



**NORTH HERTS LOCAL PLAN EXAMINATION  
MATTER 11 – ICKLEFORD AND LOWER STONDON**

**STATEMENT ON BEHALF OF CALA HOMES LTD**

Land at Burford Grange, Bedford Road, Ickleford

DLA Ref: 15/215  
January 2018

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## 1.0 INTRODUCTION & SUMMARY

- 1.1 This statement relates to a site known as Burford Grange, located on Bedford Road in Ickleford. The statement is made on behalf of CALA Homes Ltd, who are working with the landowner to promote the site. The site was initially put forward by the owner but CALA Homes are now responsible for the promotion of the site.
- 1.2 The site was first included as a proposed allocation in the Preferred Options consultation version, published for public consultation in December 2014. The site was then retained in the pre-submission version of the Local Plan, published in October 2016 for a further six-week period of consultation.
- 1.3 CALA Homes supports the proposed allocation of the Burford Grange site, and supports its release from the Green Belt. Exceptional circumstances exist to remove this site from the Green Belt for housing purposes. The identification of Ickleford as a Category A village and the scale of housing proposed for the village are also supported.
- 1.4 However, the Local Plan proposals for the site are not sound in one specific respect. The estimated capacity of the site of 40 dwellings is not justified nor supported by evidence. The estimate should be replaced by an estimate of 50 dwellings in order for the Local Plan to be found sound.

## 2.0 PRE-APPLICATION DISCUSSIONS AND EVIDENCE BASE

- 2.1 As part of the ongoing promotion of the site by CALA Homes, a pre-application submission to the Council was made in July 2016. This submission and the pre-application advice from the Council's Planning Officer was attached to the Regulation 19 representations, together with the technical reports that supported the proposal. As summarised in the representations, the response was broadly supportive and the layout was considered "largely acceptable". Importantly, no objection was raised in principle to the demolition of Burford Grange, nor to the scale of dwelling provision of 51 homes.
- 2.2 A further pre-application submission was made in May 2017 to continue to refine the proposals. In terms of principle, the Council's advice was to await the outcome of the Local Plan examination before submitting a planning application. CALA Homes has followed this advice and continued to refine the layout ahead of a planning application. The latest iteration of the site masterplan is attached as Appendix A to this statement.

## 3.0 INSPECTOR'S MATTERS AND ISSUES

### 3.1 Deliverability (Matter 11.28)

- 3.1.1 The Burford Grange site is deliverable as a housing site. The site is a single land parcel owned by a Mr and Mrs Rainbow, who are committed to pursuing residential development on the site. To that end, the landowners have sign an option agreement with CALA Homes Ltd, who have been promoting the site for residential development since 2016. CALA Homes are contractually obliged to purchase the site within 3 months of a satisfactory planning permission being granted. CALA Homes has commissioned a number of technical studies to support delivery of the site and has sought pre-application advice from North Hertfordshire District Council (see appendix B to November 2016 representations for details).
- 3.1.2 Matter 11.28(b) related to access for vehicles and pedestrians and the evidence base supporting the allocation. CALA Homes has commissioned Conisbee engineers to produce a Transport Statement to examine the transport arrangements for the site and this report was attached as Appendix F to the November 2016 representations. It demonstrates that a suitable junction on Bedford Road can be provided to meet the Local Highway Authority's standards and that visibility splays of sufficient length can be provided in both directions within the site or on highway land.
- 3.1.3 In terms of pedestrians, the Transport Statement noted that there was currently no footway provision on the western side of Bedford Road. As part of the proposals, a new footway will be provided north of the proposed junction and this will incorporate dropped kerbs and a central refuge island to assist pedestrians crossing Bedford Road.
- 3.1.4 Matter 11.28(c) sought confirmation that the site is deliverable having regard to necessary infrastructure and services and any environmental or other constraints. A development of the size proposed can be accommodated within the existing infrastructure of the village, using developer contributions where necessary to expand provision. There are no specific infrastructure or service constraints that would prevent development. Similarly, there are no constraints that would prevent development.
- 3.1.5 Although not shown on the Local Plan Policies Map, there is a Local Wildlife Site adjoining the Burford Grange site. The site is circular in shape, centred on Westmill Lane. Ethos Environmental Planning produced a Preliminary Ecological Appraisal to examine the impact of development. In terms of the Local Wildlife Site and its origins, the Appraisal stated:

*“Although specific reasons for the designation were not held by HERC, an ecology adviser from Hertfordshire County Council was able to confirm that the LWA was designated due to the presence of a bat roost. The boundaries of this LWS are therefore*

*indicative to include a suitable area for foraging around the roost. Therefore, preservation of bat foraging habitat across the site will be necessary to mitigate impacts on the LWS.”*

- 3.1.6 The hedgerows around the site were assessed as likely to provide foraging and commuting habitat for bats. The Appraisal concluded that *“provided the development does not result in any degradation of bat foraging habitat, then it will not affect the integrity of the LWS”*.

### **3.2 Likely impacts of development (Matter 11.29)**

- 3.2.1 The Council’s Sustainability Appraisal (SA), at Appendix 6 (pages 76 & 77), highlights the likely sustainability impacts of development. This appraisal records no significant negative impacts of development. The site was judged to result in the loss of agricultural land, although the site is currently not in agricultural use since it is grazed by horses and has been for many years. The SA records a negative finding in terms of landscape, although it isn’t clear what the negative impact is, other than requiring sensitive housing design. A slight negative finding was recorded in terms of surface water flooding, although this would be addressed through Sustainable Drainage Systems at the point of a planning application. Finally, the SA recorded a negative impact in terms of health, relating to the construction period of development.

- 3.2.2 Appendix 9 of the Council’s SA goes on to record potential mitigation measures for any remaining significant effects. The only mitigation measures recommended for the Burford Grange site are that landscape issues are addressed in the Design and Access Statement, that a Construction Management Plan be produced and that the layout and landscaping of development considers the potential impact on neighbouring residents. These issues will be addressed at subsequent stages of the planning process.

### **3.3 Appropriateness of proposed allocation IC2 (Matter 11.30)**

- 3.3.1 We consider that the Burford Grange proposed allocation is the most appropriate when considered against reasonable alternatives. It has been suggested that the emergence of two brownfield development sites in Ickleford since the publication of the Local Plan means that one or more proposed allocations can be removed. However, paragraph 13.3 of the submitted Local Plan makes it clear that the information on the number of homes in each community is not a target, nor is it the maximum number of homes to be provided. Footnote 139 to this paragraph specifically raises the prospect of windfall sites appearing later in the plan period. A total of 1,100 homes are expected to come from windfall sites over the plan period. On this basis, the additional sites must be seen as additional to, rather than a replacement of, the proposed allocations. It is also worth noting that, at the time of writing, only one site actually has planning permission (Ickleford Manor, 19 homes), with one other application (Ickleford Mill, 71 homes) still undetermined.

### 3.4 Green Belt considerations (Matter 11.31)

*a) Do exceptional circumstances exist to warrant the allocation of the site for new housing in the Green Belt? If so, what are they?*

3.4.1 Exceptional circumstances do exist to remove the Burford Grange site from the Green Belt and allocate for housing. The Council's Housing and Green Belt Background Paper (HOU1) establishes that exceptional circumstances exist as a matter of general principle. It then advocates a balanced, site-specific consideration of harms and benefits in the broader context of housing need. The summary table at Appendix 2 of HOU1 states that the Burford Grange site is *"On edge of Category A village on land within Green Belt. Site-specific criteria allow for appropriate mitigation of potential impacts"*. It concludes that the site should be allocated. This sits alongside the SHLAA's conclusion (HOU9) that the site is suitable for development.

*b) What is the nature and extent of the harm to the Green Belt of removing the site from it*

3.4.2 The impact of removing the site from the Green Belt is set out in the Council's Green Belt assessment (CG1, page 112). Overall the site was considered to make a moderate contribution to the Green Belt. The assessment noted that the site *"is outside settlement boundaries although adjoins existing development on one side. The site is close to Hitchin, however as Ickleford isn't a town, this isn't significant in Green Belt terms"*.

*c) To what extent would the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?*

3.4.3 While not a significant Green Belt issue, the separation between Ickleford and Hitchin remains a planning issue. CALA Homes has commissioned a Landscape and Visual Assessment (see Appendix D to the November 2016 representations) and this examines the visual role of the site and the potential impact of development. The findings of this study were summarised in our Regulation 19 representations. In terms of mitigation, the Assessment recommended a limit on the height of any proposed dwellings (to 2.5 storeys) and a set-back from the site boundaries to allow existing vegetation to mature and new boundary elements to establish.

*d) If this site were to be developed as proposed, would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's allocation?*

3.4.4 The inclusion of the Burford Grange site does not compromise the ability of the remaining Green Belt to fulfil Green Belt purposes. Principally, the sub-parcel within which this site sits (area 12a) plays a role in preventing the outward expansion of Hitchin and safeguarding the countryside from encroachment. These roles can continue to be fulfilled with the proposed Green Belt boundary.

*e) Will the Green Belt boundary proposed need to be altered at the end of the plan period, or is it capable of enduring beyond then?*

3.4.5 There is no reason why the Green Belt boundary around the Burford Grange site now proposed cannot endure beyond the plan period.

*f) Are the proposed Green Belt boundaries consistent with the Plan's strategy for meeting identified requirements for sustainable development?*

3.4.6 The Green Belt boundaries are consistent with the Plan's strategy for growth and the scale of housing provision for Ickleford is reasonable in relation to other settlements of a similar size. In comparison with other category A villages that are inset from the Green Belt, Ickleford (209 homes) has more housing proposed than Kimpton (45 homes) but less than Knebworth (663 homes), Codicote (364 homes) and Wymondley (316 homes). While the site at Lower Stondon is technically within Ickleford parish it is an extension to Lower Stondon and will look to the services and facilities in Lower Stondon. It is more than 2 miles from Ickleford so should not be seen as part of Ickleford's housing provision.

3.4.7 It is also worth considering the scale of growth previously seen in Ickleford. The last Local Plan for North Hertfordshire was adopted in 1996 and hence development around Ickleford, which is tightly constrained by Green Belt, has been severely limited. Appendix 1 to HOU1 includes a table of information produced in 2014 showing population growth in various communities between 2001 and 2011. The population of Ickleford over this ten-year period actually reduced from 1,848 to 1,833. There were only 21 housing completions over this ten-year period. Arguably, with a more timely Local Plan process, Ickleford would have seen considerably greater growth over this period and the current proposals perhaps may not have aroused the same level of objection.

*g) Has the Green Belt boundary around the site been defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is unnecessary to keep permanently open?*

The proposed Green Belt boundary follows the southern and western boundary of the Burford Grange site. These boundaries are currently defined by mature hedge rows with trees and as such are features of sufficient permanence to make an appropriate Green Belt boundary. Furthermore, the proposed layout for the site allows for the growth and consolidation of these landscape features, as recommended by the Landscape and Visual Assessment.

### **3.5 Proposed settlement boundary (Matter 11.32)**

3.5.1 The changes to the settlement boundary are considered to be consistent with the methodology for identifying such and are appropriate and justified.



## 4.0 REPRESENTATIONS BY CALA HOMES TO THE LOCAL PLAN

4.1 The representations made DLA Town Planning, on behalf of CALA Homes Ltd, in November 2016 can be summarised as follows:

- Support for Ickleford as a Category A village in the proposed settlement hierarchy;
- Support recognition that new housing is needed in Ickleford;
- Support acknowledgement that insufficient land is available outside the Green Belt;
- Support identification of exceptional circumstances for Green Belt release;
- Support scale of housing proposed in Ickleford;
- Support identification of Burford Grange site;
- Object to estimated capacity of the Burford Grange site.

4.2 While CALA Homes supports much of the Local Plan, we do not consider that the dwelling estimate for the site is sound.

4.3 The Preferred Options version of the Local Plan, published in December 2014, included the Burford Grange site but with a dwelling estimate of 48 dwellings. It is not clear what prompted the subsequent reduction in dwelling estimate but we understand the lower estimate was based on the premise that the existing dwelling at Burford Grange would be retained. However, as set out in the November 2016 representations, there is no reason to retain this dwelling. It is of no specific architectural merit, is not listed, nor locally listed, nor within a Conservation Area. The Council's pre-application response for the site raised no objection to its proposed demolition.

4.4 CALA Homes understands that the dwelling estimates provided in Local Plans are provided purely for guidance purposes and to calculate overall housing provision – they are not binding targets. However, the dwelling estimate still needs to be correct and, in order to be sound, the estimate needs to be justified and based on evidence. There is no reasonable evidence supporting the estimate of 40 dwellings. The estimate of 50 dwellings, proposed by CALA Homes, is based on technical work which includes highways, landscape and ecology studies, and has been through two rounds of pre-application discussions with the Council's Development Management service. While the fine details of the layout are still being refined, the overall scale of development and principles behind the layout are supported by the Council's officers.

4.5 The dwelling estimate of 40 dwellings given for site IC2 should be replaced with an estimate of 50 dwellings in order for the Local Plan to be considered sound.

## 5.0 FURTHER SOURCES OF INFORMATION

5.1 The following documents were submitted with the Regulation 19 representations:

- Appendix A – Indicative site layout
- Appendix B – Pre-application submission
- Appendix C – Pre-application response from NHDC
- Appendix D – Landscape and Visual Impact Assessment, ACD Environmental, July 2016
- Appendix E – Ecology, Ethos, November 2016
- Appendix F – Transport Statement, Conisbee, November 2016

5.2 A copy of the latest iteration of the site masterplan is attached as Appendix A to this statement.



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PROJECT: Bedford Road, Ickleford. Herts

DRAWING: Revised Sketch Layout (With Notes)

# Preliminary

REV DATE AMEN APP REVISION

DRG. NO. 16/022/SK007

SCALE: 1:1000@A3 DATE: 08.05.2017

DRAWN: CW APPROVED: JR