

ROK PLANNING

ALTERNATIVE SITES ASSESSMENT

In respect of

Land at Pound Farm, Hitchin, SG5 3RS

On behalf of

Bugler Homes Ltd

QUALITY MANAGEMENT

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1. INTRODUCTION

1.1 This Alternative Site Assessment has been prepared by ROK Planning, on the instruction of Bugler Homes Ltd, to support a planning application at Land at Pound Farm, Hitchin, SG5 3RS.

1.2 The application seeks planning permission for:

“Hybrid application for a mixed-use development to provide a total of up to 230 dwellings, a residential care home (Use Class C2), an Independent Special School (ISS) and new sports pitch, with access from Bedford Road, landscaping, parking and SuDS comprising: Phase 1 – Application for full planning permission for the erection of 100 dwellings, an ISS, new sports pitch and associated parking, landscaping, open space and SuDS; Phase 2 – An outline application on the remaining part of the site for the erection of up to 130 dwellings, a residential care home (Use Class C2) and associated works with access from Bedford Road (all matters reserved apart from access).”

1.3 This assessment has been produced to identify suitable, achievable and available sites for the proposed development, specifically within the North Hertfordshire District Council local authority area. The assessment considers all potential sites against the specific spatial, locational and operational requirements of a development of this size and nature. Accordingly, sites falling outside the required site size range of 10 - 30 hectares, or those that are not suitable or achievable for delivery, have been excluded from further consideration.

1.4 The conclusions of this report are based on publicly available data including available planning policy, local residential agent listings and property websites. This assessment finds that there are no suitable alternative sites within North Hertfordshire that can accommodate the proposed development and meet the identified criteria. A full list of all documents researched can be found in Section 2.

1.5 The subsequent sections of this assessment are structured as follows:

- **Section 2** describes the site and the surrounding area;
- **Section 3** outlines the proposed development;
- **Section 4** sets out the methodology; and
- **Section 5** provides an analysis and conclusion.

2. SITE AND SURROUNDING AREA

- 2.1 The Site is approximately 20 ha and is located in Ickleford, North Hertfordshire. It currently comprises unused agricultural land with the settlement of Ickleford bordering the Site to the southeast and the existing buildings of Pound Farm to the north. The Site lies on the outskirts of Ickleford, with the surrounding area predominantly agricultural and green field land. The eastern border of the site is bound by A600 Bedford Road. A public right of way (Bridleway 016) runs east-west through the centre of the Site.
- 2.2 Figure 1 below shows the site boundary (edged red).



Figure 1. Site Location Plan

- 2.3 Ickleford is a medium-sized village with almost 2,000 inhabitants. It has a range of services, including shops, restaurants, a primary school and a post office. It lies just to the north of Hitchin, a long-established market town with over 30,000 inhabitants. Hitchin has a full range of services and amenities available including additional retail and café/restaurants, schools and sustainable transport options.
- 2.4 There are no listed buildings on or near the site, and the site is not within a Conservation Area or the setting of one. The Site is located in Flood Zone 1 indicating a 'Low' risk of flooding from the rivers and sea and has a 'Very Low' risk of surface water flooding.
- 2.5 The southern parcel of the Site is designated as Green Belt, while the remainder of the Site is characterised within the North Hertfordshire Local Plan as 'Rural Areas beyond the Green Belt'.

3. PROPOSED DEVELOPMENT

3.1 The following development is proposed:

“Hybrid application for a mixed-use development to provide a total of up to 230 dwellings, a residential care home (Use Class C2), an Independent Special School (ISS) and new sports pitch, with access from Bedford Road, landscaping, parking and SuDS comprising: Phase 1 – Application for full planning permission for the erection of 100 dwellings, an ISS, new sports pitch and associated parking, landscaping, open space and SuDS; Phase 2 – An outline application on the remaining part of the site for the erection of up to 130 dwellings, a residential care home (Use Class C2) and associated works with access from Bedford Road (all matters reserved apart from access).”

3.2 There are also several areas of landscaped open space across the Site for the use of future residents including play areas, public open space and community allotments.

Subject Site Assessment

3.3 The Site is assessed in the same manner as the assessment of alternative sites as found at Appendix A.

Site	Size (approx.)	Distance from Site	Planning Policy Designation
Land at Pound Farm, Hitchin, SG5 3RS	20 ha to be developed	N/A	The southern part of the site lies within the Green Belt. The remainder of the site lies within Rural Areas beyond the Green Belt.
Assessment			
The Site is formed of vacant agricultural land at the northern edge of Ickleford. The southern part of the Site is designated as Green Belt while a small portion of the northern part of the Site is located within the Rural Area Beyond the Green Belt. The proposed plans indicate that the development that would occur within the Rural Area beyond the Green Belt would principally comprise of sports pitches and the single-storey school buildings.			
The Site does not significantly contribute to Green Belt purposes as set out in the Covering Letter) and summarised below:			
The Site is adjacent to the existing settlement at Ickleford and would form a natural extension to its north, forming a consistent edge to the north alongside the site allocation for 150no. homes to the east of Bedford Road. As such, its significance is limited in terms of purpose a) of the Green Belt.			

	• Ickleford is defined as a village in the North Hertfordshire Local Plan. It is separated from Hitchin by a band of Green Belt land to its immediate south. As such, the Site is not adjacent to a large built-up areas and does not contribution to Green Belt purpose b). • Ickleford is not a historic town and therefore there is no contribution to purpose d). • There is a limited contribution to purpose c), which is mitigated by the presence of physical features to all boundaries of the Site, including the strengthening of historic field boundaries to the northern and western edges. As such, the proposed development would not give rise to significant or harmful encroachment into the countryside. With regards to the sustainability of the Site's location, it is adjacent to the existing settlement of Ickleford which benefits from a modest range of local amenities. It is served by several bus routes located within proximity on Bedford Road and is approx. 11 minutes' cycle from Hitchin Railway Station. Additionally, the Site is in a suitable location for the proposed ISS, given the good access from the highway and public transport network. The Site lies within Flood Zone 1 and is not within proximity of any heritage assets. As such, there are not considered to be any material planning or environmental constraints (the partial Green Belt designation notwithstanding). The Site is under single ownership and the developer intends to bring the Site forward for development immediately, subject to planning permission. Phase 1 would be deliverable within five years. As such, it is considered to be available and achievable for development within the short term.		
	Suitable	Achievable	Available
	Yes	Yes	Yes

3.4 The following section sets out the methodology in relation to the alternative site assessment.

4. METHODOLOGY

Introduction

- 4.1 This section details the methodology of the Alternative Site Assessment including how the search area has been defined, how sites have been assessed, and how sites have been identified. The methodology for discounting potential sites is fully explained.

Defining the Search Area

North Hertfordshire District Council

The Site is located within the North Hertfordshire District Council Boundary meaning the Site's location, planning and relevant documentation relate to North Hertfordshire District Council. As the proposed development addresses unmet housing and educational needs within the North Hertfordshire District Council Boundary the search area is limited to inside the borough boundaries.

4.2 Defining the criteria used to assess sites

Size

- 4.3 The primary criteria used to determine whether an alternative site would be suitable for the development is the necessary size, incorporating a degree of flexibility.
- 4.4 The proposed development includes the provision of a SEN school, in conjunction with residential development, residential care home, sports pitches and associated parking and landscaping. The proposed school will be delivered and funded as part of the wider development proposals and would not be able to come forward as a standalone development. The total cost of delivering the school is approximately £7.5 million, which includes land acquisition, construction, on-site and off-site infrastructure, servicing, and all associated professional and delivery costs. The delivery model for the school is structured such that the developer will deliver the school in Phase 1 of the development, supported with funding from the residential development, and will then be handed over to Omnia following development. In the absence of the residential development, there is no realistic or deliverable mechanism by which the school could be brought forward, and its provision is dependent on the comprehensive nature of the proposed scheme.
- 4.5 The approach adopted is consistent with the planning inspector's comments in Appeal decision Ref. APP/Q3115/W/24/3350890, in which it was noted that "Whilst smaller areas of land may be available in some of the search area, there is no policy requirement for developers to seek smaller sites or to fragment their proposed operations." This establishes that an ASA should consider a development as a whole rather than as disaggregate parts, which may not be feasible or desirable to deliver separately.

Accordingly, this ASA appropriately focuses on sites of a comparable size to the proposed development (while allowing for an appropriate degree of flexibility).

- 4.6 The developed area of the site is 20ha enabling it to accommodate the needs of the proposed development, including both the built form and supporting infrastructure including SuDS and public open space, as required by local planning policy. To provide additional robustness, the search parameters are based on a minimum site area of 10 ha, which is considered to be the minimum necessary to provide the proposed quantum of development (notwithstanding that it would be considerably more dense than the current proposals).
- 4.7 Similarly, it is not considered appropriate to consider far larger sites as suitable for the proposed development, as a development of the proposed scale on these sites would constitute an inefficient use of the land.
- 4.8 Therefore, in order to be considered suitable for the development, alternative sites must be able to accommodate the following requirements with regards to size:
- Minimum of 10ha
 - Maximum of 30ha
- 4.9 Similarly, sites which are approximately 10ha larger than the overall site area will not be considered appropriate for the reasons given in paragraph 4.4.

Suitability

- 4.10 Several factors must be considered in relation to whether a site would be suitable to accommodate the proposed development.
- 4.11 Planning constraints including a site's planning designation and history have been considered to determine whether a site is suitable to accommodate the proposed development and its likelihood of gaining planning permission.
- 4.12 Brownfield sites are less likely to meet the requirements for the proposed development in terms of size and location but have been included in the search and none have been identified.
- 4.13 Additionally, as detailed in the SEND Needs Assessment, operator of the Independent Special School requires a site with access to outdoor space/nature and a quiet, calm environment to meet the unique needs of its students. Spaces that are too urban or busy, often associated with noise, congestion, and constrained outdoor areas, would not provide the conducive environment required for sensory regulation and learning.
- 4.14 Given the prevalence of Green Belt land within North Hertfordshire, the majority of potential sites (including the subject site) are located within the Green Belt. These have

been analysed in relation to purposes a) to d) of the Green Belt, as set out in paragraph 143 of the NPPF. All land within the Green Belt is considered to make an equivalent contribution to purpose e), therefore this is not specifically assessed in relation to each site.

Achievability

- 4.15 It is understood that the Council cannot demonstrate a 5-year housing land supply (5YHLS). As of the November 2025 Five-Year Housing Land Supply Update, NHDC is able to demonstrate a 5YHLS of 2.6 years against its adopted housing requirement. Furthermore, as there were concerns regarding the supply of sites identified in NHDC's Local Plan upon adoption (2022), the Plan included a policy committing to an immediate review of the Local Plan. This is understood to be in the early stages of preparation.
- 4.16 As there is a high demand for housing, all potential sites must be deliverable in the next 5 years.

Availability

- 4.17 Local property agents and websites were consulted to ensure that all potential sites were available.

Identification of Sites

- 4.18 The following paragraphs set out how potential sites have been identified and their application within the Sequential Assessment relative to the above methodology. The assessment of the sites is split into four parts:
- Sites identified via independent online property searches;
 - Sites identified through liaison with local property agents;
 - Independent search of the 2016 SHLAA; and
 - Independent search of the 2022 Brownfield Land Register.
- 4.19 For each of the above, a detailed assessment of each site has been undertaken including an assessment of size, availability, and any further potential constraints prohibiting the site from accommodating the requirements of the proposed development.
- 4.20 Searches were undertaken between May and June 2025 while additional searches were conducted in January 2026.

Sites identified via independent online property searches

- 4.21 The following national and local property agent online listings have been reviewed to source alternative sites:

- Zoopla;
- Rightmove;
- Realla;
- Property Link;
- On The Market;
- Knight Frank;
- Prime Location;
- Savills;
- Connect UK Land Auctions; and
- UK Land and Farms.

4.22 No sites were identified via a search of the above property sites.

Liaison with Local Property Agents

4.23 The following local property agents were contacted regarding the availability of sites:

- Ashtons Estate Agents (Response in **Appendix B**);
- Homes and Mortgages (Response in **Appendix C**);
- Norgans (Response in **Appendix D**);
- Putterills (Response in **Appendix E**);
- Satchells Estate Agents (Response in **Appendix F**);
- Savills Estate Agents (No response);
- Fine and Country (No response);
- Connells (No response);
- Acorn (No response);
- Greenhill Estates (No response); and
- Elliot Leigh (No response).

4.24 One potential site was identified by a property agent. As this Site was larger than 30ha it was not considered to be appropriate for the proposed development..

Independent Search of North Hertfordshire 2016 SHLAA

4.25 An independent search of the North Hertfordshire 2016 Strategic Housing Land Availability Assessment (SHLAA) has also been undertaken to identify any potential sites.

4.26 14 sites were identified by an independent search of the SHLAA. All Sites are located in the Green Belt. A full assessment of each site in relation to their suitability, achievability, and availability for development is included in **Appendix A**.

Independent Search of North Hertfordshire Brownfield Land Register 2022

- 4.27 An independent search of North Hertfordshire Brownfield Land Register 2022 has also been undertaken to identify any potential suitable, achievable and available sites that were not allocated in the Local Plan.
- 4.28 All sites found within the Brownfield Land Register were below 10ha and thus not suitable for the proposed development.

Summary of Alternative Site Assessment

- 4.29 14 potential sites were identified within North Hertfordshire as a result of extensive research.
- 4.30 All potential sites identified via an independent assessment of the SHLAA. However, none were found to be suitable, achievable or available for development.
- 4.31 In a majority of cases, sites were unavailable due to existing ownership or approved planning permission.
- 4.32 Sites considered unsuitable for the proposed development if they were too small to accommodate the proposed development of up to 230 dwellings, a residential care home and an ISS, allowing for a significant degree of flexibility (10ha minimum size, compared to the subject site of approx. 20ha).
- 4.33 Sites that were located within the Green Belt were considered unachievable or unsuitable if they had significant planning constraints that would likely prevent development occurring at all or within the next 3 years or if their development would result in significant harm to the Green Belt.
- 4.34 All identified sites are unsuitable to accommodate the requirements of the proposed development. The alternative site assessment has therefore been passed and there are no alternative sites available to accommodate the proposed development that would be preferable to the site at Land at Pound Farm.

5. CONCLUSION

- 5.1 This Alternative Site Assessment has been produced in order to support a planning application for a residential development and new ISS at Land at Pound Farm.
- 5.2 The assessment has been undertaken to identify any alternative sites within North Hertfordshire District that could accommodate the proposed development.
- 5.3 The methodology of this alternative site assessment is set out in full at Section 5 of this report. 14 sites were identified as available through extensive research and these sites are assessed at **Appendix A**.
- 5.4 The sites are either unavailable, unsuitable, or unachievable to accommodate the requirements of the proposed development. Therefore, it is not considered that there are any alternative sites.
- 5.5 In the absence of alternative sites, it is demonstrated that the site at Land at Pound Farm is the only site capable of accommodating the proposed development, providing very significant weight in favour of the planning application.