

Comments on the submission of Ashwell Parish Council (APC) to the submitted appeal

The statements below are provided in response to the letter from Ashwell Parish Council dated 29th July 2026 to Appeal 6011739 at Station Road, Ashwell. Parts of this letter (with slightly different wording) had also been submitted to the appeal on behalf of the Parish Council. Some rebuttal has therefore already been provided by the appellant at the Final Comments stage, and are referenced where relevant, but not repeated.

We note that this letter refers to the old NPPF, which has since been replaced by a new NPPF in August 20206, after submission of the APC letter and Final Comments. We understand from other appeals that the Inspector (once appointed) is likely to request comments on the NPPF update, particularly in relation to the new national decision-making policies. We would request that both parties are allowed opportunity to comment further on these new national policies, particularly as some relate to the replacement of paragraph 11, which is a fundamental argument in this appeal. Some national policies may also mean existing development policies are provided less weight if in conflict with the new NPPF, which is a material consideration.

The Parish Council's statement regarding there being three recent applications on the appeal site has already been clarified in the appellants Final Comments, with a conclusion to be drawn that the built development subject to the appeal is not the same site these previous applications, which date back to 2017. The appeal is to be assessed on the basis of the submitted evidence, which outlines the design approach taken in the context of the site itself, its location in the landscape and adjacent built developments.

The APC suggestion that a total number of houses is somehow used to assess impact of the appeal, ignoring the existing nature of the site that provides physical separations, plus the significant net gains and landscape improvements in the developments is simplistic, and would require that much of the evidence submitted to the application is ignored, but that existing built development not part of the appeal is considered into the assessment of suitability of new development. This argument is weakened further by the fact that several years after some development was approved in the village, the Council is still in a position of a severe housing shortage, providing a clear evidenced need for additional housing to be provided in sustainable locations in addition to those already consented and built.

The Final Comments have already commented on the sustainable location of the site, which was improved significantly by the recent development providing a bus stop close to the frontage of Station Road near the site access. As argued in the appellants statements, there is not a need to provide all forms of alternative transport to the motor car for a site to be considered acceptable for new development. The appeal site does provide for sufficient non-car modes of transport, particularly for the nature of the rural village of Ashwell, and details are contained in the submitted evidence.

Similarly, comments from the APC regarding housing mix are seeking to directly limit the size of houses per plot across a relatively small development in the context of the district. Policy HS3 provides a district wide mix of houses, and does not propose that each individual development site should directly match the mix. A conflict with the overall mix has no direct impact on the appeal site, as detailed in the evidence of the application and appeal, including the delegated report that considered this an recommended approval. Therefore this is not a sufficient reason to refuse consent on an individual site.

For the purposes of the remained or the text below, the text in **black** below is taken directly from the APC submission and the text in **RED** is the appellants response provided by their consultant Barnes Walker:

Impact on the landscape

Paragraph 187 of the NPPF (Dec 2024) states that “Planning policies and decisions should contribute to and enhance the natural and local environment.” The development plan fulfils the requirement in the following policies:

- Local Plan policy SP5, Countryside and Green Belt
- Local Plan policy CGB1 Rural Areas Beyond the Green Belt
- ANP policy ASH1 Location of Development
- ANP policy ASH8 Locally Significant Views

The application location is in an area highly sensitive to development, as highlighted in North Herts Landscape Character Area Assessment 224, referred to in ANP policy ASH8. The site would lie over a traditionally farming scene of land that has a Grade 2 Agricultural Land Classification, i.e. ‘very good’.

*The site sits **adjacent to** the North Baldock Chalk Uplands Area 224, not within it. This is covered in detail within the submitted LVA.*

The Strategy and Guidelines for Managing Change for Area 224 “North Baldock Chalk Uplands” as set out in the North Hertfordshire and Stevenage LCA confirms as follows:

Conserve and Restore

- Promote creation of new woodland and for existing woodlands encourage a diverse woodland flora*
- Promote the creation of buffer zones between areas of intensive arable production and areas of semi-natural habitat and the creation of links between habitat areas*
- Promote hedgerow restoration to create visual links between existing woodland areas*
- Promote the use of traditional field hedges in place of post and wire fencing to new grazing areas*
- Promote the diversity of hedgerow species and the planting of standard hedgerow trees*
- Maintain and extend the rights of way network*

It is contended that the submitted scheme itself positively address all of the above.

The appeal proposal would cause a harmful urbanising effect through the extent of built form, estate roads, parking, garages, lighting, domestic gardens, boundary treatments and associated activity. Euphemistically describing the development as ‘low density’ or ‘landscape-led’ does not remove the harm.

We disagree with the above. As is set out in the LVA, DAS and within other submitted documentation, great care has been taken to deliver built form that relates to the location at the edge of settlement. The design approach, combining a typical edge of settlement “farmstead” type of clustering of built form at the site entrance with lower density housing beyond, served by a simple spine road is a wholly positive contextual response. South of the Millennium Wood, where the housing is arguably more sensitive, the layout has been designed appropriately, with a network of green spaces between the “Farmstead” and low-density housing beyond. Furthermore, the “inaccessible” ecological buffer around the perimeter of the housing/site notably reduces any proximate threat from paraphernalia and/or domestic lighting to the more open fields beyond and associated public views therefrom. This would deliver a transitional form of development that allows for the provision of a new wooded edge and assimilation of built form into the wider setting. This is set out in more detail within the submitted DAS and the development as a whole goes some way to delivering on the Strategy and Guidelines for Managing Change as set out above and in the LCA for North Baldock Chalk Uplands 224.

Reference to density should not be reduced to a simple dwellings-per-hectare calculation. A low gross density produced by 20 large detached houses, large plots and

extensive screening can still represent an inefficient and physically extensive suburban incursion into countryside. The relevant issue is whether the amount, spread, scale, layout and typology are appropriate at this rural village edge. APC submits that they are not.

This has been covered in the submitted DAS which confirms that the “Farmstead” type arrangement at the site entrance is typically dense and “in character” with the associated built form typology at the edge of other settlements in the wider area (DAS ch.9). A looser grain for the housing set within a sea of green infrastructure allows the rest of the proposed housing south of the Millennium Wood to be enveloped by new planting which will, particularly in time, assimilate the development into its setting. The housing to the north of Millennium Wood is responsive to the Phase 1 (Senuna Park) development immediately adjacent and still delivers a meaningful green infrastructure, ecology and amenity space and comprehensive SUDs provision.

The North Herts landscape adviser identified further concerns that the effect on Ashwell and its surrounding landscape could be greater than assessed by the applicant because winter photography had not been provided as a worst-case assessment, and significant viewpoints SVG and SVH (Ashwell Neighbourhood Plan fig. 6.10) have not been accurately assessed.

The photographs were taken at the earliest possible opportunity following instruction, in April 2025. This is addressed in chapter 3 of the LVA. Early spring photographs still demonstrate a balanced view when compared with either late spring or summer. They are also comparable to early (or even late) autumnal screening. The photographs and visuals themselves give a sufficiently accurate representation of the nature of the identified views covering a period of time through the year wherein the site would be no less ‘screened’.

We would contend that view SVG has been accurately assessed and for the reasons previously submitted, it is considered that our VP11 represents a clearer (and thus “more representative”) location for the “important view” than SVG as described by the location in Fig 6.10 of the Ashwell Neighbourhood Plan.

View SVH is a distant view and is from elevated ground wherefrom views of the upper parts of important buildings within the village centre can be glimpsed above and beyond the application site. From there, the application site forms a notably smaller element in the wider view than those described by chosen VP3 and VP6 (LVA). In terms of the effect that the proposed development would have on that “important view” we feel that both VP3 and VP6 are closer to the site and would thus present the development of the site as a larger feature within a shorter view and thus describes the potential visual prominence from a less favourable location. Hence, we do not agree that view SVG and SVH “have not been accurately assessed”.

Those concerns reinforce the need to assess the site in leaf-off conditions and from the Station Road approach and relevant public rights of way.

Again, this is addressed within the LVA. Furthermore, we stand by the robustness of the LVA accompanying this application.

The proposal requires a road through a ‘Millennium Wood’ and the removal of 24 live trees. APC acknowledges the proposed replacement planting and the claimed biodiversity net gain. The measures are relevant benefits and mitigation, but they do not reverse the fundamental change from open rural land to housing estate. Much of the proposed boundary planting is required to screen and assimilate built development that is otherwise at odds with the open character of the Steeple Morden Plain landscape.

The submitted visuals demonstrate that from the identified viewpoint south of the application site (including the locally significant view “SVG” (Station Road)), even at year 1 following completion/planting, the proposed development would assimilate well into the edge of settlement location. The nature of the approach to Ashwell from Station Road passing other urban form on route is well documented in the LVA and the careful, landscape-led design. retained and supplemented hedgerows, along with the nature, scale, form and proposed materiality of the dwellings south of Millennium Wood (and indeed to the north of the Wood), would all help to harmoniously assimilate the development into its surroundings, which will only be enhanced once the planting establishes.

Village character

The applicant's claim that the design reflects Senuna Park ignores the true nature of the village, comprising small clusters of heterogeneous dwelling styles from different eras.

This has been covered in detail in the analysis section of the DAS. The evolution of Ashwell is well recorded, including in the housing typologies of different eras during expansion. The nature, type and arrangement of built form expansion is varied. The proposed design response, is complimentary to the adjacent built form at Senuna Park and would relate well. It also responds to design cues throughout the village of Ashwell.

Repeating the architectural language of a recent estate may make the two phases appear coordinated, but it also magnifies the cumulative suburban character that the refusal seeks to prevent. The relevant context is not only the adjoining new houses; it is Ashwell's village edge, the open countryside and the approach to the historic settlement, it would present a jarring contrast with neighbouring Visual Character Area V2 (ANP fig. 6.1), severely detracting from its appearance as “part of the countryside”.

The design has not introduced only housing in a uniform estate. The response is wholly responsive to the landscape and edge of settlement setting. Millennium Wood along with the significant areas of new woodland and other planting and network of open

space, visibly breaks up the perception of a large, high density suburban housing estate. Furthermore, the nature and materiality of the housing to the south of the Wood has notable elements of distinction to that proposed to the north (based on context), whilst retaining similarities to bind the development.

The “Farmstead” form, the proposed material palette, the sparing use of render and indeed the removal of any render from the upper parts of elevations of those dwellings located to the south of Millennium Wood, whilst also inter-weaving its use more notably within the housing to the north of the wood has directly demonstrated that there has been a careful distinction drawn between simply copying adjacent built form and responding to the wider context. We believe that this has been successfully done.