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Ref: DF / PL-0710

[REDACTED]

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Submitted via E-mail: paul.chaston@north-herts.gov.uk

Dear Mr Chaston,

Layout objection to Outline Application 25/02401/OP: Erection of up to 100 dwellings with means of access from Turnpike Lane, including associated landscaping, drainage, car parking; infrastructure and all ancillary and enabling works following demolition of all existing structures (all matters reserved except means of access) Land South of Turnpike Lane, Ickleford, Hertfordshire

I write on behalf of my client, Hill Residential in relation to the proposed Outline Planning Application 25/02401/OP (the Turnpike Lane Site).

As set out on our original representation, Hill Residential are the owners of Ickleford Flour Mill (Mill Site), which immediately adjoins the Turnpike Lane Site to the south-east. The Mill Site benefits from Outline Planning Permission (17/01955/1) for up to 71 dwellings. In early March 2026, a Reserved Matters Application (26/00631/RM) for the erection of 55 dwellings was submitted in relation to the Mill Site.

Since the submission of the February 2026 objection letter, updated plans have been submitted in relation to the Turnpike Lane Site. Hill Residential have concerns in relation to the updated Illustrative Masterplan (CMP-01, Rev R8), which was submitted by the applicants in March 2026. The concerns relate to the close proximity of the new dwellings within the Illustrative Layout to the proposed dwellings within the Ickleford Mill site to the south and east, which is being delivered by Hill Residential.

North Hertfordshire Local Plan 2011-2031

The North Hertfordshire Local Plan 2011-2031 which was adopted on 8 November 2022 and is the key development plan document. The relevant design policies are:

- Policy D1: Sustainable Design which explains planning permission will be granted provided development proposals respond positively to the site's local context and have regard to the Design SPD
- Policy D3: Protecting living conditions which explains planning permission will be granted for development proposals which do not cause unacceptable harm to living conditions.

National Planning Policy Framework 2024 (NPPF)

The National Planning Policy Framework ('NPPF') sets out the Government's planning policies for England and how these should be applied. Chapter 12: Achieving well-designed and beautiful places, is particularly relevant. Paragraph 139 explains:

Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design (Footnote 54: Contained in the National Design Guide and National Model Design Code), taking into account any local design guidance and supplementary planning documents such as design guides and codes.

The National Model Design Code: Part 2 Guidance Notes (2021) includes the following indicative information in relation to privacy distances:

76. Privacy Distance:

Privacy distances are important but can have an impact on the density of development. There would not normally be a privacy distance at the front of the property.

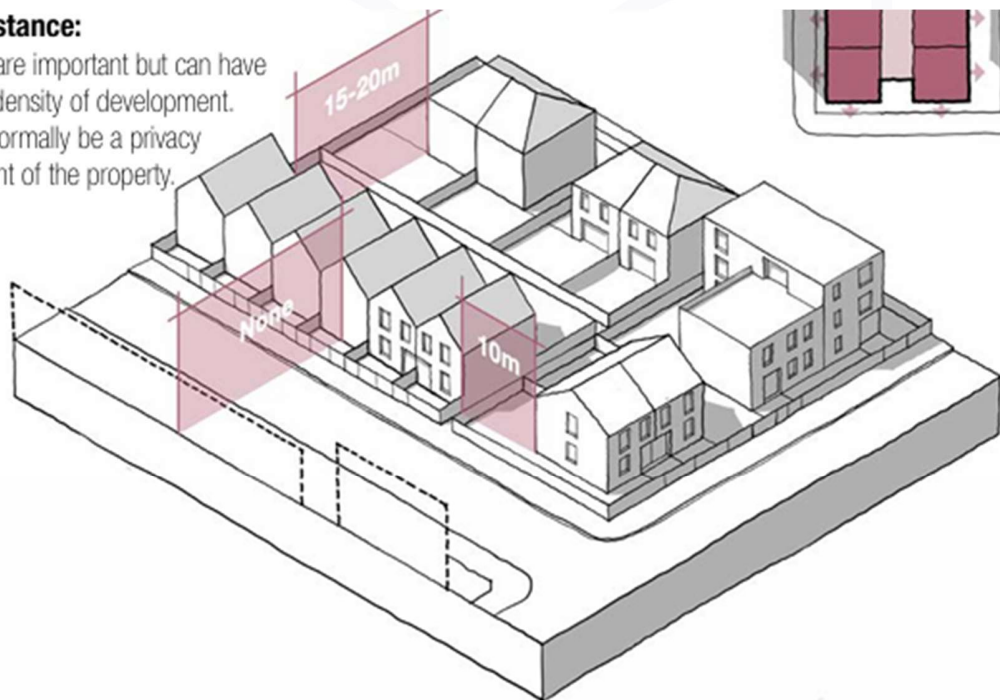


Figure 1: National Model Design Code: Part 2 Guidance Notes (2021)

The Revised Layout

On 18 March 2026, an updated Illustrative Masterplan (CMP-01, Rev R8) was uploaded to the LPA's website in relation to the Turnpike Lane Site. On the same day, the Hill Residential Reserved Matters Application 26/00631/RM for the Ickleford Mill site was validated. The Reserved Matters Application includes Proposed Site Layout plan 185-PS-103, Rev A. As a result of collaborative pre-application discussions with North Hertfordshire District Council the layout of the Ickleford Mill layout has been amended from the illustrative layout shown at Outline planning application stage, with dwellings now backing onto the Turnpike Lane site.

The key area of concern is highlighted below (Figure 2).



Figure 2: Left: Turnpike Lane Site Illustrative Masterplan (CMP-01, Rev R8), Right: Mill Site Proposed Site Layout (185-PS-103, Rev A)

As shown by the Illustrative Masterplan, dwellings are proposed in very close proximity to the boundary of the Turnpike Lane Site. The layout of Hill's Site shown on the Illustrative Masterplan (greyed out) was submitted illustratively at Outline Planning Application stage and the layout shown by the Proposed Site Layout has now been submitted for approval under Reserved Matters Application 26/00631/RM. It should be noted that the Reserved Matters Application follows an approved Outline Planning Permission on an allocated site and extensive pre-application engagement. As shown by Figure 3, the distance between the Hill Site dwellings and the site boundary is only 13m. In addition to this, there is a significant step-up in ground levels from the Mill Site to the Turnpike Lane Site, with the Turnpike Lane site being on substantially higher ground. As a result, the current arrangement would result in an unacceptable impact on residential amenity, in terms of privacy, overlooking and the Turnpike Lane Site dwellings being overbearing in relation to the Mill Site dwellings.

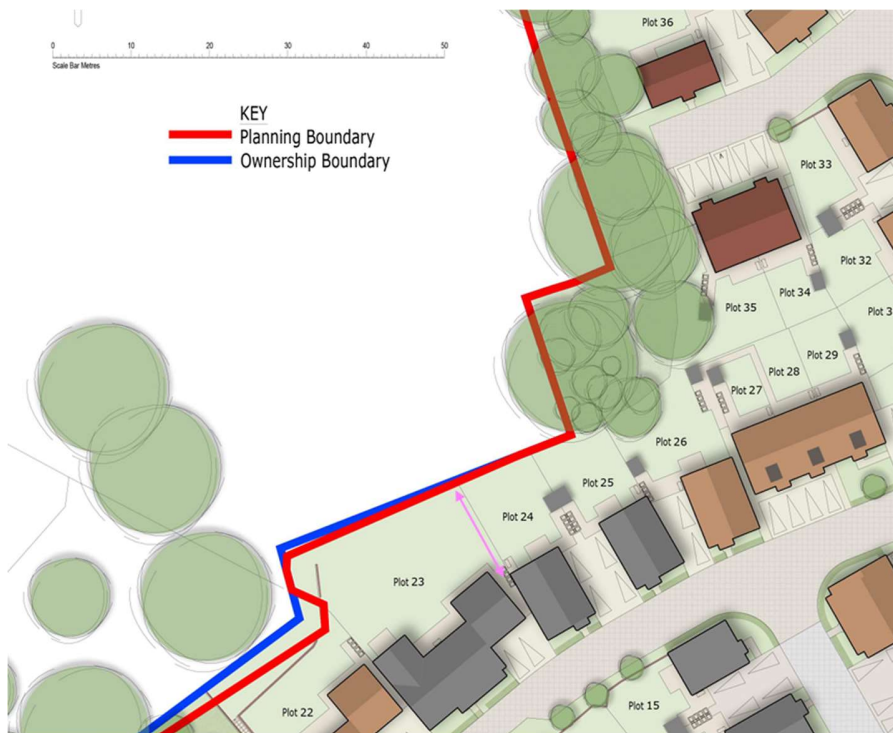


Figure 3: Pink Arrow –13m

The National Model Design Code provides some indicative privacy distances. With potentially acceptable back-to-back distances between 15-20m and a back-to-side distance of 10m. It should however be noted that the Model Design Code privacy distances are indicative and do not take account of elevational changes. As set out above, there is a significant step up in level from the Mill Site to the Turnpike Lane Site. The indicative distances provided by the Model Design Code are therefore not sufficient to preserve privacy, prevent overlooking and not result in the Turnpike Lane Site dwellings being overbearing in relation to the Mill Site dwellings.

Additionally, although the arrangement shown on the Illustrative Masterplan indicates the dwellings would be back-to-side and the Design and Access Statement indicates the Turnpike Lane Site dwellings would be two-storey, the final layout of the Turnpike Lane Site and the scale of the dwellings would be determined through a subsequent Reserved Matters Application. As it stands, the submitted Turnpike Lane Site Parameter Plan PPL-01, R3 (Figure 4) shows the developable area abutting the site boundary, which would potentially allow built development right up to the site's edge.

In order to rectify the situation, the Turnpike Lane Site plans should be revised to include, at least, a 10m landscaped buffer along the Turnpike Lane Site boundary in this location (Figure 4). This would create visual separation between the dwellings and their amenity spaces, preventing overlooking, loss of privacy and reducing any chance of the Turnpike Lane Site dwellings being overbearing.



Figure 4: Parameter Plan PPL-01, R3 (required landscaped buffer in dark green)

As it stands, the proposed Turnpike Lane Site layout is unacceptable and would not be in accordance with policies D1, D3, the NPPF and the National Model Design Code.

Summary

The layout proposed on the Turnpike Lane Site shows an unacceptable relationship between the Turnpike Lane Site and the Mill Site dwellings and amenity spaces and is not in accordance with policies D1, D3, the NPPF and the National Model Design Code. At least a 10m landscaped buffer along the Turnpike Lane Site boundary is required in this location. This would create visual separation between the dwellings and their amenity spaces, preventing overlooking, loss of privacy and reducing any chance of the Turnpike Lane Site dwellings being overbearing. Whilst it is appreciated that the Illustrative Masterplan is indicative, the Parameter Plan should be updated in line with the recommendation set out on figure 4 above.

I trust these matters will be taken into consideration to inform your recommendation.

Yours sincerely



David Fletcher
Partner

