

# ICKLEFORD PARISH COUNCIL



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Mr Simon Ellis  
North Hertfordshire District Council  
PO Box 10613  
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21<sup>st</sup> May 2020

Dear Mr Ellis

**Ref: Application 20/00891/FP for Full Planning Permission:**

**Erection of five dwelling houses in association with a new access spur from the Lodge Court, on-site parking, landscaping (inclusive of new trees), formation of a pedestrian footpath and designated communal open space.**

**Land At Turnpike Lane And Adjacent To 4 Manor Close, Turnpike Lane, Ickleford, Hertfordshire.**

We advise you that Ickleford Parish Council **OBJECTS** to this amended planning application. Please see below the categories and reasons for our objections.

**1. Prematurity**

Ickleford Parish Council objected to its inclusion within the revised settlement boundary during the Examination in Public of the Local Plan. The developers have assumed that the Local Plan is a forgone conclusion and base much of their amended application criteria on a far-from-conclusive outcome.

**The Planning Inspector's recent decision to reject the appeal by developers of ETF2 in Pirton was based, in part, on the fact that the proposed development lay outside the 'Settlement Boundary'. Until such time as the Local Plan Inspector approves the NHDC Local Plan and it is adopted by the Council, the development at Manor Close remains 'outside' the Ickleford Settlement Boundary.**

**2. 2016 SHLAA**

As stated in our previous correspondence, this site was reviewed in the NHDC 2016 SHLAA and was classified as '**does not meet the tests in the SHLAA**'. The reasons for not including this site were as follows:

- i) Small plot of undeveloped land to rear of existing properties on Manor Close.
- ii) House across end of Manor Close precludes access from site and would need to be taken from access to Lodge Court, leading to potentially substantial implications in terms of the setting of the Listed Buildings and the Conservation Area.

### 3. The Development

- 3.1 The developer's intention is now to build 1 x 4 bedroom, 2 x 3 bedroom and 2 x 2 bedroom houses. It is our opinion, however, that the site is still laid out to the detriment of the neighbouring houses and that the proposed houses are not in keeping with the surrounding houses. None of the designs are of the same standard as those of Manor Close or Lodge Court. The dwellings are all very similar, lacking in character and any individuality. No consideration has been shown to the site's location or its surrounding developments. The reduction of proposed houses from 8 down to 5 may suggest a compromise of quality and design. There would appear to have been little account taken of The Ickleford Conservation Area Character Statement, and the need for any proposed dwellings to blend well with the surroundings. In the original planning discussions NHDC made the point that the design needed to reflect the edge of settlement nature of the location; this appears not to have been accounted for.
- 3.2 Furthermore, the privacy of existing residents continues to be ignored. The design which includes very large windows will lead to the established Manor Close and Lodge Court being overlooked; the former especially from House no. 5 which, according to the plan, would be only 15m away from an existing property at no. 4 Manor Close. The revised plan states that no windows from the proposed House no. 5 would overlook no. 4 Manor Close; however, this would mean that the residents of 4 Manor Close would therefore look out onto a large brick wall merely 15 metres from their windows.
- 3.3 With the felling of the majority of the established mature trees, the plan is very misleading. It shows what would appear to be mature trees giving some form of privacy to neighbouring houses, and now states that a condition "could" be applied to the site providing the position and type of trees to be planted. This by no means guarantees replacement of felled trees.
- 3.4 Whilst we have noted the feasibility document outlining the proposed access for refuse trucks on this site, we are still concerned that this route does not take account of any vehicles that may be parked on the road. As such, this could lead to cars being parked on the road which would impact on the proposed route for refuse vehicles or indeed emergency vehicles.

### 4. Harm to Historical Assets

- 4.1 No consideration has been given, in the amended Planning Application, to the following important Historical Assets:

Although not mentioned in the Domesday Survey, records show ('Parishes: Ickleford', in *A History of the County of Hertford: Volume 3*, ed. William Page (London, 1912), pp. 21-25. *British History Online* <http://www.british-history.ac.uk/vch/herts/vol3/pp21-25> [accessed 2 November 2018]), that Ickleford Manor and its surrounding lands dates back to the 13<sup>th</sup> Century, which is in keeping with the nearby St Katharine's Church, which is of Norman origin and within the Conservation Area.

- 4.2 The substantial adverse impact on this heritage asset, which NHDC notes in the 2016 SHLAA, means that this site could be impacted by the Steer Judgement – **Steer vs the Secretary of State for Communities and Local Government and Ors (2017)** – on the setting of 'Heritage Assets'. This case broadens the definition of 'setting' in this context. We also refer to 2ii) above.
- 4.3 Particular note should be taken of the NPPF: Conserving and enhancing the historic Environment; (para. 193): **'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.'**

## 5. Green Belt

5.1 The Developer's Statement extensively uses the argument that justification for the development is covered by the need to meet projected housing requirements. Other projected sites presently under discussion will more than meet those targets without the need to compromise further our important and dwindling green spaces.

5.2 The National Planning Policy Framework (NPPF) (Para. 144) states: **'When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.'**

The Developer's Statement still shows no attempt to address this NPPF ruling. It is still evident that every attempt is, once again, being made to depend on the outcome of the Local Plan, and in doing so is ignoring the NPPF and its regulations on the Green Belt Policy. This land remains within the Green Belt, and, although the developer may find the postponement of the public examination inconvenient, nevertheless they are bound by current regulations and cannot predict or assume the outcome of the examination.

5.3 This land, lying within the Green Belt, adds to the 'openness' of the village and its surrounding heritage buildings. It is, therefore, still our opinion that every effort should be made to safeguard this Green Belt land to protect Ickleford from urban sprawl for future generations.

## 6. Ecology

6.1 We are very concerned that little or no consideration has been given to the ecology in this area, as significant witness has been made to the presence of badgers, foxes, bats and deer. There appears to have been little or no study/impact assessments regarding wildlife. The advice from an Ecological expert should have been sought before considering a development in such a wild and natural situation.

6.2 There is a serious decline in the numbers of myriad species in the UK. Wildlife organisations, including The Wildlife Trusts and Natural England, recognise that natural wildlife corridors are vital for the protection and continuation of all species of animals, including reptiles and insects, and all plants. They conclude that these natural corridors should be included in any considerations when planning infill developments.

Simply considering adding bat boxes on completion of the development, as stated on the revised plan, does not address these very serious ecological concerns.

6.3 Witness has already been made of the felling of trees on this site, bringing about a dramatic decline in the number of birds in the area. Some of these trees could be of ecological interest and yet no expert advice had been sought and no written report presented with the original application. We are therefore concerned as to what tree types would be lost, bearing in mind the many British trees and wild flowers that are becoming rare. The current Arboricultural Impact Assessment included within the present application should be considered as 'closing the gate after the horse has bolted'.

## 7. Archaeology

With the site being located within an area of heritage interest, we are still very concerned that no expert advice was sought before submitting this amended Planning Application, and that little or no consideration has been given to an area that could be of archaeological interest, bearing in mind that the 13<sup>th</sup> Century link has been quoted (see Item 4 above).

## **8. Flooding**

The amended Planning Application still shows that no expert advice has been sought to any possible flooding in this area. The developer undertakes to carry out a SuDS exercise. We are further concerned that should this site be developed, the chance of flooding after a severe downpour could lead to flooding not only of the site, but more importantly, the lower-lying Manor Close.

## **9. Travel Plan**

9.1 Insufficient parking has been provided for these houses, with 2 out of 3 spaces designated as visitor parking double-accounted for as those for house 4. Indeed it is likely that all those spaces designated as visitor parking will be taken up by the 5 properties. It is clear that the parking for this site is still inadequate and will lead to parking issues, not only by Lodge Court and Manor Close, but also along Walnut Way and beyond.

9.2 Whilst plans are in place for the widening of the exit to Turnpike Lane, insufficient thought has been given to the dangerous situation this exit brings to the already very busy and relatively narrow Turnpike Lane, and the impact on traffic exiting Walnut Way onto Turnpike Lane, during development and afterwards.

Ickleford has always been a 'rat run' for those travelling from the North of the village (Arlesey, Stotfold and Letchworth Garden City) to the A600 Bedford Road. During peak traffic flow times, Turnpike Lane is extremely busy, being exacerbated by the increased traffic from and to the A600 from local areas.

9.3 Whilst consideration has been given in this Amended Planning Application to the walking public by the provision of a footpath and a proposed dropped kerb (subject to planning approval), no thought has been given as to how pedestrians are expected to traverse this extremely busy road at this point.

With the development consisting of 2-, 3- and 4-bedroom homes, there is every possibility that young children and mothers with pushchairs will need to be able to cross Turnpike Lane to reach not only the village school, but all the other amenities available (village hall, shop, church and sports/recreational ground).

The safety of the residents must be paramount to the developer and more importantly to NHDC, and any decisions taken must include the provision of a safe zebra/pelican crossing. Without this facility, the developer and NHDC would be creating a very dangerous crossing point on Turnpike Lane.

9.4 With the proposed Bowman's estate of 70 residences being planned, it could be seen that this new development may be a way of easing any problems that the proposed new Bowman's estate could face, by encouraging their residents to walk through this new site to reach Turnpike Lane and the Village.

We are still therefore very concerned that we are no longer taking into account the five proposed houses and their residents, but also those pedestrians from the proposed Bowman's estate, who would also need to cross Turnpike Lane at the same point.

## **10. Waste Water and Sewerage**

It would appear from inspecting the planning responses received by NHDC to date, Anglian Water will not formally comment regarding this development as it is below their minimum of 10 houses.

However, after consultation by the Parish Council with Anglian Water Representatives it was brought to our attention, that whilst giving permission for connection to their facilities, when analysing any proposed output from developments, Anglian Water only calculate sewerage output and do not take into account rainwater deluge, which is a great cause for concern.

Only after heavy rainfall was it found that the Victorian drainage system within the Village cannot cope and houses situated at each end of the system are plagued by the back-up of sewerage and waste/rain water.

We are very concerned that the sewerage output from this site will only add to andacerbate the very disturbing situation that all too commonly arises in Ickleford, whereby sewerage rises in the homes and gardens of Laurel Way, Duncots Close and Lower Green after a heavy storm. Anglian Water's own pumping station located near Cadwell regularly has to be assisted by Bowers, because the pump cannot cope. Anglian Water recognise that this pipe needs to be replaced by two separate pipes, one for sewerage and one for waste water, but because of insufficient funds, this is very much a distant plan.

### **In conclusion**

- We consider this development to be premature and any decision is bound to be withheld until the outcome of the Inspector's Report, following the Examination in Public.
- This site was reviewed in the NHDC 2016 SHLAA and was classified thus: '**does not meet the tests in the SHLAA**'
- The design and layout of the development is deemed by Ickleford Parish Council as not within keeping with its surroundings and buildings.
- The development is within an area of Heritage interest.
- This land lies within the Green Belt and adds to the 'openness' of the village and its surrounding heritage buildings.
- The ecology of the development is under threat and will be lost.
- The developers have not considered this site to be of archaeological interest.
- The site may be prone to flooding.
- The Travel Plan does not address the impact on traffic and pedestrians.
- The real and potential sewerage problems have not been properly considered.

Ickleford Parish Council strongly considers that the conclusive issues above significantly and demonstrably far outweigh the benefits of new homes being built on this site and we therefore **OBJECT** to this Planning Application.

Yours sincerely

*Judith Crosier*

Judith Crosier  
Clerk to Ickleford Parish Council

cc Planning Officer Anne McDonald  
County Councillor David Barnard  
District Councillor Sam North  
CPRE – David Irving