upon the guidance set out in the SPD.
- 5.66 The overall target for the site is that there will be an onsite reduction in regulated carbon emissions of at least 35% beyond the baseline of Part L of the building regulations and all homes will achieve at least a 'B' EPC rating. This is to be achieved by optimising passive design and fabric performance as well as the use of low energy and sustainable heating technologies. The following provides an outline of the aspects which have already been considered and will continue to be developed as part of the detailed design of the site.

Optimising Passive Design & Fabric Performance

Layout:

- 5.67 The site is broadly set on an east west access. Care has therefore been taken to design the dwellings to take advantage of south facing elevations and where some of the dwellings include rear elevations with a primarily northern aspect toward rear gardens larger glazed areas are provided to maximise light and solar gain where possible.

Insulation

- 5.68 As set out in the SPD, the applicant is conscious that around half of the heat loss in a typical home occurs through the walls and the roof. PDHL seeks to ensure insulation levels beyond current building regulations requirements as this is often the cheapest and most effective method of reducing CO2 emissions and energy needs. Good quality insulation including loft insulation, wall insulation, floor insulation and draught proofing keeps buildings warmer in the winter and cooler in the summer.

Air tightness

- 5.70 Air leakage occurs in several places but in particular draughty windows, doors and joints between ceilings and walls are the primary causes. In this case it is proposed to include high quality double glazed windows and care is taken to ensure gaps around window and door frames are properly sealed. All holes around services passing through the external walls including water pipes, gas pipes, boiler flues and electrical cables will also be sealed.

Low Carbon Energy

- 5.71 The SPD highlights a number of low carbon energy options which could be considered as part of residential developments. These include Ground Source Heat Pumps, Air Source Heat Pumps, Solar, PV, Biomass and Wind Turbines.
- 5.72 The applicant favours the use of air source heat pumps (shown green opposite). These work by converting the temperature of the outside air into heat for the building and supplying energy for the hot water system. The units are small scale and so do not require a large outside area and can be located discreetly to minimise visual impacts.
- 5.73 On a recent development undertaken by the applicant in nearby Guilden Morden (Cambridgeshire) the use of heat pumps alongside the passive measures discussed above achieved a 35% betterment against building regulation requirements was achieved and a similar outcome is expected here. EV charging points are also highlighted (blue).



Plan showing the location of ASHP's and PV charging points

Minimising Carbon Footprint

5.74 The Applicant is keen to ensure that Whole Life Carbon (WLC) principles are followed as part of the sites development. Consideration has and will continue to be given to both the embedded and operational carbon impacts of the proposals.

5.75 To minimise waste (which also has the advantage of reducing unnecessary costs) the Applicant will follow best practice through the efficient management of waste during construction. This will reduce construction waste and but where this cannot be avoided as much as possible will be recycled and so diverted away from landfill.

5.76 Operational waste will also be minimised through the encouragement of recycling. This is achieved through the provision of convenient storage for waste internally and also externally to the houses. The plan opposite highlights the consideration of waste storage at each property.

Healthy Placemaking

5.77 The development is not of a scale whereby new public square and other open spaces are required or could be provided.

5.78 However, the proposals have been developed with landscaping as a key element of the scheme.

5.79 The public areas are appropriately overlooked from the dwelling frontages whilst the private garden spaces retain high levels of privacy.



Plan showing refuse storage locations

Promoting Biodiversity

- 5.80 As highlighted above a PEA and BNG metric calculation has been undertaken. The proposals include the provision of new on site hedgerow, wildflower and tree planting.

Sustainable Travel

- 5.81 To encourage the use of electric vehicles all of the houses are provided with EV charging points. All benefit from cycle storage either within garages or stores within the garden areas.

Conserving Water

- 5.82 The proposals will include aerated washbasin/kitchen taps and shower heads, tapered and low capacity baths, low flush toilets and water efficient white goods and appliances such as washing machines and dishwashers.

6.0 CONCLUSIONS

- 6.1 This application seeks full planning permission to enable the construction of 9 new high quality homes on land north east of Duncots Close in Ickleford. The site is allocated for residential development of 9 new homes under Policy IC1 of the adopted North Hertfordshire Local Plan.
- 6.2 This statement and the accompanying reports and full plans package has demonstrated that the proposals fully comply with Policy IC1 and all other relevant local plan policies.
- 6.3 The proposals would deliver a high quality residential environment for the future occupiers and provide 9 new homes toward the Council overall housing stock. At the present time the Council is unable to demonstrate a five year housing land supply. This site forms part of the supply and so would assist the Council toward improving the current position.
- 6.4 There are no technical constraints to the sites development and no adverse impacts arising for site neighbours.
- 6.5 The application includes detailed information in respect of landscaping, materials for the proposed dwellings, trees and tree protection etc. The Applicant is keen to minimise or remove the need to address pre-commencement condition if possible to enable an immediate start on site.
- 6.6 Officers support for this application is sought.