

NORTH HERTFORDSHIRE DISTRICT COUNCIL



9 October 2026

Our Ref Planning Control Committee 22 October 2026
Contact. Committee Services
Direct Dial. (01462) 474655
Email. committee.services@north-herts.gov.uk

To: Members of the Committee: Councillors Nigel Mason (Chair), Emma Fernandes (Vice-Chair), Clare Billing, Ruth Brown, Val Bryant, Ian Mantle, Caroline McDonnell, Louise Peace, Martin Prescott, Tom Tyson, Claire Winchester and Dave Winstanley

Substitutes: Councillors Daniel Allen, Sadie Billing, Jon Clayden, Mick Debenham, Joe Graziano, Steve Jarvis, Bryony May, Michael Muir, Claire Strong, Tamsin Thomas and Tim Johnson

NOTICE IS HEREBY GIVEN OF A

MEETING OF THE PLANNING CONTROL COMMITTEE

to be held in the

COUNCIL CHAMBER - DISTRICT COUNCIL OFFICES, GERNON ROAD, LETCHWORTH, SG6 3JF

On

THURSDAY, 22ND OCTOBER, 2026 AT 7.00 PM

Yours sincerely,

Isabelle Alajooz
Director – Governance

****MEMBERS PLEASE ENSURE THAT YOU DOWNLOAD ALL AGENDAS AND REPORTS VIA THE MOD.GOV APPLICATION ON YOUR TABLET BEFORE ATTENDING THE MEETING****

Agenda

Part I

Item		Page
1.	APOLOGIES FOR ABSENCE Members are required to notify any substitutions by midday on the day of the meeting. Late substitutions will not be accepted and Members attending as a substitute without having given the due notice will not be able to take part in the meeting.	
2.	MINUTES - 17 SEPTEMBER 2026 To take as read and approve as a true record the minutes of the meeting of the Committee held on the 17 September 2026.	(Pages 5 - 12)
3.	NOTIFICATION OF OTHER BUSINESS Members should notify the Chair of other business which they wish to be discussed at the end of either Part I or Part II business set out in the agenda. They must state the circumstances which they consider justify the business being considered as a matter of urgency. The Chair will decide whether any item(s) raised will be considered.	
4.	CHAIR'S ANNOUNCEMENTS Members are reminded that any declarations of interest in respect of any business set out in the agenda, should be declared as either a Disclosable Pecuniary Interest or Declarable Interest and are required to notify the Chair of the nature of any interest declared at the commencement of the relevant item on the agenda. Members declaring a Disclosable Pecuniary Interest must withdraw from the meeting for the duration of the item. Members declaring a Declarable Interest, wishing to exercise a 'Councillor Speaking Right', must declare this at the same time as the interest, move to the public area before speaking to the item and then must leave the room before the debate and vote.	
5.	PUBLIC PARTICIPATION To receive petitions, comments and questions from the public.	

6. **25/02571/OP - GROWING BALDOCK DEVELOPMENT SITE - BA1 (LAND EAST OF NORTH RD AND NORTH OF RAILWAY LINE); BA10 (LAND BETWEEN RAILWAY LINE AND ROYSTON RD); BA3 (LAND WEST OF A505); BA2 (LAND SOUTH OF CLOTHALL RD); WALLS FIELD; URBAN OPEN LAND WEST OF A505, AND LAND WEST OF NORTH RD, BALDOCK** (Pages 13 - 214)
REPORT OF THE DEVELOPMENT AND CONSERVATION MANAGER
- Growing Baldock Development Site: Outline planning application with all matters reserved except for means of highway access into the development from North Road and Clothall Road for: up to 3,200 homes, up to 16ha of employment, waste and leisure infrastructure, a mixed use local centre, up to 1 secondary school, up to 2 x primary schools, nursery/childcare facilities, health hub, green infrastructure (including parks, formal sports provision, play, habitat areas, informal open space and structural planting), internal street network, access junctions and railway crossing, public transport infrastructure, pedestrian/cycle network (including PRow diversions, active travel routes, mobility hubs and crossing of the railway), utilities and drainage infrastructure (including diversions of existing and provision of new infrastructure, pumping stations, sustainable drainage, primary substations, rising main/strategic sewer and renewable energy infrastructure), ground remodelling/earthworks and any necessary demolitions (as amended).
7. **26/01125/S73 HUB FITNESS, UNIT 1-4, GLOVERS COURT, HITCHIN, HERTFORDSHIRE, 23-25 BURY MEAD ROAD, SG5 1RP** (Pages 215 - 232)
REPORT OF THE DEVELOPMENT AND CONSERVATION MANAGER
- Changes to wording of condition 3 of planning permission 87/01900/1 granted 04.02.1988 for erection of single storey building for 6 work shop units and parking spaces. (Revised by plans received 28/01/1988)
8. **EXCLUSION OF PRESS AND PUBLIC**
To consider passing the following resolution: That under Section 100A of the Local Government Act 1972, the Press and Public be excluded from the meeting on the grounds that the following report will involve the likely disclosure of exempt information as defined in Paragraph 7 of Part 1 of Schedule 12A of the said Act (as amended).
9. **PART 2 MINUTES - 3 SEPTEMBER 2026** 233 -
To take as read and approve as a true record the Part 2 Minutes of the meeting of the Committee held on 3 September 2026. 234
10. **APPEALS** (Pages 235 - 254)
REPORT OF THE DEVELOPMENT AND CONSERVATION MANAGER
- To update Members on appeals lodged and any decisions made.

This page is intentionally left blank

Public Document Pack Agenda Item 2

NORTH HERTFORDSHIRE DISTRICT COUNCIL

PLANNING CONTROL COMMITTEE

MEETING HELD IN THE COUNCIL CHAMBER - DISTRICT COUNCIL OFFICES, GERON ROAD, LETCHWORTH, SG6 3JF
ON THURSDAY, 17TH SEPTEMBER, 2026 AT 7.00 PM

MINUTES

Present: *Councillors: Nigel Mason (Chair), Emma Fernandes (Vice-Chair), Clare Billing, Ruth Brown, Val Bryant, Ian Mantle, Louise Peace, Martin Prescott, Tom Tyson, Claire Winchester and Dave Winstanley.*

In Attendance: *Luca Benedito (Trainee Committee, Member and Scrutiny Officer), Jamie Graham (Trainee Electoral Services Officer), Shaun Greaves (Development and Conservation Manager), Anne McDonald (Principal Planning Officer (Development Management)), Nazneen Roy (Locum Planning Lawyer), Melanie Stimpson (Democratic Services Manager) and Henry Thomas (Planning Officer).*

Also Present: *At the commencement of the meeting approximately 6 members of the public, including registered speakers.*

57 APOLOGIES FOR ABSENCE

Audio recording – 01 minute 18 seconds

Apologies for absence were received from Councillor Caroline McDonnell.

58 MINUTES - 13 August 2026

Audio Recording – 01 minute 29 seconds

Councillor Nigel Mason as Chair, proposed and Councillor Emma Fernandes seconded, and following a vote, it was:

RESOLVED: That the Minutes of the Meeting of the Committee held on 13 August 2026 be approved as a true record of the proceedings and be signed by the Chair.

59 NOTIFICATION OF OTHER BUSINESS

Audio recording – 02 minutes 10 seconds

There was no other business notified.

60 CHAIR'S ANNOUNCEMENTS

Audio recording – 02 minutes 16 seconds

- (1) The Chair advised that, in accordance with Council Policy, the meeting would be recorded.
- (2) The Chair drew attention to the item on the agenda front pages regarding Declarations of Interest and reminded Members that, in line with the Code of Conduct, any Declarations of Interest needed to be declared immediately prior to the item in question.
- (3) The Chair clarified matters for the registered speakers.
- (4) The Chair confirmed the procedure for moving to debate on an item.
- (5) The Chair advised that Section 4.8.23(a) of the Constitution applied to the meeting.
- (6) The Chair confirmed the cut off procedure should the meeting proceed at length.

61 PUBLIC PARTICIPATION

Audio recording – 04 minutes 31 seconds

The Chair confirmed that the registered speakers were in attendance.

62 26/01416/S73 Land West Of Tuthill House, Kelshall Tops, Therfield, Hertfordshire, SG8 9PT

Audio recording – 04 minutes 54 seconds

The Principal Planning Officer (Development Management) provided a verbal update on matters relating to Application 26/01416/S73 and advised that:

- A late letter had been received from neighbour Mrs Bogie, which suggested the application was not legally valid due to Land Registry ownership and company status. However, Officers said this would not be a determining factor when the agent signed a declaration in good faith.
- Notice had been correctly served on Hertfordshire Highways, considered the owner of the land to the north.
- A Section 73 application was a full planning application in its own right. The description referred to Condition 2, allowing amended plans to be submitted.
- The proposal for three detached dwellings remained within the description of the development, allowing all conditions to be varied where appropriate.
- There was legal precedent which confirmed a Section 73 application cannot alter the original description of development, but conditions may be amended if they did not conflict with the operational part of the development.
- The proposed change to Condition 9 did not conflict with the description and was detailed in paragraph 4.6.1 of the report.
- Objections regarding lack of consultation on the amended plan were addressed, as the change was considered minor and non-material, therefore did not require public consultation.
- The amended plan was sent to Highways on 13 July; Highways responded with no objection on 17 August. The plan was sent to Highways to correct an earlier consultation error relating to Biodiversity Net Gain.

The Principal Planning Officer (Development Management) then presented the report in respect of application 26/01416/S73 accompanied by a visual presentation consisting of plans and photographs.

In response to questions from Councillor Ruth Brown, the Chair advised that:

- Supplementary documents received after 4pm the day before the meeting cannot be circulated. Instead, a verbal update was provided at the meeting.
- The document was uploaded to the portal but not emailed due to timing.

In response to questions from Councillor Ruth Brown, the Principal Planning Officer (Development Management) advised that:

- The neighbouring landowner had refused consent to remove hedgerow to create the link to a public footpath, an amended plan was sought and provided.
- The link was not a policy requirement, the alternative route was short, and Highways had raised no safety concerns.

The Chair invited the Representative to the Applicant, Mr Richard Parry, to speak in support of the application. Mr Parry thanked the Chair for the opportunity and provided the Committee with a verbal presentation, and highlighted the following:

- Confirmed he had reserved the right to speak in case objectors attended.
- As no objectors were present, he had no further comments.

There were no points of clarification from Members.

Councillor Nigel Mason proposed to grant permission, and this was seconded by Councillor Martin Prescott.

The following Members took part in the debate:

- Councillor Ruth Brown
- Councillor Martin Prescott
- Councillor Emma Fernandes
- Councillor Val Bryant

The following points were made as part of the debate:

- Given the report, there were no reasons for this application to be refused.
- Parish Council have no objections to this application.
- Thought original application was an improvement on what was there at the moment and nothing contentious about this application.
- Minor tweaks were good, huge improvement on what was there and increased Biodiversity Net Gain.

Having been proposed and seconded and, following a vote, it was:

RESOLVED: That application 26/01416/S73 be **GRANTED** planning permission subject to the conditions as set out in the report of the Development and Conservation Manager.

63 25/03197/FP The Barn, Great North Road, Radwell, Baldock, Hertfordshire, SG7 5EN

Audio recording – 19 minutes 39 seconds

The Planning Officer provided a verbal update on matters relating to Application 25/03197/FP and advised that:

- An ecology reason for refusal had been added within the published addendum.
- The application sought erection of a detached industrial storage building following demolition of two existing storage buildings, retention of external lighting poles and allowing stacking of material up to 6 meters in height.

The Planning Officer then presented the report in respect of application 25/03197/FP accompanied by a visual presentation consisting of plans and photographs.

The following Members asked questions:

- Councillor Ruth Brown
- Councillor Claire Winchester
- Councillor Louise Peace
- Councillor Martin Prescott

In response to questions, the Planning Officer advised that:

- The lighting column did not have planning permission, but the existing buildings did.
- A landscaping plan existed but was not included in the presentation.
- The previous permission included a condition which required lighting hours to comply with the bat survey.
- There was not a pre application consultation.

In response to questions, the Development and Conservation Manager advised that the application was considered as a whole, the 30-meter lighting column was the most impactful element. However, without it, the recommendation may have been different, but that scenario was not before the committee.

The Chair invited the Public Objector, Parish Councillor Matt Henderson to speak against the application. Parish Councillor Henderson thanked the Chair for the opportunity and provided the Committee with a verbal presentation, and highlighted the following:

- The original planning permission was never lawfully implemented.
- The pre-commencement conditions were not discharged.
- The construction management plan was not discharged.
- The first planting season was not met.
- The barn approved years ago was never erected, the site had instead become a large industrial compound.
- The 30-meter lighting column was highly intrusive: visible from multiple junctions and villages, dazzles drivers on the A1 and A507, lighting report was inadequate and not based on on-site assessment.
- Over 50 objections had been submitted.
- The scale, height and bulk of the site are far beyond what was originally approved.
- Parish council support employment but want development delivered in accordance with the original consent.
- The current proposal is wholly from what was approved.

There were no points of clarification from Members.

The Chair thanked Parish Councillor Henderson for their presentation and invited the Member Advocate Objector, Councillor Tom Tyson to speak against the application. Councillor Tyson thanked the Chair for the opportunity and provided the Committee with a verbal presentation, and highlighted the following:

- The application was effectively retrospective, following enforcement intervention.
- The original 2022 permission retained existing buildings, limited storage height to 3 meters and was considered acceptable and non-harmful.
- The current development demolished the barn and bat roost, introduced large storage racks and tall material stacks and created a stark visual impact due to elevated ground levels.
- The 12-meter perimeter lights dazzle drivers and affect visibility, the 30-meter central lighting column dominates the skyline and requires a red aviation light, and the lighting column was a major intrusion into the rural nightscape.
- Urged Members to support refusal for reasons in Section 5.1 of the report.

There were no points of clarification from Members.

The Chair thanked Councillor Tyson for their presentation and invited the Representative to the Applicant, Mr Colm Daly to speak in support of the application. Mr Daly thanked the Chair for the opportunity and provided the Committee with a verbal presentation, and highlighted the following:

- The site was previously developed land, 2.3 ha, almost entirely hardstanding, with existing buildings and industrial use.
- Policy CGB1 allowed rural economic development and reuse of existing buildings.
- The proposal replaced two buildings with one modern structure, increase floorspace by only 38.5 square meters and is a replacement, not a significant expansion.
- Policy CGB4 supports replacement buildings where impact is not materially greater.
- The site was already industrial, surrounded by major highway infrastructure.
- Juniper green cladding chosen to reduce visual impact.
- The officer accepted 12-meter perimeter lights do not harm rural character.
- Environmental health raised no objection to the lighting.
- The proposal supported 30 full-time jobs.
- No objections from Highways or National Highways.
- Ecological matters can be addressed via conditions.
- Submitted that visual impact does not outweigh economic benefits and asked Members to grant permission.

The following Members asked points of clarification:

- Councillor Val Bryant
- Councillor Claire Winchester

In response to points of clarification, Mr Daly advised that:

- The central light was installed due to break-ins and staff safety concerns.
- The intention was to replace the central light with lower-level lighting once the new building was erected.
- The ridge height increased by approximately 2 meters, floorspace increased by 38.5 square meters, and did not have access to the full volumetric figures but denied a tripling of volume.

In response to points raised, the Development and Conservation Manager advised that:

- The application included the 30-meter lighting column, with no alternative lighting scheme proposed.
- If the application had proposed removal of the column and lower-level lighting, the recommendation may have differed.
- The lighting column was the element with the greatest impact on rural character.

Councillor Nigel Mason proposed to grant permission, and this was seconded by Councillor Ruth Brown.

The following Members took part in the debate:

- Councillor Ruth Brown
- Councillor Louise Peace
- Councillor Val Bryant

The following points were made as part of the debate:

- The principle of development was not disputed because consent already exists, but the scale and especially the 30-meter lighting column was unacceptable.
- The column is visible from long distances, is not screened by trees, and was highly impactful in the rural area.
- Members must consider the application as submitted, the officer's report clearly showed harm to countryside.
- Visited the site and saw the lighting column clearly from multiple viewpoints; noted it rises above the trees and would be even more stark in winter.

Having been proposed and seconded and, following a vote, it was:

RESOLVED: That application 25/03197/FP be **REFUSED** planning permission for the reasons as set out in the report and addendum report of the Development and Conservation Manager.

64 Appeals

Audio recording – 53 minutes 34 seconds

The Development and Conservation Manager presented the report entitled 'Planning Appeals' and advised that:

- Two appeals had been lodged, one a householder appeal, and one appeal against refusal for eight dwellings at Deards End Lane, within allocation KB1.
- One appeal decision had been received, for a single dwelling in Nuthampstead which was dismissed.

In response to questions from Councillor Ruth Brown, the Development and Conservation Manager advised that:

- The proposal at Deards End Lane involved demolition of an existing dwelling to be.
- The full application element related to the part of the site within the conservation area.
- Only full applications should be considered in conservation areas, as outline applications with little detail cannot fully assess heritage impact.
- If delivered as part of KB1, demolition may not have been necessary, as access could potentially be taken from the KB1 development rather than Deards End Lane.

Thursday, 17th September, 2026

The Development and Conservation Manager reminded Members of a briefing on the National Scheme of Delegation that will take place online on 30 September 2026.

In response to questions from Councillor Ruth Brown, the Development and Conservation Manager advised that:

- Any application not determined by 31 October would fall under the National Scheme of Delegation.
- If called-in Schedule 1 applications were not determined before 31 October, they cannot be reported to the Planning Control Committee and would be determined under delegated powers.
- Officers would aim to determine all current called-in applications before the deadline.
- New call-ins submitted now may not be able to be scheduled before the deadline due to agenda constraints.

The meeting closed at 8.04 pm

Chair

This page is intentionally left blank

<u>Location:</u>	BA1(Land East Of North Rd And North Of Railway Line); BA10(Land Between Railway Line And Royston Rd); BA3 (Land West Of A505); BA2 (Land South Of Clothall Rd); Walls Field; Urban Open Land West Of A505, And Land West Of North Rd, Baldock
<u>Applicant:</u>	Urban & Civic Baldock North Ltd and Hertfordshire County Council
<u>Proposal:</u>	Growing Baldock Development Site: Outline planning application with all matters reserved except for means of highway access into the development from North Road and Clothall Road for: up to 3,200 homes, up to 16ha of employment, waste and leisure infrastructure, a mixed use local centre, up to 1 secondary school, up to 2 x primary schools, nursery/childcare facilities, health hub, green infrastructure (including parks, formal sports provision, play, habitat areas, informal open space and structural planting), internal street network, access junctions and railway crossing, public transport infrastructure, pedestrian/cycle network (including PRow diversions, active travel routes, mobility hubs and crossing of the railway), utilities and drainage infrastructure (including diversions of existing and provision of new infrastructure, pumping stations, sustainable drainage, primary substations, rising main/strategic sewer and renewable energy infrastructure), ground remodelling/earthworks and any necessary demolitions (as amended)
<u>Ref. No:</u>	25/02571/OP
<u>Officers:</u>	Intan Keen Sam Dicocco

Date of expiry of statutory period 02nd February 2026

Extension of statutory period 31st October 2026

Reason for Delay:

Discussions and negotiations on various technical aspects, further information received and additional consultation exercises that was undertaken as a result.

Reason for referral to Committee

The site area for this application for development exceeds 0.5 ha and therefore under the Council's scheme of delegation, this application must be determined by the Council's Planning Control Committee.

Executive Summary

It is recommended that the application is approved subject to the completion of a legal agreement under Section 106 of the Town and Country Planning Act (1990) to secure appropriate mitigation of the impact of the proposed development and subject to the conditions set out in the report, subject to the removal of the holding objection from National Highways and delegation to the Development Management and Conservation Manager to resolve outstanding matters relating to planning obligations and minor amendments to planning conditions and informatives.

The application follows the adoption of the Growing Baldock Strategic Masterplan on 16 June 2025. It proposes the development of four allocated sites for residential and employment use, extending Baldock to the north, east and south-east on allocations BA1, BA2, BA3 and BA10, including the largest strategic allocation within the Local Plan. The proposal intends to deliver a significant portion of the District's planned housing and employment growth.

The proposal has been assessed against the policies of the North Hertfordshire Local Plan, the National Planning Policy Framework, the Baldock, Bygrave and Clothall Neighbourhood Plan as well as relevant supplementary planning documents.

All parts of the development would have suitable connections into the centre of Baldock, with the proposals providing for and encouraging a mode shift towards sustainable travel. The development would accommodate the necessary infrastructure required to meet its needs on site, including a neighbourhood-scale local centre, educational facilities as well as open space within or immediately linked to all residential parcels. Affordable housing would be secured on-site following scrutiny of the viability submission and the proposal would be policy compliant.

The proposal would not result in significant adverse effects relating to matters such as highway safety, landscape, heritage assets, ecology, drainage and flood risk, land contamination, noise and the function or amenity of neighbouring properties. Importantly, the housing delivery on three allocated sites would provide significant social, economic and environmental benefits, including to public health. There would be substantial benefits with regards to promoting the local economy within Baldock, including through the proposed employment uses. Statutory consultees have raised no objection to the proposals, subject to the imposition of relevant planning conditions or obligations.

It follows that the proposal accords with the relevant provisions of the National Planning Policy Framework, the North Hertfordshire Local Plan and the Baldock, Bygrave and Clothall Neighbourhood Plan.

1.0 Site History

The planning history of the site is significant given the extent of site coverage. The site history relevant to the scale of the proposal is as follows:

17/01344/1SCP - Mixed use development comprising up to 2,800 dwellings, a new local centre, primary and secondary schools, a healthcare hub, up to 1,900sqm of "A" Class land uses including a supermarket, open space, nature conservation, recreation, landscaping and associated facilities, following demolition of existing structures and vehicular access. Status: Agreed

17/01364/1SCP - Mixed use development comprising up to 570 dwellings, up to 19.6ha of Use Class 'B' Employment land uses, open space, nature conservation, education provision, recreation, landscaping and associated facilities, following demolition of existing structures and vehicular access - Status: Agreed

17/04417/OP - Proposal: Outline application with all matters other than access reserved, for strategic development to the south-east of Baldock, comprising up to 495 dwellings, up to 18.3ha of Use Class "B" Employment land uses, means of access, open space, nature conservation, recreation, landscaping and associated facilities, following demolition of existing structures - Status: Withdrawn

17/04420/OP - Mixed use development comprising up to 2,800 dwellings, a new local centre, two primary schools and a secondary school, a healthcare hub, up to 1,900sqm of "A" Class land uses (including a supermarket), open space, nature conservation, recreation, landscaping and associated facilities, following demolition of existing structures and vehicular access - outline planning application with all matters reserved other than access. Status: Withdrawn

24/00920/SCOP - Up to c. 3,200 homes- up to 16 hectares of employment land- strategic "green infrastructure"- a mixed use local centre- education provision- and associated infrastructure- waste infrastructure - Status: Decided

2.0 **Policies**

2.1 **North Hertfordshire District Local Plan 2011 – 2031**

Adopted 8th November 2022

Policy SP1: Sustainable Development in North Hertfordshire

Policy SP2: Settlement Hierarchy

Policy SP3: Employment

Policy SP4: Town Centres, Local Centres and Community Shops

Policy SP5: Countryside and Green Belt

Policy SP6: Sustainable transport

Policy SP7: Infrastructure requirements and developer contributions

Policy SP8: Housing

Policy SP9: Design and sustainability

Policy SP10: Healthy communities

Policy SP11: Natural resources and sustainability

Policy SP12: Green infrastructure, biodiversity and landscape

Policy SP13: Historic Environment

Policy SP14: Site BA1 – North of Baldock

Policy ETC1: Appropriate uses in Employment Areas

Policy ETC2: Employment development outside Employment Areas and Employment Allocations BA10 and RY9

Policy CGB5: Urban Open Land
 Policy T1: Assessment of transport matters
 Policy T2: Parking
 Policy HS1: Local Housing Allocations
 Policy HS2: Affordable Housing
 Policy HS3: Housing Mix
 Policy HS4: Supported, sheltered and older persons housing
 Policy HS5: Accessible and adaptable housing
 Policy D1: Sustainable design
 Policy D3: Protecting living conditions
 Policy D4: Air quality
 Policy HC1: Community facilities
 Policy NE1: Strategic green infrastructure
 Policy NE2: Landscape
 Policy NE4: Biodiversity and geological sites
 Policy NE6: New and improved open space
 Policy NE7: Reducing flood risk
 Policy NE8: Sustainable drainage systems
 Policy NE9: Water quality and environment
 Policy NE10: Water conservation and wastewater infrastructure
 Policy NE11: Contaminated Land
 Policy NE12: Renewable and low carbon energy development
 Policy HE1: Designated heritage assets
 Policy HE4: Archaeology

Local Housing Allocations – BA2 Land south-west of Clothall Road, BA3 – Land south of Clothall Common

New employment allocation – BA10

2.2 **Baldock, Bygrave and Clothall Neighbourhood Plan**

Policy G1 – Improving Access and Parking
 Policy G2 – Strategic Green Space
 Policy G3 Creating Well-Designed Places
 Policy G4 – Sustainable Design
 Policy G6 – Heritage Assets
 Policy E4 – Community Facilities
 Policy E2 - Green Infrastructure and Outdoor Recreation
 Policy E5 - Development North of the Railway
 Policy E6 – Royston Road
 Policy E7 – Cambrai Farm and South of Clothall Common
 Policy E1 – Transport and Air Quality

2.3 **National Planning Policy Framework (2026)**

Presumption and Decision-Making
 Policy S3 – Presumption in Favour of Sustainable Development
 Policy S4 – Development in Settlements

Housing
 Policy HO1
 Policy HO2
 Policy HO5

Policy HO7
Policy HO8
Policy HO9
Policy HO13
Annex D – Housing Land Supply and Housing Delivery Test

Economy and Employment
Policy E1
Policy E2
Policy E3

Town Centres and Retail
Policy TC3
Policy TC4

Community Infrastructure, Health, Education and Recreation
Policy HC1
Policy HC3
Policy HC4
Policy HC5
Policy HC7
Policy HC8

Effective Use of Land
Policy L2
Policy L3

Design
Policy DP3
Policy DP4

Pollution, Safety and Amenity
Policy P3
Policy P4
Policy P5

Climate Change
Policy CC3

Transport
Policy TR3
Policy TR4
Policy TR6
Policy TR8

Natural Environment, Green Infrastructure and Biodiversity
Policy N1
Policy N2
Policy N3
Policy N4
Policy N6

Green Belt
Policy GB7

Development Viability and Planning Obligations
Policy DM5
Policy PM13

Heritage
Policy HE4
Policy HE5
Policy HE6
Policy HE9

3.0 **Representations**

3.1 121 public comments have been received at the point of drafting this committee report. A written and/or verbal update will be provided before consideration at planning control committee with any comments received following this drafting.

The public representations have regard to the following –

Concerns about Environmental Impact, Sustainability and Land Use

- Loss of wildlife habitats and biodiversity
- Water supply, abstraction and the chalk aquifer
- Loss of productive agricultural land and countryside
- Drainage, flooding, sewage and surface-water pollution
- Green infrastructure, buffers and settlement separation
- Sustainable building standards and resource efficiency

Infrastructure and Services (Community Impact)

- Road capacity, congestion and highway safety
- Walking, cycling, buses and assumptions about modal shift
- Railway station capacity, accessibility and parking
- Healthcare, medical and emergency-service capacity
- Education provision, school capacity and pupil movement
- Parking within housing areas and at community facilities
- Phasing and early delivery of essential infrastructure

Overdevelopment and Population Increase

- Overall scale relative to the existing town
- Intensity and location of the proposed sports facilities
- Density, housing form and efficient use of land
- Urban expansion and settlement coalescence
- Long construction period and cumulative disruption

Economic Considerations

- Effect on the town centre and existing businesses
- Affordable housing and opportunities for local people
- Employment creation and the quality of proposed jobs
- Infrastructure funding and developer contributions
- Potential diversion of expenditure away from Baldock Town Centre

Community Impact

- Change to the character and identity of Baldock
- Residential amenity, privacy, noise and light (including concerns around the proximity of the local centre to existing residences)
- accessibility for older people and people with limited mobility
- Community cohesion between existing and new neighbourhoods
- Recreation, access to countryside and wellbeing
- Safety, security and emergency access

Government and Planning Policy

- Consistency with national transport and highway policy
- Local Plan allocation versus acceptability of detailed parameters
- Neighbourhood Plan and settlement-separation policies
- Biodiversity policy and species-specific measures
- Legal commitments, planning obligations and enforceable triggers

Other Comments

- Support for housing growth, subject to safeguards
- Quality, clarity and accessibility of the application material
- Heritage and archaeology
- Design quality and local distinctiveness
- Alternative locations and revised spatial arrangements
- Accountability, consultation and public confidence

3.2 Summary of Consultation Responses

Ashwell Parish Council – objection, on the following grounds:

- Transport will have significant adverse impacts on existing residents and their ability to access and park in Baldock;
- Impact of proposals on Ashwell and Morden Station, exacerbating existing parking conditions around this station.

Bygrave Parish Council – objection, on the following grounds:

- Transport impacts on existing residents;
- Inappropriate scale, location and function of Eastern Park (on BA1).

Caldecote and Newnham Parish Council – reserve judgement until clarification received with respect to securing necessary infrastructure to support the development and how the new development schemes will be financed.

Central Bedfordshire Council – strong reservations on the following grounds:

- Unrealistic transport assumptions and impacts on the road network within Central Bedfordshire and the A1(M);
- Limited details on the public bus services serving the development and access to wider public transport facilities.

Radwell Parish Council – objection to the Strategic Masterplan.

North Hertfordshire District Council:

- Urban Design – no objection, advice supplied
- Conservation – no objection
- Sustainability – no objection
- Environmental Health – no objection subject to conditions
- Ecology – no objection subject to conditions / planning obligation securing BNG, habitat management and monitoring and corn bunting mitigation and compensation
- Greenspaces – no objection
- Transport – no objection, advice supplied
- Housing Supply Officer – informal response with no objection subject to meeting policy requirements
- Leisure – contribution request
- Waste – no objection
- Planscape – no objection
- Carter Jonas – detailed within report

Hertfordshire County Council:

- Highways – no objection subject to conditions / planning obligation securing highways works and mitigation
- Growth and Infrastructure – no objection subject to conditions / planning obligation as detailed within report
- Lead Local Flood Authority – no objection subject to conditions
- Historic Environment (Archaeology) – no objection subject to conditions
- Minerals and Waste – no objection subject to condition
- Adult Care – no objection
- Fire and Rescue – no objection subject to condition
- Public Health – no objection
- Constabulary – no objection
- Police and Crime Commissioner – no objection subject to contributions detailed within report

Other consultees:

- Natural England – no objection
- National Highways – holding objection awaiting further technical submissions
- Historic England – no objection
- Network Rail – no objection subject to condition; contribution request
- NHS Central East Integrated Care Board – no objection
- Sport England – objection
- Hertfordshire and Middlesex Wildlife Trust – no objection subject to conditions
- Environment Agency – no objection subject to conditions
- Affinity water – no objection
- Anglian Water – no objection subject to conditions
- Thames Water – no comment
- Royal Society for Protection of Birds – concerns with regards to compensation for corn bunting
- Active Travel England – no objection
- Ramblers Association – objection
- British Horse Society – requests relating to further improvements to equestrian accessibility

4.0 **Planning Consideration**

4.1 **Site and Surroundings**

- 4.1.1 The application site mainly comprises four allocated sites within the Local Plan, separated by existing transport infrastructure, which together wrap around the existing built envelope of Baldock town to its north, east and south-east. These individual site allocations and key features are set out below.
- 4.1.2 Allocation BA1 is the largest of the allocated sites, bordered to the west by North Road (A507), a public bridleway also known as Millers Way (Bygrave 001) to the north and the Cambridge railway line to the south. The site currently contains two public rights of way which generally run north-south¹, providing connections with Bygrave Road. A roadside local wildlife site is located within the eastern half of BA1. This parcel is otherwise predominantly occupied by large arable fields and has a gently undulating topography, with a localised and curving ridgeline in its northern half, falling to Bygrave Road and down to Millers Way. Within the site, open views can be obtained across and within BA1 from the various transport routes and the built edge of Baldock town is visible. Immediately east of BA1 are fields in the Green Belt, beyond which is Ashwell Road and the residential properties within Lower Bygrave. Directly west is the residential area of Baldock generally aligned along Salisbury Road and North Road. Four properties in residential use lie within BA1, off Bygrave Road, which do not form part of the application site.
- 4.1.3 Allocation BA2 represents the southernmost part of the application site, comprising open grazing land and a landscaped frontage to the south-western side of Clothall Road (A507). It shares a boundary with an existing mobile home park to the south-west and residential dwellings to the north-west, all which form part of Baldock. The set-down A505 Baldock Bypass and associated bund form the south-eastern boundary of this site allocation; beyond is land within the Green Belt. Further south of BA2 lies the rising local nature reserve of Weston Hills. It comprises arable farmland and grazing paddocks and contains the only Category A (walnut) tree on the site. Levels slope down gently towards Clothall Road. Four residential properties are adjacent to BA2 and front an existing spur road off Clothall Road. Currently, there is no public access to this part of the site.
- 4.1.4 Allocation BA3 occupies an area of land directly south-west of Baldock and adjacent to Clothall Common, also bound by the A505 Baldock Bypass to the south-east, Royston Road (B656) to the north, an area of designated Urban Open Land to the south and Wallington Road and public footpath at the edge of Clothall Common to the north-west. There are two distinct parts of BA3: the southern part which is in intensive agricultural use and the northern half, a raised unmanaged area of land containing a network of formal and informal recreational paths. It has been elevated artificially following the construction of the A505 bypass and provides a vantage point at the intersection of paths across Baldock and to the surrounding chalk scarp landscape. As such, levels fall from this elevated point down towards the arable field in BA3, towards Clothall Common to the west and Royston Road to the north.

¹ Public footpath Bygrave 015 in the eastern portion and bridleway Bygrave 002 in the western portion.

- 4.1.5 Allocation BA10 is a long parcel of land which lies between the Cambridge railway line to the north and Royston Road to the south, extending beyond the roundabout serving the A505. Beyond the railway line is the BA1 allocation and further south are residential properties of Baldock and the raised land within BA3. Immediately west is the existing Ashville Trading Estate, an existing employment area within Baldock town. The public footpath (Bygrave 015) connecting Lower Bygrave and Royston Road crosses the railway line before traversing through BA10. This part of the site is mostly in agricultural use, with some grazing to the west. There are six residential properties on the northern side of Royston Road that fall outside of the application site.
- 4.1.6 In addition to the four allocations, the site also comprises three further areas of land, which have been described below:
- Urban Open Land which lies to the north of Clothall Road and east of Wallington Road, has a direct link to the arable field within the southern half of BA3. The public right of way traversing this part of the site provides long distance views across the Urban Open Land and through to BA3. Allotments are situated directly north-west of the Urban Open Land.
 - Walls Field is a scheduled monument (former Roman settlement) currently in intensive agricultural use, which lies to the east of the town centre and wholly within Baldock town, off the north-western side of Wallington Road, bound by Hartsfield JMI School to the north-west and Clothall Road to the south-west. A public right of way dissects this part of the site. Public footpaths also run along the north-eastern and south-western boundaries of Walls Field.
 - Land west of North Road lies within the Green Belt and is a small parcel of unmanaged grassland in the Green Belt, featuring hedgerow borders, particularly to its roadside frontage. A public right of way runs diagonally through this part of the site, where it is used for informal recreation. To the north lies Ivel Springs Local Nature Reserve and associated recreational routes within. Ivel Springs is also a scheduled monument.
- 4.1.7 The application site, at 219.84 hectares in area, falls within the boundary of Landscape Character Area 224 (North Baldock Chalk Uplands) except for the land west of North Road, which is located within LCA216 (Arlesey / Great Wymondley). None of the parts of the application site lie within the Baldock Conservation Area, where there is approximately 100m between respective boundaries. This conservation area contains the Grade I listed Church of St Mary. The site does not feature any listed buildings although there are Grade II listed buildings proximate to the western boundary and north-western corner of BA1 and the remainder of nearby listed buildings closer to or within Baldock town centre. In addition to the scheduled monument referenced above, many parts of the site feature areas of archaeology.
- 4.1.8 The red line boundary includes areas of the immediately surrounding public highway, including North Road, the westernmost A505 roundabout, Royston Road and Clothall Road as well as two sections of the railway line between BA1 and BA10.
- 4.1.9 The application site mainly comprises four allocated sites within the Local Plan, separated by existing transport infrastructure, which together wrap around the existing built envelope of Baldock town to its north, east and south-east. These individual site allocations and key features are set out below.

- 4.1.10 Allocation BA1 is the largest of the allocated sites, bordered to the west by North Road (A507), a public bridleway also known as Millers Way (Bygrave 001) to the north and the Cambridge railway line to the south. The site currently contains two public rights of way which generally run north-south², providing connections with Bygrave Road. A roadside local wildlife site is located within the eastern half of BA1. This parcel is otherwise predominantly occupied by large arable fields and has a gently undulating topography, with a localised and curving ridgeline in its northern half, falling to Bygrave Road and down to Millers Way. Within the site, open views can be obtained across and within BA1 from the various transport routes and the built edge of Baldock town is visible. Immediately east of BA1 are fields in the Green Belt, beyond which is Ashwell Road and the residential properties within Lower Bygrave. Directly west is the residential area of Baldock generally aligned along Salisbury Road and North Road. Four properties in residential use lie within BA1, off Bygrave Road, which do not form part of the application site.
- 4.1.11 Allocation BA3 occupies an area of land directly south-west of Baldock and adjacent to Clothall Common, also bound by the A505 Baldock Bypass to the south-east, Royston Road (B656) to the north, an area of designated Urban Open Land to the south and Wallington Road and public footpath at the edge of Clothall Common to the north-west. There are two distinct parts of BA3: the southern part which is in intensive agricultural use and the northern half, a raised unmanaged area of land containing a network of formal and informal recreational paths. It has been elevated artificially following the construction of the A505 bypass and provides a vantage point at the intersection of paths across Baldock and to the surrounding chalk scarp landscape. As such, levels fall from this elevated point down towards the arable field in BA3, towards Clothall Common to the west and Royston Road to the north.
- 4.1.12 Allocation BA10 is a long parcel of land which lies between the Cambridge railway line to the north and Royston Road to the south, extending beyond the roundabout serving the A505. Beyond the railway line is the BA1 allocation and further south are residential properties of Baldock and the raised land within BA3. Immediately west is the existing Ashville Trading Estate, an existing employment area within Baldock town. The public footpath (Bygrave 015) connecting Lower Bygrave and Royston Road crosses the railway line before traversing through BA10. This part of the site is mostly in agricultural use, with some grazing to the west. There are six residential properties on the northern side of Royston Road that fall outside of the application site.
- 4.1.13 In addition to the four allocations, the site also comprises three further areas of land, which have been described below:
- Urban Open Land which lies to the north of Clothall Road and east of Wallington Road, has a direct link to the arable field within the southern half of BA3. The public right of way traversing this part of the site provides long distance views across the Urban Open Land and through to BA3. Allotments are situated directly north-west of the Urban Open Land.
 - Walls Field is a scheduled monument (former Roman settlement) currently in intensive agricultural use, which lies to the east of the town centre and

² Public footpath Bygrave 015 in the eastern portion and bridleway Bygrave 002 in the western portion.

wholly within Baldock town, off the north-western side of Wallington Road, bound by Hartsfield JMI School to the north-west and Clothall Road to the south-west. A public right of way dissects this part of the site. Public footpaths also run along the north-eastern and south-western boundaries of Walls Field.

- Land west of North Road lies within the Green Belt and is a small parcel of unmanaged grassland in the Green Belt, featuring hedgerow borders, particularly to its roadside frontage. A public right of way runs diagonally through this part of the site, where it is used for informal recreation. To the north lies Ivel Springs Local Nature Reserve and associated recreational routes within. Ivel Springs is also a scheduled monument.

4.1.14 The application site, at 219.84 hectares in area, falls within the boundary of Landscape Character Area 224 (North Baldock Chalk Uplands) except for the land west of North Road, which is located within LCA216 (Arlesey / Great Wymondley). None of the parts of the application site lie within the Baldock Conservation Area, where there is approximately 100m between respective boundaries. This conservation area contains the Grade I listed Church of St Mary. The site does not feature any listed buildings although there are Grade II listed buildings proximate to the western boundary and north-western corner of BA1 and the remainder of nearby listed buildings closer to or within Baldock town centre. In addition to the scheduled monument referenced above, many parts of the site feature areas of archaeology.

4.1.15 The red line boundary includes areas of the immediately surrounding public highway, including North Road, the westernmost A505 roundabout, Royston Road and Clothall Road as well as two sections of the railway line between BA1 and BA10.

4.2 **Proposal**

4.2.1 The application is in outline form with all details reserved except means of access from North Road onto allocation BA1 and means of access from Clothall Road onto BA2. Other means of access, access in-so-far as it relates to movements within the site, appearance, landscape, layout and scale are all reserved for future applications approving details reserved matters.

4.2.2 The application represents the parent planning permission from which details will be based for future applications. The consideration running through each key matter considered is whether sufficient information has been provided that the Local Planning Authority are confident that the operative part of the permission (the description of the development) can be delivered with acceptable access, appearance, landscape, layout and scale, and what mitigation in the form of conditions or obligations are required to ensure the proposal can be integrated into the community and infrastructure arrangements.

4.2.3 The application has been supported by a Development Specification, which sets out the extent of land uses proposed within the site, alongside key principles for development, building upon the key principles set out within the Strategic Masterplan. The proposal would incorporate the following within the residential allocations of BA1, BA2 and BA3:

- Up to 3,200 dwellings in BA1, BA2 and BA3, including market, affordable, self-build, older persons' and accessible and adaptable housing;
 - A local centre in BA1 comprising a mix of uses including convenience retail, other retail / café / restaurant, pub, residential institution / hotel, gym, community centre, office and if not provided on BA10, a health hub;
 - Nursery / childcare facilities on BA1 or BA10;
 - Up to two two-forms of entry primary schools within BA1, with the potential to expand to three-forms of entry (totalling six forms of entry of primary education);
 - One secondary school of up to five-forms of entry on BA3 (or up to a maximum of 12 forms of entry if accommodating the relocation of Knights Templar School in this location).
- 4.2.4 Within the employment allocation of BA10, the proposal would include the following:
- Up to 20,000m² office;
 - Up to 5,000m² indoor sport and recreation;
 - Up to 26,500m² research and development and / or light industrial;
 - Up to 26,500m² industrial;
 - Up to 6,000m² health hub;
 - Waste infrastructure consisting of a vehicle depot (up to 1,500m²), waste transfer station (up to 3,500m²) and household waste recycling centre (up to 1.1 hectares); and
 - Renewable energy infrastructure.
- 4.2.5 The application has been submitted in outline form with all matters reserved, with the exception of the proposed accesses to the eastern side of North Road serving BA1 and the proposed access to BA2 on the south-western side of Clothall Road.
- 4.2.6 The application has been submitted in outline form with all matters reserved, with the exception of the proposed accesses to the eastern side of North Road serving BA1 and the proposed access to BA2 on the south-western side of Clothall Road.
- 4.2.7 Transport infrastructure is proposed across the site including active travel links serving pedestrians and cyclists including the Baldock Greenway connecting all allocations, including the safe crossing of the railway line between allocations BA1 and BA10 in the form of a multi-modal bridge and a separate underpass. Mobility hubs would be created throughout the development, bringing together a range of transport options and integrating key communal spaces. Rights of way are proposed to be extended and, in some cases, would be diverted. Modal filters would be proposed on Bygrave Road traversing BA1, which would restrict general vehicular traffic but enhance pedestrian and cycle access.
- 4.2.8 A network of green infrastructure would be included as part of the proposals, mainly comprising six areas of strategic open space within BA1, BA3, BA2, the Urban Open Land and Walls Field covering a total of 87.42 hectares of the site. Together, these areas would be multi-functional, incorporating parks, play areas, formal outdoor sports provision, buffer areas with structural planting, retained and proposed wildlife habitat areas, community food growing areas and formal and informal open space and recreational routes. The land west of North Road has been identified for allotments.

- 4.2.9 The submitted Development Specification also includes other infrastructure including drainage works including sustainable drainage systems, demolition of existing buildings and structures, ground works including any necessary ground remodelling and boundary treatments including construction hoarding.
- 4.2.10 The application has undergone three additional consultations under Regulation 25 of the EIA Regulations in February, May and August 2026 following the submission of additional information relating to transport and access, landscape and visual impact, archaeology, ecology, drainage, sports, air quality and noise and socio-economic considerations in response to specific consultee comments.
- 4.2.11 As has been set out within the Strategic Masterplan and the subsequent Design and Access Statement, it is proposed that the development contains three levels of approval, following a three-tier structure as follows:
- First tier – outline stage, which includes aspects of the current outline application as submitted and relates to the site as a whole;
 - Second tier – phase framework submissions, which include elements of the development that shall be brought forward consecutively and generally within the boundaries of each individual site allocation; and
 - Third tier – reserved matters stage, considering the details of the reserved matters and other details of the scheme that require approval.
- 4.2.12 This tiered approach is required to arrange delivery over an extended build-out period associated with the scale of the application and also assists with the ‘master-developer’ delivery method. The additional second tier provides a layer of detail to large areas of development allowing for consideration of delivery schedules and plans, consistent design toolkits, management planning, employment strategy, and ecological details at a wider scale.
- 4.3 **Environmental Impact Assessment Regulations**
- 4.3.1 A scoping opinion was provided for the proposal on the application site. This established that the development would constitute EIA development and what any submitted Environmental Statement should cover as a minimum, respectively, pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
- 4.3.2 Following the withdrawal of applications referenced 17/04420/OP and 17/04417/OP, a further scoping opinion was submitted by the applicant and agent responsible for the application currently under consideration (referenced 24/00920/SCOP). The determination of the scoping opinion, dated 11 September 2025, concluded that the chapters scoped in by the applicant were required, and no further environmental topics were required to be scoped in. The topics agreed to be scoped into the Environmental Statement were as follows:
- Transport;
 - Noise and vibration;
 - Air quality;
 - Landscape and visual;
 - Heritage;
 - Hydrology and flooding;
 - Ecology;
 - Ground conditions and soils;
 - Socio-economics and health;
 - Waste;

- Lighting;
- Utilities and services;

Climate change

4.3.3 Schedule 4 of the EIA Regulations 2017 sets out the required information for inclusion in Environmental Impact Assessment statements, summarised as descriptions or details of the following:

- The development, including its location, physical characteristics, main characteristics of the operational phase, estimates of expected residues, emissions and waste produced during the construction and operation phases;
- A description of reasonable alternatives, relevant to the proposal;
- Relevant aspects of the current state of the environment as a baseline and the likely evolution without implementation of the development;
- Factors likely to be significantly affected by the development;
- Likely significant effects of the development on the environment including direct, indirect, secondary, cumulative, short-term, medium-term and long-term, permanent and temporary, positive and negative effects;
- Forecasting methods or evidence used to identify and assess significant impacts on the environment;
- Measures envisaged to avoid, prevent, reduce or if possible, offset any identified significant adverse effects on the environment;
- Expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and / or disasters which are relevant;
- A non-technical summary of the information provided under the above; and
- A reference list detailing the sources used for the descriptions and assessments included in the EIA statement.

4.3.4 Notwithstanding the assessment below, the application has been accompanied by such information listed above, contained within the submitted ES and addendums since its original submission and would therefore satisfy Part 4 of the EIA Regulations 2017.

4.3.5 When determining a planning application that has been accompanied by an ES, pursuant to paragraph 26(1) of Part 5 of the EIA Regulations 2017, the local planning authority must reach a reasoned conclusion on the significant effects of the proposed development on the environment, taking into account the examination of the submitted environmental information and, where appropriate, their own supplementary examination.

4.3.6 The assessment of the application, detailed in the following sections of this report, shall refer to the submitted ES and the relevant descriptions of the effects of the development listed previously, where relevant.

4.4 Key Considerations

4.4.1 The main issues of relevance to the consideration of this application relate to the following:

- Principle of Development
- Impact on Urban Open Land
- Green Belt considerations
- Infrastructure contributions

- Economic considerations
- Quantum of residential development
- Design and layout
- Transport
- Landscape and visual impact
- Impact on heritage assets
- Impact on ecology
- Flood risk, drainage and water management
- Land contamination and stability
- Sustainability
- Impact on neighbouring properties
- Noise
- Air quality
- Waste
- Public health
- Waste

4.5 **Principle of Development**

4.5.1 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, by managing the use and development of land in the long-term public interest (paragraph 15). There are three overarching objectives for the provision of homes, commercial development, facilities and infrastructure which society needs: economic, social and environmental (paragraph 17).

4.5.2 The spatial strategy and vision of the North Hertfordshire Local Plan includes promoting the key settlements, such as Baldock, as the focus within the District for meeting future housing needs and supporting economic growth (Policy SP1). Within the District's settlement hierarchy, Baldock is specifically identified as one of the main locations for development and change.

4.5.3 The principle of development for housing, employment and a range of uses complementary or ancillary to the development has also been established through the adopted Strategic Masterplan. Its vision is that Growing Baldock will deliver a new neighbourhood of open spaces, homes, community facilities and employment areas that is part of and intrinsically linked to the existing town.

4.5.4 The specific land use principles set out in the Strategic Masterplan are listed below:

- High-quality housing to meet the needs of all ages;
- Meet the educational needs of primary and secondary pupils from the development, in Baldock;
- Supporting and strengthening Baldock Town Centre.

4.5.5 The application has been supported by a Parameter Plan, Development Specification and Design and Access Statement, which demonstrate how the proposal has encompassed the key land use principles contained within the Strategic Masterplan as well as the on-site infrastructure requirements detailed within consultee comments from Hertfordshire Growth and Infrastructure and the NHS Central East Integrated Care Board.

4.6 **Policy and Principle of Residential Development (BA1, BA2 and BA3)**

- 4.6.1 In keeping with the spatial strategy, the Local Plan makes provision for at least 13,000 new homes between 2011 and 2031 (Policy SP2)³.
- 4.6.2 The provisions of Policy SP1(c) provide the basis for granting proposals, whether individually or cumulatively, including the following criteria:
- deliver an appropriate mix of homes, jobs and facilities that contribute towards the targets and aspirations in this Plan;
 - create high-quality developments that respect and improve their surroundings and provide opportunities for healthy lifestyle choices;
 - provide the necessary infrastructure required to support an increasing population;
 - protect key elements of North Hertfordshire's environment including biodiversity, important landscapes, heritage assets and green infrastructure (including the wider environment); and
 - secure any necessary mitigation measures that reduce the impact of development, including on climate change.
- 4.6.3 The adoption of the Local Plan in 2022 endorsed the majority of the application site as part of a strategic allocation and local housing allocations, thereby removing the areas of the site within BA1, BA2 and BA3 from the Green Belt, where the provisions of Local Plan Policies SP14, BA2 and BA3 apply.
- 4.6.4 The following Local Plan policies with respect to housing are set out below:
- Policy HS1 (Local Housing Allocations) which supports development that broadly accords with the indicative number of homes shown;
 - Policy HS2 (Affordable housing) sets the percentage of affordable homes to be delivered and for a tenure split to be 65% rented and 35% other forms of affordable housing;
 - Policy HS3 (Housing mix) encourages an appropriate range of house types and the factors guiding the mix of housing, also noting that the density, scale and character should be appropriate relative to the site's location and its surroundings;
 - Policy HS4 (Supported, sheltered and older persons housing) supports housing in Use Classes C2 and C3 if local services and facilities and public transport is accessible and importantly, requires that planning permission for residential developments of 100 or more units provide an element of accommodation for older persons housing;
 - Policy HS5 (Accessible and adaptable housing) requires major developments to demonstrate that at least 50% of homes can be built to the M4(2) Accessible and Adaptable Standard and 10% of affordable units can additionally be built to the M4(3) wheelchair user standard.
- 4.6.5 Part 6 of the NPPF (Delivering a sufficient supply of homes) confirms the objective of delivering a substantial increase in the supply of homes by ensuring that a sufficient amount and variety of land can come forward when needed. This includes planning for an appropriate mix of accommodation for the local community and ensuring that land with permission is developed without

³ Footnote 33 of the Local Plan acknowledges that the figures for individual settlements are the total of planned, permitted and completed development; they are not a target and do not necessarily represent the maximum number of new homes that will be built.

unnecessary delay. The housing provisions within this chapter of the NPPF are listed below as relevant to the application:

- Policy HO7 of the NPPF attributes substantial weight to the benefits of providing homes which will contribute towards meeting the evidenced accommodation needs of the community.
- Policy HO8 of the NPPF encourages proposals to meet or exceed up-to-date requirements for the proportion and mix of affordable housing tenures relevant to the location, which should be provided on-site, unless in the event of some exceptions. It continues to state that the reuse or redevelopment of vacant buildings shall reduce the proportionate requirement of affordable housing provision; however, this does not apply to major development on land within or released from the Green Belt.
- Policy HO9 of the NPPF seeks to address specialist housing needs that should address living conditions and access to services appropriate to the needs of their residents. Amongst other types of housing, accommodation for older and disabled people should be located where residents will be able to access frequently used services easily and safely by walking, wheeling (including mobility scooters) and by public transport or on-site transport services.
- Policy HO13 of the NPPF addresses the build out of residential and strategic sites, emphasising their role in significantly boosting the supply of homes, it is important that land with permission is developed without unnecessary delay. Proposals for major development involving the provision of housing should be capable of bringing forward within a reasonable period, taking into account the proposed tenure mix for the development, local market conditions and the development history of the site. Paragraph 3 is of importance, noting that for strategic sites, the consenting framework should firstly, set out the parameters and requirements for the design, infrastructure and other features of the development, with the level of initial and subsequent detail tailored to the proposed scale and phasing of the development; secondly, be flexible enough to respond positively to changing circumstances as phases are brought forward, including changes to housing need, infrastructure requirements, viability and design.

4.6.6 Annex D is referred to, which sets out how housing need should be calculated, how land supply should be assessed and the Housing Delivery Test applied. The following is relevant:

- Paragraph 8 of Annex D states that local planning authorities should identify and update a supply of specific deliverable sites, sufficient to provide a minimum of five years' worth of housing, assessed against their housing requirement in the development plan or against their local housing need. Paragraph 9 continues to state that the supply of specific deliverable sites shall be subject to a buffer of a minimum of 5% to ensure choice and competition in the market for land.
- Paragraph 11 of Annex D outlines that the Housing Delivery Test measures net homes delivered in a local authority area against the homes required. These are published annually. Further, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below the housing requirement for the previous three years, there are policy consequences in instances where this is below 95%.

- 4.6.7 North Hertfordshire's latest reported Five-Year Housing Land Supply Update (September 2026) acknowledges that the District is currently facing the effect of a cumulative shortfall of housing completions, in an undersupply of 1,934 dwellings⁴.
- 4.6.8 The Secretary of State published the results of the Housing Delivery Test (HDT)⁵, noting that North Hertfordshire's latest position is 75%. In line with Annex D, as the HDT has fallen below the 75% benchmark, a 20% buffer is required for the five-year housing supply.
- 4.6.9 Taking these two factors into account, the total requirement for housing delivery from 1 April 2026 to 31 March 2031 within the District is 9,041 dwellings. The total identified supply has been reported as 4,389 dwellings, amounting to a five-year land position of 2.43 years, which falls below the five-year requirement.
- 4.6.10 As set out above, the principle of development of the allocations BA1, BA2 and BA3 for housing and complementary or ancillary uses has been established through the adopted Strategic Masterplan. Land use principles within the Strategic Masterplan include the provision of high-quality housing to meet the needs of all ages.
- 4.6.11 *Presumption in Favour of Sustainable Development*
- 4.6.12 Policy S3 of the NPPF outlines that decisions on development proposals should apply a presumption in favour of sustainable development. This triggers the requirement for assessment under Policy SP4 of the NPPF, which relates to the principle of development in settlements. There is one portion of the application site which lies outside of the settlement boundary contained within the Local Plan (2022); this shall be dealt with in a separate section of the report.
- 4.6.13 As set out above, the Council is currently unable to demonstrate a five-year supply of deliverable housing sites as required by national policy and as such, the proposal would contribute to the supply of housing within the district and in turn would add to much-needed housing delivery, which the NPPF outlines should be approved without delay.
- 4.6.14 Policy S4(1) of the NPPF states that development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in the NPPF. Local Plan Policies SP14, BA2 and BA3 confirm that the developable areas of the application site lie within the settlement boundary of Baldock and as such, Policy S4 is applicable in the consideration of the development proposals on the allocated parcels.
- 4.6.15 Paragraph 2 of Policy S4 of the NPPF is relevant and is quoted below:
- 2. In applying policy S4, the circumstances in which the benefits of approving development are likely to be substantially outweighed by adverse effects (but are not restricted to) situations where the development proposal would:*
- a. Have a substantial adverse impact in relation to:*

⁴ Table 2 of the Five-Year Housing Land Supply Update, September 2026.

⁵ Published in August 2026.

i. The allocation or safeguarding of land or buildings for particular uses in the development plan, unless there is no reasonable prospect of an application coming forward for the allocated use, or there is evidence that the safeguarding is no longer appropriate, or

ii. The application of policies in this Framework for existing recreational land and facilities (HC7), Local Green Space (HC8), areas of particular importance for biodiversity and geodiversity (N6), Protected Landscapes (N4) and development within residential curtilages (LC(1)(d)).

b. Involve the whole or partial loss of undeveloped land which is used for a cemetery or burial ground; or for water storage and / or flood risk management (unless suitable compensatory provision is made that does not increase the risk of flooding either on or off-site); or

c. Fail to comply with one of the national decision-making policies which state that development proposals should be refused in specific circumstances.

4.6.16 The following sections of the report detail how the proposal performs against the relevant policies as required by Policy S4(2)(a)(ii) and (c), noting that paragraph (b) of the above is not applicable in this instance⁶.

4.6.17 *Housing Development*

4.6.18 The application would facilitate the residential development of three allocated sites within the Local Plan in accordance with Policies SP14 and Policies BA2 and BA3. Specifically, Policy SP14 relates to Strategic Housing Site BA1 for approximately 2,800 homes. Additionally, Policies BA2 and BA3 have stated dwelling estimates of 200 and 245 homes, respectively.

4.6.19 The Strategic Masterplan references a development of approximately 3,300 homes and that infrastructure provision and site constraints would enable around 3,000 dwellings to be incorporated within the site. Under the current application, the proposed maximum figure seeks outline planning permission for up to 3,200 homes following further detailed consideration of provision of various infrastructure requirements on the site.

4.6.20 The housing proposal for up to 3,200 dwellings would accord with the cumulative number of homes to be delivered across the allocated sites BA1, BA2 and BA3. It is noted that Policy SP14 sets out an approximate housing figure, which allows for variation to accommodate other infrastructure requirements also listed within this Local Plan policy. The proposal would not conflict with the above-referenced policies contained within the Local Plan and importantly, would further the objectives of housing delivery set out within the relevant policies of Section 6 of the NPPF.

4.6.21 In the event planning permission is granted, a condition shall be attached requiring the submission of a breakdown of the proposed housing mx across the three residential allocations within the application site to accord with the requirements of Policy HS3 of the Local Plan, which requires an appropriate range of house

⁶ For clarity, the provisions of Policy S4 of the NPPF apply to the assessment of development on all four allocated sites BA1, BA2, BA3 and BA10 as well as Walls Field and the Urban Open Land.

types and sizes taking into account the findings of the most recent evidence⁷ and the location and accessibility of the site (amongst other things).

4.6.22 *Housing Delivery*

4.6.23 Policy HO7 of the NPPF seeks to meet the need for homes and thus applies substantial weight to the benefits of housing provision, which will contribute towards meeting the evidenced accommodation needs of the community. Reference to Policy HO13 of the NPPF is emphasised, which seeks to significantly boost the supply of homes through strategic site development which can tackle issues with respect to under-delivery.

4.6.24 The housing target in Policy SP8 of the Local Plan sets a level of housing which the Council expects to achieve and exceed. As alluded to above, it is clear that the towns and allocated sites have an important role in the delivery of the housing strategy.

4.6.25 Furthermore, Local Plan Policy SP2 identifies housing and other development to be located within the adjusted settlement boundaries of towns, including Baldock. It aims for Baldock to deliver 2,198 homes within the plan period of 2011 to 2031. Specifically, paragraph 4.195 of the Local Plan states that 1,400 of the homes within BA1 are anticipated to be built within the plan period to 2031.

4.6.26 Based on the proposed phasing contained within the submitted Design and Access Statement⁸, the early stages of development, if approved, would add to this housing delivery figure and would continue to contribute towards the District's housing delivery beyond the 2031 plan period.

4.6.27 It is prudent to expedite the delivery of allocated sites in the interests of maintaining a housing land supply and to address causes of under-delivery as required under Part 6 of the NPPF.

4.6.28 It follows that the proposal would contribute significantly to the delivery of homes within the District, where there is a recognised undersupply and more recently reported under-delivery of housing. As such, substantial weight is attributed to this factor.

4.6.29 *Affordable Housing*

4.6.30 Policy HS2 of the Local Plan requires a 40% target of dwellings to be affordable for developments of 25 or more dwellings. The policy goes on to state that affordable housing shall be delivered on-site unless robustly justified and is genuinely affordable to local people where rents or prices are linked to open-market values.

4.6.31 Local Plan policy allows for a reduction of the standard 40% affordable housing on residential development, provided that evidence has been submitted to confirm

⁷ Including the Strategic Housing Market Assessment.

⁸ Dated February 2026, which sets out that residential development will initially commence on BA2, before construction on BA1, where development shall begin from the westernmost end of North Road and move eastward. The intention is BA10 will be developed in conjunction with BA1, its progress also moving west to east. Due to the education options on BA3, this will unlikely come forward in the earlier stages of the construction program but planning conditions and obligations have been worded to enable appropriate flexibility.

that the scheme would not be viable. The approach to affordable housing policy has been confirmed by the comments of the Council's Housing Supply Officer.

- 4.6.32 The Developer Contributions Supplementary Planning Document (2026) sets out that the Local Plan should be the starting point for affordable housing provision for residential developments, with the underlying viability evidence demonstrating overall scheme delivery. Proposed departures from on-site provision of affordable housing will be considered on a case-by-case basis.
- 4.6.33 The Developer Contributions SPD continues to state that the need for and provision of housing within Use Class C3 shall be treated separately from the need for and provision of more specialist accommodation falling within Use Class C2. The overall housing requirement and references to dwelling estimates for the Strategic Housing Sites and Local Housing Allocations are for C3 uses only. The requirements for Use Class C2 units are set out separately and in addition⁹.
- 4.6.34 Section 6 of the NPPF relates to Delivering a sufficient supply of homes, including affordable housing, under Policies HO1 and HO2. It is noted that when establishing the need for housing, the size, type and tenure of housing needed for different groups in the community should be considered. The type of affordable housing needed should be stipulated within policy. Policies HO5, HO7, HO8 and HO9 of the NPPF identifies the benefits of mixed tenure sites, including creating diverse communities and supporting timely build out rates.
- 4.6.35 One of the Ten 'Big Moves' underpinning the Strategic Masterplan for the site is the provision of much-needed homes for Baldock, which would incorporate a mix of dwelling types, sizes and affordabilities to meet a wide range of needs.
- 4.6.36 The Planning Statement submitted in support of the application notes that the indicative housing mix shall be agreed at outline application stage¹⁰. The final housing mix will be approved as part of the reserved matters stage and should be informed by evidence of local need and ensure the site can maintain its deliverability and viability so that it does not prevent the overall delivery of homes and infrastructure, as sought under Policy SP14 of the Local Plan. A condition requiring phase framework submission, including indicative housing mix, shall be secured if planning permission is granted.
- 4.6.37 Following viability submission and scrutiny, the details of which shall be set out within a separate section of this report, the current proposal would provide affordable housing at a level of 15% of the total number of dwellings, based on the following assumptions:
- Details of the finalised number of affordable housing units and their locations shall be secured as part of any legal agreement under Section 106 of the Town and Country Planning Act 1990;
 - The affordable housing secured would be subject to a split of 65% affordable rent and 35% intermediate products, which have been produced in the table below in line with comments from the North Hertfordshire Housing Supply Officer comments;

⁹ Paragraph 5.2.27 of the North Hertfordshire Developer Contributions Supplementary Planning Document (2026).

¹⁰ Appendix A: Affordable Housing Statement

- Any review of the viability position would result in an upward-only provision of affordable housing and any increase in affordable housing would be up to a policy compliant cap in line with Policy HS2 of the Local Plan.

4.6.38 The figures in the table below show a breakdown of the maximum number of affordable housing units, noting importantly that the application has been submitted in outline form and the proposed 3,200 residential units stated in the proposal description is a maximum limit.

Tenure	Affordable Rent (65%)	Intermediate (35%)	Total Affordable Units
Homes	312	168	480

Table 4.6.1: Affordable Housing Tenures in accordance with Policy HS2(b)(ii) of the Local Plan

4.6.39 The provision of affordable housing shall be secured by planning obligation and condition, requiring details of affordable housing to be provided alongside any reserved matters submission for development on the residential allocations of the application site.

4.6.40 In addition to the 15% affordable housing to be secured as part of the development, Hertfordshire Growth and Infrastructure has sought the on-site provision of six supported living units for adults as well as one unit for looked after children. Both types of accommodation would comprise affordable housing. These would align with the description of the proposed development and would not conflict with the housing policies previously referenced and would contribute to the aims of provision of sheltered and supported housing under Policy HS4 of the Local Plan.

4.6.41 Whilst the proposal would represent a shortfall of the maximum affordable housing percentage target set out under Policy HS2 of the Local Plan, the submission of a viability assessment has been tested by independent expert consultants and a negotiated position agreed. It is important to note that any affordable housing to be delivered on the site is as a result of the majority of the development proposing market housing, noting the strong drive for housing delivery within the NPPF and the Local Plan. The development is therefore compliant with Policy HS2 of the Local Plan, Policy DM5 of the NPPF and the relevant provisions of the Developer Contributions SPD. Very substantial weight is attributed to the provision of on-site affordable housing.

4.6.42 *Other Housing Matters*

4.6.43 An appropriate range of house types and sizes is sought under Policy HS3 of the Local Plan. For residential developments of 100 units or more, an element of accommodation within Use Class C3 for older persons' housing is included under the requirements of Policy HS3(a).

4.6.44 The adopted Strategic Masterplan sets out that a mix of housing tenures would be sought on the site, including homes for senior living and custom build. The Strategic Masterplan states that the level of affordable housing will be agreed as part of negotiations under the outline planning application, with the amount balanced against other infrastructure and build costs as required.

- 4.6.45 The Development Specification sets out that of the up to 3,200 dwellings proposed on the site, a portion of these would include older persons' housing. The breakdown of the housing mix shall be secured through a planning obligation in the event of a grant of permission to ensure its compliance with Policy HS3 of the Local Plan and meet the land use key principle to deliver housing to meet the needs of all ages within the Strategic Masterplan.
- 4.6.46 Further, the Development Specification includes space of 6,200m² towards a hotel or residential institution, falling within Use Class C1 or C2. This would include the provision of a care home on BA1, to meet the requirements of Policy SP14(f) of the Local Plan. This would be delivered by the applicant as a commercial, private offer. Its location within or proximate to the proposed local centre would ensure appropriate access to facilities and services, whilst reinforcing the role of the local centre.
- 4.6.47 In addition to the care home, Hertfordshire Growth and Infrastructure has requested the on-site provision of one children's home falling within Use Class C2.
- 4.6.48 The proposed care home and the requested children's home would also comply with the Developer Contributions SPD, which clearly sets out that any Use Class C2 provision shall be separate from the Use Class C3 dwellings set out within the residential allocations. The proposal for a C1 use enables flexibility noting the considerable construction timeframes on allocation BA1.
- 4.6.49 Policy SP14 sets out that 28 of the homes within BA1 are to be self-build plots. A specific number has not been included within the submitted Development Specification; however, it does state that the whole development shall contribute towards self-build homes. Section 5.3 of the Developer Contributions SPD sets out that 1% of plots shall be reserved for self build on some of the strategic housing allocation sites, including BA1¹¹.
- 4.6.50 All other forms of housing proposed on the site, in line with requirements of Policy HS4 of the Local Plan and the representations from Hertfordshire Growth and Infrastructure shall be secured as part of condition requirements for phase framework submissions across the residential allocations, where relevant, if planning permission is granted.
- 4.6.51 It is acknowledged that the largest of the residential allocations, BA1, is sited adjacent to the existing railway line. Network Rail has commented on the application and has required protective fencing, which shall be controlled by condition to address the aims of Policy P5 of the NPPF, which seeks to anticipate and address hazards (amongst other things). This shall be considered in detail under further sections of this report.
- 4.6.52 The contribution of the development towards the provision of other forms of housing to support a diverse range of needs is attributed moderate weight.
- 4.7 **Policy and Principle of Employment Development (BA10)**

¹¹ Self build and custom build are interchangeable terms, as noted within paragraph 5.3.3 of the Developer Contributions SPD.

- 4.7.1 As set out above, the proposal comprises the extension of the existing employment area within Baldock and as such, the relevant provisions of Section 7 of the NPPF (Building a strong, effective economy) are listed below:
- Policy E1 of the NPPF provides the conditions for long-term economic growth, requiring development plans to set out a clear economic vision and strategy that takes into account local business needs and wider needs and opportunities for economic growth and investment including relevant market signals and priority places for investment in key sectors; address barriers to investment such as inadequate infrastructure, services or housing or a poor environment and allocate sites to implement the economic vision and strategy and meet identified needs over the plan period, paying particular regard to facilitating development to meet the needs of a modern economy and the specific locational requirements of different sectors. Paragraph 2 continues to state that development plans should not be overly prescriptive about the types or uses or unit sizes that would be acceptable on particular sites.
 - Policy E2 of the NPPF aims to support business growth, attributing substantial weight to the economic benefits of proposals for commercial development and benefits for domestic food production, animal welfare and / or the environment.
 - Policy E3 of the NPPF outlines that to support the effective and efficient movement of goods, development proposals for freight and logistics and associated infrastructure should have good access to transport networks, limit environmental impacts including through colocation and provide sufficient space for parking for lorries and other vehicles anticipated to be used.
- 4.7.2 Policy SP3 aims to proactively encourage sustainable economic growth through allocation of an adequate supply of employment land to meet the needs of the Functional Economic Market Area over the plan period to 2031. The BA10 allocation, east of Baldock, is specifically identified for 19.6 hectares of employment land and is guided by other Local Plan policies covering employment development, set out below.
- 4.7.3 Policy ETC1 promotes the development of employment allocations for the purposes of office, research and development, industrial processes, industrial and storage and distribution. It continues to state that planning permission for other uses will be granted as an exception provided they meet any one of four criteria, as follows:
- i) ancillary to the above uses;
 - ii) essential to the continued operation of an established premises;
 - iii) would bring comparable benefits to office, research and development, industrial processes, industrial and storage and distribution uses in the same location; or
 - iv) would make use of a site that would otherwise be likely to become or remain vacant for an extended period of time.
- 4.7.4 Policy ETC3 supports new retail, leisure and other main town centre development subject to development meeting various conditions. Main town centre uses are defined within the Local Plan.

- 4.7.5 The development requirements of Policy BA10 have been addressed in other sections of this report.
- 4.7.6 The Strategic Masterplan holds the ambition that the BA10 parcel would accommodate strategic and / or aspirational employment uses, the type of which would be influenced by market demand whilst ensuring that any new uses are compatible with the shape and size of the site.
- 4.7.7 It is important to note that the BA10 allocation has been split into two parts by a thin wedge extending southwards from BA1 to allow a transport link from the largest residential neighbourhood into existing Baldock town, facilitating a crossing over the railway line. As such, the proposals for BA10 have two distinct parts, which shall be detailed below.
- 4.7.8 The latest submitted Development Specification and Parameter Plan propose up to 16 hectares of employment use on BA10, representing an extension to the smaller existing employment area within Baldock town. The Planning Statement accompanying the application notes a lower employment area compared to the above-referenced policy figure, which is proposed due to the requirement for the BA10 parcel to accommodate strategic drainage, accessibility infrastructure and buffers to existing properties and enhancing the ecological corridor along the northern boundary of the employment allocation. Specifically, the active travel routes through this part of the site, connecting the largest housing allocation, BA1, to the employment area and the existing Baldock town centre beyond, via a bridge crossing over the railway, has resulted in a lower employment land use area.
- 4.7.9 The latest Development Specification identifies up to 84,000m² of employment uses on BA10. The application submission specifically includes the following breakdown:
- Up to 20,000m² office;
 - Up to 26,500m² research and development and / or light industrial;
 - Up to 26,500m² industrial;
 - Up to 5,000m² indoor sport and recreation;
 - Up to 6,000m² Health Hub (note upper limit in the event that health facilities are not delivered on BA1).
- 4.7.10 It is acknowledged within the Strategic Masterplan that the easternmost end of the employment parcel shall incorporate waste facilities. In addition to the uses listed above, the easternmost part of BA10 proposes waste infrastructure as set out in the Development Specification, which would consist of the following:
- Up to 1.1 hectares (11,000m²) household waste recycling centre (sui generis);
 - Up to 3,500m² waste transfer station (use class B2); and
 - Up to 1,500m² vehicle depot (sui generis).
- 4.7.11 In addition to the above, renewable energy infrastructure is also proposed. There is also space for the provision of nursery and childcare facilities amounting to 1,100m², if these are not provided within the BA1 mixed use local centre.

- 4.7.12 The western and central portions of BA10 would include a range of uses including offices, research and development, light industry and general industry that would support the diverse requirements set out within the provisions of Policy E2 of the NPPF. These would be complemented by the provision of a health hub as referenced above, providing easy access to healthcare for occupiers of the extended Baldock employment area as well as the new neighbourhood to the north in BA1.
- 4.7.13 As suggested within the above-mentioned policy context, it would not be unusual for employment areas to host a range of uses including healthcare and indoor sport and recreation. An integrated and multi-functional healthcare facility as well as indoor sport and recreation typically require larger footprint buildings and would therefore sit comfortably within a designated employment area. The floor areas proposed for these uses, both individually and combined, would represent a smaller part of the BA10 employment allocation, would be proportionate and not detract from the larger office, research and development and industrial uses sought. Whilst indoor sport and recreation could fall within the Local Plan definition of a main town centre use (specifically, leisure) in this instance, due to the proximity of the BA10 allocation to the town centre, the emphasis within the NPPF for development to address sustainable economic growth and developing sites that are flexible and adaptable¹², also noting that the proposed indoor sport facilities would be appropriate and subordinate to other employment uses on BA10 set out within the Development Specification, the proposal would not conflict with the aims of Policy ETC3 of the Local Plan.
- 4.7.14 Local Plan employment policy seeks to ensure that the contribution of sectors other than B Class uses and offices, research and development and light industrial uses, including tourism are recognised in the provision of jobs (Policy SP3(g) of the Local Plan refers). The provision of a health hub, indoor sports and recreation and nursery / childcare facilities would contribute to generating employment and would assist in furthering the aims of Policy SP3. It is acknowledged that the mix of uses on BA10 has been proposed with the intention of boosting economic development locally whilst responding to the identified need for a range of facilities within the town, driven by Policy BA10 as well as requests set out in Hertfordshire Growth and Infrastructure comments.
- 4.7.15 Additionally, the mix of uses proposed within BA10 would contribute towards achieving the aims of national policy, which seeks to secure that anticipated need is met, including meeting the needs of a modern economy. Specifically, the potential siting of nursery and childcare facilities could sit comfortably within the mix proposed within BA10 where there are adjacent compatible uses. This would include siting amongst office space, the health hub and leisure facilities, which would also take up space within BA10. Similarly, the siting of nursery and childcare uses would not compromise the functionality of such employment uses.
- 4.7.16 Proposals for BA10 include the provision of renewable energy development, the details of which have not been confirmed due to the outline nature of the application. As alluded to above, it is not considered that there would be a conflict with the above-referenced employment policies and in fact any renewable energy development would be ideally sited within BA10 due to the mix of employment uses and associated operations.

¹² Policy E1(1)(a) of the NPPF refers.

- 4.7.17 Employment uses within BA10 would be subject to conditions relating to limiting the floor space for specific uses to maintain the diversity required within the employment area whilst maintaining flexibility to respond to changing employment needs (the Development Specification, which sets out the maximum floor space limits would sit within any approved plans conformity condition). Opening hours shall also be subject to details reserved by condition on any planning permission. The detail of buildings proposed within BA10, including any machinery or plant would be considered through the reserved matters process if planning permission is granted in accordance with Policy D3 of the Local Plan and Policies P3 and P4 of the NPPF.
- 4.7.18 The proposal would accord with the aims of provision of employment land to meet the needs of the District and as such would be in accordance with Policies SP3 and SP14 of the Local Plan as well as furthering the objectives of Policy L2(1)(b) of the NPPF, which seeks to make better use of vacant and underutilised land and buildings and Policy HC3(1)(b) of the NPPF relating to the provision of community facilities in developments to meet need.
- 4.7.19 Weightings attached to the economic benefits of the proposal are set out in a separate section of this report.
- 4.8 **Policy and Principle of Development of Other Non-Residential Uses (BA1, BA3 and BA10)**
- 4.8.1 Policy HC3 of the NPPF states that proposals for housing, employment or other development which would give rise to significant numbers of additional people living in, working in or visiting an area should be informed by an understanding of the need for any associated improvements to community facilities and public service infrastructure and provide for new or improved community facilities and public service infrastructure which are necessary for the development to be acceptable in planning terms. Paragraph 3 of this policy outlines that planning conditions and obligations should be used to secure the timely delivery of community facilities and public service infrastructure required to serve new development, so that these facilities are available for use when the development or agreed proportion of such is first occupied or comes into use.
- 4.8.2 Policy HC4 of the NPPF gives substantial weight to the benefits where new or improved public service infrastructure or community facilities would be provided and development proposals would make a demonstrable contribution towards promoting health and social interaction (amongst other things).
- 4.8.3 Policy SP1 of the Local Plan supports the principles of sustainable development by maintaining the role of key settlements within the district as the main focus for housing, employment and new development. Policy SP2 sets out the settlement hierarchy, noting that the substantial majority of new employment, retail and other development will be located within the adjusted settlement boundaries of identified towns, including Baldock. Further, Policy SP3 of the Local Plan proactively encourages sustainable economic growth, supporting new and existing businesses through permitting an appropriate range of offices, research and development, light industrial or B-class employment uses. Allocation BA10 is specifically referenced, with an allocation size of 19.6 hectares. As alluded to above, land within the BA10 allocation has also been removed from the Green Belt and therefore lies inside the settlement boundary of Baldock under the Local Plan.

- 4.8.4 Additionally, Policy SP7 of the Local Plan requires proposals to make provision for infrastructure that is necessary in accommodating additional demands resulting from developments.
- 4.8.5 Policy SP10 of the Local Plan promotes healthy communities, requiring appropriate levels of new community, cultural, leisure and built sport and recreation facilities to be provided in new development. Reference is also made to the provision of healthcare facilities to ensure appropriate coverage within the district.
- 4.8.6 Specific to BA1, the Local Plan requires the provision of various non-residential uses, including a local centre under Policy SP14(a), a community hall and GP surgery under Policy SP14(g) and both primary and secondary education facilities under Policy SP14(h) and (i).
- 4.8.7 Neighbourhood Plan policies as relevant have been referred to in relevant sub-sections below.
- 4.8.8 The Strategic Masterplan seeks to secure development where Baldock will grow in an environmentally, socially and financially sustainable way. Part of this is through the provision of new education, health, employment and community facilities that will complement and enhance existing provision in Baldock. Accordingly, the application proposes a range of other non-residential uses. The policy and principle acceptability of these shall be discussed in turn.
- 4.8.9 *Education*
- 4.8.10 The Strategic Masterplan acknowledges the need for the development to meet its educational needs for both primary and secondary-age pupils.
- 4.8.11 Policy SP14 requires that all of the education is proposed within BA1. However, the location of schools has been distributed across BA1 and BA3, noting that the specific education requirements of the scheme have not yet been fixed through consultation with Hertfordshire Growth and Infrastructure.
- 4.8.12 Two primary schools are proposed on BA1, which would accord with the specific requirement for provision of up to six forms of entry (FE) within Local Plan Policy SP14(h). In line with the applicant's construction program, the westernmost primary school on BA1 would be developed first of the two proposed school sites, initially with capacity for 2FE. The land for the primary school would enable it to be further extended to 3FE, noting that infrastructure contributions are set out in a separate section of this report.
- 4.8.13 A second primary school has been proposed in the eastern portion of BA1; similarly to the first primary school, would also be initially constructed as a 2FE school, with sufficient land for it to be expanded in future to 3FE.
- 4.8.14 An education review would underpin any extension to either of the primary schools and would be secured through the provisions of a legal agreement under Section 106 of the Town and Country Planning Act (1990).
- 4.8.15 A secondary school is proposed on BA3 as set out in the approved Strategic Masterplan; however, also subject to education review is the consideration of three options for secondary education provision:

- Option 1 – build a 12FE school on BA3, to involve the relocation of the existing Knights Templar School;
 - Option 2 – extend the existing Knights Templar School; or
 - Option 3 – construct a 5FE school on BA3 and for Knights Templar School to remain in its current location.
- 4.8.16 Policy SP14(i) relates to BA1 and allows for optionality, noting that a school with a capacity above 6FE would be supported where it is located to the south of the allocation and safe, sustainable routes are provided from Clothall Common. It is not considered that the location of any secondary school on BA3 would result in a policy conflict, noting the provisions of Policy BA3 which allow for an appropriate solution for short and long-term education requirements and, as stated above, the quantum of housing to be delivered across the sites would generally accord with the cumulative requirement across the residential allocations and secondly, the development would meet its demand for secondary education provision within the boundaries of Baldock town, as influenced by the allocated sites. With regards to accessibility, the development of a secondary school on BA3 would also ensure safe access from Clothall Common, noting the existing public right of way to be retained along the north-eastern boundary and a proposed access point off Wallington Road (the latter is a reserved matter). Suitable connections from BA1 would be secured to facilitate movement from the largest residential allocation to secondary school locations in the town. Importantly, the location of the secondary school has been considered through the Strategic Masterplan adoption and as such, the proposal would accord with the aims for delivery of secondary education provision to meet the needs of the development.
- 4.8.17 The provision of education would be subject to review and shall be secured as part of any Section 106 agreement in accordance with Policies SP7 and SP14 of the Local Plan.
- 4.8.18 *Local Centre and Retail Development*
- 4.8.19 Policy TC3(1) of the NPPF states that a sequential test should be applied to proposals for main town centre uses, where these are neither in an existing centre nor in accordance with an allocation for that purpose in an up-to-date development plan. As the proposed local centre is subject to allocation under Policy SP14(a) of the Local Plan, the NPPF makes it clear that a sequential test is not required.
- 4.8.20 Policy TC4(1) of the NPPF sets out that development proposals for retail and leisure uses located outside town centres should be accompanied by an impact assessment if the proposal exceeds a floorspace threshold set out in an up-to-date development plan.
- 4.8.21 Policy ETC6 of the Local Plan relates to local centres, where secured in strategic masterplans, shall contain a mix of uses to meet day-to-day needs whilst maintaining the vitality and viability of the centre.
- 4.8.22 Policy E4 of the Baldock, Bygrave and Clothall Neighbourhood Plan seeks the provision of new community facilities as early as possible during the development process, in order to encourage and support the creation of strong and inclusive communities.
- 4.8.23 A local centre is proposed within BA1 that would accord with the aims of SP14(a) which seeks to facilitate the development of a new mixed-use local centre/s to provide for a range of day-to-day local needs including additional neighbourhood-

level provision of convenience and comparison retail and food and beverage floor space.

- 4.8.24 As noted in the Strategic Masterplan, the local centre would complement the existing Baldock town centre and would not compete with the vibrancy and success of Baldock High Street. The submitted Development Specification¹³ is consistent with this, setting out the maximum floor space limits of units within the local centre. Residential land uses have been discussed above; in terms of retail and local centre uses, the following would be created:
- retail uses including maximum limits of 700m² convenience and 800m² retail / café / restaurant (use class E a / b);
 - up to 750m² pub with expanded food provision / takeaway (sui generis);
- 4.8.25 This would be above the floor space requirements stipulated within Policies SP14 and ETC6. Specifically, Policy SP14 states additional neighbourhood-level provision around 500m² (net) convenience retail provision and 1,400m² (net) of comparison retail and food and beverage floorspace. Policy ETC6 sets out that proposals for over 500m² gross floor space will generally not be suitable in local centres.
- 4.8.26 The floor space areas within Policy SP14 (relevant to BA1) are worded in such a way that they should not be treated as maxima with the primary objective that the retail offer would have a local function. The restrictions placed on proposals for over 500m² gross is a general requirement and therefore allows flexibility in the application of Policy ETC6 on the merits of each individual application. The submitted Design and Access Statement makes reference to the local centre serving the community at a neighbourhood level that would not compete with the town centre. Further, occupants of the south-eastern residential parcels of BA2 and BA3 would be likely to travel to other retail centres, including Baldock town centre due to distance and convenience as opposed to the proposed local centre on BA1.
- 4.8.27 Whilst the proposal incorporates uses within the local centre with potentially greater floor space areas than stipulated within the policy, it is important to note the following:
- Policy SP14 contains the specific wording, 'around 500m² (net)' which would imply a level of flexibility in application of the floor space measurement, which also does not align with the more restrictive requirement and broader local centre Policy ETC6 of the Local Plan;
 - The increase in convenience retail is offset by a lower overall amount of retail proposed within the local centre: cumulative retail floor space would be up to 1,500m², compared with the policy directive of 1,900m² combined convenience and comparison floor space;
 - As no end users have been secured to occupy retail units within the local centre, the proposed convenience floor space at up to 700m² is not a net area as it would likely require ancillary storage and staff amenities that would not contribute towards net retail floor area;
 - Food and beverage retail is proposed at up to 750m² and has not been included in the total amount of retail floor space over convenience and comparison reported above; this is due to this particular unit likely requiring the vast majority of its product to be consumed on the premises and would

¹³ Latest version dated August 2026.

add to the variety within the local centre whilst maintaining its neighbourhood function, akin to a local pub within a village or neighbourhood.

- 4.8.28 Additionally, the submitted Planning Statement acknowledges the existence of other retail centres within and proximate to Baldock and the proposed development. The proposed convenience and comparison floor space would not trigger a retail impact assessment under either Policies ETC6 of the Local Plan or TC4 of the NPPF. Due to the number of additional homes to be provided on BA1 and the specific policy requirements with respect to retail provision, it is considered that it would be reasonable that a larger floor area would be required to serve the day-to-day needs of the community that would be created as a result of the proposals.
- 4.8.29 It is considered essential for the benefits of placemaking, in the interests of community building, sustainable transport and associated public health benefits that a local centre providing a mix of uses is located within BA1.
- 4.8.30 No end users have been identified as part of the application. To ensure that the development would not exceed the proposed floor space limits for the convenience and comparison retail elements, the Development Specification shall be secured as an approved document by condition in the event planning permission is granted. The proposed local centre within BA1 and its delivery would be secured through the submission of phase framework documentation to be reserved by condition in the event planning permission is granted. This would ensure a timely and appropriate delivery of the local centre to meet the day-to-day needs of the northern residential portion of the development in accordance with Policy SP14(a) of the Local Plan and the above-referenced policies as relevant to infrastructure provision.
- 4.8.31 Policy HC5 of the NPPF strongly discourages hot food takeaways within reasonable walking distances of schools and places where children and young people congregate, unless in a designated town centre. The Development Specification includes reference to a takeaway within the unit identified for use as a pub, forming part of the local centre in BA1. As the frontage of the westernmost primary school in BA1 is sited at the edge of the local centre on the Parameter Plan, a condition shall be imposed on any planning permission confirming that notwithstanding the Development Specification, hot food takeaways shall be precluded from the mix of uses within the local centre in accordance with Policy HC5 of the NPPF.
- 4.8.32 *Other Land Uses within the Proposed Local Centre (BA1)*
- 4.8.33 The Development Specification includes the provision of two additional land uses, which would include up to 550m² of office floor space and a gym of up to 1,150m². Both are uses that would be expected to meet the day-to-day requirements of a new neighbourhood. By comparison, their floor areas would be much lower than those proposed within the employment development on BA10. These have not raised concerns from consultees. As such, it is considered that the proposal would not conflict with the aims of Policy SP14 of the Local Plan.
- 4.8.34 *Community Building (BA1)*

- 4.8.35 The North Hertfordshire Community Halls Strategy (2011) sets out that community buildings are required as part of larger residential developments, confirmed by Policy SP14(g). Policy SP10 is consistent as it seeks to provide and maintain healthy, inclusive communities for residents through a number of objectives, including requiring appropriate levels of new community, cultural, leisure and built sport and recreation facilities to be provided in new development.
- 4.8.36 Consistent with the Strategic Masterplan, the proposals incorporate an up to 500m² community building within the BA1 local centre, which would meet the floor space requirements set out in the Community Halls Strategy. Policy SP14 does not indicate a floor space requirement for the community building or its specific purpose(s).
- 4.8.37 Whilst the application has been submitted in outline form and details of the community building have not been submitted for approval, it is acknowledged that various consultees during the application process have expressed a desire to either occupy or designate space for specific community uses. To be able to accommodate these requirements, the following community hall specification proposed by the applicant shall be secured through the provisions of any Section 106 agreement.
- 4.8.38 The provision of the community centre would be secured through the Section 106 legal agreement to ensure its appropriate delivery. It is proposed that the community building would initially be managed and maintained under a stewardship model, that would transition to a community-led facility. The development would be policy compliant as it would enable the provision of a building for community uses. The management of this facility by a stewardship body would not give rise to any issues that would outweigh the benefit of providing a community building on BA1.
- 4.8.39 The proposals are compliant in this regard with reference to Policies SP10(b) and SP14(h) of the Local Plan.
- 4.8.40 *Healthcare*
- 4.8.41 In addition to the above-referenced national and local provisions, Policy SP14(h) of the Local Plan seeks to secure the provision of a GP surgery on BA1.
- 4.8.42 The Strategic Masterplan through its Ten 'Big Moves' commits to the provision of a health hub for Baldock, comprising GP and other health facilities. A health hub has been identified on BA10 in the Masterplan.
- 4.8.43 However, the submitted Development Specification provides the option for the health hub to be located either within BA1 or BA10. The upper floor limits for the two healthcare options on the site have been set out below:
- Up to 2,000m² on BA1; or
 - Up to 6,000m² on BA10.
- 4.8.44 The policy context for the BA10 employment land has been set out above. It is acknowledged that the land use make up of employment centres allow for a range of uses and it is not considered that the proposal option for a health hub to sit within BA10 would conflict with existing uses at the western interface of this part of the site nor would it compromise other proposed uses identified within BA10 coming forward.

- 4.8.45 The benefits of the GP and wider health hub provision being incorporated within BA10 is that it would offer convenient access to healthcare during the working day and would provide a more accessible location for existing residents of Baldock to access medical and secondary health services.
- 4.8.46 Noting that a GP would be provided as part of the proposals and supporting infrastructure would need to be in place by the 1000th occupation on the site, the proposal to locate the health hub on BA10 would not conflict with the aims of Policy SP14 (specifically relating to BA1).
- 4.8.47 The relevant consultee with regards to healthcare provision is the NHS Central East Integrated Care Board (ICB). Their comments set out the need for the development to contribute towards healthcare and specifically the provision of three GPs. Additionally, the ICB's first preference is to be located on BA10 and for the GP surgery to occupy space as part of a wider health hub that could offer complementary, secondary health services.
- 4.8.48 Prior to the submission of any reserved matters applications on BA1 or BA10, the approval of a Health Strategy shall be sought by condition or planning obligation to ensure appropriate delivery of the GP facility stipulated within Policy SP14(h) of the Local Plan.
- 4.8.49 If planning permission is granted, the provision of necessary funding and space for three GPs and the building specifications would be secured through the provisions of the legal agreement under Section 106 of the Town and Country Planning Act (1990) in conjunction with advice from the Central East ICB.
- 4.8.50 *Indoor Sports Development*
- 4.8.51 Indoor facilities for sports would be met through a combination of different buildings: the community hall, the primary school halls and any secondary school provision on-site as well as a gymnasium proposed on BA10. It is noted that Sport England in their latest comments acknowledge that the approach to both outdoor and indoor sports provision proposed is welcomed and would provide for the delivery of a large proportion of the facilities needed to meet the additional demand generated by the development. Other elements of Sport England's comments shall be addressed in separate sections of this report.
- 4.8.52 Sport England in their comments had expressed a desire to utilise the proposed community hall, with a limit of 500m², within BA1 for indoor sports. This would be an appropriate use of the community space and would further the objectives relating to community facilities including Policies HC3 and HC4 of the NPPF as well as Policies SP1, SP7 and SP10 of the Local Plan and would not compromise other site-specific requirements set out within Policy SP14 of the Local Plan.
- 4.8.53 *Open Space and Sports Pitch Provision*
- 4.8.54 In addition to the above-referenced national policies, it should be noted that Policy HC4 of the NPPF supports the provision of new or improved facilities for play.
- 4.8.55 Policy SP12 of the Local Plan promotes the enhancement of a strategic multi-functional network of green infrastructure and supports the provision of new and improved open space. Additionally, Policy NE6 of the Local Plan encourages the provision of new open space which meets the needs arising from development

and contributes towards improving the provision, quality and accessibility of open space.

- 4.8.56 Neighbourhood Plan Policy E2 relates to green infrastructure and outdoor recreation, seeking to create an integrated network of open spaces and semi-natural areas that provide benefits for both people and nature, incorporate land for sport and informal recreation as well as new sports school facilities for appropriate community use and play areas that promote the safety of children and other users.
- 4.8.57 The Strategic Masterplan sets out to achieve ‘Ten ‘Big Moves’’ and form the basis of the development. One of these is the aim to promote a healthy and connected town through the Baldock greenway as well as a new life for the historic common land at Bygrave Common.
- 4.8.58 The application has been accompanied by a Strategic Open Space plan, which sets out the six main areas of open space, consistent with the areas shown in the approved Strategic Masterplan. Four of these areas of strategic open space form a part of the residential allocations and are listed below:
- Bygrave Common, located within the northern portion of BA1;
 - Eastern Park, within the easternmost part of BA1;
 - Green space east of Clothall Common, within a generally triangular piece of raised land within the northern half of BA3;
 - Walls Field, located to the west of BA3 on the opposite side of Wallington Road;
 - Urban Open Land, immediately south of the BA3 allocation; and
 - Weston End, forming the south-eastern portion of BA2.
- 4.8.59 It should be noted that whilst Walls Field is currently an arable piece of land, its planning designation is part of Baldock town. The application proposals for this land to form part of the strategic open space would expand its accessibility to the public, beyond the existing public right of way which runs north-east to south-west through the field. The area within the Urban Open Land shall be considered in the following section of this report.
- 4.8.60 The provision of open space and the strategic areas outlined above would not conflict with Policy SP14 of the Local Plan. The proposals for outdoor sport and informal recreation would reflect the aims of Policies SP1, SP7, SP10 and NE6 of the Local Plan.
- 4.8.61 The amount of open space proposed and the assessment of its quantum has been addressed in a separate section of this report. The delivery of open space within the development shall be secured by condition on any planning permission, requiring the submission of further phasing documentation for each residential allocation, in accordance with the above-referenced national and local policies.
- 4.8.62 *Policy and Principle Conclusion*
- 4.8.63 The proposals would clearly deliver social and economic benefits in terms of new homes, social and community infrastructure, highways improvements promoting sustainable modes of travel and local employment during the construction phases. These specific considerations shall be explored in detail in later sections of the report.
- 4.9 **Impact on Urban Open Land**

- 4.9.1 Policy CGB5 of the Local Plan relates to the planning designation of Urban Open Land which enables the provision of land or limited ancillary built facilities for the following, provided it is low intensity in nature and would maintain openness and respect the transition from the urban area to the rural area beyond:
- i. outdoor sport, outdoor recreation or cemeteries;
 - ii. rural land uses or buildings appropriate in an urban fringe location; or
 - iii. landscaping, essential transport infrastructure or other earthworks associated with the development of adjoining allocated sites.
- 4.9.2 Neighbourhood Plan Policy G2 seeks to conserve the open 'green lung' within Baldock, with a focus on enhancing visual or recreational value, including improvements to public access.
- 4.9.3 Additionally, Policy E2 of the Neighbourhood Plan promotes the provision of a range of publicly accessible green infrastructure, including sport and recreation and school sports facilities (amongst others).
- 4.9.4 In terms of national policy, of relevance is Policy SP4 of the NPPF, which covers the principle of development in settlements. It states that development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in the NPPF. Paragraph 2 of this policy continues to set out some of the examples of substantial adverse impacts of development that could outweigh the benefits, which include:
- i. The allocation or safeguarding of land or buildings for particular uses in the development plan, unless there is no reasonable prospect of an application coming forward for the allocated use, or there is evidence that the safeguarding is no longer appropriate; or
 - ii. The application of policies in this Framework [NPPF 2026] for existing recreational land and facilities (HC7), Local Green Space (HC8), areas of particular importance for biodiversity and geodiversity (N6), Protected Landscapes (N4) and development within residential curtilages (L2(1)(d)).
- 4.9.5 Policy HC4 of the NPPF is also relevant with regards to the benefits of providing community infrastructure that has a positive impact on public health.
- 4.9.6 The proposed site layout diagrams contained within the Strategic Masterplan identify the Urban Open Land as an area for open space, adjacent to any secondary school being delivered on BA3. It would also form part of the wider movement network around the site as well as providing key play areas, enhanced allotments and sustainable drainage features.
- 4.9.7 The area of Urban Open Land applies to an open field directly south of the residential allocation BA3, bound by the A505 (Baldock Bypass) to the east, Clothall Road to the south and Wallington Road to the west. The proposals for this part of the site are for it to be developed containing either public open space or for dual-use playing pitches within any secondary school realised on BA3. Either of the above options would result in the land being developed with playing pitches in line with requests from Sports England. Both proposed uses on the Urban Open Land would accord with the development aims of Policy CGB5(i).

- 4.9.8 With regards to the latter option, it is understood that any proposal to incorporate the Urban Open Land within the proposed secondary school grounds would require the installation of safeguarding fencing, the details of which would be considered as part of any education review and at the reserved matters stage, in the event planning permission is granted.
- 4.9.9 The background text to Policy CGB5 recognises that this land could provide opportunities for development including school playing fields, sports pitches or other low-intensity uses associated with nearby development (amongst other things)¹⁴. Further, paragraph 6.30 of the Local Plan sets out that in considering the intensity of any proposed uses of Urban Open Land, consideration will be given to the nature and scale of any associated secondary effects, such as vehicular movements, as well as the development itself.
- 4.9.10 The proposal for playing pitches on the Urban Open Land would replace an existing agricultural use – an arable field. It would facilitate a community use or a dual-use, which as alluded to above, would represent a social facility within Baldock that is supported by Policy SP10 of the Local Plan.
- 4.9.11 The policy context surrounding education has been reviewed in an earlier subsection of the report and it is noted that any playing pitches associated with school provision would have policy support under Policy HC4 of the NPPF as well as Policies SP7, SP10 and NE6 of the Local Plan and Policy E2 of the Neighbourhood Plan.
- 4.9.12 It follows that the development of the Urban Open Land would represent a community benefit to Baldock, whilst providing for the recreational needs of the development, noting on-site pitches has received the support of Sport England. As such, there would be no objection in principle to the development of this part of the site with open space, recreational or education purposes. In fact, the removal of the site from intensive agricultural use to further the recreational objectives set out within the Neighbourhood Plan and contributing to the aims of Policy HC4 of the NPPF, it would represent a benefit as part of the overall offer of open space proposed on the site.
- 4.10 **Green Belt**
- 4.10.1 A small section of the development site lies within the Green Belt, isolated to land to the West of North Road. All other areas of the site lie within the expanded settlement boundary of Baldock as allocated within the Local Plan, alongside other specific land use allocations.
- 4.10.2 Policy SP5 sets the Council's position in respect to the countryside and Green Belt. Part c) of the policy provides that the Council will only permit development proposals in the Green Belt where they would not result in inappropriate development or where very special circumstances have been demonstrated.
- 4.10.3 Relevant to the proposed use and development on Green Belt land, policy NE6 of the Local Plan sets out that planning permission will be granted for development proposals that make provision for new and/or improved open space that meets the needs arising from the development having regard to the Council's open space standards and other relevant guidance. Any built facilities within new or existing open space must be ancillary to the primary use and of an appropriate scale and

¹⁴ Paragraph 6.28 of the Local Plan refers.

design. Proposals for new open spaces which meet identified needs will be encouraged in suitable locations, served by a choice of sustainable travel options.

- 4.10.4 Neighbourhood Plan Policy E2 has regard to green infrastructure and outdoor recreation. Relevant to consideration of the proposed development within the Green Belt, which is isolated to land to the west of North Road, the policy requires a strategic approach to locating land for sport and informal recreation, so that the most appropriate sites for each purpose are used (taking into account the allocations as a whole, as well as neighbouring land within the applicant's control where this would accord with other policies in the development plan).
- 4.10.5 The land within the Green Belt is as part of the development site is isolated to land to the west of North Road. The land will be used as allotments, adjacent to existing allotments.
- 4.10.6 Policy GB7 of the NPPF defines development that is not inappropriate within the Green Belt. Pertinent to this part of the assessment of the proposed development is policy GB71.f.iv.. This part of policy GB7 sets out that the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments are not inappropriate development provided the impact on the openness of the Green Belt is minimised, and there would not be a significant conflict with the Green Belt purposes.
- 4.10.7 The Baldock Strategic Masterplan (BSM) sets out that new allotments will be provided on land to the west of North Road. This is set out in the masterplan as an expansion and enhancement of the existing allotments. The masterplan continues to suggest offering access points for community gardens and allotments for vehicle delivery and servicing, and where necessary appropriate provision of car and cycle spaces.
- 4.10.8 The application is for outline planning permission. No details of access or any other details are provided in relation to the allotments located within the Green Belt subject to this assessment.
- 4.10.9 The Parameter Plan sets out the land as strategic open space. The Development Specification, within part SP2 of the Spatial Principles sets out that no built development (with the exception of the provision of sports pitches and ancillary facilities, productive landscapes, footways/cycleways, sports pavilion and local road access/parking) will be located within land west of North Road.
- 4.10.10 The Development Specification limits the built development on land within the Green Belt to ancillary facilities, footways/cycleways and local road access/parking. The application is in outline form, with no substantive details provided to assess the impact on openness or purposes of the Green Belt.
- 4.10.11 Reserved matters applications will set out and determine access, appearance, layout, landscaping and scale, within which scale, access and layout will be material to the impact on openness and purposes, and landscaping and appearance will have potential mitigating features. The tests of minimising impact on openness and, to a more limited degree, no significant conflict with the purposes of the Green Belt, will be material considerations in later reserved matters applications, but not in-so-far as they relate to the principle of the acceptability of the development.

- 4.10.12 The application of the NPPF in the context of the form of application and details submitted, is that the Local Planning Authority should be satisfied that the site can be designed in a way which minimises the impact on openness, and the development would not significantly conflict with the purposes of the Green Belt.
- 4.10.13 The site, as it exists, is absent of built form, presenting a field bounded by hedging to the south, east and west, with an area of shrub to the north, with the access road to the existing allotments to the north beyond the red line of the application. There is some aerial satellite imagery evidence of walking activity criss-crossing the site, with a particular 'path' from the southeast to the northwest. This activity is not protected by any rights of access or rights of way.
- 4.10.14 In terms of the purposes of the Green Belt, the site forms part of Parcel BD15 in the 2026 Green Belt Review. The assessment concludes that the parcel has a strong contribution to purpose A (Checking the unrestricted sprawl of large built-up areas); purpose C (Assisting in safeguarding the countryside from encroachment); and, purpose D (Preserving the setting and special character of historic towns). Further, the parcel has a moderate contribution to purpose B (Preventing neighbouring towns from merging); and an equal contribution to purpose E (Assisting in urban regeneration). I have no reason to conclude otherwise than in accordance with the assessments which concluded the above contributions for the wider parcel do not apply to the site which forms part of that parcel.
- 4.10.15 Allotments already exist within the wider parcel. Allotments, subject to the reasonable scale and appearance of ancillary structures, do not contain urbanising features, and have no other characteristics that would have a significant impact on any contributions to the Green Belt.
- 4.10.16 Save access, car and cycle parking, and ancillary structures, allotments are free of built form, and serve to maintain openness as a result of their important social function. There are no permitted development rights for allotments, so reasonable restriction will apply pursuant to the approval of reserved matters and the establishment of the proposed use against additional built form.
- 4.10.17 The Development Specification, in-so-far as it sets out that no built development (with the exception of the provision of sports pitches and ancillary facilities, productive landscapes, footways/cycleways, sports pavilion and local road access/parking) will be located within land west of North Road goes some length to evidencing minimising impact on openness. In addition, the reserved matters application required for any operational development will consider matters of layout and scale, within which a judgement can be applied as to whether the development represents the minimum impact in those regards.
- 4.10.18 On the basis of this assessment, the proposal would not constitute inappropriate development in the Green Belt.
- 4.10.19 Notwithstanding the compliance of the proposed development with Green Belt policy, subject to the condition set out above, it is noted that the allotments are required to mitigate the impact of the residential development proposed, and could be located within the development allocation itself. Support for this location is drawing from the requirement of the Neighbourhood Plan to take a strategic approach to the location of land for informal recreation, so that the most appropriate sites for each purpose are used (taking into account the allocations as a whole, as well as neighbouring land within the applicant's control where this

would accord with other policies in the development plan). Additional support for the location is provided by the Councils endorsement of the Masterplan which shows new and enhanced allotments in this location. The benefits of the siting in terms of management by positioning them adjacent to existing managed allotments are such that the siting of the allotments outside of the site itself in order to mitigate the impact of that development is considered acceptable, and in Green Belt terms, this weighs neutrally in the planning balance.

4.11 **Infrastructure and Developer Contributions**

4.11.1 *Viability*

4.11.2 Local Plan Policy HS2: Affordable housing reads as follows: *"Planning permission for new homes will be granted provided that: a) Affordable housing is i. provided in accordance with the following targets subject to viability:..."*

4.11.3 Section (f) of Local Plan Policy SP7: Infrastructure requirements and developer contributions states: *"The Council will require development proposals to make provision for infrastructure that is necessary in order to accommodate additional demands resulting from the development. We will: ...(f) Need robust evidence to be provided where developers consider that viability issues impact upon the delivery of key infrastructure and/or mitigation measures. This evidence will be used to determine whether an appropriate and acceptable level of contribution and / or mitigation can be secured."*

4.11.4 NPPF Policy DM5: Development viability reads as follows:

1. Where development proposals accord with relevant up-to-date plan policies and national decision-making policies, they should be assumed to be viable. Relevant policies in this context are those that relate to the contributions expected from development.

2. There may be circumstances in which a viability assessment demonstrates that it would not be possible for development to proceed on a policy compliant basis. In such circumstances, the submission of a viability assessment as part of a development proposal may be justified to ensure that the proposed development makes the maximum possible contribution to affordable housing and other infrastructure. Such circumstances may include where:

a. The development proposed is materially different to any development type considered in the viability assessment that informed the development plan;

b. The site characteristics are materially different to those considered in the viability assessment that informed the development plan;

c. The development is demonstrably burdened by costs which were not taken into account in the viability assessment that informed the development plan; and/or

d. Site or economic circumstances have changed significantly since the viability assessment that informed the development plan was prepared.

3. Neither the price paid for land, nor the price intended to be paid through an option agreement, should be a justification for failing to accord with relevant policies in the plan.

4. Where a viability assessment is submitted with a development proposal, this should be based upon and refer back to the viability assessment(s) that informed the relevant development plan policies. It should fully evidence all inputs and assumptions used in the assessment and explain any differences from those used for viability assessment that informed the relevant plan policies. All viability assessments should reflect the recommended approach in planning practice guidance, including the standardised inputs, and should be made publicly available.

5. It is a matter for the decision-maker, having regard to the circumstances under which the viability assessment is submitted, to assess the weight to be given to a viability assessment.

- 4.11.5 It is noted that footnote 22 of the NPPF, when considering economic circumstances, 'changed significantly' would be a recession or similar significant economic change. The Local Plan Viability Assessment – Update was provided to support current policies on affordable housing and infrastructure in August 2016. Whilst there has not been a recession since then, significant economic change has been affected. In addition, the Local Plan Viability Assessment – Update dated August 2016 assumed an upper amount of £23,000 per unit in both enabling infrastructure costs and S106 infrastructure contributions for strategic sites such as BA1. The submitted and agreed viability appraisal provides for £129,848,358 in S106 financial contributions and £120,355,630 in strategic infrastructure costs to enable the development. That equals £250,203,988, which divided per unit equals £78,188.75. This is a significant difference (about 440%) to the viability assessment supporting the local plans' assumption of £23,000. Thus, category 2.c. and 2.d. are engaged.
- 4.11.6 National and local policies require the Local Planning Authority to consider the submitted viability assessment in relation to this application.
- 4.11.7 The application was submitted setting out that the development will be subject to a site-specific viability assessment. The viability assessment was subsequently submitted upon clarification in regards the extent of infrastructure contributions required to mitigate the impact of the development (which is a critical component to viability assessments).
- 4.11.8 The applicants Financial Viability Statement was supplied by CBRE. Using their inputs, providing the requested financial contributions towards infrastructure to mitigate the impacts of the development alongside 40% affordable housing provision in line with policy targets resulted in a £33.10m loss. Undertaking scenario testing, CBRE sets out that 9.81% affordable housing would deliver the required return on investment to incentivise the development to come forwards and be delivered.
- 4.11.9 The Local Planning Authority procured the services of Carter Jonas to respond to the applicants' Financial Viability Statement. After critical assessment, Carter Jonas provided alternative inputs that they consider defensible, and returned with a position where sufficient developer return to incentivise delivery can be provided with the financial contributions required to make the development acceptable in planning terms through delivery of infrastructure and 18% affordable housing.
- 4.11.10 A response letter was subsequently received by CBRE refuting some of the key inputs differences and accepting others, resulting in an alternative position worsening the level of affordable housing asserted as deliverable to 4.25%. The

key unresolved difference which affects the two opposing positions is on-plot construction costs, based on whether costs are calculated based on trends in the past 5 years (CBRE/applicants' position resulting in higher estimated build costs) or 15 years (Carter Jonas/Local Planning Authority position resulting in lower build cost estimates). Further to this, Carter Jonas provided a response on behalf of the Local Planning Authority holding to the build costs input, thereby maintaining that 18% affordable housing is viable.

- 4.11.11 Following a virtual meeting, with both CBRE and Carter Jonas, as well as a representative of both the applicant and Local Planning Authority, neither are able to reconsider their positions.
- 4.11.12 The applicants have put forward an offer of 15% affordable housing as a baseline on any planning permission granted pursuant to this application and resolution. This is a commercial decision taken at the risk of the applicant contrary to the standing advice of their technical viability consultant expert.
- 4.11.13 Officers take the position that 15% affordable housing as a baseline, subject to viability review mechanisms at stages in the lifeline of the development, to be agreed through negotiation, which would provide greater clarity on actual costs and values, housing mix, and settling the optionality within the development itself in regard to secondary school education would be the maximum affordable housing baseline while incentivising delivery.
- 4.11.14 Inputs, triggers and other details of the financial viability review mechanisms are to be agreed through officer negotiation post-resolution of this committee.
- 4.11.15 Subject to appropriate details of viability review mechanisms that allow increased on-site affordable housing delivery and infrastructure delivery through financial contributions, and capture any uplift at late stage for off-site financial contributions towards affordable housing and infrastructure delivery through financial contributions, the offer of 15% affordable housing and financial and non-financial infrastructure delivery as set out in the Heads of Terms (table 4.11.1, below) is considered to accord with policy HS2 and SP7 of the Local Plan.
- 4.11.16 *Developer Contributions*
- 4.11.17 Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 sets out statutory tests, which are that a planning obligation may only constitute a reason for granting planning permission for the development if the obligation is
 - “(a) necessary to make the development acceptable in planning terms;*
 - (b) directly related to the development; and*
 - (c) fairly and reasonably related in scale and kind to the development.”*
- 4.11.18 These are referred to in the text below as the CIL tests.
- 4.11.19 NPPF Policy HC3: Community facilities and public service infrastructure serving new development reads as follows:
 - “1. Proposals for housing, employment or other development which would give rise to significant numbers of additional people living in, working in or visiting an area should:*

a. Be informed by an understanding of the need for any associated improvements to community facilities and public service infrastructure, whether on or off-site; and

b. Provide for new or improved community facilities and public service infrastructure which are necessary for the development to be acceptable in planning terms, whether by direct provision or a contribution to off-site improvements (which may be through Community Infrastructure Levy payments, where applicable).

2. Where the development plan does not set locally-specific standards for recreational land and facilities, all development proposals should use relevant national standards and best practice to identify improvements in the quantity and quality of provision which should be provided or contributed towards, as appropriate to the nature of the development and taking into account existing levels of provision in the area.

3. Planning conditions and obligations should be used to secure the timely delivery of community facilities and public service infrastructure required to serve new development, so that these facilities are available for use when the development (or an agreed proportion of the development) is first occupied or comes into use.”

4.11.20 Local Plan Policy SP7: Infrastructure requirements and developer contributions states that:

“The Council will require development proposals to make provision for infrastructure that is necessary in order to accommodate additional demands resulting from the development.”

4.11.21 The Developer Contributions Supplementary Planning Document (adopted June 2026) is a material consideration.

4.11.22 Following the submission of the viability appraisal by the developer, amended responses have been received from Hertfordshire County Council Growth and Infrastructure Unit and Local Highways Authority. The contribution requests from the Growth and Infrastructure Unit have been reduced in accordance with the results of the viability appraisal discussions. The updated response confirms that the level of infrastructure contributions sought on behalf of Hertfordshire County Council are at a level whereby the impact of the development on infrastructure would be suitably mitigated.

4.11.23 In addition to the significant on-site and off-site Highways and other infrastructure to be delivered directly by the developer (set at a cost of £120,355,630 in the Viability Appraisal submitted with the application), detailed negotiations have taken place with the applicant and agreement reached on a range of matters that are included in a draft S106 agreement, with the Heads of Terms set out below –

Category (Authority)	Figure (£)	Infrastructure Project(s)
Primary Education (HCC) Nursery Education Contribution included	£ 31,643,427 cost index linked to BCIS 1Q2024 plus regional factor	towards the delivery of a two new primary schools at 2 form entry with potential to expand each primary school to 3 form entry

within the primary education contribution		on-site and/or provision serving the development
Secondary Education Contribution (HCC)	£30,531,071 cost index linked to BCIS 1Q2024 plus regional factor	Towards new secondary education provision with the following options: Option 1 – Knights Templar expansion and relocation to BA3: Relocation and expansion (up to 12FE) of Knights Templar School to BA3. Option 2 – Knights Templar expansion: Expansion of Knights Templar on existing site (up to 10FE). Option 3 – Additional secondary school on BA3: Provision of additional secondary school (up to 5FE) on BA3.
Primary School Land (HCC)	Nil	Comprising two parcels of land up to Xha each together with requirements to submit school land specification and a phasing plan for approval.
Secondary School Land	Nil	Land on BA3 to accommodate the following secondary education on-site solutions: Option 1 – Knights Templar expansion and relocation to BA3: Relocation and expansion (up to 12FE) of Knights Templar School to BA3. Option 3 – Additional secondary school on BA3: Provision of additional secondary school (up to 5FE) on BA3.
0-2 Childcare Contribution (HCC)	£638,979 index linked to BCIS 1Q2024	Towards increasing the capacity of 0-2 year old childcare facilities at a

		provision serving the development
5-11 Childcare Contribution (HCC)	£44,567 index linked to BCIS 1Q2024	Towards increasing the capacity of 5-11 year old childcare facilities at a provision serving the development
Special Educational Needs and Disabilities (SEND) (HCC)	£5,448,150 index linked to BCIS 1Q2024 plus regional factor	Towards the new EAST SLD SEND school and/or provision serving the development
Library Service Contribution (HCC)	£297,832 index linked to BCIS 1Q2024	Towards increasing the capacity of Baldock Library and/or provision serving the development
Youth Service Contribution (HCC)	£465,134 index linked to BCIS 1Q2024	Towards the resource requirements to support the delivery of youth work with young people arising from the development at the new community centre on site and/or provision serving the development
Waste Service Land (HCC)	Nil	Provide suitable land for the delivery of 3.5 hectares for a combination of transfer station, recycling centre and depot.
Fire and Rescue Service Contribution (HCC)	£247,690 residential and £604,680 commercial index linked to BCIS 2Q2025	Towards the expansion of Baldock Fire Station and/or provision serving the development
Children's Homes	Nil	The delivery of one new children's home (use class

(HCC)		C2) is provided on the development built in accordance with HCC specification and located in accordance with HCC specification
Adult Care Service C2 Nursing Home (HCC)	Nil	HCC first refusal of a 70-80 bedroom C2 nursing home delivered on-site measuring between 5,200 and 6,200sqm (depending on the number of stories).
Adult Care Service Supported Housing	Nil	Delivery of 6 self-contained units of supported affordable housing for people with learning and/or physical disabilities with a land size of around 2,000 sqm
Monitoring Fees (HCC)	£54,000 + £420 per distinct trigger point index linked to RPI January 2024	These will be based on the number of triggers within each legal agreement with each distinct trigger point attracting a charge of £340.
Affordable Housing (NHDC)	Nil	Affordable housing 15% of homes on site to be affordable homes, with 65% of the affordable homes to be affordable rented and 35% of the affordable homes to be shared ownership with affordable housing mix indicated within a housing strategy. S106 to also specify triggers by when certain proportions of affordable homes are to be delivered, and mechanism for agreeing mix of affordable housing between each phase of development or reserved matters application.
Affordable Housing Viability Review Mechanisms	Nil	Legal agreement to secure triggers, terms and number of viability review mechanisms.
Community Centre	Nil	Delivery of a community building with a minimum

(NHDC)		floorspace requirement (TBA) and the submission of a Community Building Specification in consultation with key stakeholders to be managed by the Stewardship Body
Off-site Corn Bunting (NHDC)	Nil	Mitigation to be delivered on Corn Bunting Mitigation Land in accordance with Corn Bunting Strategy (to be appended), during the Corn Bunting Mitigation Period (from 1 September 2026 to 1 September 2042)
BNG and Corn Bunting Monitoring (NHDC)	TBA	Contributions towards the specific and ongoing monitoring of BNG and on and off site Corn Bunting mitigation.
Primary Health Care Provision (NHDC/NHS ICB)	On-site delivery or £5,500,000	Submission, approval and delivery of Healthcare Strategy to confirm preference for on-site health hub provision or payment of Health Contribution following consultation with ICB If on-site provision, Healthcare Strategy to include: a) details of the medical / health services floorspace (maximum size of 6,000sqm in either BA10 or BA1 local centre); b) specification for the facility and confirmation of the operator; c) confirmation of intended delivery strategy for the facility; d) timetable for delivery of facility;

		e) confirmation of total costs to be incurred by the Owner; the level of contribution to be paid by the Healthcare Provider to the Owner where the costs (including land and build costs) of delivery will exceed £5.5m In the event off-site provision, Healthcare Strategy to identify the project to which a contribution is sought and the level of contribution required (capped at £5.5m).
Management Arrangements (NHDC)	Nil	Submission of detailed arrangements for the management and maintenance of Key Open Spaces, other areas of Open Space, the Community Building [and other relevant facilities] including but not limited to details of: stewardship / management body responsible for managing and maintaining the relevant area or facility; funding; governance; and any other relevant matters.
Self / Custom Build Homes Scheme (NHDC)	Nil	Scheme of 28 of the open market plots shall be marketed as self-build or custom build plots. Plot passports and marketing terms shall be agreed. Any such plots which have not sold to eligible self- or custom-builders following the marketing period may be developed and sold.
Sports Facilities (NHDC)	TBA / £1,500,000	TBA amount covering higher spec sports hall and 3G AGP for community use of on-site Secondary School or on-site delivery of 3G AGP, dual-use court facilities, floodlighting and sports pavilion and additional £1.5m contribution

		to expand the Knights Templar Sports Hall in the event of an off-site Secondary School solution; alongside use of part of the community centre as a fitness/activity studio and delivery of Eastern Park for grass pitches for football and cricket, as well as youth football and mini soccer, a pavilion and parking
Hertfordshire Constabulary (NHDC/Hertfordshire Constabulary)	Nil for space £10,000 for ANPR CCTV TBA for recruitment, equipment and training costs of officer and support staff	Provision of space set out to specifications to be agreed (with a starting point of 27m ² with locker and equipment room) for on-site officer presence within the proposed community building/on-site CCTV cameras in locations to be agreed/a contribution to officer and support staff who will utilise the on-site space
School Community Use Agreement (NHDC)	TBA	Use of Primary and Secondary School sites for community use to be agreed in consultation with Herts CC Growth and Infrastructure Unit and Sport England with contributions required to uplift proposed facilities to enable community use.
Open Space Management and Maintenance Scheme (NHDC)	Nil	To include – a) Details of landscape management and maintenance plans; b) Details of planting, grass cutting, weeding and pruning; c) Management of sustainable urban drainage features; d) Management of biodiversity enhancements; e) Inspection, repair and maintenance of all hard landscaping and structures;

		f) Management, monitoring and operational restrictions; and g) Maintenance and planting replacement programme for the establishment period of landscaping
Public Transport (HCC Highways)	£1,500,000	Towards bus service enhancements including Herts Lynx funding
Monitor and manage (HCC Highways)	£1,500,000	Towards a monitor and manage approach enabling ongoing monitoring of impacts to the surrounding highway network and a method to mitigate impacts should they arise at: Whitehorse Junction Norton Road between Baldock and Stotfold Wallington Road Newham Road Ashwell Road Norton Bury Lane (s)
Rights of Way Works (HCC Highways)	£100,000	Towards works to PRow Baldock 048 and PRow Baldock 001
Travel Plan (HCC Highways)	Nil	Submission of travel plan for each phase/parcel
Baldock Railway Station Improvements (NHDC/Network Rail)	£5,000,000	Towards new station entrance and station improvements.

Section 106 Monitoring Fee (NHDC)	TBA	Contributions towards the ongoing monitoring of NHDC obligations and any other obligations for which NHDC will be the collecting authority, excluding BNG and corn bunting.
--------------------------------------	-----	---

Table 4.11.1 – Heads of Terms

- 4.11.24 The Developer Contributions Supplementary Planning Document sets out that the Council will consider the adoption and management of new strategic green space in the following circumstances:
- It is located within the four main towns of Baldock, Letchworth, Hitchin and Royston (and Great Ashby) and complements existing service maintenance operations.
 - The green space is meeting a current deficiency and new provision would meet the needs of existing and new residents.
 - The green space is meeting a strategic gap in the green space network and improving the quantity, quality and connectivity of the district's green space network.
 - Where longer term revenue streams such as council tax can be effectively recycled back into the locality as part of place investment.
 - Where other corporate objectives can be met such as climate change, biodiversity and health and wellbeing.
- 4.11.25 The guidance continues to set out that the Council will consider other management approaches such as private management companies. Such arrangements would require open space management in perpetuity.
- 4.11.26 Whilst no formal response has been received from the Greenspace team at North Hertfordshire Council, regular discussions and meetings have been undertaken between the planning case officers, members of the Greenspace team and the applicants. The Greenspace team, recognising that there is a wider environment of considerations within which the decision on management of open spaces is considered, including viability, commuted sums, Biodiversity Net Gain and management of SUDs features, have deferred the determination to planning case officers while expressing comfort with the management company approach.
- 4.11.27 The development meets the criteria for consideration of the Council adopting the open space. Notwithstanding this, development site has issues surrounding viability of the development, and aims to deliver on-site infrastructure such as unadopted roads, SUDs, and a community centre alongside open space which requires careful consideration in regards to stewardship and long-term management. There exists a wide and broad set of evidence of successful delivery and maintenance of high-quality landscapes with high levels of community engagement and autonomy in Urban and Civics portfolio of delivery of strategic scale developments with significant open space. On balance, it is considered that securing details of a stewardship model of management of the open space,

community centre, SUDs and unadopted roads would be acceptable in the specific circumstances of this application.

- 4.11.28 Hertfordshire Constabulary expressed, within a response from an Estates and Facilities officer, a requirement for infrastructure towards police services. The requests include recruitment, equipment and training costs for seven police officers for the neighbourhood policing team, five North-Herts force-wide police officer, two neighbourhood policing team support officers, and five force-wide support officers, contributions towards vehicle fleet for the neighbourhood policing team, space within the community centre, and extension to Letchworth Police Station, and the installation of five automatic number plate recognition cameras.
- 4.11.29 The formulae and annexes put forth in the Hertfordshire Constabulary response is noted in respect to neighbourhood policing, however, insufficient evidence as to how the applied formula has been calculated has been provided to ensure the output is proportionate in scale and kind to the impact of the development.
- 4.11.30 The request for North Herts force-wide officer recruitment, equipment and training costs does not accord with the test of being directly related to the development, nor would it be reasonably related in scale and kind to the development proposed.
- 4.11.31 Turning to the request for contributions towards the vehicle fleet, the formula applied is unclear, and the appeal decision used to justify the contribution is not comparable in legal agreement process, consideration, or scale of development/contribution. The request is for vehicles that serve the development and surrounding area, and requests a full contribution for said vehicles. This cannot be reasonably related in scale and kind as the provision would serve more than the site itself.
- 4.11.32 The request to extend the Letchworth Police Station premises is related directly to the above. As the contributions towards the level of recruitment set out is not reasonably related in scale and kind to the impact of the development, additional space within the Letchworth Police Station to accommodate these additional officers and support staff is also not reasonably related in scale and kind.
- 4.11.33 The applicants' position to provide contributions towards the recruitment, equipment and training of two new neighbourhood police officers and one new neighbourhood police support staff which will, part-time, have a presence on the Growing Baldock site within the community centre proposed and set aside/fitted out for use of the neighbourhood policing team is reasonably related in scale and kind, directly related to the development, and required to mitigate the impact of the proposal. In addition, the funding of two ANPR cameras to be positioned on the site itself would meet the CIL tests of planning obligations.
- 4.11.34 There is a shortfall of delivery of on-site football pitch delivery of 4 to 5 natural turf pitches, as well as rugby and hockey provision. Furthermore, no on-site project is proposed to provide swimming facilities, not are contributions provided to improve existing swimming facilities in the surrounding area.
- 4.11.35 A request has been received for improvements to North Hertfordshire Leisure Centre in Letchworth. The request sets out projects for internal roof replacement

above the pool (£250,000); and pool surround and wall tile replacement, improving safety, aesthetics and usability (£450,000).

- 4.11.36 No projects were identified for improvements to existing infrastructure in regards to rugby and hockey provision. In regards to football pitch provision, on-site provision to satisfy the additional requirement were not progressed due to impacts on the viability of the development alongside topographical issues surrounding sports pitch level requirements.
- 4.11.37 The projects identified for North Hertfordshire Leisure Centre in Letchworth would not increase the capacity of the pool, which indicates that the pool operates under capacity, and will be able to absorb any increases in demand. As a result, the contribution is not considered CIL compliant as the projects are not required to mitigate the impact of the development.
- 4.11.38 Baldock hub have approached through consultation response for a contribution towards an existing community facility. The proposal provides a community facility on-site to mitigate its impacts which aligns to the site specific policy requirements for the allocations and the visions within the Strategic Masterplan for Growing Baldock.

4.12 **Economic Considerations**

- 4.12.1 Notwithstanding the viability testing during the assessment of the application as outlined in the previous section, it is clear that the economic benefits of the scheme will be substantial in the short to medium term when considering the scale of the proposals and will continue throughout the lifetime of the development.
- 4.12.2 *Residential Development*
- 4.12.3 During the short to medium term, the development would provide economic benefits through construction and associated monitoring of development. Reference is made to the Home Builders Federation report 'The Economic Footprint of House Building in England and Wales,' which identifies house building as a driver of economic growth and recognises the contribution that this industry makes to the UK economy¹⁵. The Environmental Statement further extracts that approximately 3.4 jobs (direct, indirect or induced) are created for each new home that is built. This has further benefits in terms of job creation across the supply chain.
- 4.12.4 Based on the above formula, the proposal has the potential to create a total of around 10,880 jobs, specifically, 6,800 direct jobs and 4,080 indirect or induced jobs over the expected development period of 15 years¹⁶. This would equate to 725 jobs per year over the construction period of the residential elements of the development.
- 4.12.5 The effect of the development in terms of economic considerations during the construction stage in isolation would be of a local to regional scale and has been

¹⁵ Paragraph 13.5.3 of Chapter 13 Socio-Economic and Health of the submitted Environmental Statement refers.

¹⁶ The development period is not fixed and other supporting information submitted with the application suggest more conservative timeframes.

assessed as having a moderate beneficial effect in Chapter 13 (Socio-Economic and Health) of the Environmental Statement.

- 4.12.6 This is considered reasonable and the benefits in terms of the economic contribution of the residential element of the proposal shall be given moderate weight, with reference to paragraph 17(a) of the NPPF.
- 4.12.7 *Non-residential Development*
- 4.12.8 Construction benefits through increased jobs reported for the residential development above would be boosted further through the construction stage of the employment uses at BA10 and other non-residential uses in other parts of the site.
- 4.12.9 The impact of the proposed development would be an increase in the town's population, which would rely on the proposed BA1 local centre for day-to-day needs. However, due to the proximity of the BA1 residential development and other residential allocated sites relative to Baldock town centre, it is likely that residents of the development would use the town centre for a significant amount of their convenience and comparison shopping needs as well as for leisure activities. The Environmental Statement reports this as having a minor to moderate beneficial effect.
- 4.12.10 The supply of employment land on BA10 of up to 16 hectares would represent a permanent impact with regards to the economic growth on both a local and district scale. Together with the increase in residents as a result of the development, this would support not only the growth of new employment but also the sustainability of existing employment areas nearby within the district. This has been reported as having a major beneficial effect in the Environmental Statement and is not contested.
- 4.12.11 Net employment generated by the development would attract additional indirect and induced jobs, where a multiplier of 1.3 has been applied to each job generated by the proposal, as advised in the HM Treasury Green Book (2022)¹⁷.
- 4.12.12 Non-educational employment uses were calculated to create 2,742 anticipated jobs, with the above-referenced multiplier, the total full-time equivalent jobs would be 3,565. This figure had not included the proposed health hub employment, which would generate 8 full-time equivalent jobs (direct, indirect and induced).
- 4.12.13 The education uses have been based on the initial application submission, which has been altered through revisions to the Development Specification and mostly on the advice of Hertfordshire Growth and Infrastructure Unit. Specifically, since the submission of Chapter 13 (Socio-Economic and Health) within the Environmental Statement, there has been an uplift in the proposed nursery and childcare floorspace provision on the site, a reduction of the SEND school (now off-site) and a reduction in the level of primary education by one form of entry.
- 4.12.14 Applying three 50-place nurseries at 150 children, as requested by Hertfordshire Growth and Infrastructure and the maximum floorspace dedicated to nursery and childcare in the Development Specification, this would create 27.3 jobs. Using the pupil-to-adult ratio referred to in the Environmental Statement, the provision of five

¹⁷ Paragraph 13.5.2 of Chapter 13 Socio-Economic and Health of the submitted Environmental Statement refers.

forms of entry primary education would generate 101 jobs¹⁸. The 5FE reported within the Environmental Statement for secondary education has been retained and applies to the option for a secondary school to be located on the site, separate to Knights Templar School in Baldock. The total full-time equivalent jobs in education would be 195.3. With the added multiplier for indirect and induced jobs, the total anticipated job creation would be 253.9 for proposed education uses.

- 4.12.15 The above assessment has not taken into account the full extent of employment-generating uses on the site, also noting that end users are currently unknown. Particularly, roles associated with the additional 3,000m² health hub floorspace, vehicle depot and renewable energy infrastructure do not feature within the employment calculations. The permanent opportunity for employment on the application site would have a major beneficial effect, noting the proposals would contribute to meeting the aims of Policy E2 of the NPPF. Substantial weight is therefore attributed to this factor.

4.13 **Quantum of Residential Development**

- 4.13.1 The Strategic Masterplan shows an indicative Composite Framework Plan, subsequently supplemented by the submitted Parameter Plan under the current application. This has been based on a clear hierarchy of routes including active travel links, particularly with multiple strong east-west routes across BA1 including a roughly circular route (the 'Baldock Greenway') providing connections to the south-eastern corner with access to BA3 and other parts of the site further south. North-south links would be established, enabling safe and direct access between BA1 and BA10 and to the existing Baldock train station and town centre beyond.

- 4.13.2 The relevant aspects relating to the developable areas of the site for residential purposes shall be discussed below.

4.13.3 *Dwelling Density*

- 4.13.4 There are various pieces of policy guidance with respect to density that are applicable to the current proposal, including:

- Above-referenced strategic site allocations forming part of the Local Plan (2022) and subsequently adopted Strategic Masterplan indicating the total number of dwellings on the site, which can be used to calculate density;
- Policy HS3(b) of the Local Plan seeks to secure a density, scale and character of development appropriate to its location and surroundings;
- Policy L3(1) of the NPPF promotes the efficient use of land, taking into account the identified need for different types of housing and other development.
- Policy L3(2)(a) of the NPPF asserts that to contribute to making efficient use of land, within settlements, development should contribute to an increase in the density of the area, unless there is justification that this is inappropriate or not possible;

¹⁸ Information derived from Table 13.37 within Chapter 13 Socio-Economic and Health of the submitted Environmental Statement and associated relevant footnotes used for the preparation of calculations for full-time equivalent jobs.

- Policy L3(2)(c) of the NPPF seeks to secure densities of at least 35 dwellings per hectare where developments for residential or mixed-use schemes are within reasonable walking distance of a well-connected station;
- Policy DP3(1) of the NPPF encourages development to respond to its context but should not preclude innovation or change where applicable, including increases in scale or density where it is justified;
- Policy TR3(1)(b) of the NPPF promotes the utilisation of existing or proposed transport infrastructure in optimising the amount or density of development in different locations, particularly in locations near modes of non-motorised travel;
- North Hertfordshire Design Code (2026); and
- Planning Practice Guidance on Effective Use of Land

- 4.13.5 The Design and Access Statement submitted with the application identifies key elements of existing development within Baldock, with the following three classifications: town centre zone; historic high-density zone and low-density residential zone. The last of these is described as a distinct character area covering much of the southern half of the settlement with a semi-rural quality. It continues to report that typical densities in Baldock range from 25 to 45 dwellings per hectare, with the denser residential areas proximate to the town centre presenting a dwelling density comparable to zones with a mix of modern apartment blocks and houses.
- 4.13.6 Dwelling density shall be considered together with the mix of housing to be determined at the reserved matters stage if planning permission is granted. The Design and Access Statement notes that different typologies and layout designs will need to be utilised to achieve a range of dwelling densities as appropriate to their individual locations and character areas within each allocation. The proposal adopts an approach seeking higher densities within mixed use zones and periphery areas with lower densities. The lower densities within the application site would be the areas of the development adjoining open spaces and rural edges.
- 4.13.7 Using existing densities within Baldock, the Design and Access Statement confirms that the proposed housing development would achieve a density of approximately 37.5 dwellings per hectare. Importantly, to respond to the various interfaces to residential development, both within and outside of the site, densities will vary across the application site. Higher than average densities would be proposed around the BA1 local centre, proximate to the station entrance and along active travel routes both for accessibility as well as creating distinctive places.
- 4.13.8 Figure 35 of the Design and Access Statement identifies the areas of greatest density within the site, which would be entirely within the central and south-western corner of BA1, for the reasons set out above. The majority of the site would have a medium density, including residential allocations BA2 and BA3, which lie adjacent to residential areas with lower densities and areas of strategic open space proposed within the site.
- 4.13.9 This approach would be appropriate in light of Local Plan policies, which promote that dwelling densities are appropriate to their location and surroundings (Policy

HS3 of the Local Plan refers) and with respect to the urban design principles set out in the Strategic Masterplan.

- 4.13.10 As alluded to above, dwelling density is one factor to be considered amongst others when assessing whether the quantum of development is appropriate.
- 4.13.11 In the context of the above-mentioned housing supply position within North Hertfordshire and the provisions of the NPPF, as stated above, the dwelling density figure set out within the submitted Design and Access Statement is an average only. The sections below indicate areas where dwelling density could be increased, particularly where taller buildings are envisaged to mark key locations throughout the residential areas of the application site. Whilst greater densities are encouraged in the interests of making efficient use of land, the NPPF recognises the need for development to respond to its local context, in many parts of the site the development is represented by fringe locations that need to respect the sensitive open character of the surrounding Green Belt.
- 4.13.12 It follows that the proposal would not raise concerns with regards to dwelling density in isolation and would not conflict with the aims of the above-referenced policies and guidance.
- 4.13.13 *Developable Area and Open Space*
- 4.13.14 The provision of housing on their respective allocations BA1, BA2 and BA3, notwithstanding their cumulative policy target to contribute towards meeting the District's housing delivery test, must be balanced against the provision of other non-residential policy requirements and infrastructure to meet the needs of the development (under Policies SP7 and SP10 of the Local Plan). To deliver a landscape-led scheme and provide active travel links and connectivity within the application site whilst responding appropriately to its natural topography has determined the amount of land available for residential development.
- 4.13.15 As shall be detailed in the following sections, the proposal, through provision of an extensive and cohesive green space network would contribute towards Local Plan Policy SP14(b), (j) and (l).
- 4.13.16 As set out in earlier sections of this report, the development of BA1, BA2 and BA3 for residential purposes must also be balanced against the provision of various facilities, services and other infrastructure to meet the needs of the development in line with Local Plan Policies SP7 and SP14 (amongst others). Further, to accord with the Strategic Masterplan, a significant proportion of the application site has been dedicated to areas of open space. The submitted Development Specification identifies the six areas of strategic open space that shall be delivered throughout the construction of the residential element of the scheme. Strategic open spaces across the site comprise:
- Bygrave Common, named after the historic Bygrave Common located within the northern area of BA1, forms the largest piece of open space and would accommodate active travel links in all directions, including beyond the site to the north and west, whilst providing focal points to the town and surrounding countryside as part of a heritage trail, both informal and equipped areas of play, MUGAs, community growing opportunities and supporting ecology through planting and retention of habitats.

- Eastern Park, located within the eastern portion of BA1, would have an outdoor sports focus comprising grass sports pitches, as well as extending the heritage trail and Baldock greenway route and providing NEAP, LEAP¹⁹ and further community growing.
- Urban Open Land located immediately south of BA3 and opposite Clothall Road relative to BA2 would represent further outdoor sports provision and an opportunity to extend the existing allotments directly north-west. The active travel routes including heritage trail would also extend into this part of the application site.
- Weston End would occupy an area of land within the south-eastern portion of BA2 along the extent of this boundary, as a location for equipped play, ecological enhancements and connections to Weston Hills Local Nature Reserve.
- Walls Field located within Baldock and to the west of BA3 on the far side of Wallington Road, would be transformed from an arable field to a wildflower meadow, respecting its archaeological sensitivity, with the retained public right of way traversing this part of the site together with new informal recreation routes.
- Green space east of Clothall Common, directly north of the residential area proposed within BA3, would be retained as open space and would be subject to management in the interests of promoting wildlife. Existing rights of way would also be retained within this portion of the site to maintain connectivity and the circular greenway route around Baldock town.

4.13.17 It is acknowledged that the development overprovides with respect to green space when assessed against the Developer Contributions SPD, a full assessment of which has been set out in separate sections of this report, noting the Strategic Masterplan key principle of providing additional green spaces to reduce recreational pressure elsewhere (in the interests of biodiversity). The location, areas and roles of the six strategic areas of open space have been dictated by a mix of topographical, ecological or other planning constraints. Specifically, the following layout considerations with respect to strategic open space are relevant:

- BA1 policy requirements include avoiding development beyond the north of the existing ridgeline under Policy SP14(b). As a result, Bygrave Common is restricted in its location within the northern half of the BA1 allocation. Additionally, the proposal is required to respond sensitively to its Green Belt interfaces and avoid the coalescence of the neighbouring settlement of Bygrave to the north-east, which has not been raised as a concern within the consultation response provided by Planscape. As such, Eastern Park is sited in the easternmost part of BA1. The developable area identified on the Parameter Plan would also accord with Policy SP14(l) requiring the containment of development to the south and south-west of the prominent ridgeline traversing BA1 as well as Policy E5 of the Neighbourhood Plan, which seeks to maintain a clear visual and physical gap between the expanded edge of Baldock and Lower Bygrave.

¹⁹ Neighbourhood equipped areas of play and local equipped areas of play.

- Whilst Bygrave Common represents the largest area of green space within the development, it cannot contribute towards the outdoor sports requirement for the development due to the fall in levels to the northern boundary. Eastern Park is preferable with regards to levels and therefore has an outdoor sport function.
- BA2 relies on a piece of land along its eastern boundary (Weston End) for open space. Whilst the housing on BA2 shall be delivered in conjunction with Walls Field, the two areas are separated by Clothall Road and Wallington Road. Weston End is required to be provided on BA2 to reduce recreational pressure on the Weston Hills Local Nature Reserve located due south.
- Walls Field is designated Urban Open Land and would contribute to the site's biodiversity net gain, with proposals to take it out of its current agricultural use and transform it into a wildflower meadow, retaining the existing public right of way traversing this part of the site. Walls Field does not form part of the residential allocation and under Neighbourhood Policy Plan G2 forms part of the essential 'green lung' within the south-eastern part of Baldock town, identified for an area to be improved for visual or recreational purposes.
- BA3 would retain its northern portion (green space east of Clothall Common due to its biodiversity value and its topography) and the Urban Open Land immediately south of BA3 would form the second area dedicated to outdoor sports, as one of the flattest parts of the application site, would accommodate sports pitches to contribute towards meeting requirements of Sport England.
- The Strategic Masterplan secures the creation of a greenway for Baldock and a network of connected wildlife corridors and green spaces.
- The development is required to meet a statutory minimum of biodiversity net gains and provide landscape buffers to other sensitive interfaces including existing residential areas, the railway line and the local wildlife site to ensure policy compliance.
- A SuDS corridor is required to ensure the satisfactory disposal of surface water within BA1.

4.13.18 Taking into account the above land requirements for open space and other necessary infrastructure, the proposed Parameter Plan identifies an appropriate area for residential development that would align with the allocations of BA1, BA2 and BA3. It follows that the proposal would accord with the aims of Local Plan Policies SP14, BA2 and BA3 with regards to the quantum of residential development.

4.13.19 In terms of construction and phasing, each of the three residential allocations across the site shall be directly linked and developed alongside an area (or areas) of strategic open space as outlined in an earlier section to cater for the recreational needs of the development as construction progresses. As such, the areas of strategic open space identified within the submitted Parameter Plan and Development Specification shall also be considered alongside the quantum of residential development. Policies as relevant to the provision of open space have been specifically set out in a later section of this report. The area allocated to

housing development should also be considered in the context of the adopted Strategic Masterplan, where key principles relating to the provision of high quality housing, a greenway for Baldock, creating a series of parkland destinations and landscape-led design, together with other biodiversity and movement key principles.

- 4.13.20 It is considered that the development, noting the current submission in outline form, would strike an appropriate balance between the amount and location of dwellings together with the provision of open space and other community and social infrastructure. Additionally, the development is also required to have regard to the sensitive landscape immediately surrounding it, which has been explored in detail in separate sections of this report.

4.14 **Design**

- 4.14.1 Section 14 of the NPPF seeks to promote high quality, healthy inclusive and sustainable places, through setting clear expectations about design outcomes and the use of relevant tools and processes.

- 4.14.2 Paragraph 2 of Policy DP3 of the NPPF outlines various aspects to be considered to create well-designed places. These relate to:

- a) Liveability;
- b) Climate;
- c) Nature;
- d) Movement;
- e) Built Form;
- f) Public Space; and
- g) Identity.

- 4.14.3 Further, paragraph 5 of Policy DP3 continues to state that substantial weight should be given to outstanding or innovative designs which promote high levels of sustainability or which help to raise the standard of design more generally in an area, so long as they are consistent with the overall form and layout of their surroundings. Additionally, paragraph 3 applies substantial weight to compliance with relevant development plan policies when assessing the design quality of proposals.

- 4.14.4 Policy DP4 of the NPPF relates to the design process and places importance on the use of a range of design tools to inform proposals, including design review panels and pre-application engagement.

- 4.14.5 Policy P3 of the NPPF sets out that development proposals should be appropriate for their location, taking into account the likely effects of pollution on health, living conditions and the natural environment, whether these effects are on or off-site; and whether this is as a result of the development itself or the product of preexisting conditions in the vicinity.

- 4.14.6 Policy P4 of the NPPF is also relevant, noting that existing businesses, community facilities, public services and defence and security activities should not have unreasonable restrictions placed on their current or permitted operation as a result of development being approved after they were established.
- 4.14.7 Policy P5 of the NPPF seeks to anticipate and address possible malicious threats and other hazards and is relevant to occupiers and users, including where particular groups may be vulnerable to crime or would be at risk from physical hazards. It also addresses locations where large numbers of people are expected to congregate, such as transport hubs, night-time economy venues, shopping centres, health and education establishments, hotels and restaurants and commercial centres (amongst other things).
- 4.14.8 The emphasis on the key role that good design plays in place-making is supported by Local Plan Policies SP9 and D1. Specifically, Policy D1 seeks to create or enhance public realm; retain existing vegetation and propose appropriate new planting; maximise accessibility, legibility and physical and social connectivity within and outside of the site and design out crime and anti-social behaviour.
- 4.14.9 Requirements specific to parcel BA1 are set out within Local Plan Policy SP14, which requires the following, as relevant:
- (b) Structural planting to create a sense of place, integration into surrounding landscape and to reinforce a long-term, defensible Green Belt boundary to the north and east;*
 - (c) A new link road connecting the A507 North Road to the A505 Baldock bypass including a new bridge across the railway;*
 - (d) Sustainable transport measures to include:*
 - i. a secondary rail crossing for pedestrians and cyclists in the vicinity of Ashville Way;*
 - ii. safe access routes to / from, and upgrades to, Baldock station;*
 - iii. sensitive integration of Bridleway Baldock 034 / Bygrave 002 as a north-south route through the development;*
 - iv. the use of Bygrave Road / Ashwell Road from the south-western edge of the allocated site to the link road as a sustainable transport corridor; and*
 - v. comprehensive integration into the existing pedestrian and cycle, public transport and road networks;*
 - ...*
 - (j) Address existing surface water flood risk issues, particularly to the south of Ashwell Road, through SuDS or other appropriate solution;*
 - (k) Appropriate mitigation, compensation and / or enhancement of key features of biodiversity ...*

(l) Built development contained to the south and south-west of the ridgeline that generally extends eastwards from the A507 south of Blackhorse Farm and southwards from Ashwell Road;

(m) Sensitive treatment of heritage assets and their settings including:

i. an access solution from the A507 North Road which satisfactorily addresses potential impacts;

ii. retaining framed views of St Mary's Church from within and beyond the site;

iii. using the location of areas of archaeological significance to inform a site-wide green infrastructure strategy; and

iv. Ivel Springs Scheduled Ancient Monument.

- 4.14.10 Policy NE1 relating to strategic green infrastructure applies to the assessment of the application and seeks to protect and enhance existing strategic green infrastructure networks and secure its long-term maintenance and management. Mitigation measures to satisfactorily address impacts on the strategic green infrastructure are also required under Policy NE1.
- 4.14.11 Further, Local Plan Policy NE6 supports the creation of new and / or improved open spaces which meet the needs that arise from development, contributes towards improving the quality and accessibility of open space and incorporates open space buffers for visual, landscape, ecology or air quality reasons.
- 4.14.12 Neighbourhood Plan Policy G3 is relevant, requiring proposals to demonstrate a high standard of design and that site allocations should relate sensitively to their immediate context and the wider character of Baldock and establish a strong sense of place.
- 4.14.13 Policy E2 within the Baldock, Bygrave and Clothall Neighbourhood Plan sets out that the allocated sites should provide for an appropriate amount and range of publicly accessible green infrastructure that incorporates an integrated network of open spaces and semi-natural areas, improves tree cover, connects with existing green corridors and public rights of way and considers the delivery and management of new green infrastructure (amongst other things).
- 4.14.14 Further, Policy E6 of the Neighbourhood Plan is relevant to the development of BA10, seeking to create a high quality and distinctive entrance to the town along Royston Road, using well-designed buildings and a consistent approach to landscaping and lighting. It requires development to respond appropriately to the sensitive interface with existing adjacent residential properties and the formation of a landscape buffer to the railway line and other measures to soften the visual impact of development.
- 4.14.15 With respect to BA2 and BA3, Neighbourhood Plan Policy E7 requires the formation of landscape buffers to the edge of the developments and the bypass, the reinforcing of planting to the interface with the mobile homes to the rear boundary of BA2 and avoiding the siting of new buildings on raised land within BA3.
- 4.14.16 Principles relating to urban design as set out in the Strategic Masterplan are listed as follows:

- Respecting and responding to Baldock's unique character and built form;
- Retaining and enhancing key views towards Baldock and the wider landscape;
- Integrating the new neighbourhoods with Baldock through the considered design of connections and transitions between old and new;
- Putting place-making at the heart of the development;
- Creating a new gateway into Baldock; and
- A mix of buildings, spaces and character.

4.14.17 Also of relevance are the green infrastructure principles of the strategic masterplan, including the following:

- Enhancing inherited assets;
- Prioritising nature-rich places;
- Celebrating heritage;
- A greenway for Baldock;
- Creating a series of parkland destinations;
- Landscape-led design;
- Ensuring 360° access to your '5-a-day.'

4.14.18 The application has responded to the above through the submission of the following documentation in support of the proposals:

- Parameter Plan (February, 2026);
- Development Specification (August, 2026);
- Design and Access Statement (February 2026);
- Planning Statement (October, 2025);
- Green Infrastructure Strategy (Bradley Murphy Design, revised February, 2026);
- Environmental Statement Chapter 7 Landscape and Visual Impact (Bradley Murphy Design, 2025);
- Supplementary Information – Response to Sport England and NHC Parks and Leisure, Appendix G (2026);
- Arboricultural Planning Report (Seed Arboriculture Ltd, 2025);
- Sustainability and Energy Strategy (Turley Sustainability & ESG, 2025).

- 4.14.19 The Design and Access Statement reports the outcomes of the Design Review Panel of July 2023, where seven recommendations were made with respect to the station entrance and rail crossing; clarification around non-residential uses; a masterplan for the BA1 community hub area; areas of higher density; design of the link road; the green infrastructure strategy; the minimisation of operational and transport-related carbon emissions and optimising the use of renewable energy. These elements have been incorporated into the suite of documents supporting the application, particularly the Parameter Plan, the Design and Access Statement and the Sustainability and Energy Strategy. As noted previously, some of the non-residential uses shall be secured by condition or Section 106 agreement in the event planning permission is granted. The outcome of the Design Review Panel subsequently informed the preparation of the Strategic Masterplan²⁰, prior to its approval.
- 4.14.20 The proposals were subject to a second Design Review Panel in June 2025, resulting in a further nine recommendations. These related to: design quality and character; improving town-wide connectivity; consideration of direct and legible north-south routes for site permeability; incorporation of straight and direct pedestrian and cycle routes contributing towards active travel; design of the active travel spine; purpose of the proposed north town gateway and design of the landscape and SuDS; utilise existing landscape to inform the proposed green spaces and edges; test the visual impact of housing and consider how design coding can ensure consistency in character. Following this, further public consultation was undertaken following the adoption of the Strategic Masterplan and ahead of the application submission.
- 4.14.21 Therefore, the Design and Access Statement has demonstrated how the development and evolution of the proposals have been informed through relevant tools such as the Design Review Panel process, in accordance with NPPF Policy DP4(2)(a).
- 4.14.22 *Design Principles of the Development*
- 4.14.23 Strategic Masterplan conformity has been outlined within the submitted Design and Access Statement, setting out that the Strategic Masterplan has informed the site-wide design principles relating to the four areas of movement and connectivity, built form and place identity, sustainability and green infrastructure. These in turn have translated to key places and spaces and their design principles, which include edges of the development, gateways into Baldock town, places and green infrastructure.
- 4.14.24 Notwithstanding the proposals submitted in outline form, the spatial and design principles contained within the application submission that form part of the Development Specification have been considered against the relevant design-related policies below.
- 4.14.25 *Built Form and Place Identity*
- 4.14.26 These site-wide principles reflect the relevant Urban Design principles set out within the Strategic Masterplan, specifically to respect and respond to Baldock's unique character and built form, retaining and enhancing key views towards Baldock and the wider landscape, integration of the new neighbourhoods with Baldock, putting place-making at the heart of the development and a mix of

²⁰ Subject to consultation in November 2023.

buildings, spaces and character. The site-wide principles have been informed by the existing development of the town and would celebrate its historical and natural features whilst ensuring that healthy communities can be fostered through design and accessibility.

- Future place identity and character – the existing character of Baldock is referenced and key features isolated which shall inform the detailed design stages. The proposal would contribute towards the identity of the development, creating visually attractive, distinctive and characterful development that would integrate successfully within the existing town.
- Density and massing – as set out above, a medium density development is proposed, with variations to density and building height depending on the location of dwellings, particularly those proximate to key active travel routes or near the station. The development would create focal points within the development and where possible, promote compact forms of development to optimise the site's potential.
- Mix of typologies – a range of house types to meet local need would reference existing development in Baldock. By incorporating a mix of tenures, the development would support mixed and vibrant communities.
- Hierarchy of frontages – development would front onto and frame streets and open spaces, utilising strong and consistent building lines and minimal setbacks within the key areas (to be expanded on further). Other parts of the development would embody a less formal approach displaying greater variation in terms of building setback, useable open frontages and gardens. This would support healthy communities and promote social interaction, using building patterns to define the arrangements of streets and public spaces and ensure these spaces are safe, secure and inclusive whilst being legible and assisting with wayfinding through the site.
- Integration of existing properties – existing properties along Bygrave Road / Ashwell Road and Royston Road would be accommodated within the design of the development and their setting and amenity preserved through the siting of open space, landscaping and tree planting as well as sensitive building design to limit height relative to these interfaces. This would contribute towards supporting integrated communities.
- Public realm and street design – the relationship between streets, spaces and buildings are essential in physically and visually integrating the development, encouraging community interaction and establishing the identity of specific key locations. The development would be based on a clear hierarchy of movement routes and formal and informal open spaces would inform the design of the public realm. This would contribute to the site's liveability, supporting healthy communities, incorporate a network of high quality, accessible green infrastructure, provide transport infrastructure and travel choice, include spaces that are accessible and encourage play and healthy lifestyles.
- Protecting and enhancing strategic views – the topography of the area allows for views across Baldock from elevated locations. Strategic views towards the historic St Mary's Church shall be incorporated into the design through planting, alignment of streets and block layout to create view corridors. This would also facilitate views to the surrounding countryside

and respect the existing identity of Baldock town whilst enhancing views into and out of the scheme.

- Residential edges – the proposal would involve the sensitive treatment of boundaries and interfaces with existing adjacent residential properties through a combination of backing gardens and / or buffer planting to ensure appropriate integration of the development.
- Affordable housing – the development would be tenure blind and would have equitable access to facilities.

4.14.27 The above design principles should be considered in the context of the Parameter Plan and strategic open space areas contained within the Development Specification, which together would result in an acceptable form of development when considered against the policies referenced. Specifically, the development, through the above built form and place identity principles would contribute to the aims of Policy DP3(2)(a), (c), (d), (e), (f) and (g) of the NPPF with regards to supporting mixed and healthy communities, provision of green infrastructure, enabling movement, introducing focal points and key views and demonstrating identity. Further, it would meet the objectives of Policies SP9 and D1 of the Local Plan.

4.14.28 The proposal has acknowledged sensitive interfaces with existing properties outside of but adjacent to the application site. The proximity of the existing railway line and the proposed residential area within BA1 has been addressed through the provision of appropriate buffers, which could include spur lanes and play spaces, incorporating security fencing, as has been required by Network Rail. These details and wider crime prevention design elements shall be controlled through the phase framework approvals and reserved matters stages following any grant of planning permission, to accord with Policies P3, P4 and P5 of the NPPF and the comments of Hertfordshire Constabulary.

4.14.29 The Design and Access Statement submitted in support of the application provides specific detail with regards to the design of key places and the treatment proposed to the site's boundaries, particularly to its sensitive interfaces; these shall be considered in later sections of this report.

4.14.30 *Movement and Access*

4.14.31 As shown on the Parameter Plan, the site has been designed around key movement routes that connect existing and proposed services, facilities and social infrastructure with new homes. This supports the key principles relating to movement as set out within the Strategic Masterplan, to create a place where half of all trips are made on foot, bicycle or public transport, encouraging active and sustainable travel and reclaiming spaces for walking, cycling and public transport. In design terms, this involves the appropriate design and placement of buildings and clear routes to make sustainable journeys attractive.

- Active travel network – a hierarchy of movement routes have been incorporated into the design depending on the volume of traffic anticipated along each. The development would provide transport infrastructure and choices to support the design vision for the site, provide good connections the wider settlement and prioritise sustainable forms of transport whilst providing multi-functional green infrastructure.

- Active travel route design – direct routes would be incorporated into the scheme to connect key destinations and places within and outside of the site. Natural surveillance through the positioning of buildings would be achieved together with landscaping to provide shading. This would ensure that climate, nature, movement and public space elements are combined to facilitate safe, efficient and enjoyable routes throughout and beyond the development.
- A connected neighbourhood – active and sustainable transport routes would be direct and convenient, whereas car travel would be managed to remove traffic from residential areas.
- A walkable neighbourhood – the central siting of community and commercial facilities within BA1 as well as BA10 would further improve accessibility to essential services and facilities, incorporating mobility hubs / bus stops.
- Leisure routes – the development would incorporate a network of informal routes through the strategic open spaces and other public open spaces and habitats, utilising existing public rights of way adding to non-motorised routes within the development. Accessibility to recreational spaces and wildlife would be improved through the development.
- Sustainable transport priority and access – sustainable transport would be further prioritised through bus enhancements including bus stops at regular intervals and within walking distance from all homes, which would provide connectivity to the station and other community or commercial facilities.
- Specific on-site infrastructure to facilitate active and sustainable movement – the development would provide an underpass to improve active travel, a potential new northern station entrance, multi-modal transport bridge connecting BA1 and BA10, all of which would enhance town centre links.
- Street design and hierarchy – the movement network proposed would prioritise walking and cycling to be segregated from vehicular movement routes and accesses. Crossings with priority for active modes would be incorporated into the design, together with landscaping, lighting and opportunities for SuDS features / swales.
- Parking – residential car parking would be a mix of on-plot and off-plot and cycle parking to be as convenient as possible. Shared car parking areas would be designed flexibly and shared public cycle parking and hire opportunities would be provided.

4.14.32 Principles relating to movement are closely linked to the assessment of the application with regards to transport; however, from a design perspective, noting the outline form of the proposals, the development would provide an appropriate mobility network and hierarchy. Importantly, travel routes within, through and beyond the site and its different allocations would be delivered in a cohesive manner with respect to key buildings and spaces and contribute towards the aspirations of high quality, healthy, inclusive and sustainable places in line with Policy DP3 of the NPPF. The proposed movement hubs would be subject to further details through phase framework and reserved matters conditions; however, would not conflict with the aims of Policies P3, P4 and P5 of the NPPF. Whilst provision of safe points of crossing the existing railway line shall be dealt

with under a separate section of this report, the design of the proposal furthers the aims of Policy P5 of the NPPF, which seeks to address hazards.

4.14.33 *Green Infrastructure*

4.14.34 As alluded to above, the proposal provides an extensive network of green infrastructure that would cater for a range of needs both for existing and future residents of Baldock as well as supporting active travel, healthy lifestyles and providing for wildlife.

- Create a strategic nature recovery network – ecological areas would be buffered and form a strategic network together with the open space at BA1 on Bygrave Common, all of which would facilitate the movement of wildlife.
- Deliver key open space destinations – the open space areas would be logically connected and would have unique landscape character and roles, some of which would incorporate opportunities for play, sport, food production, historical interpretation and sustainable drainage. The Green Infrastructure Strategy identifies how all the above open space elements can be accommodated within the site.
- Provide access for all – movement routes to accommodate for pedestrian and cyclists would form part of the proposed layout and greenway around Baldock town and provide connectivity to key destinations. The key movement routes, in particular from the North Road and western boundary of BA1, traveling east and then south through BA10 and BA3 to connect with BA2. This is supported by the Indicative Play Strategy Plan embedded within the Green Infrastructure Strategy, demonstrating how all new residential units within the development would have access to equipped play areas within 400m; multi-use games areas within 1km.
- Bringing the past to life – the heritage assets within the site would be celebrated within the development of Bygrave Common on BA1 through the provision of a heritage trail and focal points. BA1 would also facilitate the reinterpretation of the historic Winterbourne route within the southern portion of the allocation.
- Integration of water – SuDS features would be embedded into the strategic green infrastructure, noting the Parameter Plan contains the SuDS corridor within its south-western portion and provide connectivity to the realigned Winterbourne channel. Primary SuDS features serving all allocations within the site have been shown in the Parameter Plan.
- Green infrastructure within parcels – in addition to the strategic open spaces identified, smaller green spaces would be incorporated within the residential development parcels, which would be connected by active travel routes. These would have a range of functions including equipped play, play on the way, community growing space, SuDS and active travel. Smaller green spaces would be interspersed throughout BA1 and BA3 to serve the recreational needs of the development, as indicated within the Green Infrastructure Strategy.
- Stewardship – a long-term approach to the maintenance and management of green infrastructure and other community assets would be established and the design of these spaces take this into account. This would ensure

that communal spaces would function over the lifetime of the development and fulfil their respective roles.

- 4.14.35 With almost 40% of the site being developed as the green infrastructure network serving the development (strategic open space calculation only), the above design principles reflect the various roles of the open spaces and secure their management, consistent with the Strategic Masterplan green infrastructure key principles and Section 14 of the NPPF.
- 4.14.36 *Sustainability*
- 4.14.37 Whilst matters across and relevant to sustainability shall be dealt with in a separate section of the report, an assessment in terms of the submitted site-wide design principles on the theme of sustainability has been set out below.
- Sustainable layout and landscaping – this would be achieved through a variety of measures including plot orientation, maximising solar gain, buildings and planting to contribute to shading and green infrastructure to support the benefits of passive heating and cooling.
 - Integration of SuDS – the development would incorporate a surface water drainage strategy with a multi-functional role of water management, recharging the underlying chalk aquifer, providing benefits with regards to cooling, amenity and biodiversity and if dry, incorporating play. This would minimise the risks of climate change, incorporating accessible and multi-functional green infrastructure, improving water quality and provision of public space. Locations of strategic SuDS features and infiltration basins have been identified across the entire site, specifically for the developments at BA1, BA2, BA3 and BA10.
 - Building design and integration of energy generation – buildings shall be designed in accordance with the energy hierarchy, passive design measures and a fabric-first approach together with renewable technologies would contribute towards climate change mitigation, in line with the North Hertfordshire Sustainability SPD.
 - Enabling healthy lifestyles – the provision of a range of connections including active travel and a range of open spaces would promote health, wellbeing and community interaction. This would facilitate vibrant, mixed and integrated communities whilst enabling choice in movement across and through the site.
- 4.14.38 The above principles would accord with the sustainability key principles embedded within the Strategic Masterplan, noting a further assessment on the sustainability of the proposals is set out in a later section of this report. They would also achieve compliance when assessed against Policy DP3(2) of the NPPF and Policies SP9 and D1 of the Local Plan.
- 4.14.39 Any future application with respect to design codes and phase framework documentation reserved by condition as well as reserved matters applications shall be required to conform to the site-wide principles appended to the Development Specification and outlined above. This would ensure consistency throughout the development and secure its accordance with Policy DP3 of the NPPF.

4.14.40 *Crime Prevention by Design*

4.14.41 Whilst not a specific key principle of the development, comments received from Hertfordshire Constabulary note the importance of design in addressing crime, disorder and the fear of crime. No specific recommendations have been given, aside from the following:

- Achieve enhanced compliance with Part 'Q' (Security) of Building Regulations;
- Demonstrate that the issues of crime, disorder and the fear of crime have been addressed as per both national and local planning policies;
- Compliance with the National Model Design Code in relation to public spaces;
- Compliance with the new Hertfordshire Healthy Placemaking Framework; and
- Achieve accreditation to Secured by Design which can assist in climate control measures by reducing the potential carbon footprint of the estates over their lifetimes

4.14.42 In response to the correspondence from Hertfordshire Constabulary, it is noted that the proposal would be required to meet Building Regulations, if permission is granted and the development carried out. In terms of meeting national and local policies, an assessment against the relevant provisions of the NPPF, Local Plan and other planning guidance and supplementary documents has been carried out and addressed throughout the report.

4.14.43 The National Model Design Code and the sustainability aims of the proposals are referenced in the Strategic Masterplan and have been considered in the Design and Access Statement submitted in support of the application.

4.14.44 In terms of the Hertfordshire Healthy Placemaking Framework, both national and local policies address placemaking, as has been outlined earlier and this has also been addressed in other relevant later sections of this report.

4.14.45 The main design elements for addressing crime which would incorporate natural surveillance and the layout of the internal movement network are matters that are not for determination at outline stage. It follows that the development would not conflict with policy aims to reduce crime under Policies P5 (maintaining public safety and security) and TR4 (street design, access and parking) of the NPPF and Policy D1(b)(vii) of the Local Plan.

4.14.46 *Key Areas*

4.14.47 A central element of ensuring a high-quality design is creating a sense of place for the new development and ensuring that the various allocations have their own identity. Overall, the proposed development will have an overarching identity of being landscape-led, focused on key routes, including a network of retained or diverted public rights of way and the strong east-west Bygrave Road active travel spine running through BA1 and the north-south key routes connecting BA1 and BA10.

4.14.48 Noting the scale of the development, with the site size at approximately 220 hectares, the design approach has involved the formation of distinguished key areas within parts of the site based on their location, land uses or key features. In addition to responding to the site's topography, this will ensure the development is navigable and accessible for new residents and visitors alike.

4.14.49 The Design and Access Statement provides further description around how these important parts of the site shall be designed. The four key areas identified shall be set out in turn.

1) Places – these generally mark destinations within the development, including the first residential parcel to be delivered in line with the phasing indicated within the Design and Access Statement.

- Bygrave Road Corridor – this would extend from the existing built development on Bygrave Road and provide a multi-functional space, ranging in width to create interest and identifying opportunities for taller buildings in corner locations and signalling key routes off Bygrave Road, including the railway underpass, local centre buildings and integrating the existing Bygrave Road Local Wildlife Site. The illustrative concept incorporates areas of informal landscaping, play areas, a wetland / SUDS feature and biodiversity net gain. It also incorporates the frontages of the two primary schools, one of which would be proximate to the local centre, with overlooking of public spaces.
- Local Centre – the illustrative concept shows the main local centre uses fronting a high-quality, pedestrianised public open square at the intersection of two main routes through BA1. Tree-lined routes feature within and around the local centre and the interlinked historic Winterbourne channel as part of the attenuation network. Opportunities for key buildings including apartments have also been identified.
- Active Travel Spine – as a connector route between the northern part of the development, providing segregated, safe and direct active travel through a landscaped setting and before reaching the local centre, then passing through a dense, more urban edge before travelling under the railway through BA10 to Royston Road.
- BA2 – proposed as the first residential parcel to be developed if planning permission is granted. As it will not be subject to a design code requirement by condition, more detailed design principles underpinning BA2 have been set out in the Design and Access Statement. These include:
 - Access off Clothall Road, designed to give priority to pedestrians and cyclists and active travel connections to the town centre, across Clothall Road and the footpath network;
 - Linear open space to the eastern edge that would provide further active travel, retained and enhanced habitat, reinforced landscaping, screening to road interfaces, green space and equipped play area;
 - Sustainable drainage basin proximate to the access off Clothall Road within the lower part of the allocation, with additional biodiversity benefits;

- Built form to front onto linear green spaces and edges of the development to protect residential amenity and limit overlooking to adjacent properties through a combination of longer rear gardens, screen planting and separation through linear landscaped strips;
- Consideration of opportunities to reference the alignment of Roman Road.

2) Gateways – these areas relate to the main transport links into Growing Baldock and the approach from existing roads into the town.

- North Road – as one of the key entrances into BA1, it will also signal an arrival into Baldock from the north with a landscape setting and sustainable drainage system providing a transition between open countryside and the built-up part of Baldock. Development will frame the gateway into BA1 and a crossing incorporated to North Road.
- A505 – the roundabout intersection with Royston Road provides a gateway into Baldock from the north-east into the proposed employment area as well as the multi-modal bridge over the railway. Active travel routes including safe, set back crossing points form part of this gateway. There will also be an emphasis on landscaping and public right of way diversion.
- Clothall Road – the frontage of BA2 and the Urban Open Land mark the south-eastern entrance to Baldock, featuring robust, structural landscaping for a transition into the town. The gateway will open up to the sports pitches to the north-eastern side of Clothall Road and key buildings to be provided on the BA2 frontage together with a road crossing.

3) Edges – these frontages require sensitive treatment due to their location and prominence.

- Bygrave Common – an area adjacent to the northern area of strategic open space within BA1, which would provide built form cohesion in materiality and form. Dwelling densities would vary between west and east to respond to the sensitive field in the Green Belt to the east. Building lines would be varied to add interest. There would be a slight increase in the developable area compared with the Strategic Masterplan, which extends slightly northward and contained within the existing ridgeline. This would enable a varied edge to Bygrave Common.
- Railway – a varied design approach would be required noting the topography in this area and with both BA1 and BA10 fronting onto the same. A noise-mitigation function would be required along this edge as well as public realm infrastructure, which would include a linear park strip on BA1 as well as active travel routes and drainage features.
- A505 – the combined frontages of BA3, the Urban Open Land and BA2 would respond to this edge through provision of a landscaped buffer to create screening of the development. Noise mitigation would be addressed through the reserved matters process.

4) Green Infrastructure – these areas have been identified in an earlier section and are detailed below with respect to their design, noting that they have been

strategically located to facilitate the provision of a heritage trail and a continuous public right of way network around and through the Growing Baldock area.

- Bygrave Common – the northern and larger area of strategic open space within BA1, containing the Millers Way public right of way to the north and the curved ridgeline further south. The Baldock Greenway would be incorporated within this area of open space as well as other routes travelling south, new open chalk grassland habitat, community growing and informal natural play and fitness interventions. Creation of native scrub and tree planting as part of a wooded landscape buffer along the ridgeline would aid the transition in character as viewed from the wider landscape, benefitting species movement and softening the proposed built form.
- Eastern Park – open space within the easternmost portion of BA1 would provide outdoor sports pitches and associated pavilion and parking, whilst incorporating this space within the heritage trail. There would also be opportunities for community growing areas in this location. Proposed landscape mounds / bunds, featuring pollinator and planting to provide a buffer between the proposed residential development, formal sports pitches and existing properties at Lower Bygrave would be incorporated within this part of BA1..
- Green space east of Clothall Common – the northern portion of BA3 would be incorporated within the heritage trail, taking advantage of the elevated position within this part of the site. A series of informal recreation routes would be indicated within this green space and the landscaping enhanced for species encouragement.
- Urban Open Land – directly south of BA3 and opposite Clothall Road relative to BA2, this portion of the site would provide views towards Baldock and the surrounding landscape. As noted in a previous section of this report, it would be occupied by playing pitches and maintain an open corridor through Baldock.
- Walls Field – an open area located to the north-west of the Urban Open Land, on the far side of Wallington Road, would be taken out of its current intensive agricultural use and managed for biodiversity. Light recreational access would be provided, including the retention of the existing north-east to south-west connection traversing the field. References would be made to Baldock's cultural heritage noting the existing scheduled ancient monument designation on this part of the site.
- Weston End – this linear strip on the south-eastern edge of BA2 would provide dedicated walking, cycling and horse riding, to be connected to the existing and proposed active travel network. Equipped areas and opportunities for fitness interventions are envisaged within this green space. It would form part of the gateway setting (described above) and existing habitats would be retained and supplemented with further buffer planting.

4.14.50 The main identity areas described above do not cover the full extent of the site and all areas covered by the application would be subject to further design detail to be reserved by condition (reserved matters), noting the tiers of information to be supplied as referenced earlier.

- 4.14.51 To address concerns with respect to the increase in intensity of the use at Eastern Park for use as playing pitches and that it would undermine the immediately surrounding Green Belt areas, it should be noted that this area of strategic open space occupies a substantial area extending from Bygrave Road to the railway line and would be sited immediately east of a new multi-modal north-south route. It is therefore likely that the main activity within Eastern Park (such as any parking and sports pavilion or building) would be concentrated proximate to this primary route and could enable an appropriate buffer and transition to the sensitive Green Belt interfaces to the north and east of this strategic open space as required under Policy SP14(b) of the Local Plan. As Eastern Park forms part of the BA1 allocation, which has been removed from the Green Belt through the adoption of the Local Plan (2022), its development would not conflict with the objectives of Policy SP5 (Green Belt)²¹. Furthermore, the treatment of the interface to the Green Belt would be dealt with through detailed submissions at the reserved matters stage if planning permission is granted.
- 4.14.52 A significant portion of the site, particularly within BA1 would be dedicated towards green and blue infrastructure, which would link to the site's gateway location along its North Road frontage in accordance with Policy SP14(j) of the Local Plan. This corridor would form part of a linear portion of green space running east-west through the southern half of BA1, emulating the historic Winterbourne channel, for the most part running along the Bygrave Road corridor. This green corridor would assist in breaking up larger areas of built form within BA1 and allow individual character areas to form either side. It is considered that the detailed design of this area would be appropriately determined through any phase framework submission (specifically, the design code covering allocation BA1) reserved by condition as well as the reserved matters process to ensure that it is suitably integrated within the development and contributes to high quality design within Baldock town.
- 4.14.53 The residential allocations of BA2 and BA3 are bound by the bund and road reserve of the A505 bypass. Residential development is identified on the Parameter Plan as being set back from the south-eastern boundary to the Green Belt. A buffer would be provided to the bypass in the form of the provision of the Baldock Greenway that would run parallel to the site's extensive south-eastern boundary. This would not raise concerns with regards to the layout of the development, noting that the lower level of the road reserve of the A505 would ensure an appropriate barrier to the new footpaths / bridleways.
- 4.14.54 *Open Space Provision*
- 4.14.55 The six areas identified as strategic open space on the Parameter Plan and Development Specification have been described in detail with regards to location and functions. Open space provision has been assessed under the following relevant policies:
- Policy SP1(c)(iii) of the Local Plan seeks to secure the necessary infrastructure required to support an increasing population.

²¹ Policy SP5 (Green Belt) specifically acknowledges that land has been removed from the Green Belt to enable strategic development at the locations referred to in Policies SP8 and SP3, which includes the BA1 strategic allocation, of which Eastern Park forms a part.

- Policy SP7 of the Local Plan, which requires development proposals to make provision for infrastructure that is necessary to accommodate additional demands resulting from development.
- Policy SP9(c)(vi) of the Local Plan, requires strategic masterplans to be prepared for certain developments including the creation of accessible and multi-functional green infrastructure networks.
- Policy SP10(b) and (f) of the Local Plan encourages the provision of new community, cultural, leisure and built sport and recreation facilities in new development and new physical and green infrastructure to foster healthy lifestyles.
- Policy SP12(a) and (e) of the Local Plan further promotes a strategic multi-functional network of green infrastructure and seeks the protection of open spaces and provision of new and improved open space.
- Policy SP14(b), (l) and (m) of the Local Plan, specifically relating to BA1 and requiring integration into the surrounding landscape including a long-term defensible Green Belt boundary to the north and east; requiring built development to the south and south-west of the ridgeline that generally extends eastwards and using the location of areas of archaeological significance to inform a site-wide green infrastructure strategy.
- Policy HC1 of the Local Plan supports new community facilities subject to being appropriate in scale, accessible by a range of transport modes and would meet an identified need in the community.
- Policy NE1(a) and (c) of the Local Plan seeks to protect, conserve and enhance the strategic green infrastructure network and create new strategic green infrastructure.
- Policy NE6 of the Local Plan supports new open space that meets the needs arising from development; contributes towards improving the provision, quality and accessibility of open space and incorporates necessary open space buffers for landscape, visual, ecological or air quality reasons.
- Policy PM13(1) of the NPPF states quantitative standards set through development plan policies for infrastructure provision (amongst other things) should provide clarity and a high degree of certainty about the requirements that relevant development proposals are expected to meet. Relevant national standards should be adapted where appropriate including in relation to green infrastructure.
- Policy CC3(d) of the NPPF seeks to use design approaches which minimise risks from overheating and include green infrastructure and suitable tree planting.
- Policy DP3(2)(c) of the NPPF promotes the incorporation or connection to a network of high quality, accessible, multi-functional green infrastructure.
- Policy HC1(d) of the NPPF encourages development plans to set local standards for the provision of different types of recreational land and

facilities, drawing upon relevant national standards and best practice, whilst tailored as necessary to local circumstances and evidence.

- Policy HC3 of the NPPF has been explained in a previous section and is relevant to the consideration of open space provision.
- Policy HC4(1) of the NPPF has also been referred to in a previous section and explains the weighting applied to public service infrastructure or community facilities.
- Policy N1(d) of the NPPF promotes the use of standards for green infrastructure so that it incorporates recreational land and refers to Natural England's Green Infrastructure Standards for England, which should be tailored to local circumstances.
- Policy N2(e) of the NPPF seeks to use green infrastructure and natural solutions to secure multiple benefits to the natural environment.
- North Hertfordshire Sustainability Supplementary Planning Document (2024) places an expectation on developments to achieve higher sustainability levels (silver or gold rated) against various criteria. Healthy placemaking is one of the central themes to the SPD, promoting comprehensive green infrastructure within developments and design guidance for these spaces (paragraphs 4.9 to 4.16, inclusive).
- North Hertfordshire Developer Contributions Supplementary Planning Document (2026) sets out open space standards at paragraphs 9.2.8 and 9.2.9 in terms of hectares per person and equipped play provision.
- North Hertfordshire Design Code Supplementary Planning Document (2026)

4.14.56 When assessed against the Developer Contributions SPD, overall, the proposal would provide a far greater area than required, on the basis of the development generating a population of up to 7,680 using an average occupation rate of 2.4 persons per dwelling²²:

Category of Open Space Standard (hectares per 1000 people)	SPD Quantum Required (hectares per 7680 people)
Open Space	
Parks and Gardens (0.8)	6.144
Amenity Green Space (0.6)	4.608
Natural / Semi-natural (1.8)	13.824

²² Sport England in their comments reference a population of 7,520, it is understood this has been quoted with reference to Chapter 13 of the submitted Environmental Statement, which applies a slightly lower multiplier of 2.35 persons per household, which the Environmental Statement reports is the average number of persons per household within North Hertfordshire, instead of the rounded 2.4.

Play Space	
Equipped Designated Play (0.25)	1.92
Informal Play Provision (0.3)	2.304
Outdoor Sports	
Pitches / Courts / Tracks (1.6)	12.288
Other	
Allotments (0.3)	2.304
Total (5.65)	43.392

- 4.14.57 Due to the submission of the application in outline form, specific design details and defined areas of open space shall be secured through the phase framework and reserved matters submissions if permission is granted. The Development Specification identifies the open space provision on the site to amount to 87.42 hectares. The largest area of strategic open space at Bygrave Common represents 37.98 hectares of the proposed total to be provided across the application site. It should also be noted that the open space provision would in fact likely exceed 87.42 hectares due to the calculations which exclude neighbourhood equipped areas of play, local equipped areas of play and local areas of play and other smaller informal green spaces. Specifically, the development provides for double the requirement with regards to the open space standard stipulated within the SPD.
- 4.14.58 The demand for land within the areas of open space relates to the requirement for the development to provide for outdoor sports, where pitches typically require flatter surfaces and larger areas. As such, the Parameter Plan builds on the Strategic Masterplan, identifying two areas to provide for formal outdoor sport: Eastern Park and the Urban Open Land. The application submission incorporates indicative pitch locations where Eastern Park would support a mix of adult, youth and mini football pitches amongst a centrally-located cricket pitch, supported by a pavilion and parking. The Urban Open Land would provide sports pitches, which would occupy land within the secondary school grounds in the event this is developed on BA3. In the event there is no school on BA3, a sports hub with a floodlit 3G artificial grass pitch and floodlit games courts would be provided for public use, supported by a pavilion and parking.
- 4.14.59 Sport England requested scaled drawings for clarification that the site's open space areas could accommodate the pitch dimensions, which was subsequently satisfied through the submission of further information in February 2026.
- 4.14.60 It is acknowledged that Sport England in their most recent comments had confirmed the proposal would under-provide with respect to both outdoor and indoor sport. The requirement for pitch provision required by Sport England has been set out below:

- 1.68 adult football pitches – one adult football (3G artificial grass) pitch is proposed on the Urban Open Land²³;
- 4.97 youth football pitches – two natural turf youth pitches would be provided within Eastern Park;
- 3.51 mini football pitches – three larger and four smaller pitches would be provided on Eastern Park.

4.14.61 Based on the above, there would be a technical shortfall of less than one adult football pitch (0.68) and almost three youth football pitches, although there would be an overprovision in mini football pitches. The originally proposed second 3G pitch had been considered by Sport England to satisfactorily offset the reduction in provision of youth football pitches. Following considerations around the viability of the scheme as reported above, the development is providing for a single adult football pitch due to the cost implications of providing a second artificial pitch. Whilst Sport England has raised concern with the lack of changing facilities associated with the artificial pitch provision on the site, this is a matter that shall be controlled through subsequent design code and reserved matters approvals processes in the event planning permission is granted and to be guided by any future review of secondary school education provision.

4.14.62 Other areas of the site had been considered for further pitch provision. However, levels across the proposed Eastern Park represent suitable topographical conditions for playing pitches, which require flat surfaces, if they are to achieve the requirements set out by Sport England and the North Hertfordshire Developer Contributions SPD. The other large (strategic) areas of open space within the site are less suitable for outdoor sports due to either singular or a combination of constraints relating to topography, ecology, archaeology and / or size. Consequently, the remaining four proposed strategic open space areas of Bygrave Common, green space east of Clothall Common, Walls Field and Weston End have been discounted as options for provision of formal outdoor sports including the formation of playing pitches.

4.14.63 It has been set out above that where the proposal would represent a shortfall in outdoor sports pitches²⁴, this would be balanced against an overprovision of green space to meet the recreational needs of occupants of the proposed development.

4.14.64 *Building Height*

4.14.65 Details of massing and scale are reserved under this outline application. However, information has been supplied with respect to maximum building heights within the updated version of the Development Specification, as follows:

- Development within BA1, BA2 and BA3 will be up to two storeys (12.5m) except for development in and adjacent to the local centre, active travel spine south of the local centre and adjacent to the northern station

²³ Following submission of the Financial Viability Appraisal (CBRE, 2026), the proposal has been reduced from providing two 3G artificial turf pitches to one, the latter which met the approval of Sports England, although their objection was in relation to provision in relation to other sports. This supersedes the plans shown in the submitted Green Infrastructure Strategy for the Urban Open Land.

²⁴ Sport England advice refers, noting a shortfall in on-site provision for natural turf football pitches, ancillary facilities for meeting shared use facilities on the secondary school, rugby union facilities, hockey facilities and swimming facilities.

entrance where building heights of up to 4 storeys (15m) may be appropriate;

- Development within BA10 will be up to three storeys (14m);
- The general location of the waste transfer station is indicated on the Parameter Plan, where a stack of up to 15m will be permitted;
- Building heights from finished floor level to ridge height; finished floor levels may vary from existing ground floor levels by up to 1.5m.

4.14.66 The building heights stated above would accord with the description of places set out above and would ensure that heights are kept within the limits tested under the Environmental Statement. Importantly, identifying areas of the site with greater tolerance for height would ensure that density could be increased in frequented locations such as the local centre within BA1, along the active travel spine where it connects through to BA10 and beyond, as well as around the station entrance, in the south-western corner of BA1. The provision of greater densities in this location would, as set out above, assist in achieving objectives with respect to efficient use of land.

4.14.67 *Trees*

4.14.68 Policy NE2 of the Local Plan requires that developments are designed to ensure the health and future retention of important landscape features and have considered the long-term management and maintenance of any existing and proposed landscaping.

4.14.69 Policy N2(1)(d) of the NPPF seeks to conserve and enhance existing natural features of visual, historic or nature conservation value.

4.14.70 Policy N3(1) of the NPPF recognises the benefits of trees in new development and their contribution towards ecology, climate change mitigation and the character and quality of the built environment. Paragraph 1(a) and (b) highlight the importance of the suitable locations of tree planting and that provision should be made for their long-term maintenance (c).

4.14.71 The ecological considerations relating to trees and vegetation shall be considered in a later section of this report.

4.14.72 The application has been supported by an Arboricultural Planning Statement²⁵, which surveyed 183 individual trees, 77 groups of trees and 37 hedgerows. Over half of the vegetation surveyed on the site, the vast majority is of Category C retention value. One Category A tree was identified within the site, which is proposed for retention.

4.14.73 Paragraph 4.1.4 of the submitted arboricultural report states that the proposed development will require the loss of 78 individual trees, 37 groups of trees and 21 hedgerows. The tree loss would include 23 Category B trees; 89 Category C trees and 24 Category U trees. It should be noted that the Arboricultural Planning Statement makes recommendations only. As such, specific tree removal would need to be approved at the reserved matters stage.

²⁵ Prepared by Seed Arboriculture Ltd, dated September 2025.

- 4.14.74 The trees proposed for removal within BA2 are of limited value and either proximate to adjoining properties, existing utilities or would facilitate active travel routes through to the Weston End strategic open space area from the northern road frontage. Many trees proposed for removal on this part of the site are Category U trees with constrained growth and no retention value. Three tree groups (Category C and U) are proposed for removal within BA2. Further, three Category C hedgerows are proposed for removal together with partial removal of two Category B hedgerows.
- 4.14.75 Some trees along Bygrave Road / Ashwell Road are proposed for removal within BA1, across a mix of Category B, C and U trees. The trees proposed for removal along the existing public right of way running north from Bygrave Road are mostly Category C or U trees. There would be loss of some tree groups and hedgerows, predominantly Category C. A Category B hedgerow is recommended for removal to enable the proposed development, along the northern side of Bygrave Road, leading into the site from its western boundary. The Category B vegetation recommended for removal is visually prominent in some cases, although the Arboricultural Planning Statement notes that replacement tree planting is proposed within the site.
- 4.14.76 The employment allocation of BA10, like the existing, adjacent employment area within Baldock, would be expected to have substantial areas of hardstanding and buildings with large footprints. It follows that the extent of tree removal is high on this part of the site. It is acknowledged that some of the trees proposed for removal within this area range from Category B, C and U trees, including tree groups that have been identified within this part of the site. Hedgerow removal is also proposed (Category C). However, the loss of trees in this location to facilitate the development of the employment allocation could be offset through planting elsewhere within the site.
- 4.14.77 Within BA3, similarly, existing trees in locations where they would be constrained by existing hardstanding are proposed for removal. These generally represent boundary features of low / limited arboricultural value, including the trees along the boundary between the development area of BA3 and the green space east of Clothall Common. The Category C tree group where the existing public right of way runs through would require partial removal to enable active travel links, including any route diversion. Another Category C group of trees would require removal where it is constrained by the existing public right of way leading from Wallington Road. Two further Category C groups adjacent to Royston Road have also been recommended for removal. A single tree within a Category B group adjacent to the existing public rights of way junction would require removal.
- 4.14.78 Tree removal on Walls Field is limited to poor quality specimen on the north-western boundary of this part of the site. Dead and collapsed trees within the Category C group proximate to the boundary with the existing garden centre are also recommended for removal.
- 4.14.79 All trees within the land west of North Road would be retained.
- 4.14.80 The single Category A tree, a walnut tree, located on the north-western boundary of BA2, is proposed for retention as part of the proposals.
- 4.14.81 Due to the location of many existing trees adjacent to publicly accessible locations, they add to the existing character of the area. However, the majority of trees throughout the site and therefore the main groups proposed for removal have been

identified as Category C trees of low quality or low retention value. In addition to facilitating the proposed development on these strategic allocations, the active travel network and spine roads proposed within the development would require the upgrading or diversion of existing public rights of way, which would inevitably require vegetation removal. As noted above, in terms of mitigation, detailed planting schemes would be submitted as part of any reserved matters application, noting that the residential allocations include open space which would allow for tree planting to offset the tree losses outlined above. Moderate adverse weight is attributed to the harm arising from the impact on trees as a result of the development.

4.14.82 *Design Conclusion*

4.14.83 The proposals as outlined and described within the submitted Design and Access Statement, Parameter Plan and Development Specification build upon the urban design principles embedded within the Strategic Masterplan and conformity with key principles has been set out. The proposals have undergone review through public consultation, Design Review Panel and pre-application engagement and have been devised to create a well-structured and legible place, ensuring place-making, wayfinding, connectivity and landscape are central to the overall layout across all parts of the application site, in accordance with Policy DP4 of the NPPF and Policy SP9 of the Local Plan.

4.14.84 Furthermore, considering the areas and geographical span of the application site, it has been demonstrated that the proposals, through appropriate design mechanisms, would satisfactorily integrate and connect to each other as individual parcels as well as to the surrounding area. This would result in a significant enhancement in terms of place identity, movement, safety and fostering healthy communities. This would contribute significantly towards the aims of Local Plan Policies SP1, SP7, SP9, SP10 and NE6 of the Local Plan.

4.14.85 The provision of open space within the development is considered to be a significant benefit both in terms of design and place-making but would contribute towards active lifestyles and would add to the choice and offer of leisure facilities within and around Baldock town. Any grant of planning permission would secure the long-term management and maintenance of green spaces, equipped areas of play, sustainable drainage features and parts of the internal transport network through a combination of planning conditions and obligations so that the development would accord with the aims of Policies SP9, SP14 and D1 of the Local Plan and Policy DP3 of the NPPF. The beneficial weight attributed to the overprovision of green space including the range of facilities provided within and the establishment of its connectivity throughout the site would result in a positive impact on public health and shall be addressed within a later section of the report

4.15 **Transport**

4.15.1 *Policy*

4.15.2 Policy SP6 (Sustainable Transport) promotes the use of sustainable transport modes, encouraging development in locations which enable sustainable journeys to be made to key services and facilities. It also seeks opportunities to implement sustainable travel infrastructure on the Strategic Housing Sites in order to influence the behaviour of occupiers or users, along with supporting Travel Plans to embed sustainable travel patterns at an early stage.

- 4.15.3 Policy T1 (Assessment of transport matters) requires that development does not lead to highway safety problems or cause unacceptable impacts upon the highway network. In addition, there will be a requirement to secure necessary sustainable transport measures and improvements to the existing highway network.
- 4.15.4 Policy T2 (Car Parking) Policy T2 requires parking for residential development to be provided in line with the minimum standards set out within Appendix 4 of the Local Plan. Proposed Development should also have regard to SPDs relating to parking and applicants should clearly identify how they provide for all likely types of parking demand and demonstrate that parking will be safe and of a design and layout that will function satisfactorily.
- 4.15.5 Policy SP14 covering site allocation BA1, as far as transport and movement is concerned, requires:
- “c) A new link road connecting the A507 North Road to the A505 Baldock bypass including a new bridge across the railway;
- d) Sustainable transport measures to include:
- i. a secondary rail crossing for pedestrians and cyclists in the vicinity of Ashville Way;
 - ii. safe access routes to / from, and upgrades to, Baldock station;
 - iii. sensitive integration of Bridleway Baldock 034 / Bygrave 002 as a north-south route through the development; and
 - iv. the use of Bygrave Road / Ashwell Road from the southwestern edge of the allocated site to the link road as a sustainable transport corridor; and
 - v. comprehensive integration into the existing pedestrian and cycle, public transport and road networks”
- 4.15.6 In regards to transport and movement, allocation policy BA10 required the development to *“ensure access arrangements control HGV movements to direct vehicles towards the A505 rather than through Baldock.”*
- 4.15.7 Policy BA2 has not site specific transport and movement requirements, with policy BA3 requiring the development to;
- “Deliver a southern link road connecting the B656 Royston Road to Wallington Road or the A507 Clothall Road within the southern bypass;
- Provide suitable vehicle, cycle and pedestrian links to ensure integration with adjoining site BA4;
- Consider the most appropriate routes and movements for all modes between the allocation site, the existing Clothall Common estate and the wider transport network; and
- Incorporate alignment of former Wallington Road and Bridleway Clothall 027 as green corridor through the site.”

- 4.15.8 *Baldock, Bygrave and Clothall Neighbourhood Plan (2021)*
- 4.15.9 Objectives have been identified for the Neighbourhood Plan as follows:
3. Secure the right infrastructure and facilities needed to serve the expanded town, and to avoid unacceptable impacts from new development
4. Ensure that Baldock grows in a way that builds strong connections between all parts of the town (and maintains good connections with neighbouring villages and countryside); and which provides homes, services and job opportunities that cater for both existing and new residents.
- Limited additional parking to serve Baldock train station within the built up area of Baldock, or as part of site BA1;
 - Pedestrian and cycle improvements to Baldock station;
 - Changes to the drop-off and pick-up arrangements serving Knights Templar School to improve safety; and
 - Improved pedestrian and cycle connections to the High Street and Tesco.
 - The Neighbourhood Plan will support Proposed Development for specific access and parking improvements under Policy G1 (Improving Access and Parking):
- 4.15.10 Neighbourhood Plan Policy E1 deals with transport and air quality. The policy states that applications to develop sites allocated in the North Hertfordshire Local Plan should not be permitted if, taking into account proposed mitigation, the residual cumulative impact on the local road network would be severe or if national Air Quality Objectives would be breached.
- 4.15.11 The Neighbourhood Plan also considers managing construction impacts to ensure that during build out of sites, impacts upon Baldock, Lower and Upper Bygrave and local roads is minimised.
- 4.15.12 NP Policy E5 requires BA1 to “make provision for improved pedestrian and cycle access between Bygrave and Baldock, through a new footpath and cycleway using the route of Bygrave Road/Ashwell Road, designed in a way that maintains as much as possible of its rural character and habitat value; and to minimise the potential for increased traffic flows through Lower and Upper Bygrave, by providing for an appropriate package of measures such as: suitable access arrangements (including restrictions on heavy vehicles); physical features such as gateways and appropriate road surfaces; speed limits and signage).”
- 4.15.13 The Growing Baldock Strategic Masterplan (SMP) sets a movement framework. Within that framework, principles and objectives are broken down by active travel, public transport and vehicular key components. The BSM goes on to consider all-modes access, parking, construction access and off-site interventions.
- 4.15.14 In regards active travel, the framework plan in the BSM sets out –
- Four Junction Improvements (active travel priority measures)

- One on the roundabout for Tesco, London Road, South Road and High Street
- One at Station Road, Icknield Way, Icknield Way East and Football Close
- One at Station Road, Royston Road, Clothall Road and Whitehorse Street
- One at Clothall Road, Wallington Road and South Road
- Eight Pedestrian and Cycle Gateways
 - Two on North Road
 - Two on Clothall Road
 - One on Bygrave Road within the site
 - One on Royston Road (near the roundabout junction with the A505)
 - One within the site at the junction of PROW CH027 and CH028
 - One on PROW BA022 near Weston Hills Wildlife Site
- Eight New Active Travel Crossings
 - One on North Road
 - Four on Royston Road
 - Two on Clothall Road
- Eight Improved Active Travel Crossings
 - Two on Clothall Road
 - Two on Station Road
 - One on the roundabout of the Hitchin Street, Whitehorse Street and High Street
 - One on the junction of Norton Road, Hitchin Street and Letchworth Road
 - One on the roundabout for Tesco, London Road, South Road and High Street
 - One on Wallington Road
- Key Pedestrian and Cycle Connections
 - Four permeating BA1
 - Two through BA10
 - One through BA3 connecting and permeating BA2
- Public Rights Of Way

- Three diversions (CH001, BA034 and BA015)
 - Off-Site Key Pedestrian and Cycle Connections
 - Several identified connecting sites through Clothall Common, and to other key town destinations and public transport connections.
- 4.15.15 Turning to public transport, the BSM sets out:
- A new Train Station access opportunity
 - Seven Mobility Hubs both on and off-site
 - Bus priority bus gates into Clothall Common on Yeomanry Drive
 - A primary bus route to key destinations
 - New bus only access onto BA1
- 4.15.16 Vehicle access in the BSM is indicated as follows:
- Traffic light controlled one-way shuttle working under railway bridge
 - Three modal filters to prevent private motorised vehicle access
 - Three key access junctions (Royston Road, North Road and Clothall Road)
 - Four existing junction improvement areas
 - A primary vehicular route through BA1 and BA10 connecting North Road and Royston Road, with further vehicular route to Bygrave
 - Two indicative secondary accesses off the primary route within BA1, two for BA10, one for BA3 and one for BA2
- 4.15.17 In addition, the BSM sets out some parking principles, and sets out 32 off site highways interventions.
- 4.15.18 *The Application*
- 4.15.19 The application is for outline planning permission with some means of access unreserved. Detailed planning permission is sought for vehicular and bus access points onto BA1 from North Road (primary road in the BSM), and vehicular access onto BA2 from Clothall Road (secondary road in the BSM). All other access junctions will be subject to future reserved matters applications for access and other matters, including the primary access onto Royston Road, which was initially submitted for detailed permission but withdrawn from consideration in February 2026 in favour of reserving that matter for future consideration.
- 4.15.20 The following drawings are considered for approval in some form relevant to transport and movement:

- PC7029-ITP-CE-GB-DR-D-0152 Rev P02 – Development Site Access – BA2 site (Clothall Road)
- PC7029-ITP-CE-GB-DR-D-0110 Rev P04 - Development Site Accesses: North Road
- UAC092-002 Rev R – Parameter Plan

4.15.21 These details, specifically the access drawings, provide for on-site works to facilitate accesses. The Parameter Plan provides details of on-site internal movement plans for active travel, bus routes, primary street alignment, crossings of the railway, public rights of way including diversions and modal filters. The parameter plan will be secured by condition in a way in which future reserved matters application and any other details will need to have regard to it, but will not require strict adherence.

4.15.22 *Relevant consultation responses*

4.15.23 Hertfordshire County Council as Local Highways Authority have responded to consultation dated 05/10/2026 with no objection. The response is summarised as follows:

“The proposed development forms part of the adopted growth strategy for Baldock and has been supported through both the Local Plan and Masterplan processes. The submitted transport evidence demonstrates a vision-led approach which prioritizes walking, cycling and public transport in accordance with national policy and the objectives of LTP4. Whilst the development will generate additional travel demand, the assessment demonstrates that a comprehensive package of active travel infrastructure, public transport enhancements, highway mitigation and travel planning measures can mitigate those impacts to an acceptable degree. The Highway Authority therefore concludes that there are no highway safety grounds upon which planning permission should be refused subject to the below conditions, and that the residual cumulative impacts of the development would not be severe within the meaning of the National Planning Policy Framework.”

4.15.24 National Highways are appointed as a strategic highway company with a responsibility as highway, traffic and street authority for the Strategic Road Network (SRN). National Highways have responded to consultation on three occasions, consistently providing a holding objection. The latest response dated 17 September 2026 recommends that planning permission not be granted for a specified period. The specified period of three months (to the 17th December 2026, is reasoned due to continued review of submitted models with some outstanding issues being identified that need some further clarification. The continued review has regard to:

“A1(M) Junction 9 Base Model

- *There are outstanding concerns regarding the validation of queues on the northbound off-slip.*
- *Further clarification is required on the implementation and operation of MOVA, to include understanding the derivation of the Saturation Flow values.*
- *AECOM is awaiting confirmation from JCT regarding the methodology applied to the give-way parameters.*

A1(M) Junction 9 Proposed and Sensitivity Test Models

- *The proposed and sensitivity test models should apply consistent queue delimiters.*
- *Any amendments necessary to address issues identified within the base model should also be carried through to the proposed and sensitivity test models.*

Other Outstanding Matters

- *Consideration should be given to whether a Road Safety Audit (RSA) and/or a Walking, Cycling and Horse-Riding Assessment Review (WCHAR) is required for the proposed mitigation. We are also reviewing this further.*
- *Further clarification is required regarding the changes made to the TEMPro scenarios between assessment years, including the methodology used and the assumptions applied.”*

- 4.15.25 These matters have regard to off-site mitigation measures and thus have no impact on the contents of the proposal under consideration herein. Any recommendation pursuant to the consideration of this application in the round, and any resolution of the Council at Planning Control Committee, will have to be subject to the satisfactory resolution of the National Highways outstanding matters and National Highways removing their current recommendation of non-approval.
- 4.15.26 Active Travel England responded recommending deferral in November 2025, April 2026, June 2026, and on 11 September 2026. Following the recommendation of deferral on 11 September 2026, the applicant provided a direct response providing summary information on transport interventions secured by either legal agreement of planning conditions on 17 September 2026. Following this submission, Active Travel England responded on 23 September 2026 with no objection subject to conditions.
- 4.15.27 Central Bedfordshire Council maintain there is a lack of information regarding highways impacts on the network within their authority, and no consideration of public transport options to employment destinations to the north, and object to the application in its current form.
- 4.15.28 The contents of Central Bedfordshire Council's responses are noted. The applicant has provided a response which, in regard Hitchin Road, acknowledged increases in vehicles using Hitchin Road, caveating that this increase represents approximately 1 vehicular movement a minute in the AM and PM peaks. This is an identifiable increase, it does not represent a substantial uplift in traffic, having no material impact on the operational capacity of the route. The magnitude of change in traffic on Hitchin Road is limited, raises no operational or safety concerns, and no severe residual cumulative impact would arise.
- 4.15.29 In respect Norton Road, the applicants have responded pointing out that the Transport Assessment Addendum concludes that the resulting impacts are not severe and do not warrant additional mitigation beyond the measures already incorporated into the proposed development. The increases in traffic on Norton Road are not wholly new development generated trips and result from a wider re-distribution of traffic, the changes do not result in unacceptable operational conditions at key junctions, no road safety concern has been identified and there

is no evidence of a severe residual cumulative impact. It is acknowledged that the forecast increase in traffic on Norton Road. Notwithstanding this, the route has been specifically assessed, mitigation has already been incorporated into the scheme, and an ongoing monitor and manage mechanism is available should future monitoring identify impacts greater than those currently forecast.

- 4.15.30 Public transport connections have been fully considered in the development proposal. Bus services will be integrated into the development at agreed stages, with a Herts Lynx demand responsive solution before integrating services 37 and 91 before service 91 and 92 being incorporated, all of which provide connections to wider employment, education and service destinations. In addition, the transport strategy places significant emphasis on rail connectivity with Baldock railway station identified as a key sustainable transport hub, providing connections to London, Cambridge, Hitchin, and other destinations.
- 4.15.31 Responses have been received during public consultation having regard to the impact of transport interventions to mitigate the impact of the development on the viability and vitality of existing businesses within the existing Baldock Town Centre. The primary concern surrounds the single-lane shuttle system under the railway bridge on Station Road, identified as Link 5. The responses consider the interventions anticipate a 44.5% to 45.4% reduction in total average annual daily traffic flow, with a residual severance effect of minor adverse significance rising to moderate beneficial in some instances. A Keep Baldock Open survey findings document has also been provided which suggests a significant proportion of respondents travel by car, that car access via North Road is critical or very important to their decision to visit Baldock and businesses within, and that they are very or extremely likely to reduce visits if accessing Baldock becomes more difficult due to delays.
- 4.15.32 The applicant has provided response to this issue in the Transport Assessment Addendum section 3.6. The key points raised are that the development aims to manage through traffic without discouraging access to existing services. Measures such as traffic “gating” on North Road, alternating shuttle working under the Station Road railway bridge, changes to access arrangements, and potential turning restrictions at key junctions are intentionally designed to reduce the attractiveness of the town as a through-route, whilst balancing access to the town centre's offer. Where localised congestion is forecast, it is either comparable to existing conditions or arises from deliberate traffic-management measures intended to restrain traffic volumes, rather than from uncontrolled congestion caused by development traffic. Subject to mitigation measures, including a monitor and manage package and a bus service linking new neighbourhoods, the town centre, and the station, demonstrates that the proposals do not harm the viability or vitality of the Town Centre.
- 4.15.33 *Appraisal*
- 4.15.34 *Policy BA1 of the Local Plan, TR8 of the NPPF and E5 of the Neighbourhood Plan*
- 4.15.35 The Parameter Plan submitted in support of the application shows primary site accesses for all modes of traffic onto BA1 from North Road (A507) and from the A505 and Royston Road roundabout. In addition, a primary street with indicative alignment would link these two primary accesses. This route and accesses includes an all-modes bridge over the railway line. Subject to suitable conditions securing the parameter plan, the proposal accords with part c) of Policy BA1.

- 4.15.36 The development proposes an active travel crossing of the railway to the east of Ashville Way. This is considered in the vicinity of Ashville Way and would be secured by condition. The details of this crossing remain reserved.
- 4.15.37 Details of how the proposal will provide safe access to and from Baldock Station, as well as upgrades to Baldock station, are provided within the Environmental Statement Chapter 4, Appendix 4.1 of the ES which contains a Transport Assessment, within which sits a Public Transport Strategy, the Design and Access Statement, the Environmental Statement Addendum Volume 1: Text — Chapter 4: Transport, the Transport Assessment Addendum, CBRE Financial Viability Statement, and responses to consultation from Network Rail, Hertfordshire County Council as Local Highways Authority and Active Travel England.
- 4.15.38 The Design and Access Statement provided the details of improvements indicatively proposed for Baldock Station:
- 1. Existing south entrance to station with potential improvements to provide DDA access (lift and/or ramp); quality townscape/space at the station entrance befitting of the importance of this key gateway to the town; and improved secure cycle parking.*
 - 2. Potential to re-open and improve the existing dilapidated station building to provide a new northern entrance to the station with potential wider improvements and functionality to match the southern entrance.*
 - 3. Station Road existing 5 way junction rationalised to 3 way (emergency/service vehicles access only to Ickniel Way and Football Close), to enable potential for improved overall active travel access to/from the station – particularly with the High Street and other areas to the west. Improved bus facilities also have the potential to be provided.*
 - 4. Access from North Road to the re-opened northern station building for active travel and potentially service vehicles only.*
 - 5. Improvements to provide increased width for active travel priority under the existing rail bridge – vehicular flows would be managed via new traffic lights.*
 - 6. Potential for a new eastern station entrance to the eastbound platform from the considerable proposed development north of the rail line (BA1). This would be for access via active modes, primarily along the Bygrave Road corridor. Secure cycle parking would also be provided.*
 - 7. Quality boundary treatment to existing properties at this new gateway to the town, and provide security to rear gardens.*
 - 8. Proposed development fronting new space/access to potential eastern station entrance, providing natural surveillance and activity.*
 - 9. Access to/from station, High Street and wider west Baldock via a choice of routes – Ickniel Way, Football Close or Whitehorse Street.*
 - 10. Access to/from station, proposed employment (BA10), Clothall Common, and new rail crossings via Ickniel Way East and active travel improvements to the Royston Road corridor.*

11. Access to/from station, Clothall Road corridor and proposed development at BA2 and BA3.

12. Access to/from station, North Road corridor and western end of proposed development at BA1.

- 4.15.39 Following consultation, a Transport Assessment Addendum has been provided, which includes within information regarding transport infrastructure improvements, including the re-opening of pedestrian access to the station from A507 North Road. This is not scheduled within the phasing plan for delivery as it is subject to negotiations between Network Rail and the developer, and relates to delivery of improvements to the station itself. The improvements to the station itself, and the potential for a connection to the north platform of the junction from the site are financial contributions (£5m) and on-site connections respectively.
- 4.15.40 The combination of the off-site highway improvements, the financial contribution to Network Rail for improvements to the station itself with a focus on accessibility, improved cycle parking and townscape improvements and the commitment to explore an on-site connection to a reopened northern platform satisfies that the proposal would provide for safe access to and improvements to Baldock Train Station.
- 4.15.41 Bridleway Baldock 034 combines with Bygrave 002 running north through the site from just to the east of Laymore Farm off Bygrave Road connecting to Bygrave Bridleway 001 which marks the northmost extent of the site allocation approximately half way along the width of allocation BA1.
- 4.15.42 The SMP showed a diversion to Bygrave Bridleway 002 as it runs south from Bygrave Bridleway 001 to direct in a south-east-east direction, with a dog leg 90-degree turn to the west for a short distance before continuing on its existing path and connecting to a retained Baldock Bridleway 034.
- 4.15.43 Where Baldock Bridleway 034 connects Bygrave Road, the Parameter Plan proposes the retention of the bridleway on its current alignment which provides views of St Marys spire.
- 4.15.44 The commitment to maintain the rights of way in their existing location with enhancements and continuation to the north platform results in the application evidencing sensitive integration of Bridleway Baldock 034 / Bygrave 002 as a north-south route through the development. This assessment is made in isolation of the right of way providing vantage and experience of the existing landscape, which will be considered under landscape considerations. The assessment is made only in relation to whether the proposal sensitively integrates the respective bridleways.
- 4.15.45 The Development Description provides for the following features which will provide for the use of Bygrave Road as an active travel corridor through the site, as well as Baldock Greenway:
- Full description of development - Active travel (pedestrian and cyclist) infrastructure including enhanced existing and new leisure and utility routes and crossings, and the Baldock Greenway and modal filters on Bygrave Road (restrictions to general vehicular traffic that maintain pedestrian and cycle access).

- Spatial Principles - SP6 - Bygrave Road – modifications into active travel corridor retaining local vehicular access only (a), Baldock Greenway leisure route within the site, connecting Ivel Springs and Weston Hills Local Nature Reserves (f), SP9 - Baldock Greenway leisure route to provide a continuous green active travel connection around the development areas (d) and Active Travel Link and Bygrave Road (e).
 - Movement and Access Site wide principles – 1. Active travel network, 2 Active travel route design, 5. Leisure routes.
 - Places Bygrave Road Corridor - Bygrave Road will be a key east/west route through the development, designed to facilitate and prioritise active travel as well as providing for limited vehicular access to existing premises only, and where Bygrave Road crosses the proposed all-mode development access, priority will be given to active travel modes where possible through signal-controlled crossings and other design measures.
- 4.15.46 The cumulative details secured by the Development Specification and supported within the Parameter Plan satisfy the site specific requirement of policy SP14 to *use of Bygrave Road / Ashwell Road from the southwestern edge of the allocated site to the link road as a sustainable transport corridor*. Furthermore, the information in regards the Baldock Greenway provides additional leisure routes throughout the site which provide health benefits.
- 4.15.47 *Policy BA10*
- 4.15.48 The proposed development provides indicative access arrangements in regards to Royston Road. These include; new crossing points, access junctions to BA10, and a bus gate to Clothall Common; a gateway feature to slow traffic and deter HGVs; and an additional arm on the A505 roundabout to connect with BA1 access road. The new accesses proposed onto the new employment uses on BA10 would be designed to deter right turns for HGVs, and alongside the other mitigation measures and arrangements on Royston Road are such that large vehicle movements would be sufficiently encouraged towards the A505 while not preventing required bus movements.
- 4.15.49 *Policy BA3 of the Local Plan and Policy TR8 of the NPPF*
- 4.15.50 Following options testing for the SMP, the policy requirement for a southern bypass was not pursued. This decision was taken due to the limited benefit in regards diverting movements away from junctions in the town centre, and likelihood of inducing vehicular journeys. The outline application aligns with the agreed upon masterplan, and the conflict with this section of the allocation policy is not afforded any negative weight in the planning balance.
- 4.15.51 The SMP for Growing Baldock includes bus-only access from Royston Road into and through Clothall Common as well as new active travel crossings of this road. This will allow for sustainable and active travel connectivity between Royston Road, BA3 and Wallington Road. The outline application continues this commitment. The solution is considered an appropriate arrangement for routes and movements for all modes.
- 4.15.52 The strategic masterplan provided for a key pedestrian and cycle connection from Royston Road running south alongside the boundary with BA4 and the outer edge of Clothall Common. The parameter plan submitted with the outline application

shows a key pedestrian and cycle access point in the same location from Royston Road. A small parcel of residential development is identified on the parameter plan supporting this application adjacent to allocation BA4 and south of Royston Road. The development of BA4 is such that potential vehicular connections are provided for. The proposals for Royston Road which would connect to active travel permeability into and from BA4, as well as the connections and active travel routes from allocation BA3 into Clothall Common will provide connectivity between the allocations.

- 4.15.53 There are two options open in respect to former Wallington Road and Bridleway Clothall 027, dependent on whether BA3 comes forward as a secondary school, or not. In any event, the existing connection between Clothall 027 and the former Wallington Road will be retained, with details as to how the area around Bridleway Clothall 027 reserved for future consideration. In the event that a secondary school is provided on BA3, the former Wallington Road will be utilised as part of the proposed Baldock Greenway. In any event, the alignment of former Wallington Road and Bridleway Clothall 027 will be respected as a green corridor within and in parts through the site.

- 4.15.54 *Policy BA2*

- 4.15.55 There are no site-specific requirements in the site allocation of BA2 that have regard to transport. A single all modes access is proposed onto Clothall Road, with details unreserved. Within the site, the proposed Baldock Greenway is indicated as running along the outer north edge of the site alongside Clothall Road running east, then running south intersecting the residential development part of the site in this area and the green space. Along this route, the greenway will pass the front of two existing, retained dwellings. This alignment varies from the SMP which provides an alignment of the greenway which runs through the residential development area. The acceptability of this route is dependent on landscape, layout and access details still reserved. It is expected that the safety, legibility and amenity matters related to this route will be considered at later detailed design stages.

- 4.15.56 *Policy T1*

- 4.15.57 The application has been supported by an Environmental Statement within which Transport matters are covered in Chapter 4, with appendices including a Transport Assessment. Two subsequent addenda have been submitted, in part to provide COMET modelling, alongside a Framework Travel Plan.

- 4.15.58 These documents provide details as to how the two unreserved accesses will be provided without the creation of highway safety issues or resulting in unacceptable impacts on the highway network. The supporting documents relating to transport matters also set out and have supported the negotiation with Hertfordshire County Council as Local Highways Authority, Highways England as National Highways Authority, Active Travel England, North Hertfordshire District Council Transport Policy & Projects Team Leader and other stakeholders, towards an agreed package of necessary sustainable transport measures and improvements to the existing highways network to be secured by legal agreement.

- 4.15.59 The package of off-site and on-site highways interventions and improvements would provide safe, direct and convenient routes for active travel. The site will be well integrated into the existing (and enhanced) pedestrian and cycle, public

transport and road networks. A high frequency shuttle bus connecting to the site to key local destinations will serve the development.

- 4.15.60 A Monitor and Manage Framework is proposed which will review the performance of the development against the Travel Plan targets and if required, allow HCC Highways to require a financial contribution (up to an agreed cap) towards specified junction improvements or further travel planning measures.
- 4.15.61 The proposal, subject to conditions and a legal agreement securing the required infrastructure contributions, would satisfy the requirements of Policy T1 of the Local Plan and Policy TR6 of the NPPF.
- 4.15.62 *Policy T2 of the Local Plan and Policy TR4 of the NPPF*
- 4.15.63 Parking details remain unreserved at this outline application stage. A parking strategy has been developed and supports the outline planning application which aims to reduce parking below the minimum standards required by policy T2 of the Local Plan. Given the site's location and improvements proposed to enhance sustainable modes of transport for future residents, the principle of reduced parking in areas of the site subject to this outline application is agreeable. The application of the parking standards will be undertaken within the stages towards reserved matters approval on a case-by-case and area-by-area basis.
- 4.15.64 *Local Transport Plan 4*
- 4.15.65 The supporting documents pertaining to transport matters satisfy that the development would reflect the Transport User Hierarchy, encouraging movement by sustainable transport modes. In addition, the proposals have satisfied, in full in regards the access proposals to BA1 from North Road and BA2 from Clothall Road, and to a sufficient degree for all other accesses, that arrangements are safe, suitable, and built to an adequate standard. All other matters covered by policy 5 of the LTP4 have been covered above, and the development satisfies the Local Planning Authority that it accords with the objectives set therein.
- 4.15.66 *Policy TR3 of the NPPF*
- 4.15.67 The site is allocated in the Local Plan and has been developed a strategic master plan. The site is in close proximity to a train station which is proposed to be enhanced with greater connectivity available for future residents north of the station. The proposed development will also connect into the existing network for sustainable transport, in regard active travel and access to existing bus services. The site is thus in a sustainable location and can be made sustainable through infrastructure enhancements as proposed and agreed. Modelling has been provided evidencing no significant adverse impacts on the transport network.
- 4.15.68 The environmental impacts of traffic and transport infrastructure and their subsequent use, in respect to adverse environmental impacts, have been considered by the applicant and are covered in separate sections of this report (air quality and noise).
- 4.15.69 The applicant has provided information in regards the Connectivity Tool introduced within the latest version of the NPPF, and how it applies to the site. The results indicate that the site scores between 50 and 65 for all areas within the site. Within the classification of rural town and fringe, this existing situation falls between the 60th up to the 90th percentile. The Connectivity Tool produces the existing situation

and does not account for improvements to connectivity that can and will be achieved through the development itself, and the mitigation proposed. The Connectivity Tool is only to be used in conjunction with other relevant quantitative and qualitative evidence, for which a significant amount has been provided to support the determination of this application. Considering the scale of evidence provided to appraise the transport impacts of this proposal, the results of the Connectivity Tool does not affect the outcome of the assessment.

4.15.70 *Masterplan*

4.15.71 The outline application, to a significant degree, accords with the Strategic Master Plan for Growing Baldock. There are some interventions and improvements that were suggested within the SMP that later, as a result of detailed modelling of movements and impacts, are no longer required to mitigate the impact of the proposed development. All Highways Authorities have been involved in the negotiations regarding infrastructure interventions required to ensure the modal shift envisioned and targeted within the framework travel plan and have raised no objections subject to conditions and infrastructure contributions. As such, the changes from strategic master plan to outline planning are not objectionable, and the development would maintain compliance with the requirements applicable policies within the Local Plan.

4.15.72 *Policy E1 of the Neighbourhood Plan*

4.15.73 An Outline Construction Environmental Management Plan has been submitted in support of the outline planning application. This document outlines how construction will be phased and controlled throughout the build process to ensure impacts are minimised. Construction vehicles will be routed via the strategic road network (A1, A505, A507), rather than through neighbouring villages.

4.15.74 *Policy G1 of the Neighbourhood Plan*

4.15.75 It is acknowledged that the outline application does not accord with parts of neighbourhood plan, specifically the neighbourhood plan vision of providing limited additional parking to serve Baldock train station within the built-up area of Baldock, or as part of site BA1, or changes to the drop-off and pick-up arrangements serving Knights Templar School to improve safety. Providing additional parking for the train station would pull away from the well-established principles of the Local Plan, Local Transport Plan and NPPF to promote alternative modes of transport, and as such, the conflict with the this part of policy G6 of the neighbourhood plan is afforded very limited weight.

4.15.76 The future of the existing Knights Templar School is not yet decided in this application. There are two options by which the existing Knights Templar School will remain, one where a second secondary school is provided on the application site in BA3, and one where Knights Templar School is expanded to accommodate the needs pursuant to the development. The evidence submitted supporting this application does not identify the drop-off/pick-up arrangements at the existing Knights Templar School as an issue that requires mitigation pursuant to the proposed development in all scenarios. That said, in the event that the existing site is extended, and in that situation, the drop-off/pick-up arrangements will be considered and arranged appropriately.

4.15.77 *Conclusion on Transport*

- 4.15.78 The Local Highways Authority has responded to the application together with Active Travel England, both raising no objection subject to conditions, and in the case of the Local Highways Authority, S106 contributions.
- 4.15.79 The proposed vehicular junctions on North Road to BA1, and on Clothall Road to BA2, have been scrutinised and are considered acceptable, subject to conditions. Walking, cycling and wheeling (Active Travel) improvements and mitigation measures are also proposed, and these would be delivered through conditions and obligations.
- 4.15.80 Phased provision of bus services linking the development to key services and destinations, starting with a demand-responsive Herts Lynx provision; enhanced conventional bus services with increased frequencies as occupation levels increase, improved connectivity; upgrades to, Baldock railway station; and future review and enhancement of public transport services through the Travel Plan and planning transport strategy.
- 4.15.81 Car and cycle parking details would be secured through conditions and later reserved matters applications. Traffic impacts will be mitigated through off site works funded by financial contributions secured under the s106. Conditions are proposed to deal with other details and mitigation measures.
- 4.15.82 It is noted that Central Bedfordshire Council and local interests remain concerned around impacts on the transport network in Central Bedfordshire jurisdiction and public transport connections to key destinations to the north, and the Town Centre respectively. These concerns are not reflective of the evidence provided in the application.
- 4.15.83 Furthermore, National Highways remain a position of recommending non-approval for a period to 17 December 2026 to allow for further considerations of specific concerns relating to the Strategic Highway Network. Any recommendation pursuant to this report will be subject to the removal of this non-approval position and a positive recommendation from National Highways.
- 4.15.84 Some of the infrastructure being delivered for transport means have wider public benefits. These include, but are not limited to, the introduction of a leisure route Baldock Greenway, and improvements to the railway station. The proposal is considered to be acceptable from a highway perspective, so no harm is identified subject to conditions. The benefits of the delivery of transport infrastructure that serves a wider benefit, seen in the context of the scale of the development, provides a modest positive weight in the planning balance.
- 4.16 **Landscape and Visual Impact**
- 4.16.1 Policy NE2 of the Local Plan outlines that development should respect the landscape sensitivities of the relevant landscape character they sit within and have regard to the guidelines identified for built development and landscape management.
- 4.16.2 National policies are set out within Section 19 of the NPPF (Conserving and enhancing the natural environment), where the following provisions are applicable:
- Policy N2 of the NPPF requires decision-making to contribute positively to the natural environment and support nature's recovery through considering the environmental qualities of land including habitats, landscape character

and the natural beauty of the countryside; take into account the quality of agricultural land (paragraph 1(b)). Provisions relating to the provision of green infrastructure are relevant and have been detailed in earlier sections of this report.

- Policy N3 of the NPPF relates to trees in new development, is relevant when considering the landscape and visual impact of the proposal, the specific provisions of which have been referenced previously.

4.16.3 None of the parts that make up the application site lie within a Protected Landscape and as such, assessment under Policy N4 of the NPPF is not relevant in this instance. The nearest Protected Landscape relative to the application site is the Chilterns National Landscape, located due west of the site, from which it is separated by the existing settlement of Letchworth.

4.16.4 Within the Local Plan, Policies NE1 is relevant and seeks to protect, conserve and enhance the strategic green infrastructure network. Additionally, Policy NE2 of the Local Plan relates to Landscape and requires development to respect the sensitivities of the landscape character area and to not cause unacceptable harm to the character and appearance of the surrounding area, taking account of suitable mitigation measures necessary.

4.16.5 Also of relevance are the Neighbourhood Plan Policies as follows:

- Policy G2 – Strategic Green Space
- Policy G3 – Creating well-designed places
- Policy G4 – Sustainable design
- Policy E2 – Green Infrastructure and Outdoor Recreation
- Policy E5 – Development north of the railway
- Policy E6 – Royston Road
- Policy E7 – Cambrai Farm and south of Clothall Common

4.16.6 The North Hertfordshire Sustainability Supplementary Planning Document (2024) is also of relevance with regards to the sections on healthy placemaking, promoting biodiversity and incorporating sustainable drainage.

4.16.7 The approved Strategic Masterplan contains a number of key principles relating to land use, green infrastructure, biodiversity, movement, urban design, which are relevant in the consideration of landscape and visual impacts.

4.16.8 The application has been supported by a Landscape and Visual Impact Assessment appended to Chapter 7 of the Environmental Statement (Landscape and Visual), with parts of the submitted Design and Access Statement also identifying the visual impact of the BA1 residential development from public vantage points within the site. The submitted Green Infrastructure Strategy also identifies topography and key existing vantage points within the site. Further, comments received from the Council's landscape consultant, Planscape, confirm that the submitted LVIA has been produced in accordance with the latest relevant

guidance and provides a level of detail proportionate to the application's outline status.

- 4.16.9 The EIA scoping process determined a study area of 3km from the boundaries of the application site as appropriate. Chapter 7 of the Environmental Statement considers that impacts at a distance beyond the 3km radius would be negligible at worst and therefore have not been considered. No objections have been raised with regards to the extent of the landscape and visual impact study.
- 4.16.10 The baseline assessment contained within the Environmental Statement refers to the various ecological, arboricultural and historic features within and proximate to the application site. The Environmental Statement continues to report that without the proposed development, it is anticipated that existing farming activities would continue on BA1, BA2, BA3 and the eastern part of BA10, although the western portion of BA10 could fall into disrepair, risking vandalism and trespass. The northern half of BA3 (land east of Clothall Common) would continue to be unmanaged and become overgrown and invasive species. This would represent a visual detriment in two areas of the application site and impacting on the immediately adjacent landscape²⁶.
- 4.16.11 Viewpoints from a range of locations, which the applicant had agreed in advance with Planscape, have been considered under the submitted Environmental Statement, including nearby residential properties, public rights of way, open space and recreational areas, road users and from scheduled monuments.
- 4.16.12 It also notes that the assessment with regards to BA3 considers the spatial extent and maximum height of the residential and education land uses, in whichever combination or option, to be the same. It is reported that the greatest impact resulting from the change from largely arable fields to the proposed residential and employment development will be during the completion stages of the development. This would be at a time when structural landscaping would not yet be sufficiently established on the site to mitigate the visual and landscape effect of built form on the allocated sites.
- 4.16.13 This section of the report will cover the aspects relevant to Landscape and Visual Impact Assessment set out within Chapter 7 of the Environmental Statement as well as the quality of agricultural land; the following areas shall be discussed in turn below:
- Best and most versatile agricultural land;
 - Landscape character, including physical landscape resources; and
 - Views and visual amenity experienced by people.
- 4.16.14 *Best and Most Versatile Agricultural Land*
- 4.16.15 The application site comprises 220 hectares, the majority of which comprises land in agricultural use, including arable fields on the majority of BA1 and BA10, the southern portion of BA3 and all of the Urban Open Land and Walls Field that form part of the application site.

²⁶ Paragraph 7.4.75 of the Environmental Statement Chapter 7 Landscape and Visual refers.

- 4.16.16 Best and most versatile agricultural land is defined under Annex 2 of the NPPF as land in grades 1, 2 and 3a of the Agricultural Land Classification. Government guidance directs developers and local planning authorities to policies and legislation when considering development proposals that affect agricultural land and soils, with the aim of protecting the best and most versatile agricultural land from significant, inappropriate or unsustainable development proposals; also protecting soils by managing them in a sustainable way.
- 4.16.17 Natural England is a statutory consultee where a proposal would result in the loss of more than 20 hectares of best and most versatile agricultural land, if the land is not included in a development plan. As the majority of the application site forms part of a strategic allocation or has a planning designation that would allow it to be developed for purposes other than agriculture, the principle of the loss of any best and most versatile agricultural land has been accepted through the adoption of the Local Plan (2022).
- 4.16.18 Natural England has been consulted on the proposals and has not raised objection to the application; in particular, Natural England's comments do not reference concerns with regards to the loss of agricultural land on any part of the application site.
- 4.16.19 Furthermore, a large proportion of the site would not be developed with buildings, including the strategic open spaces throughout the site, most of which are currently sited on arable fields.
- 4.16.20 It is evident there would be a loss of available land for the purposes of crops and there would be economic implications for the agricultural tenants on the site. Considering the allocation of the development areas for residential and employment development and the aspirations of the Neighbourhood Plan for further recreation within the boundaries of the town as applicable to Walls Field and the Urban Open Land, moderate adverse weight is attributed to the loss of best and most versatile agricultural land in the planning balance.
- 4.16.21 *Landscape Character*
- 4.16.22 Whilst the strategic allocations of BA1, BA2, BA3 and BA10 have been removed from the Green Belt under the Local Plan (2022), they remain part of the landscape character area immediately surrounding Baldock town for the purposes of assessment under the North Hertfordshire Landscape Character Study (2011). The impact on the landscape character within which the application site lies, as well as other proximate character areas has been assessed below and noting the following landscape features:
- LCA224 (North Baldock Chalk Uplands) covers all the allocated sites, identified by its rolling chalk landform where small-rounded chalk knolls are common. LCA224 is a large character area, of which the application site makes up the south-westernmost portion. The large arable fields, suburban edge of Baldock, the Ivel valley, Lower Icknield Way footpath and substantial transport infrastructure form part of the distinctive features of the area. The landscape type is noted as being relatively unusual in the district and it is graded to be in moderate condition²⁷. Long distance views are available from localised high vantage points and LCA224 has a strong relationship with the landscape area to the south (LCA223). The

²⁷ North Hertfordshire Landscape Character Study (2011).

landscape capacity for major urban extensions or new settlements overall is considered to be low.

- LCA216 (Arlesey / Great Wymondley) encompasses the part of the site to the west of North Road, the character area stretching generally west and enclosing Letchworth on its southern, western and northern sides as well as a short length of the River Ivel, within its north-eastern corner. It is characterised by flat, expansive arable landscape to the north although the A1(M) is a notable feature. Due to the River Ivel, LCA216 has some ecologically interesting areas of marginal and barkside vegetation in the very north-east. The landscape type within LCA216 is not rare, this particular area being in a moderate condition and of low to moderate sensitivity, which has translated to being of low landscape value²⁸.
- LCA219 (Baldock Gap) lies directly south of the site, beyond allocation BA2 and is characterised by steeply sloping and undulating chalk scarp. Its character is rural and open; however, its tranquility is compromised as a result of the proximity of transport infrastructure. LCA219 is reported to be of moderate to high sensitivity²⁹, as its open and undeveloped skyline is an important feature and there are panoramic views from the scarp to the lower lying land to the north and west, in the direction of the southern part of the application site. As a receptor, it is of high sensitivity. This landscape area is classified as being of moderate value.
- The application site comprises various parcels of land, which have been described above. For completeness of this assessment, they are listed below, noting that all parcels of land contain public rights of way and / or informal paths running through them:
 - BA1 – comprising the largest site allocation, forming the northernmost part of the application site and north of the railway line in predominantly agricultural use;
 - Land west of North Road – a small parcel of grassed land, generally located opposite BA1;
 - BA10 – a linear strip of land which lies south of the railway and north of Royston Road;
 - BA3 – an irregular shaped site which has two halves visible both on the ground and plan form, comprising an elevated portion of unmanaged land to the north and an open arable field to the south, bordered by the A505 Baldock Bypass to the east;
 - Urban Open Land – an open field adjoining the southern portion of BA3 with a frontage to the north-eastern side of Clothall Road and running along the western side of the A505 Baldock Bypass;
 - Walls Field – an agricultural parcel and scheduled monument, located to the north of the roundabout intersection of Clothall Road, Wallington Road and South Road; and

²⁸ North Hertfordshire Landscape Character Study (2011).

²⁹ North Hertfordshire Landscape Character Study (2011).

- BA2 – the smallest of the allocated sites, located to the south-west of Clothall Road and flanked by the A505 Baldock Bypass to the east.
- 4.16.23 All other landscape character areas have been discounted from the assessment within the Environmental Statement due to the distance of the application site from their boundary together with any intervening urban form and green infrastructure, such that the effect has been judged as being negligible³⁰.
- 4.16.24 *LCA224 – North Baldock Chalk Uplands*
- 4.16.25 The allocated areas of the site lie within LCA224 (North Baldock Chalk Uplands) which comprises rolling chalk landform where small, rounded chalk knolls are common. LCA224 is a large character area, of which the application site makes up the south-westernmost portion. The large arable fields, suburban edge of Baldock, the Ivel valley, the Lower Icknield Way footpath and substantial transport infrastructure form part of the distinctive features of the area. The landscape type is identified as being relatively unusual in the district and it is graded to be in moderate condition, so that its objective is to conserve and restore the landscape. Long distance views are available from localised high vantage points, and it has a strong visual relationship with the landscape area to the south (LCA223). In visual terms, it is of moderate to high sensitivity and of moderate landscape value. It is noted that within LCA224, the landscape capacity for major urban extensions or new settlements overall is considered to be low.
- 4.16.26 It is acknowledged that the proposal would significantly alter the landscape character of LCA224, representing a large expansion of Baldock town to the north and east. The effect of this has been judged as being minor adverse during the construction and completion stages of the development, without mitigation, owing to the expanse of the character area and the proportion that the application site makes up.
- 4.16.27 Due to the available long-ranging views of the proposed development area, as identified on the submitted Parameter Plan, the harm created by the development would be experienced both within and outside of the site. However, there are some features of the development that require consideration in the assessment of landscape character:
- Development would sit below the prominent ridgeline that runs across BA1. This would ensure that from lower and elevated vantage points further north of the site on public rights of way, the proposed development would be seen against the backdrop of existing Baldock town;
 - The nearest buildings proximate to the ridgeline would unlikely be in full view due to the development being set down from the ridge, which is intended to be a prominent feature of the open space of Bygrave Common, this has been tested using the built envelope established by the Parameter Plan in conjunction with building heights contained within the Development Specification;
 - The development at BA2 would be contained by the existing development of the mobile homes, which are situated on higher ground relative to this

³⁰ Paragraph 7.4.32 of the submitted Environmental Statement Chapter 7 Landscape and Visual.

part of the application site and as such, development can already be viewed from elevated, surrounding vantage points;

- Both BA2 and BA3 are contained by the associated road reserve and bund forming the A505 bypass and also would be seen against the backdrop of the existing town from views further east of the site;
- The majority of BA10 would largely be contained by development within BA1 and existing topography;
- The proposals involve an extensive amount of green space and boundary buffering, thereby providing an appropriate transition from the extended town of Baldock to the open countryside beyond, which would assist in addressing the guideline of maintaining the open character of the North Baldock Chalk Uplands and retain the rural character at the edges of the development, particularly BA1;
- Whilst there would be some tree removal and the extent of tree removal as outlined previously has not been defined in this outline application, the development would ensure appropriate replacement mitigation planting and would not involve the removal of any woodland blocks and hedgerows would be retained as much as possible;
- Links between habitat areas would be created, particularly along Bygrave Road;
- Diversity in flora would be achieved through the appropriate management of open spaces, particularly the green space east of Clothall Common (BA3) and Weston End (BA2);
- The rights of way network and recreational routes would be significantly enhanced as a result of the proposals;
- There is significant transport infrastructure surrounding and within the site that already contributes to the urbanisation of this character area, particularly to the north of Baldock;
- Lighting would be controlled by condition and considered as part of the approval of phase framework documentation and the later reserved matters submissions, noting that the Environmental Statement aims to control glare through lowered angles of proposed column-mounted lanterns and the use of higher-mounted lighting to provide for lower beam angles, which would assist in reducing sky glow³¹.

4.16.28 Planting mitigation is not a detail for consideration at outline stage, although is recommended within the guidelines for LCA224 and will be considered at the reserved matters stage. The site conditions and mitigation have been assessed within the Environmental Statement as having a negligible adverse effect on LCA224.

4.16.29 *LCA216 – Arlesey / Great Wymondley*

³¹ Paragraph 15.6.4 of Chapter 15 Lighting of the submitted Environmental Statement refers.

- 4.16.30 LCA216 stretches west of Baldock and covers an area surrounding Letchworth Garden City. One of the key characteristics of LCA216 is its large, expansive arable landscape in the north, dissected by the A1(M) in its eastern part, with the River Ivel corridor being the closest part to the application site, specifically BA1.
- 4.16.31 As built form would be limited to BA1 (and the other strategic allocations forming part of the application site) the development and the change to the landscape character relative to LCA216 would be limited, noting the land west of North Road would remain open in character and largely landscaped, including any proposals for allotments or green space. As a small parcel sitting south of the River Ivel and associated wetlands, development on this part of the site against the backdrop of construction and the development itself on BA1 beyond would have a temporary and short-term negligible adverse effect.
- 4.16.32 As it is likely that the wider development would be visible from parts of LCA216, various factors including the siting of built form below the localised ridgeline of BA1 as stipulated in the Parameter Plan would address the impact of the extension of the built form of Baldock. When coupled with the strategic green infrastructure network proposed, it has been reported that the effect would be negligible beneficial with regards to LCA216.
- 4.16.33 *LCA219 – Baldock Gap*
- 4.16.34 Directly south of BA2 lies LCA219; the two are separated by the Icknield Way Trail. The area adjacent to LCA219 is limited to the rear (south-western) boundary of BA2. The scale of change would affect a small portion of the landscape character area and is considered to have a negligible adverse effect both during temporary construction activities and the short-term.
- 4.16.35 The implementation of landscaping, management of recreational space and provision of a formal connection to the Icknield Way Trail together with buffers to the rear boundary would have a negligible beneficial long-term effect.
- 4.16.36 *LCA223 – Wallington Scarp Slopes*
- 4.16.37 To the south-west of the site and adjacent to the allocations BA2 and BA3, is LCA223 (Wallington Scarp Slopes), an undulating chalk landscape considered to be in poor condition. Within the character area, open sweeping views and panoramic views can be experienced. Together with its recognisable sense of place, striking landform and visual interest, it has been attributed a moderate to high sensitivity level and moderate to high landscape value. Specific vantage points within this landscape character area have been identified and discussed below, noting that the impact would not be significant.
- 4.16.38 *BA1 (residential, primary schools, local centre, Bygrave Common and Eastern Park)*
- 4.16.39 Comprising the largest site allocation, BA1 forms the northernmost part of the application site and lies north of the railway line between Baldock and Lower Bygrave in predominantly agricultural use. A local wildlife site occupies part of the eastern half of Bygrave Road.
- 4.16.40 Historic and cultural heritage features include six separate potential archaeological areas and are therefore below ground. A scheduled monument at Ivel Springs lies to the west. The historic Millers Way forms the northern boundary of the site and

is an existing right of way. The area has been identified as part of a Bygrave Common on historic OS maps. The historic winterbourne channel traverses this part of the site generally within its southern half.

- 4.16.41 In landscape terms, BA1 is consistent with the broad description of LCA224 in which it sits, characterised by rolling chalk landform that flattens out towards Bygrave Road. Its distinctiveness has been recorded as showing signs of degradation³², due to the combination of the location adjacent to the settlement edge of Baldock and Clothall Common and intensive arable farming. Recreational rights of way traverse the site. The northern portion of the site, particularly beyond the localised ridge has a moderate level of remoteness. Overall, its landscape value has been considered as medium.
- 4.16.42 The effects of construction, including the permanent loss of areas of hedgerow boundary vegetation to facilitate access into the site and alterations to landform to accommodate building platforms and internal construction routes as well as any protective fencing has been reported as having a minor adverse effect. Appendix 7.8 of the Environmental Statement notes that a minor adverse effect would continue following the completion of construction.
- 4.16.43 However, the installation of lighting that may extend into hours of darkness during certain months of the year would result in an increase in sky glow, glare from uncontrolled floodlights and light spillage to adjacent properties, prior to mitigation implementation. The effect of the construction-associated lighting has been assessed as being moderate adverse.
- 4.16.44 The Environmental Statement places emphasis on the amount of landscaping and additional planting proposed within BA1 and reports that the long-term effect would be minor beneficial. It is not disputed that the proposals would ultimately increase access within the site and therefore enhance the accessibility to the wider landscape and that mitigation would ultimately soften the development so that the skyline would be vegetated instead of built form. It should be acknowledged that the development would result in a permanent change from the characteristic arable fields and limited landscaping.
- 4.16.45 There would be benefits, specifically as a result of the broader outline landscaping proposals that would accord with the landscape management guidelines and built development guidelines, including:
- Creation of buffer zones in the form of areas of strategic open space between the intensive arable production to the north and east and buffer zones around the Bygrave Road Local Wildlife Site and formation and strengthening of ecological links;
 - Whilst some sections of hedgerow would require removal to facilitate access to BA1, hedgerow restoration in other areas is proposed to offset this loss (the Development Specification confirms the provision of retained and additional ecological natural / semi-natural areas as well as structural planting and new planting / landscaping³³);

³² Appendix 7.8 Schedule of Likely Landscape Effects refers.

³³ Spatial Principle 9 (SP9) of the submitted Development Specification refers.

- Species diversity would be encouraged through additional planting, the details of which shall be confirmed as part of the reserved matters process³⁴;
- The development would maintain (or divert) the rights of way network and would provide additional connections to the existing footpaths and bridleways on the boundaries or traversing the site;
- Notwithstanding the level of construction proposed, key views towards existing built form landmarks and the open countryside would be retained or made accessible;
- Rural edges would form part of the development proposals;
- Lighting would be designed to minimise the impact of the development on the surrounding area and would be controlled by condition through reserved matters in the event that planning permission is granted.

4.16.46 Taking the above factors into account, the effect of the development would not be greater than moderate adverse taking into account the restriction of built form within the submitted Parameter Plan and associated mitigation, which shall be reserved by condition on any planning permission.

4.16.47 *BA2 (residential and Weston Park)*

4.16.48 The southernmost allocation within the application site lies south of Clothall Road, nestled between the existing southern residential area of Baldock, the Weston Hills Local Nature Reserve and the A505 Baldock Bypass. It comprises two open fields, relatively small in area, used as a combination of grazing horse paddock and arable farmland. Archaeological areas feature on the site. Levels fall generally in a south to north direction, towards its Clothall Road frontage. Landscaping elements include mostly boundary hedgerows and trees. Currently, there is no public access through BA2. The Environmental Statement reports that BA2 presents an opportunity to contribute to a regional multifunctional green infrastructure network and biodiversity core focus area, although the site at present makes little contribution to this function³⁵. The landscape value is considered to be low.

4.16.49 The Environmental Statement notes that protective fencing would be installed, noting the only Category A tree within the site sits on the north-western boundary of BA2 and is one of several trees proposed for retention within this part of the site. This has been reported as having a minor adverse effect in landscape terms.

4.16.50 Following construction, there would be a permanent change from the grazing and arable fields to residential development with green space. Further tree planting to offset the required losses would have commenced but not yet matured. This has also been reported as having a minor adverse effect.

4.16.51 With mitigation, noting the extensive green infrastructure, boundary buffer areas required by the BA2 design principles, which may incorporate new rear gardens

³⁴ Any approval would be required to accord with the recommendations of the Ecology Chapter of the Environmental Statement submitted.

³⁵ Page 8 of the submitted Appendix 7.8 Schedule of Likely Landscape Effects to the Environmental Statement.

of residential plots and enhancement proposals including replacement planting, would offer a greater level of tree coverage compared with existing conditions. The development would have a greater contribution with regards to both recreation and ecology and in the long-term it has been reported as having a minor beneficial effect.

4.16.52 This part of the site also lies within the North Baldock Chalk Uplands LCA224, which has the strategy to conserve and restore. The proposals for BA2 would align with various landscape management and built development guidelines, as follows:

- Promote the creation of buffer zones and the creation of links between habitat areas and enhancing existing habitat areas on the site;
- Promote the diversity of hedgerow species;
- Provide visual links between green spaces throughout the development and linking to the existing public rights of way network;
- Development would be of a height that would be appropriate to LCA224, taking references from its immediate surroundings including the established residential neighbourhood within the southern part of Baldock;
- Lighting, landscaping and building materials would be controlled through the reserved matters process in the event planning permission is granted.

4.16.53 It follows that this part of the development would have a minor adverse effect at most.

4.16.54 *BA3 (residential and secondary education options, southern portion)*

4.16.55 This part of the site lies below the raised land to the north and otherwise contained by the A505 Baldock Bypass, flanked by the established residential area of Clothall to the west and the Urban Open Land to the south. This part of the site is currently in intensive agricultural use associated with the Urban Open Land and lacking in vegetated boundaries. It is identified as an area of potential archaeological interest within the Environmental Statement. The only public footpath proximate to the site runs immediately north-west, separating it from the established residential area. Similar to farmland areas of the site previously assessed, it is currently also makes a limited contribution in terms of green infrastructure and local nature recovery and its value has been categorised as low.

4.16.56 As set out above, construction works would involve the loss of arable farmland and earthworks and associated alterations to the landform within the southern portion of BA3 would be evident. Hoarding would be installed to contain construction activities, introducing a further temporary alien feature in the landscape. The change in character during the construction stage has been reported to translate to a minor adverse effect.

4.16.57 The completion of development on BA3 in a flexible residential / educational use would create an urban extension to Baldock, bringing the settlement edge up to the A505 Baldock Bypass. Planting to enhance the local character and to assimilate the development within the existing area of Clothall Common would be in the early stages and thus the scale of change would also have a minor adverse effect in the short term.

- 4.16.58 After landscape proposals and mitigation has been carried out and with the maturing of trees, this would represent a greater level of tree coverage, together with landscaped buffer zones particularly to the A505 Baldock Bypass. Benefits with the associated extension of the rights of way network would be realised. The proposal for BA3 has therefore been judged as having a minor beneficial effect in the long term.
- 4.16.59 Considering the level of change resulting from the proposals and notwithstanding the benefits of additional planting and accessibility of the scheme in this particular location of the site, the development would restrict some views towards the surrounding open countryside which can be enjoyed from the edge of Clothall Common. It is therefore considered that the landscape change of BA3 would have a minor adverse effect.
- 4.16.60 *BA3 (green space east of Clothall Common, raised land to the north)*
- 4.16.61 The northern, elevated portion of BA3 lies between the main roads of Royston Road (B656) and the A505 Baldock Bypass, with the flatter agricultural field within BA3 to the south. Immediately west is the residential area of Clothall Common.
- 4.16.62 By contrast, the northern half of BA3 differs from its southern counterpart in terms of character, prominence and function. As one of the most elevated areas of the site, it is vegetated and provides a network of formal and informal recreation routes, providing connectivity to rights of way both into and outside of Baldock town. This includes a medieval routeway from Bygrave to Clothall³⁶.
- 4.16.63 Built development is not proposed in this location on the site in accordance with the submitted Development Specification, Parameter Plan and Design and Access Statement and as such, although there would be a level of construction activity associated with the management of this part of the site, involving some vegetation clearance and earthworks. The effect of change would be minor adverse.
- 4.16.64 The management of this part of the site would realise the enhancement of species-rich wildflower grasslands, scrub and tree planting, provision of informal recreation routes located on existing desire lines all of which would further enhance the ecological benefit of the scheme and contribute to the wider transport network and offer. The short term effect is considered to be minor beneficial, elevating to moderate beneficial in the long term through regular management and maturing of the landscaping scheme. This would contribute to achieving the strategy for LCA224 and further landscape objectives in national and local policy referenced above.
- 4.16.65 *BA10*
- 4.16.66 Bound by the railway line to the north and Royston Road (B656) to the south, BA10 represents an extension to the existing employment area within Baldock. It largely comprises agricultural fields³⁷ with dispersed residential units to its Royston Road frontage. It is dissected by a public footpath running generally north-south. An area of identified potential archaeology interest exists on BA10. Due to its relatively flat topography and existing surrounding transport infrastructure, it is visually contained. Like many other parts of the application site, it provides little

³⁶ Page 14 of the submitted Appendix 7.8 Schedule of Likely Landscape Effects refers.

³⁷ Small to medium sized overgrown, grazing paddocks to the west and medium to large-scale open, arable fields to the east.

contribution to the green infrastructure strategy and biodiversity, such that its value is considered to be low.

- 4.16.67 As detailed above, the construction activities associated with BA10 and the extension of the employment area would introduce temporary structures and traffic that would result in a level of change, having a minor adverse effect.
- 4.16.68 At the time of completion of the employment development on BA10, it would form an extension to the existing employment area, with incorporated landscaped buffers to the railway edge to the north³⁸ as well as to the boundaries of the site and has been noted as resulting in a barely perceptible deterioration of the landscape / townscape character³⁹. The landscape change in the short term has been considered as being negligible adverse.
- 4.16.69 Post-mitigation, specifically through the maturing of landscape features proposed on BA10, it would integrate into the settlement of Baldock, noting the development of BA1 to the north beyond the railway line. It is therefore not disputed that in this particular location, the long term effect of the development of BA10 would be neutral.
- 4.16.70 *Urban Open Land*
- 4.16.71 As outlined above, the area of Urban Open Land within the application site has a direct link with the southern half of BA3 as part of a larger field currently in intensive agricultural use, extending south to Clothall Road and east to the A505 Baldock Bypass. It is one of the flattest parts of the application site, traversed diagonally by a public footpath and abuts allotments to the west, beyond which lies Wallington Road. The lack of vegetation to the north provides open views to the surrounding landscape. Similar to other areas of the site, it makes a limited contribution towards green infrastructure or nature recovery. It is also identified as a site with areas of potential archaeology.
- 4.16.72 Under the Neighbourhood Plan, the Urban Open Land forms part of the 'green lung' within Baldock and its landscape value is medium-level.
- 4.16.73 The proposal for the Urban Open Land to develop it with sports pitches and associated infrastructure would take it out of agricultural use, which would require earthworks, road access and on-site vehicles during the construction process. The effect of the change would be minor adverse for a temporary period of time.
- 4.16.74 The site would remain open following construction, although any school option on BA3 would require specific fencing, even if visually permeable. However, landscape buffers and diversion of the existing public right of way would maintain the openness of this part of the site and the Environmental Statement has therefore judged this change as being minor beneficial.
- 4.16.75 Following mitigation, particularly once landscaping has matured, the site would contribute to leisure facilities as sought under the Neighbourhood Plan Policy G2, enhance green infrastructure and connections; these in turn would translate to ecological benefits; all of which would result in a moderate beneficial effect.

³⁸ Page 78 of the submitted Design and Access Statement (February 2026) refers.

³⁹ Page 10 of the submitted Appendix 7.8 Schedule of Likely Landscape Effects refers.

- 4.16.76 *Walls Field*
- 4.16.77 This open agricultural field lies within the south-eastern portion of existing Baldock town, with a visual link to the Urban Open Land. Hartsfield JMI school lies to the north-west and Tapps Garden Centre is located directly south-east. It is a scheduled monument and a public footpath runs through the site, perpendicular to Clothall Road. Otherwise, this part of the site is not publicly accessible at present. Considering the site's location and designation, its landscape value is high.
- 4.16.78 Development is not proposed on Walls Field. It would remain open, being taken out of intensive agricultural use and would be subject to planting and seeding of grassland. The level of change would be site-wide only and would have a neutral effect. Over time, this is anticipated to have a minor beneficial effect through species-rich wildflower meadow creation, light recreational access and non-invasive shrub and hedgerow planting.
- 4.16.79 In the long term, following maturing of the landscape proposals, the ecological value would be increased on this part of the site and it would contribute to the recreational offer within the town, as supported by Policy G2 of the Neighbourhood Plan. The long term effect has therefore been judged as being moderate beneficial.
- 4.16.80 *Visual Amenity*
- 4.16.81 There are numerous public vantage points to be considered with respect to the site's visual impact. Viewpoint photographs have been submitted for both winter and summer months to assess the impact of the proposal, with the maximum heights indicated to match the Development Specification. It should be noted that the details related to building massing, form and materials are elements to be approved at the reserved matters stage if planning permission is granted and thus have not been represented in the figures⁴⁰.
- 4.16.82 The various relevant viewpoints from public rights of way and residential receptors have been set out in turn below, addressing these generally from the north of the development, then to the east and south.
- 4.16.83 *Public footpath Bygrave 015 (within the proposed Eastern Park)*
- 4.16.84 This public footpath leads south from the southern curve in Ashwell Road to cross the railway line due south, before terminating at Royston Road. The stretch of footpath enjoys open views of arable fields either side of the railway line. The crossing, which includes a stile at both the northern and southern sides of the railway line acts as a physical barrier and as a result, this viewpoint has been assessed as being of low value.
- 4.16.85 The existing settlement edge of Baldock, including the established employment area is clearly visible, although further north along the footpath, these views are distant.
- 4.16.86 Due to the footpath's location within the southern part of BA1, when considering the magnitude of change, during the construction stages of the development on BA1 and BA10, the effect would be moderate to major adverse along the public right of way. This differs from Planscape comments, which state that significant

⁴⁰ Paragraph 7.4.37 of the submitted Environmental Statement Chapter 7 Landscape and Visual refers.

adverse effects are likely for users of various public rights of way, including Bygrave 015, where open panoramic views across the site towards Baldock can be experienced and would undergo significant change during the construction period.

- 4.16.87 The application proposes the diversion of this public right of way to form part of a circular leisure route and through Eastern Park, one of the areas of strategic open space within the development. The proposed built form would be closer to this vantage point and the magnitude of change following construction would be moderate to major adverse along the public footpath.
- 4.16.88 Following the establishment of on-site landscaping, the proposal has been assessed as having a minor to moderate adverse effect both on the Bygrave 015 public footpath and views along Royston Road and properties within. Planscape comments are in agreement with the landscape-led proposals, although it would be essential that any detailed designs and landscaping schemes ensure a gradual transition between built development and countryside through a combination of landform, planting and open space to create a defensible and visually integrated edge.
- 4.16.89 *Public footpath Bygrave 004 (north-eastern corner of BA1), Ashwell Road and Bygrave, including public footpaths Bygrave 005 and 006 (north-east of BA1)*
- 4.16.90 Connecting the residential areas of Bygrave and Lower Bygrave (Ashwell Road) and joining with the Eastern Park corner of the application site (BA1) and public footpath Bygrave 015 described above, Bygrave 004 travels generally south, flanking dwellings within Lower Bygrave before curving to terminate at the bend in Bygrave Road / Ashwell Road. It has an elevated position across the open rolling fields with distant views of the northern parts of BA1 and BA3 and BA2 even further beyond, in the context of the surrounding chalk scarp. The footpath is recorded as being well-used and as such its value is high.
- 4.16.91 Further north, residential properties on Ashwell Road (Lower Bygrave) are located to the north-east of the application site, proximate to the BA1 allocation, with open views towards undulating countryside, distant residential and industrial buildings within Baldock and oblique views to the BA10 area.
- 4.16.92 Due to the transient views of various parts of the application site, construction activity would be apparent across these viewpoint locations, albeit at a distance, so that the magnitude of change would have a moderate adverse effect during this stage of the development. Prior to the establishment of landscaping, the built form would be closer to this viewpoint above existing conditions, also resulting in a moderate adverse effect. Similar to the construction impacts outlined above for Bygrave 015, it is anticipated that there would be a significant adverse effect on Bygrave 004 nearer to the application site (BA1), although this stretch of public footpath would not be directly affected as a result of diversion.
- 4.16.93 The long-term effect on Bygrave 004 and Lower Bygrave properties following the establishment of landscaping, where development would form a visual extension and proposed planting would assist in blending the development into the vegetated horizon would be minor to moderate adverse.

- 4.16.94 Properties further north-east located in the village of Bygrave would have restricted views due to the distance of the application site⁴¹ and intervening buildings, structures and vegetation. The public footpaths immediately south, Bygrave 005 and Bygrave 006, have high value. Whilst these represent vantage points further north-east compared with Lower Bygrave, outlined above, their elevated position and resultant visibility would enable transient oblique, partial glimpsed and filtered, distant views of some ground level construction activity within all four allocations forming part of the site. The temporary effect of construction has been judged as being moderate adverse, including in the absence of established landscaping. However, after maturing vegetation, the long-term effect is reported to be negligible adverse. It should be noted that the impact of the development, particularly the strategic allocation site at BA1 and the associated construction works, will vary along different sections of the public rights of way. As noted above, any significant adverse effects likely to be experienced during the construction period would be appropriately mitigated through landscaping and open space details such that they would be reduced to having a long-term effect that would be no greater than moderate adverse.
- 4.16.95 *Public Bridleway Bygrave 001 (BA1 northern boundary / Millers Way)*
- 4.16.96 Forming the northernmost boundary of the site, this route follows the historic Millers Way and is the boundary of the allocation BA1. It is set down within a localised valley depression due north of the curving ridgeline within the northern half of BA1, which facilitates greater views south, towards the eastern part of BA1. As such, two vantage points along this bridleway have been assessed under the Environmental Statement⁴². Due to the historic nature of this route, the views are considered to be of local importance and value to walkers with evidence of regular use; as such both viewpoints have been assessed as being of high value.
- 4.16.97 The length of the bridleway within the application site would be integrated into the site's green infrastructure network and specifically Bygrave Common.
- 4.16.98 Due to the extensive construction activities that would take place on BA1, the effect during construction has been assessed as being moderate adverse on both ends of the bridleway. Following completion of development, the magnitude of change would be moderate adverse. However, with the implementation of planting and softening of development within BA1, the effect of the proposal would be minor to moderate adverse at the western end of public bridleway Bygrave 001. Planscape comments note that during construction and early operation that the impacts would be significant adverse. It is acknowledged that the phased construction of BA1, as proposed from west to east could assist in reducing this impact, also noting that built form would not encroach beyond the localised ridge, thus only the upper parts of construction machinery and permanent buildings would be visible from the western parts of this public bridleway.
- 4.16.99 The development has been reported to have a negligible adverse effect on the eastern viewpoint on the bridleway Bygrave 001. The submitted Schedule of Likely Visual Effects notes that the existing vegetation coverage across the site would soften the views of the proposed built form, thus helping to assimilate the

⁴¹ Reported to be a distance of approximately 1.1km under paragraph 7.4.54 of the submitted Environmental Statement Chapter 7 Landscape and Visual.

⁴² Viewpoints numbered 2 and 17 for the eastern and western locations along the public bridleway Bygrave 001 (Millers Way) as set out in Technical Appendix 7.9 – Schedule of Likely Visual Effects submitted with the Environmental Statement in 2025.

development with the verdant character observed from this vantage point that would be seen in the context of nearer buildings at Lower Bygrave and Norton⁴³. Noting the location of the proposed areas of open space would be the most visually prominent aspects of the development, whilst there could be some visibility of built form, these views would be long-distance and further relative to the existing properties along Ashwell Road.

- 4.16.100 *Ivel Springs, North Road and Salisbury Road, Baldock (west of BA1)*
- 4.16.101 The public footpath network around Ivel Springs consists of Baldock 002 and Baldock 33, accessible via the western side of North Road (opposite BA1). Views from these footpaths are across Ivel Springs Local Nature Reserve and the scheduled monument, representing a popular visitor attraction for recreational use in Baldock. As such, the value of these footpaths is very high.
- 4.16.102 Residential properties along North Road and Salisbury Road are located south-west of BA1, some of which will have an outlook towards land west of North Road within the application site or BA1. The landscape within the western part of BA1 is undulating towards the distant tree line marking the site's northernmost boundary and is free from structures beyond the established boundary of the residential area. The impact of construction to the west of these footpath and residential receptors will be nearby, although a SuDS corridor is proposed to wrap around the block of existing residential properties. The effect has been assessed as being minor to moderate adverse on the footpaths and residents as a result.
- 4.16.103 The public footpaths Baldock 002 and Baldock 033 are further from the development area of BA1 when compared with the residents of North Road and Salisbury Road, from where the proposed construction activities would be apparent. Where North Road properties are oriented towards Ivel Springs Local Nature Reserve to the west, the effect of construction associated with the allotments would be moderate adverse. This would reduce to minor to moderate adverse following the establishment of landscaping.
- 4.16.104 In contrast, the outlook of residential properties within Salisbury Road towards BA1 beyond the area identified for the proposed SuDS corridor would be moderate to major adverse when considering the effect of the change in landscape. The change relative to these properties would also be experienced during the nighttime hours, where lighting would be apparent from houses and streets within the western portion of the development.
- 4.16.105 The Schedule of Likely Effects notes the residential properties on North Road, which would have an outlook towards the land west of North Road, identified for allotments, would experience a negligible adverse effect.
- 4.16.106 It should be acknowledged that the Development Specification includes a spatial principle requiring framed views to St Mary's Church from this part of the site within BA1 as required under Policy SP14(m) of the Local Plan.
- 4.16.107 *Public bridleway Bygrave 002 (within BA1) and restricted byway Bygrave 014 (north of BA1)*
- 4.16.108 Public bridleway Bygrave 002 travels north to south, intersecting Millers Way and traverses the western part of BA1 before terminating at Bygrave Road, proximate

⁴³ Viewpoint 2, page 4 of Appendix 7.9 – Schedule of Likely Visual Effects.

to dwellings on Salisbury Road. It passes over the localised ridge within BA1, where open, long-distance views of BA1 can be obtained, with oblique views of BA10 looking south-east and existing built development within Baldock town beyond.

- 4.16.109 Restricted byway Bygrave 014 runs to the north of the application site, along another localised ridgeline, which offers views towards BA1 as well as the existing industrial units of Baldock, the rooftops of properties within Clothall Common and the raised land within BA3.
- 4.16.110 The surrounding landscape is of local importance and the rights of way are well-used. As such, their value is high.
- 4.16.111 Due to the visibility of BA1, there will be extensive views of construction. Distant views of construction on BA10, BA3 and BA2 will also likely be observed from various points along the bridleway and restricted byway. This translates to a moderate adverse effect during construction.
- 4.16.112 The landscape will change for a large expanse of area visible along the restricted byway ridgeline, which will also be perceived from the southern part of Bygrave 002, from agricultural fields and introducing built form at much closer range. Without established planting, the effect would also be moderate adverse.
- 4.16.113 Established landscaping as part of the proposals, particularly within the strategic green space of Bygrave Common, would assist in screening built form and enhance the existing treed character on the settlement edge of Baldock. The long-term effect has been assessed as being minor to moderate adverse.
- 4.16.114 *Bygrave Road (BA1)*
- 4.16.115 Bygrave Road is currently used for vehicular travel, although there are existing residential, agricultural and industrial buildings and uses along Bygrave Road, particularly within the central and western areas of BA1. Views are predominantly rural, with the built form of Baldock town in the background beyond the railway line and associated infrastructure. Views in a westerly direction are of properties within the parallel residential streets of Bygrave Road, Salisbury Road and Larkins Close, which lie outside the application site. The Schedule of Likely Visual Effects reports that vehicular users of Bygrave Road will experience disruption due to the proposed modifications, where Bygrave Road is proposed to be transformed to an active travel route, serving no more than 310 dwellings. The temporary and short-term effects as a result of construction and the stage following completion would have a minor adverse effect.
- 4.16.116 With regards to sensitive residential receptors on Bygrave Road, views of construction activities have been described as open, elevated, near distance and would include ground level and upper elements of construction activities to the north and south of Bygrave Road. It is noted that some residential properties are sited proximate to the indicative location of the local centre, where building heights could be greater than two-storeys as set out in the Development Specification. The effect has therefore been reported as being moderate to major adverse during the construction and completion stages of the development.
- 4.16.117 However, following the implementation of landscaping associated with the green infrastructure network and improvements to active travel is reported to increase

the attractiveness of Bygrave Road in terms of landscape and experience. For users of Bygrave Road, this would result in a negligible adverse effect.

- 4.16.118 For residents on Bygrave Road, the permanent change from open fields to close-range built form, including with established buffers and screen planting, would have a minor to moderate adverse effect.
- 4.16.119 *Royston Road B656 and southern part of public footpath Bygrave 015 (BA10)*
- 4.16.120 The submitted Schedule of Likely Visual Effects notes that the southern stretch of public footpath Bygrave 015 does not appear to be well-used⁴⁴, noting the barrier of the double stile crossing over the railway line. This is consistent with observations during site visits. The value of the footpath in visual terms is considered to be low. Along this footpath, Royston Road B656 and the dispersed residential properties on the northern side of the road reserve, views across open countryside can be obtained at close range, with the railway line and associated infrastructure beyond.
- 4.16.121 Construction stages, particularly on BA10 as well as BA1 beyond, would result in a minor to moderate adverse effect, noting that the proposals involve the diversion of Bygrave 015 through Eastern Park (BA1) and over the proposed multi-modal bridge before connecting with Royston Road further east of its current location. This has been disputed within Planscape comments, as outlined above, that from certain public vantage points there would be significant adverse effects resulting from construction.
- 4.16.122 However, in the long-term, after established landscaping and provision of the green infrastructure framework, including buffer landscaping to the railway line, the effect of the development has been assessed as being minor adverse on the southern portion of Bygrave 015 and Royston Road and Planscape comments confirm that the level of change would result in a moderate adverse effect following the implementation of mitigation.
- 4.16.123 Public bridleway Clothall 003 has considered the impact of the proposed landscape and ecological management of the elevated northern portion of BA3 and note that the foreground view from the part of Clothall 003 within the site would improve, resulting in a minor beneficial effect. This is not disputed; however, it is important to note that beyond the management benefits of BA3 (green space east of Clothall Common) there would be distant views north towards BA10 and BA1 beyond, even if through gaps in new planting, resulting in a change from arable fields to built form for some distance. It is therefore arguable that the effect would be at least minor adverse, consistent with the assessment for the elevated footpath Bygrave 004.
- 4.16.124 *Public bridleway Rushden and Wallington 041 (east of BA10) and Clothall 028 (east of BA3)*
- 4.16.125 These two public bridleways are located due east of the application site on well-used paths. Along these rights of way, long-distance countryside views can be obtained and particularly the public bridleway Clothall 028 located proximate to the A505 and associated pedestrian bridge leading to BA3 enjoys an elevated, open and panoramic view. Both are considered to be of high value.

⁴⁴ Viewpoint 11A and 11B, page 17 of Appendix 7.9 – Schedule of Likely Visual Effects refers.

- 4.16.126 Due to the elevated position of bridleway Clothall 028 and proximity to the development areas, the change resulting from construction activities would be perceivable above existing vegetation and would have a moderate adverse effect. This effect would be maintained following the completion of the development, prior to the maturing of implemented landscaping.
- 4.16.127 After the establishment of landscaping within the site, particularly to its eastern borders to all of the allocated sites would result in a moderate adverse effect. The bridleway Rushden and Wallington 041, due to its position further from the development and with views directed more towards BA1 and BA10 would not experience the same level of magnitude of change as agricultural views would remain widespread from this perspective.
- 4.16.128 *Icknield Way Trail, public bridleway Clothall 005 and public footpath 006 (south-east of BA3 and BA2)*
- 4.16.129 This long stretch of bridleway⁴⁵ connects the villages of Wallington and Clothall, crossing Warren Lane. The public footpath has a shorter stretch, parallel to the south of Clothall Road. Both form part of the Icknield Way Trail and have distant views of the site, located downhill from these rights of way. Their value is high.
- 4.16.130 Despite their elevated position relative to the site, intervening vegetation along the trail would obscure some views of construction activity at a distance within the four allocated sites so that the effect resulting from the change would be minor adverse; carried through to the completion of development.
- 4.16.131 Following the establishment of landscaping as part of the proposals, the effect has been reported as being negligible adverse where the development would be softened, with glimpses of upper stories and roofs available. Due to the distance of this part of the trail from the development, it is noted that it would not fundamentally alter the rural character of the view. The effect has been reported as negligible adverse.
- 4.16.132 *Permissive footpath on the southern settlement edge of Clothall Common (within Baldock, along the north-western boundary of BA3)*
- 4.16.133 Located west of the BA3 allocation and forming the existing residential edge of Clothall Common, this permissive footpath has direct views across the field of BA3, where the Urban Open Land can be viewed and BA2 beyond. Existing residential properties on Wallington Road (where it transitions to Yeomanry Drive), Barley Rise, Chauncy Gardens and Merchant Walk would have oblique views towards the open field within BA3 through any intervening vegetation and boundary treatment. The nearest properties opposite the permissive footpath relative to BA3 are further separated from the site by a publicly-accessible nature strip buffer with interspersed trees. The value of the footpath is considered to be high, whereas the value of the views from neighbouring properties is assessed as being low (due to their urban fringe location and in the absence of landscape designations).
- 4.16.134 The construction phase would have a direct impact upon the footpath, particularly works in BA3. From the perspective of residents, there would be views of construction activities from upper levels through gaps in existing vegetation and

⁴⁵ The Schedule of Likely Visual Effects labels the bridleway as Clothall 006; however, the public footpath is 006 and the bridleway is 005. Their locations are broadly similar and both have been assessed for the purposes of preparing this report.

external areas particularly would experience a temporary change in tranquility. This has been judged as having a moderate to major adverse effect on both the footpath and nearby residents.

- 4.16.135 The effect would be significant following completion of construction noting the proximity of built form proposed relative to the permissive path. Built form would also be at a near distance from the closest residential properties within Clothall Common. The permanent nature of the development, the nighttime activity change within this part of the site and its proximity to these receptors would result in a moderate to major adverse effect.
- 4.16.136 Proposed landscaping to the boundaries of BA3 would assist in softening the development whilst providing screening and filtering views of built form, including associated lighting. The effect has been reported to be minor to moderate adverse.
- 4.16.137 *Public footpaths Baldock 037 (through Walls Field) and Baldock 036 (north-east of Walls Field) and Clothall Road*
- 4.16.138 These public footpaths, including the footpath on the south-eastern side of Clothall Road, have a direct view through Walls Field, which includes the scheduled monument. Their value is considered to be very high. Similarly, residents with an outlook towards Walls Field from Clothall Road, Downlands, Yeomanry Drive, Mercia Road and Westell Close have been considered.
- 4.16.139 The policy requirements for Walls Field to form part of the strategic green space providing a 'green lung' within Baldock and to be enhanced for recreational and / or visual purposes, as well as its scheduled monument designation are important considerations and the proposals therefore do not involve any intensive construction activity associated with this part of the site. However, medium and close-range views within this area of the footpath network would allow for glimpses of construction activity on the Urban Open Land and BA3.
- 4.16.140 Users of the footpaths through and directly around Walls Field and associated residents beyond would experience a level of change that would translate to a negligible to minor adverse effect, including after the establishment of landscaping as part of the proposals.
- 4.16.141 *Public footpath Clothall 001 (Urban Open Land, south of BA3)*
- 4.16.142 This public footpath runs diagonally through the Urban Open Land forming the part of the application site that sites south of BA3 as part of the same agricultural field. Due to this relationship between the two parts of the site, long and open views across the Urban Open Land in conjunction with BA3 form the immediate experience whilst travelling along this right of way. Its proximity to residential properties and connection with the wider rights of way network give this footpath a high value.
- 4.16.143 The proposals to provide outdoor sport facilities within this portion of the site would require the diversion of this route together with the construction activities that would take place either side of the footpath and within close range would be assessed moderate to major adverse⁴⁶. Similar to the public footpath required to be diverted and running through Eastern Park, in the short term, the permanent

⁴⁶ Consistent with the assessment of the effect on the public footpath Bygrave 015, reported previously.

replacement of arable fields with pitches and associated lighting and any enclosures would result in a significant change, also noting that the proposed development on BA3 would further impact upon existing long-range views, therefore leading to a moderate to major adverse effect following construction.

- 4.16.144 Subsequent to the establishment of landscaping within the development, the proposed screening of the built form and lighting from the site would reduce the impact of the development, which has been reported as having a minor to moderate adverse effect.
- 4.16.145 *Clothall Road A507 and residential properties on Clothall Road, Laxton Gardens and Walnut Avenue (north-east and north-west of BA2)*
- 4.16.146 Along Clothall Road, there are residential properties that have a north-eastern outlook towards the Urban Open Land and others which are oriented south-east to BA2. There is an existing allotment located on the corner of Clothall Road and Wallington Road which also has views across the Urban Open Land and BA3 to the north.
- 4.16.147 The impact of construction on BA2, the Urban Open Land and BA3 would have a moderate adverse effect when assessing the change of the view, during construction of the development. Some properties are located adjacent to the site, including the allotments relative to the Urban Open Land where construction will be apparent. The effect would continue to be moderate adverse without any mitigation.
- 4.16.148 BA2 contains boundary vegetation; however, properties on Laxton Gardens, Walnut Avenue and Baldock Park Homes are located within close proximity of this part of the site, where there will be open views of construction activities and a reduction in the level of tranquility will be experienced from external areas. The effect has been judged as being moderate to major adverse from these perspectives. Similarly, without mitigation, the effect resulting from the change in the landscape of BA2 after completion of the development would remain as moderate to major adverse.
- 4.16.149 It is essential that the Construction Environmental Management Plan limits the hours of construction activities so that they do not encroach into the sensitive nighttime hours.
- 4.16.150 Landscaping to the boundaries of BA3 and the Urban Open Land are proposed, which would assist in screening the development and add to the verdant character of the area. As a result, it has been reported that the effect would reduce to minor to moderate adverse after mitigation.
- 4.16.151 *Public bridleways Weston 001 and Weston 048 and Icknield Way Trail (south and east of BA2)*
- 4.16.152 The Icknield Way Trail continues from the above-referenced public footpath Clothall 006 leading into Baldock, to the rear of BA2. The public bridleway Weston 048 is located parallel to the A505 Baldock Bypass outside of the settlement boundary. The value of these rights of way is considered to be high.
- 4.16.153 Due to the availability of long-range views, near to middle distant views of construction activities would be available from these public vantagepoints,

resulting in a minor adverse effect. This would continue to be minor adverse following construction and prior to the establishment of landscaping on the site.

- 4.16.154 With mitigation involving buffering to the site's boundaries, provision of open space within the easternmost portion of BA2, the effect would reduce to negligible adverse in the long term.
- 4.16.155 *Other viewpoints*
- 4.16.156 Properties on Aleyn Way and Merchants Walk facing towards the unmanaged part of BA3 (northern half) would have views towards this elevated part of the site. The northern part of BA3 would be managed as part of the proposals and it is likely that the visual effect from the perspective of these properties and associated footpaths would be negligible.
- 4.16.157 The A505 Baldock Bypass is set down from land levels of BA2, the Urban Open Land and BA3 and would not readily experience views of these areas, with the exception of the roundabout and associated western slip roads, where views of BA1 and BA10 can be obtained. The effect would be minor adverse at worst with regards to the visual impact from this public highway.
- 4.16.158 *Cumulative Effects*
- 4.16.159 The Environmental Statement has considered the proposed development alongside other nearby approvals, as follows:
- Land east of Rhee Spring and Orwell View, Royston Road (BA4) – 43 dwellings immediately west of BA3;
 - Land to the east of Talbot Way and Kristiansand Way and Flint Road, Letchworth Garden City (allocation LG3);
 - Land to the north of Letchworth (allocation LG1); and
 - Land west of Ashwell Road, Bygrave – an approximately 53 hectare solar farm, approximately 1.2km north-east of allocation BA1 on the application site.
- 4.16.160 The application site together with the above four sites lie within LCA224 (North Baldock Chalk Uplands). The first three sites, together with the application site represent urban extensions to existing towns, resulting in a cumulative urbanising of the edges of the landscape character area. As such, the wider parts of LCA224 beyond the application site would remain unchanged. In landscape terms, the effect has been judged as minor adverse at most.
- 4.16.161 In terms of visual impact, the Environmental Statement notes that only the first site, concerning the development at Rhee Spring (BA4), would be seen in conjunction with the development on the application site. It has been reported that both sites feature a strong degree of structural buffer planting to mitigate the effects of built form. It is important to note that the location of the BA4 development lies immediately adjacent to the raised part of BA3, which would serve to soften both the development at the application site and the adjacent approval. The visual cumulative effects have therefore been assessed as being negligible adverse.

- 4.16.162 Therefore, it is acknowledged that the level of change would be substantial. Any landscape buffers or building setbacks to be provided within the site would assist in softening the development and could add to its attractiveness (features that would be controlled through any future reserved matters process).
- 4.16.163 There would be relief from built form through the expansive area of open space that would be provided to the north. It is noted that due to the change in land use, the character of the northern part of the site (Bygrave Common) would also result in change, with accessibility increased and the installation of permanent features.
- 4.16.164 To a greater extent, the open space within the easternmost portion (Eastern Park) would be defined by more formal play through the provision of pitches and associated buildings and parking.
- 4.16.165 Undoubtedly, the visual impact of the development within the northern part of the site and beyond would result in change to a significant degree. However, this should be expected that a residential allocation of the scale on an open site.
- 4.16.166 *Landscape and Visual Impact Appraisal and Conclusion*
- 4.16.167 Comments received that green spaces will not be comparable to the natural beauty of the countryside were not specific to a particular part of the development. It must be noted that where proposals are for buildings they are contained largely within the settlement boundary as established through the Local Plan site allocations. It is therefore inevitable that there will be a significant level of change in land use, built form and vegetation and in turn, the character of such areas will be permanently altered when compared with their baseline conditions described above. This has been confirmed by the Planscape review of the proposals.
- 4.16.168 The proposals would facilitate a significant amount of landscaping, which would be multi-functional and particularly for landscape considerations, would assist in softening the development and ensuring that there would not be a hard edge of built form relative to the open countryside beyond, particularly to the north and east of the site, where it is clear that views across parts of the site can be obtained.
- 4.16.169 Additionally, it is important to note that no significant countryside views would be compromised. From many public vantage points, the proposed development would be seen either as built form appearing closer or would appear against the backdrop of the existing built up area of Baldock town. Elevated viewpoints within the site including the ridges within the northern part of BA3 and the intersection of the ridgeline and public bridleway Bygrave 002 within BA1 would both maintain views towards open countryside.
- 4.16.170 Mitigation to address impacts to existing strategic green infrastructure is not required, noting that the proposal incorporates substantial landscape and open space benefits to mitigate against harm in terms of the visual impact of the development. As such, the proposal would not conflict with the aims of Policy NE1(d) of the Local Plan.
- 4.16.171 In terms of landscape character, the application submission has demonstrated how the proposal would meet the relevant guidelines for built development and landscape management within LCA224 (North Baldock Chalk Uplands). It is acknowledged that LCA224 is a sensitive landscape, where major development and urban extensions are not supported under the North Hertfordshire Landscape Character Study (2011). However, as alluded to within Planscape comments, the

proposals would be located on sites allocated for residential and employment development under Policies SP14, BA2, BA3 and BA10 of the Local Plan, where it should be expected that a noticeable level of change would occur. It follows that the proposal would not conflict with Policy NE2(a) of the Local Plan, which requires development to respect the sensitivities of the relevant landscape character and have regard to the guidelines identified.

- 4.16.172 The attributed moderate adverse effect to the development, at worst, in both landscape and visual impact terms, does not translate to a significant effect and as such, would not cause unacceptable harm to the character and appearance of the surrounding area or LCA224, including proposed mitigation. Consequently, there would be no conflict with Policy NE2(b) of the Local Plan.
- 4.16.173 The retention, protection and long-term management and maintenance of existing and proposed landscaping, sought under Policy NE2(d) of the Local Plan, shall be dealt with as part of the stewardship arrangements, details of which shall be secured by planning obligation in the event permission is granted.
- 4.16.174 Taking into account the submissions, consultee comments and policy assessment above, the effects of the development in terms of landscape and visual considerations shall be given moderate adverse weight, in alignment with Planscape comments and also without disputing the Environmental Statement, which recognises the effects as not being significant in Environmental Impact Assessment terms. To secure the required mitigation as recommended by Planscape, it is considered reasonable and necessary that details relating to landscaping, planting, tree retention and levels are reserved by condition and to accord with the aims of Policies SP14(b) and (l), BA2, BA3 and BA10 of the Local Plan.

4.17 **Impact on Heritage Assets**

- 4.17.1 North Herts Local Plan policy position on heritage assets is laid out within Policies HE1 and HE4 as relevant to the proposal being considered (note - no non-designated heritage assets or their settings as material to their significance are impacted).
- 4.17.2 Policy HE1 requires the submission of a Heritage Assessment/Justification Statement for proposals that relate to designated heritage assets or their settings. Planning permission for development proposals affecting Designated Heritage Assets or their setting will be granted where they enable the heritage asset to be used in a manner that secures its conservation and preserves its significance; incorporate a palette of materials that make a positive contribution to local character or distinctiveness, where it is appropriate and justified; and will lead to less than substantial harm to the significance of the designated heritage asset, and this harm is outweighed by the public benefits of the development (as applicable).
- 4.17.3 Policy HE4 relates to subterranean heritage assets (archaeology). The policy requires the submission of appropriate desk or field-based evaluations, any archaeological remains are preserved in situ and incorporated into the layout where preferable, where loss is justified, conditions are applied that record, report, publicise and archive the results of archaeological work is undertaken prior to damage or loss.

- 4.17.4 For the same reasons as given above as to the application of Local Plan policy HE3, policy G6 of the Neighbourhood Plan is not applicable, as the non-designated heritage assets are not within a reasonable zone of influence of the development.
- 4.17.5 Policy E5 is pertinent to the heritage assessment in-so-far as it refers to the historic importance of Bygrave Road/Ashwell Road.
- 4.17.6 Policy G2 of the Neighbourhood Plan requires proposals to improve the visual or recreational value of what is referenced as the 'green lung' (comprised of the Scheduled Monument and Urban Open Land for the purposes of this Strategic Green Space policy), maintain the open character of the land, take opportunities for improved public access and the conservation and interpretation of the scheduled monument. Furthermore, policy G2 requires that any proposals affecting Walls Field and its setting should also conserve, and where possible enhance, its value as a scheduled monument.
- 4.17.7 Policies HE4, HE5 and HE6 of the NPPF are pertinent to the development in respect the impact on heritage assets.
- 4.17.8 Policy HE4 sets out the significance of heritage assets, and sets out aims to maintain the assets taking into account the positive contribution they can make to sustainable communities including local economies, and the positive contribution they can make to local character and distinctiveness and avoid, or minimise, harm, with any harm requiring clear and convincing justification in accordance with the policies in the historic environment chapter of the NPPF.
- 4.17.9 The NPPF goes on in paragraph HE5 to set out the details that should support an application which affects designated heritage assets, which will include an assessment of the assets' significance and the potential effects of the development on that significance, and should identify whether the development would enhance, preserve, harm, or result in total loss of significance. In addition, policy HE5 sets out supporting documents required for subterranean heritage assets, reflecting Local Plan Policy HE4.
- 4.17.10 Substantial weight should be given to heritage assets conservation in accordance with policy HE6. Development that has a positive effect should be supported. Conservation should also be supported. Harm to a heritage asset should be weighed against the public benefits, and where substantial harm or total loss of significance is identified, substantial public benefits must outweigh the harm, or a closed list of four criteria are satisfied.
- 4.17.11 HE9 has regard to development proposals within or affecting the significance of conservation areas. Developments should retain and conserve features which make a positive contribution to the character or appearance of the conservation area where possible; and consider the area's special architectural or historic interest (as identified as part of the designation of the conservation area) in the design of development. Proposals which preserve the conservation area should be supported.
- 4.17.12 In accordance with section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended), in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of

preserving the building or its setting or any features of special architectural or historic interest which it possesses.

- 4.17.13 The Baldock Strategic Masterplan (BSM) sets out that an Archaeological and Heritage Management Plan will be submitted with future planning application(s) with information informing a range of mitigation measures. The masterplan also identified five key views within a heritage trail, Heritage Park, and a reinterpretation of Winterbourne Way (a historic paleo channel) with SUDs and opens space features alongside a public transport corridor. In respect the Scheduled Monument, the masterplan sets out the retention of open character through use as meadow grassland, managed for biodiversity, amenity and heritage purposes followings its removal from arable agricultural use.
- 4.17.14 Documents to be considered and subject to being secured as a part of this permission that are pertinent to heritage are:
- UAC092-002 Rev R – Parameter Plan;
 - Development Specification;
 - Historic Environment Management Plan;
 - Archaeological Written Scheme of Investigation.
- 4.17.15 The Parameter Plan sets out areas of land to be used as strategic open space, which assists the appraisal of the impact of the development on heritage assets and their settings.
- 4.17.16 The Development Specification restricts built development on land within the Walls Field Scheduled Monument limiting development to interpretation boards, landscaping, planting and/or soft works. In addition, the Development Specification sets out that Walls Field will be taken out of agricultural use and provided as informal open space with ecological enhancements, and that Eastern Park will be used as formal and informal open space. The retention of historic footpath on northern edge of BA1 called Millers Way is also set within the Development Specification, alongside the provision of a heritage trail, a circular footpath around the development that connects and shares information about the site and Baldock's history. In addition no built development (with the exception of the provision of sports pitches and ancillary facilities, productive landscapes, footways/cycleways, sports pavilion and local road access/parking) will be located within land west of North Road, which is closeby to the Scheduled Monument Settlement site South of Blackhorse Farm.
- 4.17.17 Part 7 of the Built Form and Place Identity site wide principles within the Development Specification sets out that the development will protect and enhance strategic views, including and in particular to St Mary's Church. Part 5 of the Green Infrastructure site wide principles is also pertinent in that it aims to embed the heritage of the site in landscape and green infrastructure through provision of a heritage trail through Bygrave Common, vantage points within strategic green spaces providing views to Baldock and across the surrounding landscape, and reinterpretation of the historic winterbourne channel. These principles are expanded upon within the Development Specification and other supporting documents.

- 4.17.18 Reserved matters applications will set out and determine access, appearance, layout, landscaping and scale, all of which will be material to the impact on of the development on the historic environment. The tests of identifying and mitigating harm to heritage assets will be material considerations in later reserved matters applications, but not in-so-far as they relate to the principle of the acceptability of the development.
- 4.17.19 The application of the Local Plan in the context of the form of application and details submitted, is that the Local Planning Authority should be satisfied that the site can be designed in a way which enhances, preserves, or appropriately balances harm to heritage assets against public benefits.
- 4.17.20 *Built Heritage*
- 4.17.21 The site, as it exists, contains a Scheduled Monument (Romano-British small town and Late Iron Age settlement at Baldock (Walls Field)). There are also scheduled monuments, listed buildings, and a Conservation Area within a reasonable zone of influence of the development in terms of built heritage.
- 4.17.22 The submitted Heritage Impact Assessment identifies Baldock Conservation Area; two Scheduled Monuments (The Romano-British small town and Late Iron Age settlement at Baldock off Clothall Road and the Settlement site south of Blackhorse Farm; four Grade II listed dwellings along North Road (The Nook, Long Bailey, Blackhorse farmhouse and The Compasses); and, one Grade I Church of St Mary as being potentially susceptible to impacts pursuant to the development.
- 4.17.23 In respect to current contributions, the HIA sets out that the site, that forms part of the open landscape setting which physically surrounds the settlement of Baldock, is not appreciable from within the Conservation Area, and nor is the character and appearance of the Conservation Area (with the exception of the Church of St Mary, appreciable from the site).
- 4.17.24 The applicant sets out that the Scheduled Monuments are not visibly tangible historic features, and are currently experienced as areas of open greenspace on the edge of Baldock. The assets' significance is expressed as their archaeological value, and their settings are currently the surrounding settlement of Baldock.
- 4.17.25 The Listed Buildings outside of the Conservation Area are identified as The Nook, Long Bailey, Blackhorse Farmhouse and The Compasses, all located on North Road and all Grade II. The HIA suggests their significance stems from their architectural and historic interest.
- 4.17.26 The HIA continues to set out the appearance of these buildings, and that their settings are currently rural/agricultural and roadside. Importantly, the supporting document sets out that Blackhorse Farmhouse possesses no historic link to the land within the site subject to this application, and views from its location across North Road are limited by the substantial hedgerow on the eastern side of the road.
- 4.17.27 The applications supporting documents identify that the 19th century spire is visible from a number of vantage points both within the settlement and beyond it, although views outward from the church are entirely prohibited by the immediate surrounding built form of the town, and that the setting of The Church of St Mary is characterised by its town centre location, and by the prominence of its spire throughout the settlement. The application, in its HIA, acknowledge that the spire

remains a visible feature within the town in views back towards Baldock, although pylons compete with the spire and exceed its height in these long-range views. The appraisal concludes that the site is a component of the rural surrounds of the town, but that the proposals will not alter the context from which the church is appreciated.

- 4.17.28 The applicants' position, in respect the impact of the development on the Conservation Area, is that there is a sufficient buffer of existing built form surrounding it that separates the application site visually and experientially, thus resulting in no harm to the significance of the asset.
- 4.17.29 In regard the scheduled monument, the embedded mitigation of sufficient green space within the parameters set out would result in a change in character of the assets wider settings, without any harm.
- 4.17.30 The HIA sets out that none of the Listed Buildings along North Road are considered to be particularly susceptible to the level of change posed, and that the mitigation included within the Strategic Masterplan (reflected in the parameter plan and development specification subject to this appraisal) would mitigate potential effects.
- 4.17.31 Turning to The Church of St Mary, the impact assessment submitted with the application sets out the potential for some improvement of views towards the church spire from within the site. The assessment adds that the increased levels of built form surrounding the existing settlement is not considered to have any detrimental effect on the setting of the church.
- 4.17.32 *Archaeology*
- 4.17.33 The submitted Environmental Statement with regard to Archaeology is informed by a desk-based assessment, a geophysical survey and archaeological trenching across and covering 3% of the site.
- 4.17.34 The baseline conditions set out in the applicants' submissions are that Walls Field is on the heritage at risk register due to plough damage. The current condition of the Blackhorse Farm Scheduled monument is not relevant given the impact of the development would be limited to setting.
- 4.17.35 At the time of submission of the application, and contained within the October 2025 Environmental Statement Chapter 9, 12 areas of the site contained areas of archaeological interest of local significance. This position has been refined in the Written Scheme of Investigation (February 2026) to eight areas of archaeological mitigation.
- 4.17.36 In regards to settings, Chapter 9 of the Environmental Statement (October 2025) describes the current condition and surroundings of the Settlement site south of Blackhorse Farm scheduled monument and concludes that the setting makes a negligible contribution to the significance of the asset. In regard Walls Field (Romano-British small town and Late Iron Age settlement at Baldock scheduled monument) the ES states that the agricultural land to the east is separated from the scheduled monument by the existing Garden Centre, and detracted from by the continuation of Clothall Road. There is a connection to other Romano-British remains (Radwell Villa) which is approximately 2km to the north through the continuation of Ermine Street between the two. The ES concludes the setting of Walls Field makes a low beneficial contribution to the significance of the asset.

- 4.17.37 Within the site, and setting aside Walls Field as a designated scheduled monument, the areas of archaeological interest are considered of local, low significance, albeit with a high potential to be encountered during construction.
- 4.17.38 Subject to mitigation, including construction management plans, archaeological excavation and recording in the areas of archaeological interest identified in the WSI, the change of use of land away from agricultural cultivation and the use of trees and hedgerows as buffers to development, the development would have a negligible impact in terms of loss of archaeological remains, the setting of the scheduled monuments, and a moderate beneficial effect by removing an existing use threatening the condition and longevity of Walls Field, according to the ES.
- 4.17.39 *Appraisal*
- 4.17.40 North Hertfordshire Conservation Team responded to consultation generally agreeing with the approach and conclusions of the submission documents in-so-far as they relate to the contribution of the site to the setting of built form heritage assets, and the impacts therein. The Conservation Officer does raise concerns regarding the impact of the development on approaches to Baldock within which the Conservation Area is appreciated. Overall, the Conservation Officer finds the development unobjectionable.
- 4.17.41 Historic England first responded recommending that the Historic Environment Management Plan (HEMP) be provided for comment. This recommendation was overcome following the first regulation 25 set of submissions including a HEMP and Outline Archaeological Written Scheme of Investigation. Historic England's response resulted in the withdrawal of previous concerns raised as a result of the new HEMP being provided for comment.
- 4.17.42 Hertfordshire County Council Historic Environment team responded to the first consultation on the application setting out that they are not likely to object on archaeological grounds and will be recommending archaeological conditions. Subsequent re-consultations solicited responses providing no comments on the new information.
- 4.17.43 The Development Specification will be secured by condition, and thereby inform later submissions evolving the design and implementation of the development subject to this application. The Development Specification secures mitigation in respect to the considerations required to take opportunities to enhance and preserve the contribution of the site to the built historic environment. The HEMP and Written Scheme of Investigation are also to be conditioned and secure mitigation against potential effects on the historic environment.
- 4.17.44 The North Hertfordshire Conservation Officers comments regarding the wider setting of Baldock being altered as a result of the development, alongside the enlargement of the settlement and potential effect on the significance of Baldock Conservation Area are noted. Change does not equate harm. It is accepted that the proposal will enlarge the settlement within which Baldock Conservation Area is sited, and alter approaches to the settlement, as well as how the settlement is navigated and functions to some degree.
- 4.17.45 Views and appreciation of the Conservation Area from these approaches and from the development site itself are limited, as are views out of the Conservation Area to the proposed development. It is not considered that the development within the confines of the approved parameter plan would alter approaches and experience

of the approach to Baldock Conservation Area to the extent where the effect would be harmful. In the round, I consider the effect of the proposed development on the setting of Baldock Conservation Area and the listed buildings within that Conservation Area (with the exception of The Church of St Mary (considered separately)) to be neutral.

- 4.17.46 Long Bailey and The Nook Cottage are located approximately 250m north of the northwest extent of the development site, on the junction of Norton Mill Lane and Great North Road (A507). It is not considered that the site has a positive contribution to the setting of these listed buildings, and thereby the development would have no impact.
- 4.17.47 Blackhorse Farmhouse is located on the west side of North Road (A507) opposite the northwest extent of the site subject to this application. Blackhorse Farmhouse has no historic association with the agricultural use of the site itself. The listed building is enclosed within an established courtyard context, and the A507 provides a sense of separation from the application site. The development would provide embedded mitigation against potential impact on the setting of Blackhorse Farmhouse through the strategic green space use proposed on the opposing side of North Road (A507). There is scope within later reserved matters to retain and enhance existing plant screening on the east side of North Road. No harm would therefore occur to the contribution of the setting of Blackhorse Farmhouse.
- 4.17.48 The Compasses is the closest listed building to the development site, sited directly opposite North Road. It is not considered that this former public house draws significant positive contribution to its significance from the function or openness of the current circumstances of the development site. In combination with mitigation in the form of scope to retain and enhance existing mature hedging/screening on the east side of North Road, the development would preserve the negligible contribution of the setting of The Compasses to its significance.
- 4.17.49 The Church of St Mary is grade I listed, sited to the southwest of BA1. There are some views towards the spire of The Church of St Mary's from the high topographical ridge running east to west towards the north of the BA1 part of the site. These views and experience of the heritage asset are currently experienced from private land. Design Principles in Development Specification (Built Form and Place Identity Principle 7 and Bygrave Common Principle 1) secure strategic views from the development to St Mary's, which pursuant to the development will be public. There are no views out from The Church of St Mary's towards the site due to its current built surroundings. The development would not harm the significance of The Church of St Mary's, nor harm any significance drawn from its setting.
- 4.17.50 The subterranean remains of the Settlement site South of Blackhorse Farm currently draws its significance from evidential and archaeological value. The value of the site is known, and likelihood for change in its significance through experience is low. The area is bordered from the development site by North Road, with trees and hedging along the boundary with the street. To the west of the scheduled monument is the A1(M).
- 4.17.51 The contribution of the setting of the Schedule Monument, Settlement site South of Blackhorse Farm, to its significance is negligible, and background traffic noise is already part of the audible experience of the asset. It is agreed that mitigation through Construction Management Plans will reduce the potential adverse impact during construction stage to negligible. There will be a change to the setting of the scheduled monument in the form of a junction for bus access onto BA1 on the

opposing side of North Road, as well as a short term increase in traffic in the vicinity as a result of vehicular access proposals and phasing of development of BA1. Post completion, it is considered that vehicular movements along North Road will be reduced from the existing baseline. In the round, it is considered that the development will have a limited adverse effect on the experience and setting of the scheduled monument as a heritage asset.

- 4.17.52 Romano-British small town and Late Iron Age settlement of Baldock (known and referred to as Walls Field) will be taken out of intensive agricultural cultivation use in favour of a less disruptive strategic green space use, alongside the provision of interpretation boards giving information as to the scheduled monuments significance. It is considered that this embedded mitigation will provide a moderate beneficial effect on the significance of Walls Field. The ancillary built form associated with the proposed sports pitch use of the urban open land to the southeast of Walls Field, the built form on BA3, and the increased traffic on surrounding roads and pursuant auditory disturbance to the experience of the asset will have some limited negative impact on the setting of this scheduled monument. It is not considered that these negative effects on setting would outweigh the moderate positive effects of the change of use of Walls Field.
- 4.17.53 Subject to adherence to the written scheme of investigation and mitigation contained therein, alongside the Historic Environment Management Plan, the development would have a neutral impact on non-designated assets of archaeological value.
- 4.17.54 In the round, balancing the limited harm to the setting of scheduled monuments (both Walls Field and Settlement South of Blackhorse Farm) against the moderate benefits of the retained open public use of Walls Field and removal of current arable agricultural use, against the neutral effects on other heritage assets, the development would have a limited beneficial effect on the Historic Environment.

4.18 **Ecology**

- 4.18.1 Policy SP12 aims to protect and enhance the natural environment alongside accommodating significant growth over the plan period. It seeks to identify, protect, manage and enhance a strategic multi-functional network of green infrastructure, designated sites and biodiversity networks including wildlife corridors, ancient woodlands and hedgerows, wetland and riverine habitats, protected species, priority species and habitats and non-designated sites of ecological value. Measurable net gains for biodiversity should also be secured as part of development proposals.
- 4.18.2 Policy NE4 requires the appropriate protection, enhancement and management of biodiversity in accordance with the hierarchy and status of designations and features within Policy SP12. It outlines that all developments should deliver measurable net gains for biodiversity and geodiversity, contribute to ecological networks and the water environment and / or restore degraded or isolated habitats where possible.
- 4.18.3 This policy goes on to state that developments should demonstrate that adverse effects can be avoided and / or satisfactorily minimised; include appropriate measures to manage construction impacts and integrate buffers of complimentary habitat for designated sites and other connective features. Long-term management and monitoring should also be secured.

- 4.18.4 Specific to BA1, Local Plan Policy SP14(k) requires appropriate mitigation, compensation and / or enhancement of key features of biodiversity as informed by detailed assessments including:
- i. Ivel Springs Local Nature Reserve;
 - ii. Bygrave Road local wildlife site;
 - iii. Identified protected species and priority habitats.
- 4.18.5 National policy relating to ecology matters is set out under Section 19 of the NPPF, which seeks to drive nature's recovery and ensure development contributes to wider environmental outcomes, safeguarding important habitats, species and landscapes and recognises the centrality of natural capital to delivering sustainable growth.
- 4.18.6 Policy N2 of the NPPF promotes development that contributes positively to the natural environment by identifying opportunities for conserving or enhancing features which make up the natural environment; connect and strengthen ecological networks that extend beyond a site; integrating development into its surroundings, including incorporating established trees, hedgerows and other natural features of visual, historic or nature conservation value; use green infrastructure as part of any scheme and nature-based solutions to secure multiple benefits; minimising adverse impacts on biodiversity and support priority or threatened species and to ensure nature-supporting features, mitigation and management is secured for the long term and minimises risk of future failure.
- 4.18.7 Further, Policy N3 of the NPPF recognises the benefits of trees in terms of providing for biodiversity, climate change mitigation and adaptation and the character and quality of the built environment.
- 4.18.8 Protected Landscapes are covered under Policy N4 of the NPPF, where the definition under Annex B is relevant. Protected Landscapes refers to National Parks, the Norfolk and Suffolk Broads and National Landscapes in England. The policy sets out that development proposals in these areas should be limited in scale and extent and sensitively designed to avoid harm to the statutory purposes and special qualities of that Protected Landscape. None of the various parts that comprise the application site fall within designated Protected Landscapes.
- 4.18.9 Of relevance is Policy N6 of the NPPF, which supports the conservation of important habitats, species and sites of geodiversity value. It includes an assessment dependent on the impact of development on sites of international, national and local significance. Within this, paragraph 1(c) notes that a site of local importance, which for the purpose of this policy is one designated as a Local Nature Reserve or identified as a local wildlife site, local geological site or equivalent in the development plan, should only be supported if there would not be a significant adverse impact on the integrity of the site or the benefits of the development in the location proposed clearly outweigh the likely impact on the features which make the site valuable for nature conservation.
- 4.18.10 Paragraph 2 of this policy outlines that regardless of the site's designation, development proposals which would entail the loss or deterioration of irreplaceable habitats should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.

- 4.18.11 Policy G2 of the Baldock, Bygrave and Clothall Neighbourhood Plan relates to strategic green space, seeking to conserve the important 'green lung' and its associated open character which largely comprises Walls Field and the area of Urban Open Land which fall within the application site. The neighbourhood policy continues by promoting proposals that would improve the visual or recreational value of this land.
- 4.18.12 Policy E5 of the Neighbourhood Plan relates to development north of the railway, requiring appropriate planting at periphery areas, maintain habitat value as much as possible and retain and incorporate existing landscape and historical features including trees and hedgerows. Policy E6 relates to Royston Road and requires the submission of a landscape strategy for allocation BA10. Further, Policy E7 of the Local Plan is relevant to allocations BA2 and BA3 and seeks the incorporation of a landscape buffer to the A505 Baldock Bypass, planting and an enhanced green corridor and a strong green margin to the existing Hillside Park mobile home site.
- 4.18.13 The Strategic Masterplan includes the following principles with regards to ecology:
- Enhancement of Bygrave Road Local Wildlife Site;
 - Integrating habitats and corridors, trees and hedgerows into the green infrastructure network;
 - Creation of network of connected wildlife corridors and green spaces;
 - Connections to and buffering of Local Nature Reserves;
 - Mitigation of impacts on ecology through provision of new habitats;
 - Native and climate resilient planting; and
 - Additional green spaces to reduce recreational pressure elsewhere.
- 4.18.14 Where relevant, the key principles for green infrastructure embedded within the adopted Strategic Masterplan include the prioritisation of nature-rich places.
- 4.18.15 With regards to ecology matters, the application has been supported by the following documentation:
- Environmental Statement Chapter 11 Ecology (David Lock Associates, 2025);
 - Environmental Statement Chapter 11 Ecology Addendum (David Lock Associates, February 2026);
 - Environmental Statement Chapter 11 Ecology Addendum (David Lock Associates, May 2026);
 - Preliminary Ecological Appraisal (BMD, 2025);
 - Phase 2 Ecological Assessment (BMD, 2023);
 - Ecology Headlines Technical Note (BMD, 2025);

- Nocturnal Bat Survey Report (BMD, 2025);
 - Verification of Habitat Condition and Botanical Interest (BMD, 2023);
 - Corn Bunting Mitigation Sites Assessment (BMD, 2023);
 - Corn Bunting On-Site Mitigation Strategy and Management Plan (BMD, 2026);
 - Corn Bunting Off-Site Compensation Strategy and Management Plan (BMD, 2026);
 - Ecological Mitigation Plan (BMD, 2024);
 - Further Ecological Assessment (BMD, 2025);
 - Ecological Mitigation Plan (BMD, 2026);
 - BNG Assessment Technical Note (BMD, 2025);
 - Sustainability and Energy Statement (Turley Sustainability & ESG, 2025).
- 4.18.16 Chapter 11 of the submitted Environmental Statement acknowledges that the various options for development of BA3 and their differences in scale, layout and land-take will not have identical impacts with regards to the extent of habitat loss and fragmentation, the degree of pressure on retained habitats and green infrastructure and the level of disturbance to protected species. The Environmental Statement continues to set out that the submitted ecological assessment has been undertaken at a strategic level, applying a precautionary approach to ensure that a reasonable worst-case scenario is captured and assumes that the maximum potential footprint of development would be brought forward under each option.
- 4.18.17 *Statutory Designated Sites*
- 4.18.18 The Environmental Statement Ecology Chapter notes that there are no statutory designated sites within the site boundary. A 5km study area included several statutory sites, which were reviewed for ecological sensitivities, including with regards to air quality.
- 4.18.19 Directly west of the site, proximate to BA1 and land east of North Road is Ivel Springs Local Nature Reserve, comprising a mix of wetlands, species-rich grassland, woodland and riverine features. It contributes to Baldock's green infrastructure network and is accessible through a network of public rights of way. It is sensitive with regards to surface water; drainage is to be dealt with in a separate section of this report. The Environmental Statement confirms there are no direct habitat linkages with the site due to the intervening road. Ivel Springs has been reported as being of district-level importance.
- 4.18.20 The construction phase of the development would have the potential to generate dust, sediment runoff or surface water contamination that would affect the habitats within the Ivel Springs Local Nature Reserve, if unmanaged. Disturbance from noise, lighting or accidental encroachment is also identified as a risk factor.

- 4.18.21 These have been addressed through the submitted Construction Environment Management Plan and ensure appropriate site drainage, sediment management and pollution prevention in order to avoid hydrological effects. Lighting would be controlled through the use of shields and orientation and to be used under restrictive hours. Additionally, protective fencing would address any accidental overspill of storage and materials. The Environmental Statement has assessed the construction phase impacts as being negligible.
- 4.18.22 Post-construction, the proposal involves runoff to be maintained at greenfield rates and there would be no increase in volume or changes to the groundwater regime. The Environmental Statement reports that the proposed SuDS features on site would deliver a net improvement in water quality. Further, Affinity Water has confirmed that water would be supplied from Grantham Water, outside of the Ivel catchment, which would not require abstraction from the River Ivel chalk stream.
- 4.18.23 The recreational impact would be addressed through the provision of the extensive green infrastructure network and retention of public rights of way, particularly Bygrave Common within BA1. Boundary planting and fencing would serve to direct recreational routes away from sensitive habitats within the Local Nature Reserve. Based on these measures, the development has been assessed as being minor beneficial with regards to habitat quality and connectivity and hydrological protection.
- 4.18.24 No objections have been received with regards to the construction management strategy with respect to the impact on Ivel Springs Local Nature Reserve. The objection initially raised by Hertfordshire Middlesex Wildlife Trust had subsequently been withdrawn⁴⁷.
- 4.18.25 To the south of the site, adjacent to BA2 lies Weston Hills Local Nature Reserve, which rises northward from the site, consisting of chalk grassland and woodland habitats. It is susceptible to change through increased traffic on roads within a 200m distance arising from the proposed development. Functionally, the site and the local nature reserve are linked only by a narrow, vegetated corridor connecting to an arable compartment with localised areas of chalk grassland. While this provides limited ecological linkage, it does not form a continuous or high-quality corridor. It is also of district-level importance.
- 4.18.26 Similarly, mitigation measures within the Construction Environmental Management Plan incorporate dust-suppression practices and the use of low-emission construction plant so that emissions remain within acceptable limits. The construction-phase impacts on Weston Hills Local Nature Reserve is also considered to be neutral, as reported within the Environmental Statement. No concerns have been raised with regards to the impacts of construction on Weston Hills Local Nature Reserve. The additional information focused on potential indirect effects at the shared boundary (such as disturbance, lighting, dust and edge effects). These have been addressed through the mitigation strategy embedded within the Environmental Statement, which includes:
- Retention and buffering of the southern boundary habitat adjoining the Weston Hills Local Nature Reserve;

⁴⁷ HMWT objection withdrawn with respect to concerns relating to Ivel Springs Local Nature Reserve in comments dated 15 April 2026, following initial comments dated 20 November 2025.

- Delivery of new native woodland and chalk grassland planting to strengthen ecological continuity and provide a transition between development and the local nature reserve;
 - Implementation of a Construction Environmental Management Plan to manage lighting, dust, noise and pollution during construction; and
 - Ongoing habitat management and enhancement.
- 4.18.27 It should be noted that these measures would further objectives within Policies NE4 of the Local Plan as well as Policy E7 of the Neighbourhood Plan.
- 4.18.28 Therfield Heath SSSI lies 10km to the north-east of the site. Due to topography and intervening existing land uses, there are no direct habitat or hydrological pathways between the site and this SSSI. It therefore falls outside of the recognised screening distance with regards to ecology. However, it has been considered within the air quality submission forming part of the application. During both the construction and post-construction phases of the development, the Environmental Statement notes that the impact would be negligible.
- 4.18.29 Knebworth SSSI is sited 10km to the south of the site. As a result of its distance from the site, it has also been screened out with regards to ecology. However, it has been also considered within the air quality assessment submitted in support of the application. The Environmental Statement notes that the proposed development would make only a very small incremental contribution to traffic-based ammonia emissions when considered in relation to Knebworth Woods. The effect of the development has therefore been assessed as being negligible with respect to Knebworth SSSI.
- 4.18.30 Concerns were initially raised from North Hertfordshire Ecology with respect to the recreational pressure that the development, particularly BA2, would have on the Weston Hills Local Nature Reserve as the nearest public area of open space that could be reached from this part of the site without crossing a road. This was subsequently addressed in the February 2026 submission comprising further information⁴⁸, recognising that there would be an increase in recreational use of the Weston Hills Local Nature Reserve.
- 4.18.31 The Environmental Statement Addendum (February 2026) noted that the proposed development would mitigate against the impact to Weston Hills Local Nature Reserve through the provision of a significant amount of green infrastructure on the site, totalling approximately 107.43 hectares of open space. As noted above, the proposals would include multi-functional green space, including parks and gardens, natural and semi-natural green space, amenity space, outdoor sports provision and children's play areas that would be distributed across the site. This would ensure reduced reliance on existing adjacent designated sites. The Environmental Statement reported the effect as being minor beneficial.
- 4.18.32 The provision of green infrastructure described above, also noting the availability of alternative areas for recreation proximate to BA2 provided by the development

⁴⁸ Under Regulation 25 of the Environmental Impact Assessment Regulations 2017, an Environmental Statement Addendum to Chapter 11: Ecology was prepared and submitted.

and to be delivered alongside BA2 would be a satisfactory mitigation measure from North Hertfordshire Ecology.

- 4.18.33 Specifically, in the event planning permission is granted, it would be subject to a condition requiring the strategic area of open space of Walls Field to be delivered alongside the residential component at BA2 (at the point of 200 dwelling occupations) in accordance with neighbourhood plan Policy G2. The Environmental Statement Addendum outlines that the effect on the Weston Hills Local Nature Reserve would be minor adverse, which has not been disputed within the most recent comments from North Hertfordshire Ecology.
- 4.18.34 Habitat connectivity enhancements to include planting and hedgerow reinforcement between BA2 and Weston Hills Local Nature Reserve to mitigate against the impact of the development shall also be secured by planning obligation, requiring parcel-level submission of a Habitat Monitoring and Management Plan in accordance with Policy NE4 of the Local Plan.
- 4.18.35 Relevant consultees including North Hertfordshire Ecology and Natural England have not raised concerns with respect to the impact on the remaining statutory designated sites mentioned above.
- 4.18.36 Air quality impacts are to be covered in a separate section of this report.
- 4.18.37 *Non-statutory Designated Sites*
- 4.18.38 There are ten non-statutory designated sites of nature importance within 1km of the application site. One of these is the Bygrave Road Verge Local Wildlife Site, within the centre of Bygrave Road within parcel BA1. It is considered as being of local importance.
- 4.18.39 Within the site lies Bygrave Road Verge Local Wildlife Site, comprising a mosaic of ruderal and grassland habitats, representing mixed botanical value as well as a linear corridor for invertebrates, birds and small mammals. It would not be developed as part of the proposals, as confirmed within the Design and Access Statement and the latest submitted Development Specification. The Environmental Statement reports temporary disturbance to the Local Wildlife Site through trampling, dust deposition or localised soil compaction, which could reduce habitat quality if unmanaged.
- 4.18.40 It is proposed to install protective fencing to exclude vehicles and machinery from the Local Wildlife Site during the construction stages of the development. Dust suppression measures including covering open storage and treatment of haul routes within the site would be secured through the construction management process. The Environmental Statement notes that any disturbed margins shall be reinstated with wildflower-rich seed mixes together with native hedgerow or scrub planting to reinforce its linear structure. Taking the above into account, the construction-phase effects were reported to be negligible.
- 4.18.41 The strategy to improve and buffer the Bygrave Road Local Wildlife Site and incorporate it within a wider network of greenspace corridors linking to existing semi-natural habitats has been assessed as having a minor beneficial effect. This would accord with the principles for the Bygrave Road Local Wildlife Site as stipulated within the Strategic Masterplan, Policy E5 of the Neighbourhood Plan and Policy NE4 of the Local Plan.

- 4.18.42 Also considered within the Environmental Statement were Ashwell Common and Quarry Springs Local Wildlife Site, over 1km from the site, beyond existing farmland. There are no direct migratory, habitat or hydrological connections and therefore this has been screened out of ecological assessments.
- 4.18.43 Additionally, Wallington Road Verge Local Wildlife Site is located 1km from the site and is of County importance. As it is considered to be ecologically isolated from the site owing to its distance, it has been screened out of further assessments with regards to ecology.
- 4.18.44 North Hertfordshire Ecology, Hertfordshire Middlesex Wildlife Trust and Natural England in their latest comments have not raised concerns with regards to the impact of the development on the above-listed non-statutory designated sites that lie outside of the site's boundaries.
- 4.18.45 *Existing Habitats and Ecological Features*
- 4.18.46 The Preliminary Ecological Appraisal⁴⁹ accompanying the application confirms that the site does not lie within the impact risk zone of any statutory designated sites of nature conservation.
- 4.18.47 BA1 contains the Bygrave Road Local Wildlife Site, where Policy SP12 requires a 12m protection buffer. This has been set out in the revised Development Specification and would form part of any design code to be reserved by condition in the event planning permission is granted.
- 4.18.48 Arable fields, which dominate the application site, provide suitable habitat for farmland birds and other priority species but lack floral diversity due to their management. Additionally, they support foraging for birds and mammals. However, the Environmental Statement reports that they are functionally poor for biodiversity and similar fields adjoin the site to the north and east. As a result, these are of site-level importance.
- 4.18.49 Amenity grassland and improved grassland areas within the site are recognised as common habitats both locally and nationally. Whilst they can support common native and non-native species, they are of limited value to fauna due to low botanical species diversity and are easily restored or recreated.
- 4.18.50 Areas of scattered trees were identified as common habitats, some of which were reported to be in good condition owing to their maturity and important ecological niches. They are considered of local value.
- 4.18.51 Of the 13 different habitat groups that were identified as part of the Preliminary Ecological Appraisal, only one – hedgerows – meets the UK Priority / Biodiversity Action Plan habitat criteria.
- 4.18.52 All existing hedgerows (30 in total) qualify as UK Priority Habitat under the Natural Environment and Rural Communities Act 2006. One of the hedgerows, part of which extends along a short section of Bygrave Road, has been confirmed to be an important hedgerow under the Hedgerow Regulations 1997 as it supports nine species, an associated public right of way and trees. In total, eight hedgerows on the site were assessed as being species rich. The hedgerows were described as

⁴⁹ Preliminary Ecological Assessment, prepared by BMD, dated August 2025 (reference BMD.21.0045.RPE/P1.801.A.-.Ecology)

being of poor to good condition and important within a local geographical context. Regardless, hedgerows provide opportunities for connectivity, foraging / commuting and nesting. The hedgerow network of which the site forms a part has been assessed as being of local importance within the submitted ecology chapter of the Environmental Statement.

- 4.18.53 Several hedgerows, mainly those featured along North Road, Clothall Road and Royston Road have been identified as important on heritage grounds⁵⁰, denoting historic parish / township boundaries. These roads represent the main frontages and locations for accesses serving the development and consequently, the proposal would require the removal of sections of these hedgerows. The impact on heritage assets shall be considered within a later section of this report.
- 4.18.54 With regards to mitigation, the Preliminary Ecological Appraisal submitted in support of the application has recommended appropriate buffering around hedgerows within the development, which will allow them to continue to contribute to habitat value and species diversity.
- 4.18.55 The Environmental Statement acknowledges the importance of hedgerows in supporting a variety of wildlife (set out below) and proposes the retention of the majority of hedgerows, which would be protected during construction by fencing and reinstatement or re-establishment on similar alignments, should removal be unavoidable. The proposed green infrastructure strategy includes the formation of links to compensate for any fragmentation of the hedgerow network⁵¹.
- 4.18.56 The impact of the development on existing trees within the site has been set out above. None of the trees have been considered as veteran.
- 4.18.57 Whilst it is acknowledged that some areas of habitat would be removed from the site, the proposal would incorporate mitigation through the formation of green corridors with species-rich grassland including buffers together with recreational open space, gapping-up of retained hedgerows to improve linear connectivity, retention of existing woodland edges and the existing local wildlife site and the south-eastern area of grassland as well as the incorporation of sustainable drainage and SuDS features would together have a major beneficial effect.
- 4.18.58 *Protected Species*
- 4.18.59 The submitted Preliminary Ecological Appraisal sets out the various protected species of fauna and flora that would likely be impacted by the development. The results of various surveys have also been reported within the Ecological Mitigation Plan, wherein recommendations for mitigation or compensation have been included. Discussion on each specific protected species identified has been set out below.
- 4.18.60 *Bats*
- 4.18.61 A Bat Roost Assessment was carried out to inform the submitted Preliminary Ecological Appraisal, noting one building as having high suitability for roosting bats; four buildings with moderate suitability and nine buildings with low suitability. All remaining buildings were assessed as negligible suitability for bats.

⁵⁰ Under the Hedgerows Regulations 1997.

⁵¹ Paragraph 11.6.30 of the Environmental Statement (Chapter 11 Ecology) refers.

- 4.18.62 The Preliminary Ecological Appraisal notes two trees were identified as having low suitability for roosting bats. Further, the Environmental Statement ecology chapter noted that mature trees within hedgerows and tree belts were assessed for potential roost features, a number of which were identified as having features that could support roosting bats. As such, the Environmental Statement continues to state that these trees were generally assessed as having low to moderate bat roost suitability⁵².
- 4.18.63 On this basis, the Environmental Statement considers these features to be of site-level importance with respect to bats.
- 4.18.64 The submitted Ecological Mitigation Plan notes that no bat roosts were identified on the site as of 2023. However, further surveys are recommended at subsequent stages during the development process to ensure no roosts have been found, specifically, if required during the reserved matters stage. This shall be required by permission on any planning permission, to be incorporated within both phase-level and at reserved matters stage through Construction Environmental Management Plans.
- 4.18.65 Bat activity was recorded as part of the surveys carried out, with findings of consistently low activity, confined to field margins and hedgerows. The Environmental Statement reports that the site supports generalist and widespread species⁵³ in low numbers, with no evidence of notable assemblages or high-intensity foraging areas (paragraph 11.4.50 of Chapter 11: Ecology of the Environmental Statement, 2025).
- 4.18.66 Trees either confirmed or with high roost suitability would be retained as part of the proposals. Further, any trees or buildings with low or moderate suitability for bat roosts that require felling, pruning or demolition shall be first reinspected by a licenced ecologist. Removal would take place with ecologist supervision including sectional dismantling and overnight pauses so that any bats can disperse. Lighting and noisy works would also be controlled. As a result, the effect of construction on roosting bats is assessed as being negligible as reported within the Environmental Statement.
- 4.18.67 Post-construction, the proposal would incorporate further roosting opportunities for bats in the form of bat boxes on retained trees and new buildings. This would also mitigate against any roosts lost during the vegetation clearance and construction stage of the development, with the aim for a net increase in opportunities for roost provision on the site above the existing circumstances.
- 4.18.68 Key movement and foraging corridors for bats were identified through survey work including along Bygrave Road / Ashwell Road as well as the north-western site boundary adjacent to Ivel Springs. The Environmental Statement proposes the retention and enhancement of these linear features on the site, including gapping-up of hedgerows, creation of dark corridors, restoring woodland and scrub edges and establishing wetlands and ponds for foraging, which would further mitigate against the effect of development.

⁵² Paragraph 11.4.42 of the Environmental Statement refers, specifically for crevice or cavity-roosting species of bats.

⁵³ Seven species of bat recorded: common pipistrelle, soprano pipistrelle, myotis species, noctule, Leisler's, barbastelle, brown long-eared, with the first two species accounting for the majority of activity at the time of the survey.

- 4.18.69 Any planning permission would reserve details of lighting for the proposed development (post-construction) to ensure bats would be appropriately accommodated for with regards to movement and foraging within the site, a condition which has been recommended by North Hertfordshire Ecology.
- 4.18.70 Considering all of the above, the proposal would have a minor beneficial effect on bats. This has been acknowledged within comments from North Hertfordshire Ecology and no objection has been raised with respect to bats.
- 4.18.71 *Badgers*
- 4.18.72 The Phase One Desk Study informing the Preliminary Ecological Appraisal included an assessment with regards to badgers. Badger survey findings have been considered within the submitted Ecological Mitigation Plan and has identified the habitat value to be of site-level importance.
- 4.18.73 The Environmental Statement reports that construction-phase activities could have the potential to disturb or damage setts or cause injury to badgers moving through the site. The increase in noise, vibration and traffic could additionally discourage the use of peripheral areas. Adverse impacts on badgers would be avoided through undertaking pre-construction badger checks by a suitably qualified ecologist to assess any existing setts and detect any newly created setts. In the event that any active setts are found during construction, appropriate safeguards shall be applied within a 30m area, which could include temporary exclusion fencing and protective buffers.
- 4.18.74 To address moving badgers through the site, trenches or excavations left open overnight shall include ramps and machinery routes would avoid sensitive hedgerows and field margins.
- 4.18.75 As a result of the above measures, the construction-phase effect has been reported within the Environmental Statement to be negligible.
- 4.18.76 The development itself would incorporate a range of enhancements to support badgers, including planting to fill gaps in hedgerows and supplement areas of the site with native planting; formation of structurally diverse green corridors to provide connections between retained features and areas of open space on the site and the wider countryside and installation of wildlife-permeable fencing. Additionally, the vehicle network would incorporate low-speed principles and safe crossing points, which would reduce the possibility of collisions within and around the site.
- 4.18.77 It has therefore been considered that the effect on badgers would be minor beneficial. Initial comments from North Hertfordshire Ecology acknowledge the application submission with respect to badgers and has not objected on these grounds.
- 4.18.78 *Birds*
- 4.18.79 As the site contains a mix of arable land, field margins, hedgerows, rough grassland and scrub areas, this provides suitable habitat to support bird species. A total of 17 species were recorded on site during the 2024 surveys, as reported within the Environmental Statement and Preliminary Ecological Appraisal. Most of the on-site habitats are reported to be suitable for a variety of common, notable

and protected nesting birds⁵⁴. On-site features of note include hedgerows, rough grassland areas and woodlands. The northern and southern areas of the site contain breeding territories for corn bunting, a farmland species recognised within the North Hertfordshire Landscape Character Study (2011). The breeding population was assessed within the Environmental Statement as being of county-level importance, with the site being of District-level importance for the wider breeding bird assemblage.

- 4.18.80 The removal of existing farmland, comprising the majority of the site, would result in a substantial reduction in the available open-field habitat which currently supports bird species such as corn bunting and skylark. Whilst some corn bunting species may disperse to the retained margin areas of the development, the proposal would result in a shift in terms of the bird profile on the site, reducing the proportion of open farmland specialists (referenced above) and with general and edge-associated species benefitting from the development, including whitethroat, dunnock, black cap and song thrush⁵⁵.
- 4.18.81 Without mitigation, the Environmental Statement has identified the impact as being moderate-adverse for corn bunting and minor adverse for the wider farmland bird assemblage.
- 4.18.82 With regards to the construction stage of the development, the timing of clearance would be phased, with margin vegetation retained during early phases of construction so that the site can continue to support existing bird species identified on the site.
- 4.18.83 Following construction, the proposed green infrastructure strategy and network on the site would involve the recreation of open habitat mosaics (species-rich grassland, native scrub margins and managed ruderal areas) with the aim of replicating the functional role of arable fields. The Environmental Statement further reports that specific areas identified for bird breeding within the site would be buffered from residential properties to reduce the risks from cat predation.
- 4.18.84 Comments from the RSPB related solely to the effect on the corn bunting population on the site, identifying the species as being red-listed, having seen an 83% reduction in abundance in the UK in the last half century. Their comments were based upon the survey records of 17 breeding territories on the application site in 2024, which represents 10% of those in Hertfordshire.
- 4.18.85 The RSPB acknowledged that on-site mitigation through the provision of rough grassland within open space areas of the site would assist with foraging for corn bunting; however, due to its location adjacent to proposed public open space, these areas may not represent productive corn bunting territories. Their comments go on to state that the proximity of the proposed open space areas proximate to the residential component of the development would increase risks through mammalian predation as corn bunting is a ground-nesting species. The RSPB acknowledges that the ideal solution would be to compensate for the lost corn bunting territories through off-site habitats.
- 4.18.86 Subsequently, both on-site and off-site corn bunting mitigation strategies were submitted⁵⁶, the former was considered satisfactory by North Hertfordshire

⁵⁴ Paragraph 11.4.8 of Chapter 11 Ecology of the Environmental Statement.

⁵⁵ Paragraph 11.6.129 of Chapter 11 Ecology of the Environmental Statement.

⁵⁶ Received May 2026.

Ecology and the RSPB had not raised objection in relation to the on-site mitigation in isolation. Concerns were held with respect to the off-site compensation, which proposed the use of an adjacent field, Homestead land, also within the applicant's ownership, where 31.9 hectares shall be secured to accommodate displaced corn bunting. The RSPB has not raised any issues in relation to the land being used and the associated management and monitoring. Their latest comments indicate that whilst there is not an exact formula to determine the required area of land for displaced corn bunting, provision of a greater area of land would increase the chance of success, should the breeding success be less than anticipated on both on-site and off-site habitats. Further information to supplement the on-site mitigation and off-site compensation proposals was prepared by BMD; the off-site monitoring program shall be secured through any legal agreement under Section 106 of the Town and Country Planning Act 1990.

- 4.18.87 To address further habitat enhancements sought by Hertfordshire Middlesex Wildlife Trust, swift bricks shall be incorporated into the development and shall be secured by condition, details of which shall be required during the reserved matters stage.
- 4.18.88 As a result of the displacement of open field species including corn bunting, the proposal is assessed as having a minor adverse effect on birds.
- 4.18.89 *Hedgehogs*
- 4.18.90 The Environmental Statement reports that hedgehogs are commonly associated with a range of semi-natural habitats including hedgerows, rough grassland, scrub, gardens and woodland edges, areas which can be found within the application site. These features on the site support foraging, nesting and commuting, including along the Bygrave Road corridor and the south-eastern margins of the site. As the site is well-connected to the surrounding landscape, this allows hedgehog movement across the site. As such, the site is of site-level importance as reported within the Environmental Statement.
- 4.18.91 Vegetation clearance and machinery use (amongst other things) could cause injury to hedgehogs, particularly if carried out during the sensitive hibernation periods (November to March) or during breeding (May to August). Movement corridors could be severed, which would impact the risk of predation or prevent access to resources. Lighting and noise would represent a deterrent to hedgehogs occupying the site.
- 4.18.92 Mitigation measures would be incorporated within the construction phase of the development to reduce the risks to hedgehogs. These would include pre-clearance checks, fitting of ramps within trenches, avoiding disturbance in areas identified as being potential refugia and retention of hedgerow and woodland margins together with buffering with protective fencing.
- 4.18.93 Based on the above, the Environmental Statement has reported the impact on hedgehogs to be negligible.
- 4.18.94 The green infrastructure strategy and associated landscaping to be integrated throughout the site would provide benefits for hedgehogs, increasing the areas available for foraging and nesting in the longer term. The proposals are therefore reported to have a minor beneficial effect in terms of supporting hedgehogs on the site.

4.18.95 *Amphibians*

4.18.96 The Environmental Statement reports the presence of amphibians as limited. Records of amphibians were found within an area of 1-2km from the site. No suitable breeding ponds exist or are immediately adjacent to the site and therefore great crested newt has been scoped out of further assessment.

4.18.97 Potential opportunities for amphibians exist within terrestrial features of the site and are noted to be of low intrinsic quality. Amphibians using the terrestrial habitats would be subject to the impacts of construction activities and as such, phased clearance of vegetation would take place and outside of peak amphibian activity periods (late winter-early spring). Features such as log piles, tussocky grass and rubble refuges that would be of value to amphibians would be retained until the latest possible stage of works. The effect on amphibians during the construction stage of development has therefore been assessed as negligible as reported within the Environmental Statement.

4.18.98 The proposal would create a SuDS corridor (BA1) and extensive areas of open space, including informal areas, which would represent a benefit to amphibians above existing conditions. On this basis, the Environmental Statement Addendum concludes that the impact on amphibians and reptiles has been appropriately mitigated and the residual effect would be minor beneficial.

4.18.99 *Reptiles*

4.18.100 Survey results dated 2022 and 2024 identified a small population of common lizard and slow worm, mainly within the south-eastern part of the site. Features supporting basking, foraging and shelter opportunities were identified and reported to be locally valuable. As the population is of low abundance, the site was assessed as being of local-level importance within the Environmental Statement.

4.18.101 Construction activities could lead to injury to reptiles present, particularly along south-western field margins and risks highest during the active season (March to October). The Environmental Statement notes that sufficient refuge would remain available in the retained southern compartments following any habitat disturbance in the peripheral areas of the site.

4.18.102 A precautionary two-stage clearance would be undertaken prior to any vegetation clearance and a staggered process to removal, which would encourage reptiles to disperse naturally prior to final clearance to ground level and during appropriate weather conditions to maximise dispersal.

4.18.103 Lighting adjacent to identified habitats would be controlled to avoid deterring basking behaviour or altering the thermal environment. The construction-phase of development was therefore assessed as being negligible.

4.18.104 As noted above, the proposed provision of greenspaces and a variety of planting would, over time, provide ecological enhancements to support reptiles, facilitating movement to locations of ecological importance and connectivity between refugia and foraging areas. The proposals are therefore reported as resulting in a minor beneficial effect in terms of supporting reptiles.

4.18.105 *Brown Hare*

- 4.18.106 Field surveys carried out between 2022 and 2024 recorded observations of brown hare on the site, within large arable fields and pasture. Extensive open farmland habitats, including large fields with low vegetation cover, grassy field margins and hedgerow networks were identified as providing shelter and cover. The population of brown hares was assessed to be of a typical density and therefore not of exceptional value. With regards to supporting brown hares, it is of site-level importance.
- 4.18.107 Similarly, to measures to support birdlife within the site, the green infrastructure strategy forming part of the proposals would contribute towards support the brown hare population. It is expected that relocation would also occur towards adjacent fields outside the application site, noting movement corridors would be retained. The construction-phase impact has been assessed as being negligible as a result. The proposals overall would have a neutral effect on supporting the brown hare species.
- 4.18.108 *Invertebrates*
- 4.18.109 Invertebrates were also considered within the Ecological Mitigation Plan, where the site has been assessed as being of local-level importance following records of a breeding population of small blue (butterfly), weevil, ground bug and shield bug. The small blue butterfly is a Species of Principal Importance under Section 41 of the Natural Environment and Rural Communities Act 2006. Parts of the site occupied by the south-eastern grassland compartments, woodland edges and marginal habitats adjacent to hedgerows. However, the majority of the site comprising intensively-managed arable fields is of low-value to supporting invertebrates and of local-level importance⁵⁷.
- 4.18.110 The Environmental Statement reports that without mitigation, the construction stage of the development would have a negligible impact on invertebrates, unless construction activities take place adjacent to sensitive features on the site that could degrade species-rich margins, which invertebrates rely upon. Without mitigation, the effect has been assessed as minor adverse. This would be addressed through protective fencing of the existing, retained ecological features, including the Bygrave Road Local Wildlife Site, so that the effect would be negligible.
- 4.18.111 *Flora*
- 4.18.112 With regards to invasive plants, the Environmental Statement reports a small population of lizard orchid within the south-eastern portion of the site as part of the botanical assessment carried out in 2024. It continues to state that the species was recorded in isolation and not alongside a wider suite of notable plant species. Further assessment was therefore not considered to be necessary. The site was identified as being of local-level importance with regards to invasive plants. An area within the south-eastern portion of the site that has been identified as supporting species-rich neutral grassland and a population of lizard orchid would be subject to safeguards during the construction-phase of the development, including protecting fencing, installation of ground protection to preserve soil structure and maintenance of a hydrological buffer. This would reduce the risk of harm to the orchid population and its environs, where identified.

⁵⁷ Paragraph 11.6.57 of Chapter 11 Ecology of the submitted Environmental Statement refers.

- 4.18.113 The retention and enhancement proposals on the site would improve the orchid population's microhabitat and the wider green infrastructure network would contribute towards supporting and sustaining notable arable flora, having a minor beneficial effect.
- 4.18.114 No objections have been raised from North Hertfordshire Ecology or Natural England with regards to the protection of these species and no further recommendations suggested other than those proposed.
- 4.18.115 *Cumulative Impact and Protected Species Conclusion*
- 4.18.116 In summary, the proposals to remove the large arable fields comprising the majority of the site would result in the displacement of some fauna. Specifically, during the construction phase, the proposal would have a minor adverse effect with regards to existing habitats on the site. This includes the impact of temporary lighting associated with construction activities that in addition to earthworks and building works could result in the alteration to wildlife patterns on the site and the area⁵⁸. The assessment within the submitted Environmental Statement, supporting documents and relevant consultation responses confirm that there would be adverse residual impacts to habitats overall on the site, breeding birds (some species) and brown hares. To address the impact of the proposal, a package of mitigation and compensation measures would be put in place throughout various stages of the development, including the provision of benefits to various protected species, as follows:
- Safeguarding existing habitats where possible and protecting these during construction and enhancement of these areas through landscape management and provision of buffers, including to the Bygrave Road Local Wildlife Site, Ivel Springs Local Nature Reserve and Weston Hills Local Nature Reserve;
 - The formation of an extensive green infrastructure network that would provide both grassland and wetland mosaics to support wildlife mentioned above;
 - Gapping-up of hedgerows to support connectivity and nesting opportunities for some species and the replacement to compensate for necessary hedgerow removal (facilitating access to the development);
 - Construction Environmental Management Plan that would ensure the phased removal of natural features, together with pre-commencement checks by ecologists as referenced above and measures to prevent the effects of dust, air pollution and vehicle movements as well as protective fencing and provision of hydrological barriers, which would be secured by condition on any planning permission;
 - A lighting strategy to facilitate dark corridors and movement across and beyond the application site including column-mounted lanterns, pointed into the development areas with controlled light distribution;
 - Habitat Monitoring and Management Plans to ensure the continued evaluation of mitigation measures to support species mentioned above, which would be secured on any planning permission through a combination

⁵⁸ Page 12 of Chapter 15 Lighting of the Environmental Statement refers.

of conditions and legal agreement under Section 106 of the Town and Country Planning Act 1990;

- Internal vehicle routes to incorporate low-speed principles and features to promote safe mobility for wildlife within the site.

4.18.117 It would therefore be essential that any detailed submission in the form of regulatory plans, design codes and reserved matters (recommended to be secured by conditions) shall demonstrate compliance with the submitted Outline Construction Environmental Management Plan and the Development Specification and principles contained within, to accord with Policies SP12 and NE4 of the Local Plan and Section 19 of the NPPF.

4.18.118 The Environmental Statement has taken into account the cumulative impact of the proposed development together with other approved schemes in the locality and the impact on ecology. The findings reported within the Environmental Statement are as follows:

- BA4 – the adjacent approved 42-dwelling scheme at Rhee Spring resulted in a net loss of habitat units and therefore relies on off-site biodiversity units in order to meet its statutory net gain. This is not the case for the current proposal on the application site; further assessment on biodiversity net gain has been included in a further section below.
- LG3 – land east of Talbot Way and Kristiansand Way, Letchworth comprises 120 dwellings and was assessed as having limited ecological value. The proposals on this site featured embedded ecological enhancement through landscaping and bird / bat box provision. A small net gain would be realised. However, it was not considered there would be significant cumulative ecological effects due to the location of this site with intervening built form; absence of functional ecological networks and recreational pressure that would be immediately contained within Letchworth.
- LG1 – land north of Letchworth proposing 900 dwellings together with commercial / community space and primary education, together with the development, could result in landscape-scale habitat fragmentation, increased recreational pressure and loss of farmland bird habitat. However, both developments would accommodate areas of strategic open space and would incorporate measures to ensure connectivity across the wider landscape as a result of formation of corridors and retention of hedgerow networks.
- Tophams Solar Farm – this development spanning 53.62 hectares for a ground-mounted photovoltaic solar farm and associated infrastructure also incorporated mitigation and enhancement measures for farmland birds, reptiles, invertebrates and small mammals. Wildlife corridors would be improved through extensive hedgerow planting and new habitats created.

4.18.119 Based on the above, the Environmental Statement assesses the effect of construction on habitats as being minor adverse.

4.18.120 *Biodiversity Net Gain*

4.18.121 Pursuant to Schedule 7A of the Town and Country Planning Act 1990, inserted by the Environment Act 2021, it is a statutory requirement for every grant of planning

permission to be subject to the development delivering a statutory 10% increase in biodiversity value relative to the pre-development biodiversity value of the on-site habitat (with some exceptions).

- 4.18.122 The Planning Practice Guidance on biodiversity net gain sets out some matters that could be secured through legal agreements under Section 106 of the Town and Country Planning Act 1990, which could include management and monitoring arrangements and dealing with excess net gains amongst others.
- 4.18.123 The application submission includes a BNG Technical Note, which identifies the area habitats, linear features and point features that exist on the site together with their ecological value in order to inform the baseline in units. The ecological enhancements and losses as reported in the sections above has also been translated to area habitat units, resulting in a net increase of 35.43%.
- 4.18.124 It is acknowledged that there would be some loss of hedgerow units to facilitate necessary accesses to the development. However, the proposals would offset this loss through the provision of further planting; the BNG Technical Note confirming that a precautionary 0.5km of hedgerow has been assumed to be created and existing hedgerows in poor condition to be enhanced as part of the wider landscape scheme. As a result, a net gain of 19.7% would be realised in terms of hedgerow units on the site.
- 4.18.125 It is important to note that as the application has been submitted in outline form, the details of the BNG assessment are not fixed. To this end, conditions on any planning permission shall be included, reserving site-wide and reserved matters parcel-specific biodiversity net gain assessments, to build upon the measures listed below. The measures contributing towards the biodiversity gain have been set out within the submitted Sustainability and Energy Statement to facilitate a strategic nature recovery network, including⁵⁹:
- *A wildlife-focused area of green space is to be retained to the east of Clothall Common to protect the existing grassland habitat and species.*
 - *Wildlife corridors and green links will be provided to enhance connectivity. Wildlife corridors will be incorporated along Bygrave Common and Winterbourne Way to provide east-west connection between key open spaces and the LNRs. Smaller green links will run throughout the site to enhance the ecological network.*
 - *Bygrave Road LWS will be retained and enhanced, alongside the historic route of the winterbourne channel. This will form a key east-west wildlife corridor through the site.*
 - *The northern part of Bygrave Common will include grassland habitat for ground nesting birds such as corn bunting.*
 - *Ivel Springs and Weston Hills LNRs will be safeguarded and buffered. Connectivity to the LNRs will be improved through the provision of wildlife corridors incorporating newly created habitat such as SuDS features, woodland and wildflower grassland planting.*

⁵⁹ Paragraph 3.3.2 Biodiversity Mitigation and Enhancement Measures refers.

- *Substantial new parkland area will be provided in the north of the Baldock site, which will also help to relieve the recreational pressures on Ivel Springs LNR.*
- *Walls Field will be taken out of agricultural use and planted as a wildflower meadow, forming a new habitat area.*
- *The site plan will aim to retain and enhance existing hedgerow boundaries, trees and small woodlands where possible.*
- *The proposed sustainable drainage strategy also has the potential to recharge the local chalk aquifer and improve water flows in the upper Rivel Ivel.*

4.18.126 As a combination of retention and creation of habitats on the site, this would contribute to the proposal's biodiversity net gain, which would fulfil statutory requirements and accord with Policy SP11(c) and (d) of the Local Plan. To secure this, Habitat Management and Monitoring Plans at a site-wide level as well as reserved matters stages (for those parcels including an area of significant biodiversity enhancement) shall also be required through a combination of conditions and planning obligations. This would secure the requisite monitoring of such areas for a minimum period of 30 years.

4.18.127 To ensure that biodiversity net gain is achieved throughout all stages of the development, the latest submitted Development Specification identifies which the areas of strategic open space, which would be directly linked to a built development parcel. Conditions have been set out within the recommendation to ensure that the following areas of strategic open space are delivered, in accordance with their respective development parcels:

- Walls Field to come forward at the same time as the residential development on BA2;
- Bygrave Common to be delivered in sections directly north of the adjoining residential parcels to the south on BA1, starting with development from the western boundary in an eastern direction and the delivery of the sports pitches at Eastern Park;
- BA10 would rely on boundary features within its allocation (noting Network Rail requirements stipulated above) and would also benefit from ecological proposals on land west of North Road with regards to achieving net gains;
- BA3 to be developed alongside the Urban Open Land and would be directly linked to the green space east of Clothall Common (forming the northern portion of BA3)

4.18.128 Comments from Hertfordshire Middlesex Wildlife Trust seek to secure a more ambitious biodiversity net gain for the development. Whilst the application submission has evidenced that the proposal could deliver net gains in excess of 10%, it is not considered reasonable to set a higher threshold for the following reasons:

- The balance between open space and developable area is acceptable as noted in sections above and as the biodiversity net gain solution accounts

for worst-case and unknown scenarios, particularly on BA3, the net gain cannot be fixed at outline stage;

- Paragraph 3 of Policy N2 of the NPPF states that development proposals may incorporate biodiversity enhancements which exceed the statutory objective for biodiversity net gain but this should only be a requirement where it is set out in up-to-date development plan policies for specific site allocations. As none of the allocated sites are required to secure above the statutory minimum within the current Local Plan, the request has not necessary to make the development acceptable in planning terms.

4.18.129 *Ecology Appraisal and Conclusion*

4.18.130 Comments received from North Hertfordshire Ecology indicate that all protected species recorded on the site have been appropriately addressed both in terms of assessment and on-site mitigation and where required off-site compensation. The district-wide important corn bunting species reliant on the existing farmland parcels would be accommodated for through a combination of on-site mitigation as well as the allocation of a parcel of land within the applicant's ownership, which shall be secured by planning obligation.

4.18.131 Whilst the concerns of the Royal Society of Protection of Birds are acknowledged, it is important to note that the site has been designated for residential and employment development. The entirety of the sites would not be developed, noting the incorporation of buffer areas and open space areas to be provided within the residential allocations of BA1, BA2 and BA3. The species itself cannot be controlled and part of the proposed mitigation would incorporate early monitoring of the implemented measures to ensure the quality of spaces and habitats and how these contribute towards supporting corn bunting populations. Any identified shortfall of compensation area asserted by the Royal Society for Protection of Birds would not arise in significant harm to protected species, noting the allocation of the application site for residential and employment development. As such, there would not be any policy conflict when assessed against the provisions of Policy NE4(c) of the Local Plan. The long-term management and monitoring of mitigation measures would be secured by planning obligation, in accordance with Policy NE4(e) of the Local Plan.

4.18.132 Conversely, there would be benefits in other ecological areas. Where the majority of the application site would be taken out of intensive agricultural use, this would represent a benefit to supporting other species, including badgers, hedgehogs, amphibians and reptiles.

4.18.133 Any required features of the development would be controlled through the design code and subsequent reserved matters approvals if planning permission is granted. This would ensure further habitat provision and its integration with the development.

4.18.134 Overall, moderate beneficial weight is attributed to the ecological proposals across the development and associated mitigation secured by condition or planning obligation as required

4.19 **Flood Risk, Drainage and Water Management**

4.19.1 The whole of the application site lies within Flood Zone 1, with small patches of the site on BA1, BA3, BA10 and Walls Field on the Environment Agency's Surface

Water Flood Map. Parts of the site have also been identified as being located upon principal and secondary aquifers supplying drinking water within Source Protection Zones 2 and 3, also designated by the Environment Agency and confirmed by subsequent comments from Affinity Water.

- 4.19.2 Policy SP11 of the Local Plan has an overarching aim to meet the challenges of climate change and flooding. One of its objectives is to take a risk-based approach to development and flood risk by directing development to areas at lowest risk in accordance with the NPPF and ensuring the provision of sustainable drainage systems (SuDS) and other appropriate measures (amongst other things).
- 4.19.3 Policy NE7 requires development to be located outside of medium and high-risk flood areas and other areas affected by other sources of flooding where possible. It also states that Flood Risk Assessments should be prepared in accordance with national guidance that considers the lifetime of the development. Mitigation measures to address flooding will not cause harm to nature conservation, heritage assets, and / or landscape and recreation and should have a positive impact in these respects.
- 4.19.4 The provisions of Policy NE8 relate to sustainable drainage systems are also applicable (also linked to Policy SP9 (c)(vii) and Policy SP11 of the Local Plan).
- 4.19.5 Policy NE9 promotes development proposals that make space for water, setting out minimum width buffer zones for existing water features and river restoration and resilience improvements where proposals are situated close to a river or considered to affect nearby watercourses. The provisions of Policy NE10 also apply, noting that necessary or improved water infrastructure and foul water treatment and disposal can be secured on developments.
- 4.19.6 In terms of national policy, Section 18, which relates to managing flood risk and coastal change, has the objective of minimising risks to development arising from all sources of flooding, taking into account the impacts of climate change, ensuring development will be safe for its lifetime without increasing flood risk elsewhere and incorporating sustainable drainage systems.
- 4.19.7 Further, Policy F4 identifies the requirement for a site-specific flood risk assessment. Policy F5 builds on this, setting out that the sequential test for flooding should be used in areas known to be at risk now or in the future from any forms of flooding. As shall be reported below, this does not apply to the application site, noting its designation in Flood Zone 1. Regardless, paragraph 2(a) of this policy acknowledges that the sequential test is not required for sites allocated in the development plan (as they were subject to the sequential test during plan preparation).
- 4.19.8 Policy F7 states that development proposals should not present a risk from flooding to potential occupiers, users or visitors and should not increase flood risk elsewhere.
- 4.19.9 Additionally, Policy F8 seeks to incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, to be proportionate to the nature and scale of development. Paragraph 1 of this policy continues to stipulate that the systems employed should provide multi-functional benefits where possible, facilitating improvements in water quality, biodiversity and amenity. Also of relevance is paragraph 3, which sets out that developments should not enclose existing watercourses where this is not already the case and where possible,

remove existing culverts and renaturalise existing river channels, unless to do so would increase flood risk, result in other environmental harm or cause harm to heritage assets.

- 4.19.10 In terms of national policy, W4 outlines that substantial weight should be given to the benefits of providing the capacity needed to serve proposed development and / or improving the security of supply and capacity for existing users and improving water quality and reducing water-borne pollution.
- 4.19.11 Further, accessible, multi-functional green space is also sought within developments under Policy SP9 (c)(vi) of the Local Plan.
- 4.19.12 Chapter 10 of the submitted Environmental Statement addresses Hydrology and Flooding; the application submission also supported by a Flood Risk Assessment and Drainage Strategy. Addenda were subsequently issued for these during the submission of further information in May 2026. On the advice of the Environment Agency prior to application submission, a Preliminary Groundwater Risk Assessment was prepared (appended to Chapter 12 of the Environmental Statement).
- 4.19.13 The Environmental Statement acknowledges that with regards to sensitive land uses when considering flood risk, the options for development on BA3 (either for residential or for education) would have the same level of vulnerability. The worst-case scenario of the BA3 options in terms of flooding is the education use. Should BA3 be developed for residential use, the infiltration basin volume would reduce.
- 4.19.14 *Flood Risk*
- 4.19.15 The application site lies within Flood Zone 1. As such, the sequential and exception tests are not required to be demonstrated for the development under the NPPF or Policy NE7 of the Local Plan.
- 4.19.16 *Effects on or from rivers or watercourses*
- 4.19.17 The Environmental Statement reports that the site is at low risk of flooding, noting its Flood Zone 1 designation and the effect of flooding to the development, also taking climate change into account, would be minor adverse.
- 4.19.18 Construction stages of the development could involve ground disturbance and compaction, which would reduce its capacity to absorb rainfall. There will be stages during construction where the proposed sustainable drainage systems would not yet have been implemented and as such, this will present the potential for increased surface water runoff. This, in turn, could exacerbate flood risk affecting downstream watercourses and rivers. This scenario has been reported as having a moderate adverse effect.
- 4.19.19 As the development would substantially increase the amount of impermeable area above existing conditions, if the development was not mitigated, there would be a significant increase in the peak rate and volume of surface water runoff, thereby amplifying the flood risk. This would have a moderate adverse effect.
- 4.19.20 *Effects resulting from surface water*
- 4.19.21 With regards to surface water flooding, as described above, the likelihood of earthworks reducing absorption of rainfall could result in the accumulation of water

within locations of lower land levels. Whilst this would be limited to the construction stages of the development, the surface water flooding effect would be minor adverse. When considering the effect beyond the boundaries of the application site, there could also be the potential for surface water runoff, which would have a moderate adverse effect, noting the sensitivity of immediately surrounding land uses on relatively lower ground to some parts of the site (notably within BA1 and BA3).

4.19.22 Similarly, the additional hardstanding created by the development itself would result in increased surface water flowing overland and collecting at localised low points both on the site and on adjacent land. Without appropriate mitigation, this effect would be moderate adverse.

4.19.23 *Effects on or from groundwater*

4.19.24 Additionally, the construction stage of development could require excavation into groundwater and require the management of groundwater for the duration of construction. Groundwater runoff could increase as a result, prior to the installation of sustainable drainage features, affecting downstream watercourses. This has been assessed as having a minor adverse effect.

4.19.25 Following the implementation of the sustainable drainage strategy, there could be the potential rising of groundwater levels, leading to a minor adverse effect post-construction.

4.19.26 To address the effect of the construction stage of the development, Hertfordshire Lead Local Flood Authority has recommended the inclusion of a pre-commencement condition requiring the approval of details and a method statement for interim and temporary drainage measures, which would cover both demolition and construction in the interests of preventing flooding and associated pollution off-site in accordance with Policies F4 and F7 of the NPPF and Policies SP11 and NE7 of the Local Plan.

4.19.27 *Flood Risk Conclusion*

4.19.28 Hertfordshire Lead Local Flood Authority (LLFA) has not raised objection to the proposals and associated assessments with respect to flood risk; however, their initial comments recommended the following revised scenarios to be tested:

- Calculations to be based on 100% of rainfall becoming surface water runoff, instead of the originally submitted 95%; and
- A 10% allowance of urban creep formed the basis of assessment, instead of 5% - this would take into account that some permeable areas of the development would, over time, be covered with impermeable surfaces, the LLFA asserting that 10% forms part of the national standards for SuDS

4.19.29 The submission of further information in May 2026 incorporated the above-mentioned assumptions within the Environmental Statement addendum. The findings were considered satisfactory by the LLFA as confirmed in their most recent comments.

4.19.30 It follows that the proposal would satisfy the objectives of the NPPF and Policy NE7 of the Local Plan with respect to flood risk in terms of the site and the surrounding area.

- 4.19.31 *Water Contamination*
- 4.19.32 Local policy aims to protect, enhance and manage the water environment pursuant to Policy SP11(c).
- 4.19.33 The Environmental Statement lists a range of typical pollutants from construction sites which could impact surface watercourses, which in this instance, would concern the River Ivel. These include risks of leakage of spillage of fuel, chemicals or drainage systems from a range of operations as well as the associated potential migration of contaminants, which would cause pollution of the River Ivel⁶⁰. These effects have been judged to be moderate adverse.
- 4.19.34 With regards to groundwater, Chapter 10 of the Environmental Statement lists the potential significant impacts associated with the construction phase from either or a combination of leakage, spillage or migration of fuel, chemicals or the drainage systems, which would pollute the groundwater and aquifer. Considering the role of the primary and secondary aquifer in supplying drinking water, the significance of these effects would be major adverse.
- 4.19.35 During the lifetime of the development, a moderate adverse effect has been reported with respect to water quality impacts on both surface water and groundwater through the potential contamination from parking areas and roads within the site.
- 4.19.36 The Environment Agency in their comments has raised no objections to the proposal with regards to water contamination, noting that the submitted investigations did not present evidence of widespread or gross contamination that would likely result in an unacceptable risk. Similarly, Affinity Water has not raised objection subject to the imposition of suggested conditions. These relate to submission of further details with respect to excavation works, including foundations as well as addressing any water contamination during construction.
- 4.19.37 Pre-commencement conditions requested by the Environment Agency, Hertfordshire Lead Local Flood Authority and Affinity Water have been agreed with the applicant in writing, to ensure that essential infrastructure to support the various stages of the development shall be in place, in line with the aims of Policy SP7(b).
- 4.19.38 *Mitigation and Drainage*
- 4.19.39 To mitigate against the impacts during the construction stages of the development as outlined above, Chapter 10 of the Environmental Statement suggests the following:
- Submission of detailed Construction Environmental Management Plans at each reserved matters stage, to accord with the submitted (outline) Construction Environmental Management Plan, which would incorporate temporary drainage strategies to manage surface water runoff quality and runoff volumes;
 - Silt traps, temporary drainage systems and appropriate storage of fuels and chemicals to also form part of any approved Construction

⁶⁰ Paragraphs 10.5.7 and 10.5.8 of Chapter 10 (Hydrology and Flooding) of the Environmental Statement refers.

Environmental Management Plan to manage overland flow and prevent contamination;

- Regular monitoring and inspections during the construction stages to identify potential issues; and
- Preparation of emergency action plans to be implemented in the event of accidental spills.

- 4.19.40 Securing these mitigation measures would be essential to avoid increasing flood risk and water contamination through pollutants. In line with LLFA comments, it is therefore considered to be reasonable and necessary to include conditions requiring Construction Environmental Management Plans at the reserved matters stage as well temporary drainage strategies to be reserved by condition. Agreement to the imposition of these pre-commencement conditions has been received on behalf of the applicant.
- 4.19.41 The submitted Drainage Strategy provides mitigation against the adverse impacts of the development with regards to flood risk and water contamination. Groundworks would direct surface water to new infiltration basins to be contained and disposed appropriately. A combination of soakaways, swales, permeable paving, raingardens and infiltration basins would assist with the disposal of surface water, to be contained wholly within the respective parts of the application site. This would avoid run off onto roads and address risks of surface water flooding whilst ensuring the number of pollutants and debris does not contaminate any surface water sources.
- 4.19.42 Methods to treat runoff before it is discharged by infiltration would be incorporated into the final drainage design, which shall be reserved by condition if planning permission is granted. This would further ensure the reduction of the risk of water contamination as a result of runoff from impermeable surfaces of the development. The proposals embedded within the Strategic Masterplan to recharge the River Ivel through infiltration and recharging of the existing aquifer.
- 4.19.43 In line with Environment Agency standards, the SuDS features are designed to accommodate a 1 in 100-year rainfall event plus a 40% allowance for climate change, in accordance with Policy SP11 and the NPPF.
- 4.19.44 It should be noted that any planning permission would be subject to landscaping requirements through the reserved matters stage with regards to permeable surfacing as well as the detailed design of the proposed drainage strategy. A condition securing the detailed drainage design⁶¹ has been recommended by the LLFA and has been subject to agreement on behalf of the applicant.
- 4.19.45 The location and design of the SuDS corridor has been informed by existing overland flows resulting from the site's topography, as explained in the submitted Green Infrastructure Strategy. Levels generally fall towards the western area of BA1 and follow the historic Winterbourne channel, which runs south of Bygrave Road and Ashwell Road for most of its length. The incorporation of sustainable

⁶¹ The detailed designs of a surface water drainage scheme as recommended to be secured by condition by the LLFA would be required to include further infiltration testing, surface water attenuation storage and associated testing, plans and calculations of the drainage conveyance network, designs of any infiltration / attenuation / detention basin, finished ground floor levels, surface water management features and maintenance and management of the surface water drainage features.

drainage in the proposals, as shown in the westernmost portion of BA1 on the Parameter Plan would ensure compliance with Policy SP14(j) of the Local Plan. Topography across the remainder of the site within BA2 and BA3 have informed the indicative locations for sustainable drainage features, specifically, towards BA2's Clothall Road frontage, the south-western corner of BA3 and the northern part of the identified developable area of BA3.

- 4.19.46 In line with Policy F8 of the NPPF, identified sustainable drainage areas would represent multi-functional spaces, providing a buffer to existing residential properties, softening the visual impact of the development and adding to the open space provision on the site and enhancing ecological value.
- 4.19.47 The management and monitoring of the drainage systems to be installed across the site would also be secured by condition on any planning permission, in line with the recommendation from the LLFA.
- 4.19.48 *Wastewater Treatment*
- 4.19.49 Anglian Water as the relevant authority has not raised objection subject to the inclusion of recommended conditions requiring the following further details if planning permission is granted:
- A foul drainage strategy to identify connection points to address flood risks and associated contamination; and
 - Phasing details to avoid an adverse impact on existing drainage infrastructure.
- 4.19.50 This would ensure that the necessary infrastructure is in place to serve the needs of the development, in line with Policy SP7 of the Local Plan.
- 4.19.51 *Flood Risk, Water Management and Drainage Appraisal and Conclusion*
- 4.19.52 When considering the impacts of the development and the proposed mitigation, together with the conditions recommended by the LLFA and Environment Agency to address flood risk and water contamination, the proposal would have a negligible to minor beneficial effect from the construction to post-completion stages of the development. This assessment has not been disputed by either of the statutory consultees referenced above or the water authorities consulted on the application.
- 4.19.53 Additional condition requirements recommended by the LLFA include a detailed SuDS Phase Plan and verification reports to confirm the satisfactory installation of approved construction details in line with above-mentioned condition requirements.
- 4.19.54 Subsequent advice from the LLFA confirm their satisfaction with respect to reserved matters phase detailed drainage designs to be covered under the stewardship model described previously.
- 4.19.55 Based on the above, the proposed development would accommodate and mitigate against the impacts relating to flooding and water contamination. The proposal has been designed to replicate and mimic the existing greenfield surface water runoff rates and would appropriately dispose of surface water wholly within the site. Therefore, in terms of the cumulative impact of the development together

with nearby approved schemes, the effect would remain negligible to minor beneficial.

4.19.56 Anglian Water in their comments did not raise objection with regards to surface water disposal.

4.19.57 The application has therefore demonstrated that with regards to flood risk, drainage and water management, collaboration has taken place to facilitate the delivery of this strategic, allocated site in accordance with the aims of Policies SP1(c)(iii) and SP7(e) of the Local Plan. When considering the multi-functional uses of the proposed SuDS features and associated areas and the links made with historical water features above baseline conditions, limited weight is attributed to the benefits of the scheme in this regard.

4.20 **Land Contamination**

4.20.1 Policy NE11 of the North Herts Local Plan sets out that planning permission for development affecting or affected by contaminated land will be granted subject to the submission of a contaminated land study or risk assessments, appropriate mechanisms being in place to investigate, characterise the risks and remediate the contamination to remove the risks, or reduce the risk to an acceptable level, and the site being suitable for use taking into account of ground conditions, groundwater vulnerability and pollution arising from previous land use and land remediation in reference to relevant guidance.

4.20.2 Policy NE11 crosses over with the requirements of Policy NE10 given the requirement to the site being suitable for use taking account of groundwater vulnerability. Policy NE10 aims to preserve water infrastructure.

4.20.3 Within the introduction to the NPPF, an environmental objective is expressed. Within this Policy P2 contains the national guide to ground conditions. Within this, sites for development should be suitable for their proposed use taking into account ground contamination and the extent to which contamination risks can be mitigated alongside the potential impacts on the natural environment arising from remediation. Further, Policy P2 sets out that where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.

4.20.4 Potential pollutant linkages have been considered assuming change in land use from the former quarry and agricultural farmland to proposed land uses that would be more vulnerable to the presence of contamination. Residential development, schools, commercial development, allotment gardens, parks or similar uses are vulnerable to the presence of contamination.

4.20.5 Environmental, geological and historical data has been used to compile the baseline reports reflect the true nature of ground conditions and previous land use history across the Application Site and surrounding area, alongside physical ground investigations. The description of the baseline conditions within the Site has been prepared with reference to these technical reports, which form Appendices 12.1 to 12.7.

4.20.6 Given the Outline stage of the planning process, it has not been possible to fully quantify all the effects of the Proposed Development; however, an assessment has been made of the magnitude and significance of the predicted effects based on a worst-case scenario in terms of ground conditions. Given education uses and

residential uses, alongside parks and open spaces are equally vulnerable to contamination, the risks to ground conditions are the same for all three options for development on BA3.

- 4.20.7 In regards ground contamination and stability, several construction and post-completion effects have been identified, and where required, mitigation has been proposed to reduce all adverse effects to negligible or minor beneficial in some instances.
- 4.20.8 North Hertfordshire Environmental Health Team responded to consultation in respect to contaminated land. Following review of the supporting documentation, the team are satisfied with the results of the investigation and recommend three standard conditions aiming to protect human health.
- 4.20.9 The Environment Agency responded to consultation raising no objection subject to conditions, including encountering previously unidentified contaminated land, preventing unauthorised infiltration of surface water into the ground, and requiring the submission of a piling/foundation works scheme.
- 4.20.10 On review of Chapter 12 of the Environmental Statement, addendums to this chapter, and relevant appendices, I consider the mitigated impacts to be negligible and, in some instances, have minor beneficial effects in regards to ground contamination and ground stability. Subject to conditions, groundwater sources can also be protected from harm during construction.
- 4.20.11 Subject to conditions, the development will protect human health and water resources, adhering to the requirements of Local Plan policies NE10 and NE11, as well as policy P2 of the NPPF. The effects of the development following mitigation will have negligible benefits, which weighs positively in the planning balance.

4.21 **Sustainability**

- 4.21.1 Various Local Plan policies are relevant in assessing how the proposal performs with regards to sustainability; these are set out below:
- Policy SP1 – supports the principles of sustainable development within the district by maintaining the role of key settlements as the focus for new housing and employment development, providing opportunities for existing and future residents and sustaining key facilities, encouraging developments to deliver an appropriate mix of homes, jobs and facilities, be of a high quality, provide necessary infrastructure, protect key elements of the environment and secure any necessary mitigation measures;
 - Policy SP7 – seeks to deliver accessibility improvements and promote the use of sustainable transport modes;
 - Policy SP10 – supports healthy, inclusive communities for residents through delivering or retaining community, cultural, leisure and recreation facilities, provision of healthcare services, maintaining the network of local retail centres, ensuring sufficient school places and facilitating green infrastructure to foster healthy lifestyles;
 - Policy SP11(a) – supports proposals for renewable and low carbon energy development in appropriate locations;

- Policy D1 – secures sustainable design elements where reasonable, with respect to sustainable drainage systems, measures to reduce energy consumption and waste, retain existing vegetation and propose appropriate new planting, future-proof buildings for changes in technology and lifestyle and for residential schemes to meet or exceed optional water efficiency standards; and
- Policy NE12 – promotes the development of infrastructure that contributes towards renewable and low carbon energy development and attaches significant weight to the local and wider benefits of these proposals.

4.21.2 Relevant national policies are set out below:

- Policy CC2 of the NPPF seeks to mitigate against climate change and support the transition to net zero by prioritising sustainable movement patterns, supporting good access to facilities, conservation of energy, use low carbon energy sources, create or restore habitats including through planting (paragraph 1);
- Policy CC3 of the NPPF encourages proposals to take into account current and potential impacts of climate change over the lifetime of the scheme and locate development where the risk of flooding is minimised, incorporate sustainable drainage systems, use design approaches to avoid overheating and wildfire mitigation (paragraph 1).
- References to addressing flood risk, promoting ecology, prioritising sustainable transport and energy efficient buildings in design have been made in the above sections of this report.

4.21.3 The North Hertfordshire Sustainability Supplementary Planning Document notes the three pillars of sustainability: environmental, social and economic. Some of the common approaches to incorporate sustainability include conserving resources, planning for climate change and creating equitable communities. There are three standards of sustainability to consider during the assessment of an application, which represent current policy and building regulations compliance. Paragraph 1.19 of the SPD notes that applicants are not expected to achieve the highest standards (gold) across all themes; rather the expectation is for applicants to select individual themes on which to excel depending on the context, type and scale of development.

4.21.4 Considering the application has been submitted in outline form, of the eight themes covered by the SPD, the following are relevant, based on the level of detail provided within the submission:

- Healthy placemaking;
- Promoting biodiversity;
- Sustainable travel;
- Incorporating sustainable drainage

- 4.21.5 Of relevance is Policy G4 of the Baldock, Bygrave and Clothall Neighbourhood Plan, which encourages the use of design or features in new buildings to achieve high levels of energy efficiency, resilience to rising temperatures and / or a sustainable use of resources.
- 4.21.6 Policy E2 of the Neighbourhood Plan is also applicable and contains principles for the provision of green infrastructure, including the integration of a network of open spaces, incorporation of sustainable drainage features and planting of street trees (amongst other things).
- 4.21.7 Principles for sustainability within the adopted Strategic Masterplan are relevant to the assessment of the application and have been listed below:
- All buildings Net Zero in operational carbon emissions;
 - All-electric development;
 - Contributions to carbon offset fund, if required;
 - Highly energy efficient homes and buildings;
 - Use of renewable heat and energy-generating technologies.
- 4.21.8 As noted above, the application is supported by a Sustainability and Energy Statement prepared by Turley Sustainability and ESG. It refers to pre-application engagement and specific themes and targets for the development, with paragraph 2.7 outlining that an ambitious approach will be taken at Baldock in respect of the development's sustainability and energy performance.
- 4.21.9 It is important to note that within the Sustainability and Energy Statement, it is acknowledged that the development is expected to take place over a number of years, as such, the sustainability strategy aims to retain flexibility in the standards set to accommodate emerging standards and technologies over time.
- 4.21.10 Site-wide principles are set out in the Design and Access Statement and appended to the Development Specification:
- Sustainable layout and landscaping;
 - Integration of SuDS;
 - Building design and integration of energy generation; and
 - Enabling healthy lifestyles.
- 4.21.11 Taking the eight themes of the Sustainability SPD in turn (the last two have been amalgamated) an assessment on the development's performance has been set out below.
- 4.21.12 *Climate Change Mitigation Through Reducing Carbon Emissions*

4.21.13 The two key sources of carbon emissions – operational energy as day-to-day running of buildings and embodied carbon as the materials and components making up the structures – the following points are noted⁶²:

- All homes will target being net zero for regulated carbon emissions;
- All homes and buildings will be constructed to a high standard of fabric efficiency and airtightness that aims to go beyond the minimum requirements of the Government's Future Homes and Buildings Standard;
- All community buildings (built by Urban & Civic) including schools will aim to be net zero for regulated carbon emissions;
- All non-residential buildings over 1,000m² will pursue BREEAM certification with an aim to achieve a BREEAM 'Excellent' rating, which requires a strong focus on minimising energy demand and reducing carbon emissions;
- Homes and buildings will utilise a range of renewable energy technologies such as roof-mounted solar photovoltaic panels⁶³ and air source heat pumps;
- The eastern end of BA10 has been identified as potentially suitable for the provision of stand-alone renewable energy infrastructure⁶⁴;
- The whole development will be powered solely by electricity without the use of fossil fuels to provide heating and hot water;
- Parcels BA1 and potentially BA10 will include an 'innovation zone' or invite wider innovation, which will explore the use of new technologies and higher construction standards on a select number of dwellings when compared to the rest of that specific zone⁶⁵;
- Energy demand would be reduced through passive design measures and a fabric first approach before utilising low carbon energy and the production of on-site renewable energy (in line with the energy hierarchy), noting that residential buildings would aim for silver level performance against the Sustainability SPD⁶⁶;
- Building orientation and form shall consider reducing building energy demand through optimising solar gain;

⁶² Pages 11 and 12 of the submitted Sustainability and Energy Statement refers.

⁶³ Page 14 of the submitted Sustainability and Energy Statement sets out that approximately 9,300MW of PV will be installed on the roofs of domestic and non-domestic buildings across the site as a minimum.

⁶⁴ Subject to separate feasibility study, as stated on page 12 of the submitted Sustainability and Energy Statement.

⁶⁵ Page 12 of the submitted Sustainability and Energy Statement sets out that the innovation zones could include measures such as building to the UK Net Zero Carbon Building Standard, the use of modern methods of construction, smart grid technology, 'zero bills' homes or collaboration with a university or research institution.

⁶⁶ Paragraph 3.1.2.3 of the submitted Sustainability and Energy Statement sets out that homes will aspire to achieve less than 675 kgCO₂e/m², which will form part of the assessment criteria for appointing and monitoring housebuilders and other developers.

- A range of other measures to reduce energy use and carbon emissions would be considered in the detailed design of the development, including low energy lighting and high efficiency heating systems.
- 4.21.14 It is noted that these are aspirations only and matters in the Sustainability SPD such as glare, thermal mass, insulation, air tightness, form factor (volume of a building relative to its surface area), overheating, cooling and ventilation and fabric first cannot be assessed considering the outline form of the submission.
- 4.21.15 The proposals currently cannot evidence some of the above criteria under the current outline application and at this stage of the development, would not achieve a gold rating with regards to optimising passive design and fabric performance for either the residential or non-residential elements of the scheme.
- 4.21.16 It is certainly a benefit that the development commits to the use of solar PV panels and air source heat pumps; however, similarly, at this stage, the development cannot evidence a gold rating under achieving low carbon energy when assessed against the Sustainability SPD. Energy and sustainability submissions shall be required through the design codes or other phase framework submissions and secured by condition. The reserved matters process would also require the approval of details including checklists against the requirements of the Sustainability SPD
- 4.21.17 *Healthy Placemaking*
- 4.21.18 As described in previous sections, the development would deliver extensive and accessible green spaces, noting the following broad elements of the proposal:
- Provision of a range of homes and different tenures where possible, with a mix that would address identified local need;
 - Around 40 hectares of new parkland would be provided at Bygrave Common, Eastern Park, land east of Clothall Common, the Urban Open Land and Walls Field, enabling further accessibility within these areas;
 - A proposed 'Baldock Greenway' as a multi-user leisure route would be created around and through Baldock town, also providing connections to the wider rights of way network and connectivity to existing facilities and services;
 - Provision of play opportunities throughout the site and incorporating a range of these, such as local equipped areas for play, neighbourhood equipped areas of play, informal 'play on the way' and pocket parks, accessible via the proposed rights of way network throughout the site;
 - Formation of two sports hubs on the site at Eastern Park in the northern portion of the site and the Urban Open Land within the south-eastern part of the site;
 - Opportunities for food growing in various areas across the site would be incorporated, including formal allotments, community growing spaces and informal foraging / edible trails;

- Creation of a heritage trail, which would celebrate the site's local heritage and cultural context through the use of public art installations and information at key vantage points;
 - Community facilities including healthcare, a local centre and education would be provided on-site, in combination with mobility hubs and therefore accessible from a range of transport options;
 - Promoting the health of existing and future residents of the development through a sustainable movement strategy that would ensure reduced emissions, mitigation against the risk of overheating including through planting and ensuring appropriate internal and external noise guideline levels will be achieved in all dwellings.
- 4.21.19 Public consultation on the proposals has taken place and will continue to do so as part of the long-term community ownership and stewardship approach. As set out in previous sections of this report, the stewardship approach would address the long-term management of public assets comprising green spaces, play areas, footpaths and cycle paths, community centre, allotments and sports pitches (for example).
- 4.21.20 Matters relating to internal spaces in residential buildings, daylight levels, ventilation, outlook and privacy cannot be determined at this outline stage of the proposals. Whilst the layout of the site allocations is reserved, the proposed active travel measures have been emphasised and would be prioritised, with a range of play and leisure facilities, such that the proposal could achieve gold in the following areas of healthy placemaking under the Sustainability SPD:
- Ensure any Green Infrastructure provision links to strategic Green Infrastructure to complement the Nature Recovery Network;
 - Ensure all schemes propose play, community amenity and food production opportunities and Fields in Trust distances with regards to play spaces;
 - Ensure that the air quality assessment demonstrates air quality positive;
 - Ensure schemes embed key aspects of healthy placemaking as outlined in the NHS Putting Health into Place guidance.
- 4.21.21 *Biodiversity*
- 4.21.22 The development would achieve gold with respect to the submission of ecological surveys and assessments and the mitigation provided that would ensure the proposals address the displacement of protected species, provide appropriate habitat and foraging opportunities and enhances ecological connections.
- 4.21.23 Ecological buffers would be provided to existing on-site and adjacent local nature reserves and local wildlife sites and mitigation measures would be put in place through the Construction Environment Management Plan to ensure that harm to protected species and associated key ecological areas are minimised.
- 4.21.24 The proposal would over-provide with regards to the required amount of green space, which would serve to reduce the recreational pressure on existing surrounding local nature reserves, particularly to the south and west of the site.

- 4.21.25 As set out in an earlier section of this report, the development would achieve at least 10% statutory biodiversity net gain on-site. Whilst 10% off-site has not been demonstrated, as a requirement for the gold rating, the proposals could achieve net gains of 20% on-site. The exact percentage of net gain cannot be confirmed at outline stage. As such, the proposal could achieve a silver rating against this matter within the Sustainability SPD but could be able to demonstrate a gold standard once biodiversity net gain has been assessed as part of details reserved by condition and the reserved matters submissions.
- 4.21.26 Inevitably, the proposals cannot feasibly retain all trees on the site. As set out above, the extent of tree removal has not been defined, noting that layout is a reserved matter under this application. The level of tree removal would be predominantly low or poor quality (Category C or U) trees. Further, the proposals would incorporate tree planting within its extensive public landscaped areas to offset the loss of trees through construction.
- 4.21.27 *Sustainable Travel*
- 4.21.28 The proposal is underpinned by the following transport principles as summarised within the submitted Sustainability and Energy Statement:
- Reducing car dominance in Baldock;
 - Safe, direct and coherent networks for active travel;
 - Delivering a green infrastructure network;
 - Prioritising buses over private vehicles and provision of additional bus stops to serve the southern residential extensions to Baldock;
 - Enhanced rail station access;
 - Managing freight and logistics; and
 - Reducing reliance on the private car with the aspiration that around 50% of all trips are made by other modes.
- 4.21.29 The various transport benefits of the proposal shall not be repeated in this section of the report; however, it is noted that multiple connections would be provided within the site to connect the development with existing and proposed facilities and services. Existing routes within Baldock would be enhanced to prioritise pedestrian movement, incorporating safe crossings, particularly across the railway line and Clothall Road (for example).
- 4.21.30 Provision of a bus route within BA1 and bus stops outside BA2 would be secured as part of the proposals to offer choice in transport modes. Bus priority is proposed at the new North Road access leading into BA1 as well as other areas proximate to the town centre.
- 4.21.31 Car parking areas are intended to be designed with flexibility, so that they can be repurposed for different uses in the future, in the event that car ownership within the application site decreases over time. It is also proposed that all dwellings will have access to one allocated electric vehicle (EV) parking space, either on-plot or in a shared parking area. Non-residential parking would also incorporate an appropriate proportion of EV charging spaces.

- 4.21.32 Based on the above, the proposal is likely to be able to achieve gold with regards to sustainable travel when assessed against the Sustainability SPD.
- 4.21.33 *Conserving Water and Incorporating Sustainable Drainage*
- 4.21.34 The Sustainability and Energy Statement outlines how the development would address flood risk and water efficiency through the following measures:
- Incorporation of a surface water drainage strategy designed to accommodate a 1 in 100-year event plus 40% allowance for climate change, in line with Hertfordshire Lead Local Flood Authority advice;
 - Surface water to be disposed of through infiltration where possible, with individual soakaways for residential plots and roads, footpaths and BA10 buildings draining to infiltration basins through a combination of swales, bio-retention areas and piped networks;
 - Sustainable drainage would mimic natural drainage processes to reduce runoff, whilst contributing towards recharging of groundwater aquifers in the area;
 - Designing buildings with dual flush WCs, low flow fittings, water meters and leak detection devices and water efficient equipment.
- 4.21.35 It is acknowledged that limiting water consumption per person per dwelling is dependent upon occupant behaviour patterns and that to meet the gold standard targets stipulated within the Sustainability SPD, the development would require the use of rainwater / greywater recycling systems, enhanced effectiveness WC and spray showers, which the submitted Sustainability and Energy Statement confirm are not available at the scale of the development proposed⁶⁷.
- 4.21.36 With regards to sustainable drainage, any planning permission would be subject to submission of the detailed design of drainage systems within the individual reserved matters parcels, in line with the recommendation from Hertfordshire Lead Local Flood Authority and the Environment Agency. It is at this stage where the proposal may be able to demonstrate achieving a gold rating in the area of incorporating sustainable drainage.
- 4.21.37 *Sustainability Conclusion*
- 4.21.38 It is clear from the above sections of this report that the proposal, through submission of framework documents and detailed reserved matters, could achieve the gold standard for criteria relating to addressing matters such as flood risk and drainage, ecological features on and off-site and accessibility and sustainable transport.
- 4.21.39 In the event planning permission is granted, conditions requiring the submission of detailed Sustainability and Energy Statements shall be included at phase framework level. This would ensure that the objectives within the Strategic Masterplan are met and demonstrate how the detailed design of the development would contribute towards reaching the gold standard for select sustainability

⁶⁷ Paragraph 3.5.2 of the submitted Sustainability and Energy Statement refers to the Future Homes Hub Water Efficiency Report.

themes as set out within the SPD. Weightings on the various factors above have been reported in separate sections, where relevant.

4.22 Impact on Neighbouring Properties

- 4.22.1 Policy D3 of the Local Plan requires that developments do not cause unacceptable harm to living conditions. Where mitigation is required, if such mitigation does not address the identified harm, planning permission will be refused.
- 4.22.2 Further, Policy P3(2)(b) of the NPPF states that development proposals should be appropriate for their location and not give rise to, or contribute to, an unacceptable level of access to daylight and sunlight for neighbouring residents and occupiers.
- 4.22.3 The submitted Development Specification includes site-wide principles, where Built Form and Place Identity seeks to integrate existing properties sensitively within the site layout. This shall form part of an approved plans condition on any planning permission.
- 4.22.4 Impacts on neighbouring residential properties with respect to visual bulk, loss of light or overlooking shall be considered during the reserved matters stage for each parcel within the application site. With regards to the current application submission and the available information, each allocation and parcel has been considered and shall be discussed in turn.
- 4.22.5 *BA1*
- 4.22.6 The part of the application site that comprises BA1 surrounds a group of residential and agricultural properties along Bygrave Road. The proposed Parameter Plan indicates Bygrave Road to be retained as an east-west link serving these existing properties. The provision of a new north-south active travel link traversing BA1 and leading to BA10 would be sited proximate between two neighbouring properties on Bygrave Road. The intersection of these links would also comprise the location of the local centre on BA1, north of these neighbours.
- 4.22.7 The submitted Parameter Plan does not include fixed dimensions of the new (north-south) road reserve and layout details for the local centre are not for consideration under this application. As set out within the submitted Planning Statement, the development would include appropriate buffers to ensure an acceptable level of amenity for existing residential properties and neighbouring uses.
- 4.22.8 In the interests of protecting residential amenity of existing and proposed dwellings adjacent and proximate to the local centre on BA1, it would be necessary to include a condition controlling the hours of operation of retail uses and the community building on any planning permission.
- 4.22.9 *BA2*
- 4.22.10 This allocation is adjacent to residential properties to the north-east, north-west and south-west. Notwithstanding that layout and details are reserved under this outline application, it is acknowledged that a buffer would be provided to the private rear gardens of residential properties directly adjoining to the north-east and north-west of BA2. This buffer would be achieved through a combination of longer rear gardens, landscaping and siting of buildings, all of which are required to be determined through any future reserved matters process.

- 4.22.11 With regards to the two properties located near the north-eastern corner of BA2, these would adjoin an area of public open space. Appropriate boundary treatment to ensure acceptable levels of privacy would be sought by condition and controlled through the reserved matters process if planning permission is granted.
- 4.22.12 Levels fall from the south-west (rear) boundary of BA2 to its Clothall Road frontage, where it is likely that the proposed development would be sited on lower ground relative to the neighbouring mobile home park. An assessment of the layout, scale and appearance of the proposed dwellings on BA2 together with details of land levels shall be sought at the reserved matters stage to ensure that there would not be an adverse impact on the residential amenity of these neighbouring properties and others adjoining the site.
- 4.22.13 *BA3*
- 4.22.14 The proposals for BA3 include the provision of the Baldock Greenway connecting the westernmost part of Wallington Road to the raised green space east of Clothall Common. Together with the existing nature strip to the north-west of this public footpath and landscaping treatments would provide a buffer between the proposed residential and educational development on BA3 relative to the neighbouring properties immediately north and north-west of the application site, located on Barley Rise, Chauncy Gardens and Merchants Walk. Whilst detailed designs of buildings on BA3 shall be considered at the reserved matters stage, if planning permission is granted, the buffer created by the development and existing conditions would ensure that adverse impacts with respect to visual intrusion, loss of light or overlooking would be appropriately addressed and mitigated.
- 4.22.15 There are no neighbouring properties directly adjoining the area of Urban Open Land or the land west of North Road. Whilst the intensity of uses on these parts of the site would increase, the impacts on the nearest neighbouring properties would unlikely result in unacceptable levels of harm, noting that buffer zones and boundary planting would be an appropriate form of mitigation that could be controlled through conditions requiring a design code and subsequent reserved matters applications.
- 4.22.16 *BA10*
- 4.22.17 The nearest residential properties to the employment extension proposed at BA10 are located immediately south, beyond the road reserves of Royston Road (B656) and the associated nature strip and bund beyond. This includes the development currently under construction at Rhee Spring (BA4). It is also acknowledged that office premises directly west of this part of the site may also represent a sensitive interface to the development.
- 4.22.18 The placement of buildings within this employment allocation and their individual uses has not been confirmed at outline stage. However, details of the design and effects of the buildings and specific plant, machinery and emissions on neighbouring properties shall be reviewed through reserved matters stage if planning permission is granted.
- 4.22.19 *Proposed Lighting Impacts*
- 4.22.20 Lighting proposals have been outlined within Chapter 15 of the submitted Environmental Statement, which acknowledges that during the construction stage, works will likely extend into hours of darkness on occasion and as such the impact

of additional lighting above baseline conditions would be experienced from adjacent properties and the surrounding area from vehicles and other on-site lighting in certain areas. Without mitigation, this effect has been judged as being minor adverse.

- 4.22.21 Post-completion, noting that many parts of the site would be occupied and have outdoor and street lighting, this would permanently introduce artificial lighting above existing conditions. Lighting is to be controlled through the reserved matters stages if planning permission is granted so that it would not compromise the living conditions of existing residential properties to an unacceptable degree. Mitigation measures include the incorporation of downward-facing lights with built-in shields as appropriate. The change resulting from the proposed lighting has therefore been reported as minor adverse. This has not been challenged in the assessment of the application with regards to the impact on neighbouring properties.

4.22.22 *Impact on Neighbouring Properties Conclusion*

- 4.22.23 It follows the proposal would not conflict with the aims of Policy D3 of the Local Plan or Policy P3 of the NPPF. Weighting associated with the visual impacts of the development, including lighting, has been stated within other sections of this report.

4.23 **Noise**

- 4.23.1 Policy D3 of the North Herts Local Plan protects the living conditions. The policy operates to protect noise sensitive uses from noise generating uses and aims to secure high-quality amenity for proposed developments where they would be affected by a noise generating existing use. In cases where there is potential for the living conditions of the occupiers of proposed development to be impacted, the Council will consider whether there are mitigation measures that can be taken to mitigate the harm to an acceptable level.

- 4.23.2 In regard the impact of existing noise sources on the development, policies BA2 and BA3 require appropriate mitigation measures towards future occupiers from noise associated with the A505. BA2 suggests potential insulation and orientation of living spaces. BA3 sets out appropriate insulation and orientation of living spaces; and maintaining or limited re-profiling of the existing bunding towards the east of the site with no housing permitted on or beyond its (revised) alignment. Policy BA10 requires development proposals to provide adequate mitigation measures for noise associated with the railway line. Policy SP14 with respect to allocation BA1 does not have any noise specific requirements, however, given the development abuts the railway line, it is expected that the impact is assessed and mitigated.

- 4.23.3 Policy E7 of the Neighbourhood Plan suggests a landscape buffer between the edge of the developments and the Baldock bypass, using an appropriate mix of native species, to provide visual screening, an enhanced green corridor and noise attenuation in regards allocations BA2 and BA3, which aligns to the Design Guidelines in regards to edges facing the bypass. Policy E3 of the Neighbourhood Plan aims for development to secure suitable measures to monitor and manage noise.

- 4.23.4 Noise is covered substantively within policy P3 of the NPPF. Policy P3 has regard to living conditions and pollution. Additional requirements pursuant to P3 include

having particular regard to groups vulnerable to the effects of that form of pollution, for example children or older people. Further, part 2.d. of policy P3 sets out that development proposals should not result in levels of noise exposure which would have a significant observed adverse effect, and maintain the character of tranquil areas (those areas that have remained relatively undisturbed by noise from human sources and are prized for their recreational and amenity value for this reason). Significant observed adverse effect level is defined as the level of noise exposure above which significant adverse effects on health and quality of life occur.

- 4.23.5 Policy P4 of the NPPF is also considered applicable. Policy P4 introduces the agent of change principle, and aims to ensure new development does not place unreasonable restrictions on current or permitted operations. In the context of this application, policy P4 includes industrial and waste uses within a not closed list of existing business and infrastructure that should be protected. Where the operation of an existing activity could have a significant adverse effect on a proposed new development in its vicinity, development proposals should identify the nature of the potential impacts and be able to demonstrate that suitable mitigation can be provided before first occupation of the development.
- 4.23.6 The Growing Baldock Strategic Masterplan sets out a proposal to provide landscape buffers to railway and strategic road network in respect to noise mitigation. It also suggests that the supporting Environmental Statement for any future application should test any requirement for any additional mitigation such as acoustic barriers.
- 4.23.7 In respect to use allocations, areas with uses designated which could contain noise generating uses include BA10, and a local centre within BA1. In respect noise sensitive uses, BA3 is set out as either a school site, combined school and residential, or residential use, all of which are noise sensitive. BA2 is set as a residential noise-sensitive use adjacent to the Baldock Bypass. The masterplan indicates residential uses to the north of the railway line in BA1, and BA10 has potential in the masterplan for noise sensitive uses to the south of the railway line, particularly the suggested Health Hub.
- 4.23.8 Within the Development Specification, mitigation is suggested on BA2 that development to front the linear green space (which itself is adjacent to the A505) should have limited breaks in building line to provide noise mitigation to rear gardens, living rooms and bedrooms. Similar mitigation is suggested in the Development Specification in regard to the Railway, slightly enhanced to requiring near continuous terraced and semi-detached frontages facing the railway. In addition, appropriate glazing and ventilation may need to be installed in dwellings fronting the railway line so as to achieve appropriate internal noise guideline levels in noise sensitive rooms. Where and if development falls within the 30m buffer of the A505, homes must be oriented to face the A505 in order to perform a noise mitigation function, requiring near continuous terraced and semi-detached frontages facing the A505, in order to achieve appropriate noise levels in private garden areas to the rear.
- 4.23.9 The submitted Noise Impact Assessment covered in appendices 5.4 and 5.5 of the Environmental Statement appraises the impact of existing noise generating uses on the future occupiers of the proposed development.
- 4.23.10 Figure 5.2 in appendix 5.5 of the Environmental Statement identifies the siting of point noise receivers informing the baseline conditions. LT1 is located on North Road, LT2 immediately south of the rail line, LT3 off Royston Road on site BA10,

LT4 near to BA2 on Clothall Road and LT5 on the nearest point of the site within allocation BA3 to the Baldock Bypass. The site observations identified continuous noise from the A505, frequent road traffic on other local roads, and less dominant noise in birdsong, people talking, noise from passing trains, and overflying aircraft.

- 4.23.11 A further detailed noise measurement survey matrix has been undertaken across the BA3 land parcel. The attended baseline sound survey was undertaken at the BA3 land parcel to quantify the existing local sound climate across the site, with 15-minute readings taken from locations set out in Annex A of the Noise Impact Assessment, at distances from the top of the embankment alongside the A505 of 7.5m, 15m, 30m, 60m, 120m and 180m. The results show that at 30m from the top of the embankment alongside the A505, the measured sound level is 55dB(A) Leq,15min during the daytime. 55dB(A) is the upper guideline noise level for gardens of proposed dwellings, and the noise level limit for unoccupied playgrounds.
- 4.23.12 Three options were appraised in respect to BA3, Option 1 – Education (secondary and SEND) uses on BA3; Option 2 – Mix of Education (SEND) and Residential uses on BA3; and Option 3 – Mix of Education (secondary and SEND) and Residential uses on BA3. Whilst SEND use on site has been removed from the description of development and Development Specification, this has no material impact on the optionality appraised or the results at this stage of the developments evolution/process.
- 4.23.13 The noise impact assessment sets out, within indicative layouts, that subject to mitigation in the form of appropriate glazing and ventilation where rooms with a higher sensitivity to noise are located on noisier facades, a proposed school, whichever FE is considered required and deliverable on BA3, would meet the requirements of the relevant standards.
- 4.23.14 In respect to residential development, facades within BA2 and BA3 near to the A505, some dwellings to the north of the rail line, and dwellings along the street connecting North Road with the A505 through BA1, will require enhanced glazing specifications and ventilation strategies. Subject to embedded mitigation of orientation of dwellings to address noise sources, as required by the Design Principles forming part of the Development Specification, the majority of gardens proposed would meet the desired external noise guideline levels.
- 4.23.15 The conclusion of the noise impact report is that subject to mitigation measures identified within the report, internal and external noise guideline levels will be achieved in all dwellings. In addition, the secondary school site, subject to some standard noise mitigation measures will be required to meet with the requirements of BB93 in the proposed schools.
- 4.23.16 Chapter 5 of the Environmental Statement sets out in the assessment approach section that consideration will be had to the following potential impacts:
- The construction and demolition phase noise impact on existing noise sensitive receptors surrounding the Site;
 - The construction phase vibration impact on existing noise sensitive receptors surrounding the Site;

- The operational phase noise impact of development led road traffic on existing sensitive receptors located on roads leading to and from the development;
- The operational phase noise impact of proposed sources of noise on existing and proposed sensitive receptors which are adjacent to the site boundary including the proposed waste uses.

4.23.17 ;In regards to noise and vibration during construction phases, the Environmental Statement sets out that the existing sensitive receptors are of medium sensitivity and the impacts of both noise and vibration, considered separately are moderate adverse without suitable mitigation. Mitigation is indicated within the outline construction environmental management plan submitted with the application, which will be expanded upon in more detailed Construction Environmental Management Plans to be secured by condition at phase and reserved matters stage. Indicative contents of the CEMP include:

- Noisy construction works will be restricted to daytime hours, typically between 0800 and 1800 hours Monday to Friday and 0800 to 1300hrs Saturdays, with no noisy work permitted on Sundays or Bank Holidays.
- When works are taking place within close proximity to the sensitive receptors identified, the screening of noise sources via the erection of temporary screens will be employed.
- All machinery will be regularly maintained to control noise emissions, with particular emphasis on lubrication of bearings and the integrity of silencers.
- Site staff will be made aware that they are working adjacent to a sensitive area and avoid all unnecessary noise due to misuse of tools and equipment, unnecessary shouting and radios.
- As far as possible, the avoidance of two noisy operations occurring simultaneously in close proximity to the same sensitive receptor.
- Adherence to any time limits imposed on noisy works by the local authority.
- Implement set working hours during the week and at weekends.
- Ensure engines are turned off when possible.
- Should earthworks and construction activities need to be carried out during night-time hours, the local authority may include a planning condition that requests advance notice and details of any night working to be provided.
- To keep ground borne vibration to a minimum the following measures (as referred
- to in BS5228-2) will be put in place and enshrined within the CEMP:
- Substitution: Where reasonably practicable, plant and or methods of work likely to cause significant levels of vibration at the receptors identified will be replaced by less intrusive plant/methods of working; and

- Isolation of plant at source: This may prove a viable option where the plant is stationary (e.g. a compressor, generator) and located close to a receptor.
- 4.23.18 At operational phase, no vibration effects are considered likely. The Environmental Statement considered development led road traffic noise at existing sensitive receptors during operational phase, concluding that while the receptors have medium sensitivity, the impact magnitude is negligible, with the exception of Halfway Farm Bygrave Road, on which the impact magnitude is moderate but not significant.
- 4.23.19 In respect to proposed noise generating uses (commercial and educational uses) the ES accepts that some fixed plant and equipment is likely and could produce noise, albeit exact details are not yet known. There is an acceptance what without measures to implement control, noise from education and commercial premises could be large. The effect of proposed noise generating uses on existing noise sensitive receptors is major adverse without mitigation measures.
- 4.23.20 Matters relating to existing sources of noise on proposed sensitive receptors is isolated within the ES and appendix 5.4 to noise from existing roads, the London to Cambridge railway line, and the Proposed Development itself.
- 4.23.21 Where relevant to the Environmental Statement itself and not contained and explained above in respect to the Noise Impact Assessment (appendix 5.4) mitigation is required on proposed commercial premises and schools in relation to noise emissions from plant and equipment noise. The proposed mitigation is to impose a plant noise emission limit for all fixed plant items associated with the development, based on guidance provided in BS 4142:2014+A1:2019, resulting in plant noise emissions will therefore be constrained to not exceed the background sound level when assessed at the nearest noise sensitive receptor.
- 4.23.22 The ES Chapter 5 summarises the residual effects post mitigation as follows:
- Construction Phase Noise – Negligible to minor adverse
 - Construction Phase Vibration – Negligible to minor adverse
 - Operational Phase Noise (Development Led Traffic) – Negligible to moderate adverse
 - Operational Phase Noise (Non-Residential Uses) – Negligible
- 4.23.23 Cumulative effects are considered in regards road traffic noise, as embedded mitigation regarding construction noise impacts will be required in each individual development, so simultaneous construction should not have a significant cumulative effect. The cumulative operational phase assessment for traffic identifies that some receptors have the potential to experience an impact magnitude of between negligible and small. Receptors have a medium sensitivity as a result development led traffic from committed developments and the Proposed Development will cause an effect which is between negligible and minor.
- 4.23.24 North Hertfordshire Environmental Health Team responded to the consultation, in respect to noise, with no objection subject to a condition requiring a further noise assessment (to cover any outstanding matters including the proposed noise sources, as part of reserved matters) is submitted with definitive mitigation

proposals on a plot-by-plot basis, along with noise limits for fixed plant and other mitigation. The response expands on the reasoning for the need for this condition, in that the noise assessment only covers existing noise sources affecting any potential future occupiers, and that the report does not cover the noise from the proposed waste sites in area and other employment/commercial uses and their impact on future occupiers.

- 4.23.25 The results and appraisal set out in the noise impact assessment covered in appendices 5.4 and 5.5 of the Environmental Statement are agreed. Appendix 5.5 of the Environmental Statement shows that the impact from proposed road traffic in BA1 has been considered and appraised.
- 4.23.26 Case officers retain concerns regarding the noise impact assessment suggesting that noise from rail traffic appears to only affect residential the facades of dwellings to the east of BA1 and not nearer to the station (as shown in figures 5.14 and 5.19 of appendix 5.5 of the Environmental Statement), and potential noise and vibration nuisance crossing from the south side railway line from existing and proposed commercial and industrial uses.
- 4.23.27 Regarding potential noise and vibration from proposed commercial and industrial uses on BA10, Chapter 5 of the Environmental Statement states that a noise emission limit will be set for all fixed plant associated with the development operating simultaneously. The limit will be based on the guidance in BS 4142:2014+A1:2019. Accordingly, it is suggested within the Environmental Statement supporting this application that the noise pursuant from the proposed industrial and commercial uses from plant, machinery and operations will be below background noise levels. A condition will be required to ensure that noise from plant, machinery and operations pursuant to development of BA10, and the local centre within BA1, are below background noise levels in order to ensure the living conditions of future occupiers of noise sensitive uses within the site.
- 4.23.28 This does not address existing industrial and commercial uses on land immediately to the east of BA10 which are considered a noise source in the absence of expressed evidence otherwise. No information in the application has been provided as to the contribution of those uses as a noise generating use to the background levels, and whether nearby residential or other noise sensitive, proposed uses would affect the ability of those existing businesses to continue operations unabated by noise complaints.
- 4.23.29 That said, all matters regarding the proposed noise sensitive uses near to the existing commercial uses are reserved for future consideration. It is considered that an appropriately worded condition ensuring this matter is investigated, evidenced, and addressed in terms of appropriate mitigation (if any) are submitted and approved by the Local Planning Authority prior to the submission of any reserved matters would overcome concerns.
- 4.23.30 Subject to conditions requiring further detailed Construction Environmental Management Plans that consider details already indicated in the Outline Construction Environmental Management Plan and Chapter 5 of the Environmental Statement, noise and vibration nuisance during construction can be minimised to minor adverse at worst on existing sensitive receptors and future occupiers of noise sensitive dwellings.
- 4.23.31 It is accepted that long-term operational phase moderate adverse impacts in limited instances on existing noise sensitive premises will occur in terms of noise

from traffic generation from the proposed development, and there is little means of mitigating this impact. The impact from proposed noise generating uses will be mitigated by condition ensuring that noise from plant and equipment associated with the uses are below background noise levels. Accordingly, the submission documents satisfy that moderate harm would occur to a single noise sensitive receptor property, with all other noise impacts being negligible to minor.

- 4.23.32 It is considered that the evidence provided within Chapter 5 of the Environmental Statement and appendices satisfies that the development would not have a significant observable effect on the living conditions of the occupiers of adjoining properties in respect to noise or vibration (subject to conditions). Furthermore, information provided within the Design and Access Statement, parameter plan and expressed within the Development Specification (Railway Edge and A505 Edge Key Spaces and Places Principles) achieve general requirements and expectations set out in the masterplan, site specific policies and Neighbourhood Plan in-so-far as the development would aim to provide spacing of built form, orientation, and landscape buffers to noise generating transport infrastructure.
- 4.23.33 Whilst the proposed development will result in some harm in terms of noise nuisance, most notably from increased vehicle traffic noise to an existing sensitive receptor (Halfway Farm Bygrave Road), the development would, subject to conditions, accord with policy D3 of the Local Plan, policy E3 of the Neighbourhood Plan and policy P3 of the NPPF in their aims and objectives of protecting the living conditions of the occupiers of adjoining premises from noise and vibration/nuisance.
- 4.23.34 In regard to policy E7 of the Neighbourhood Plan, and the masterplan, the Development Specification sets out how the Railway Edge and A505 Edge will embed mitigation through layout, which, alongside conditions required to ensure plot-by-plot assessment and requirements for enhanced glazing specifications and ventilation, will preserve the living conditions of future occupiers from existing noise sources. The Design and Access Statements provide cross-sections indicating spacing and layout matters regarding the railway and A505 edge, which are expected in more details at reserved matters stage. These sections satisfy policy E7's aims noise attenuation between the A505 and BA3 and BA2, and the masterplan requirement to consider separation and attenuation between development and the noise generating transport corridors.
- 4.23.35 Policy P4 of the NPPF is referenced (in its old form in the previous NPPF) in the Environmental Statement, yet no appraisal has been provided in regard potential noise impacts from the existing Ashville Trading Estate and proposed noise sensitive uses north of the railway line on BA1. This matter can be satisfactorily resolved by condition.
- 4.23.36 The potential noise effects pursuant to the development can be satisfactorily mitigated, resulting in compliance with the Local Development Plan taken as a whole in this specific regard. This weighs neutrally in the planning balance.

4.24 **Waste**

- 4.24.1 Policy D1 of the Local Plan makes reference to taking opportunities to reduce waste.
- 4.24.2 The National Planning Policy for Waste (Department for Communities and Local Government (now Ministry for Housing, Communities and Local Government),

2014) provides guidance to local planning authorities when determining applications for non- waste related development. Local planning authorities are required to ensure that the “likely impact of proposed non-waste related development on existing waste management facilities and on sites and areas allocated for waste management, is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities”.

- 4.24.3 Other material considerations forming guidance in the assessment of waste pursuant to development are set out in chapter 14 of the ES, including Our Waste, Our Resources: A Strategy for England (2018), Green Future: Our 25-Year Plan to Improve the Environment (2018), Waste Management Plan for England (2021) and The Waste Prevention Programme for England: Maximising Resources, Minimising Waste (2023).
- 4.24.4 The ES sets out that waste from construction and waste during operation of the development are both likely to be generated, and without mitigation, the impacts would be substantial adverse in respect to construction waste, and major adverse in regard waste during operation.
- 4.24.5 Mitigation in the form of the site waste management plan and waste targets would increase diversion of waste resultant from construction from landfill reducing impacts to minor adverse, not significant. During operation, or post-completion stage, waste impacts would be mitigated through design measures (established in post-outline application approvals) and waste targets, reducing impacts to minor adverse, not significant.
- 4.24.6 In terms of cumulative effects, other development sites are identified in the zone of influence. It is acknowledged that construction phase impacts could have a cumulative effect increasing pressure on infrastructure, but considers the phasing of the proposed development to be such that potential cumulative impacts would remain minor adverse. During operational phase, the cumulative developments will be required to prepare and implement waste management measures to minimise waste and to maximise the diversion of waste from landfill in accordance with the waste hierarchy and national and local waste policy. In addition, the Site’s waste transfer station and household waste recycling centre will increase the capacity of local waste management infrastructure and will reduce the potential cumulative impacts. The ES chapter 14 concludes that, during the medium and long term, cumulative impacts would be minor adverse and therefore, not considered to be significant.
- 4.24.7 Hertfordshire County Council as Minerals and Waste Authority have responded to consultation expressing that, whilst they would expect a Site Waste Management Plan to be submitted with an application, subject to a pre-commencement condition, the proposal would be acceptable.
- 4.24.8 North Hertfordshire Waste and Recycling team responded to consultation with no substantive response.
- 4.24.9 On review of chapter 14 of the ES, addendums to this chapter, and relevant appendices, I consider the mitigated impacts in regard to waste to be minor adverse in line with the conclusions of the submissions.
- 4.24.10 Subject to a condition requiring the submission of a Site Waste Management Plan prior to the commencement of development, and other associated conditions

which necessitate the consideration of on-site waste infrastructure design for all proposed uses, the development will reduce waste, adhering to the requirements of Local Plan policy D1.

- 4.24.11 In regard to waste, the development would have a neutral impact in the planning balance.

4.25 **Public Health**

- 4.25.1 National and local policies surrounding public health have been considered in various earlier sections of this report and are listed below for reference (national decision-making policies only):

- Policy HC3 of the NPPF (Community facilities and public service infrastructure serving new development);
- Policy HC4 of the NPPF (Proposals for new and improved community facilities, public service infrastructure and development providing public health benefits);
- Policy HC5 of the NPPF (Hot food takeaways)
- Policy DP3 of the NPPF (Key principles for well-designed places);
- Policy P3 of the NPPF (Living conditions and pollution);
- Policy P5 of the NPPF (Maintaining public safety and security);

- 4.25.2 Policy E3 of the Neighbourhood Plan relates to managing construction impacts, requiring vehicle routes and construction activity to be directed away from residential areas, the appropriate management of noise, vibration and dust and early implementation of landscaping measures to provide screening.

- 4.25.3 Policy E4 of the Neighbourhood Plan seeks to build strong communities by providing new community facilities as early as possible in the development process and making arrangements for new residents and businesses to be involved in the continuing management and evolution of their community.

- 4.25.4 In addition to the submitted plans and Development Specification, the application has been supported by the following documents:

- Chapter 13 Socio-Economic and Health of the Environmental Statement (DLA, 2025);
- Design and Access Statement (February, 2026);
- Green Infrastructure Strategy (Bradley Murphy Design, 2026)

- 4.25.5 The effects associated with construction are outlined in Chapter 13 of the Environmental Statement. During the construction period, there would be the potential for air quality, noise and vibration impacts on a temporary basis, although these will be addressed as much as possible through the Outline Construction Environmental Management Plan (CEMP) and detailed CEMPs required by condition. Risks associated with safety and wellbeing of construction personnel and pedestrians would be significantly reduced through following construction guidelines. These impacts should also be balanced against the positive impact as a result of the creation of jobs. As has been set out in separate sections of this report, existing features on site worthy of protection for ecological or heritage reasons have been addressed within the Outline CEMP. The effect of the proposed development on health during the construction stage would be temporary and of a local scale and thus would have a negligible impact.

- 4.25.6 A Health Impact Assessment has not been submitted, although aspects of health are covered within the submissions listed above, as well as embedded in other areas of the application documentation. Previous sections of this report have detailed the social benefits of the development in terms of residential, retail, employment, job creation, healthcare, active travel, design and open space and their effects shall not be repeated here.
- 4.25.7 The additional potential impacts during both construction and completion of the development on further aspects of the development are set out below:
- Education provision – the proposed development would meet its requirements with regards to both primary and secondary facilities on the site, in line with requirements from Hertfordshire Growth and Infrastructure, which would have negligible significance.
 - Sport and recreational facilities – through an increase in population, the development would place demand on existing sport and recreation facilities in the surrounding area⁶⁸, notwithstanding that a significant portion of the site would be developed for outdoor sports (football and cricket in particular) and indoor spaces incorporated within the development would be available for community use to further widen the sporting offer across the site. Informal recreation would be provided through the extensive open space provision on the site that would exceed its requirements set out in the Developer Contributions SPD. This would have a moderate beneficial effect on local residents of Baldock and a minor beneficial effect for residents beyond within the district.
 - Community facilities – this element of the development would foster a sense of community and host local public meetings and gatherings, whilst providing space for community activities and a base for community services (the police, for example). This would have a minor beneficial effect.
 - New and enhanced allotments – the provision of community growing spaces, informal foraging and edible trails would contribute to healthy diets of the population using these areas of the development, which would be located adjacent to play areas and sports facilities, also enabling informal social activities, all of which would have a minor beneficial effect.
- 4.25.8 Comments have been received from Hertfordshire Public Health, containing various recommendations relating to air quality, accessibility, active travel, active design and sports facilities affordable housing and car parking and usage.
- 4.25.9 To expand and respond to these comments, the following key points have been set out below:
- In addition to the above, a range of other community and social facilities would be secured as part of the development including the provision of education, which has not been adversely compromised as a result of viability considerations. Healthcare provision is proposed to be in excess of the GP surgeries sought by the NHS Central East ICB in their initial comments on the application, which would represent a benefit to the development as well as wider Baldock town.
 - Social interaction throughout the development would be incorporated within the key areas such as the local centre, its design around a public square environment as described within the submitted Design and Access

⁶⁸ Noted in Sport England comments.

Statement as well as the mobility hubs, which would promote choice in transport and provide segregation to facilitate safe movement throughout the site. Proposals such as community growing areas and existing allotment extensions would further enhance social interaction opportunities in conjunction with wider health benefits.

- The application has a significant emphasis on active travel, noting the provision of multiple safe and attractive crossing points to traverse the railway line from BA1 to the remainder of the town.
- Requirements for signage and paving shall be informed by relevant technical consultees through the submission of design codes reserved by condition.
- Affordable housing and locations shall be distributed across the residential allocations as appropriate to ensure equitable access to facilities and services including a range of transport modes.
- Electric vehicle charging points shall be determined through the reserved matters process and would be required to comply with parking and sustainability policies.

4.25.10 It follows that the proposal would not contravene any national or local policies with regards to health impacts and in many ways would contribute to promoting the health of the existing community and proposed occupants of the development as has been set out in separate sections of this report. The proposal would comply with all relevant criteria set out within Policy SP10 of the Local Plan.

4.25.11 Further, the overprovision of community facilities in terms of green spaces, their edge locations and integrated formal and informal routes together with the opportunity for healthcare facilities to provide beyond the identified GP minimum uplift would contribute towards promoting healthy lifestyles. This has been expressly encouraged through Policy HC4 of the NPPF, which applies substantial weight where new or improved public service infrastructure or community facilities would be provided and proposals make a demonstrable contribution towards promoting health and supporting social interaction.

4.25.12 It is recognised that Sport England has identified a technical shortfall with respect to sports provision and in light of this, notwithstanding the topographical and other constraints of the proposal, moderate beneficial weight has been attributed to the overprovision of community facilities that would not only meet the requirements of the development but would go towards supporting the wider Baldock community.

4.26 Planning Balance

4.26.1 As identified in earlier sections of this report, there are matters that weigh in favour and against the proposed development. These are visual aids and should be read alongside the detailed assessment above.

<i>Planning consideration</i>	<i>Effect</i>	<i>Weight</i>
Trees	Harm	Moderate
Landscape and visual including loss of BMV agricultural land	Harm	Moderate

Ecology and protected species	Harm	Limited
Delivery of residential development	Benefit	Substantial
Delivery of affordable housing	Benefit	Very substantial
Delivery of employment and economic considerations	Benefit	Substantial
Open space overprovision and community facilities	Benefit	Moderate
Biodiversity net gain	Benefit	Moderate
Transport and highways	Benefit*	Limited*
Flooding, water management and drainage	Benefit*	Limited*
Green Belt	Neutral	None
Transport and highways	Neutral*	None*
Heritage assets including archaeology	Neutral*	None*
Environmental impacts	Neutral*	None*
Waste	Neutral*	None*

Table 4.26.1: Planning Balance * subject to conditions and obligations

- 4.26.2 The application site comprises three allocated housing sites within the Local Plan and will therefore make an important contribution to the District's housing land supply and secure housing delivery. The proposal also includes the development of an allocated employment site, which will assist in boosting the local economy within the District. The combination of benefits outlined above and detailed within the report would be substantial. Through appropriate mitigation, the harms arising from the development both during construction and following its completion would not amount to significant adverse effects; these have been secured by way of condition or planning obligation. As such, the scheme has demonstrated compliance with the relevant local and national policies and would further the objectives of the Baldock, Bygrave and Clothall Neighbourhood Plan.

4.27 Conclusion

- 4.27.1 The proposal would deliver the residential and employment development on four allocated sites within the town of Baldock, an area identified for urban expansion through the Local Plan on sites BA1, BA2, BA3 and BA10. Therefore, the

proposals will make an important contribution to the housing land supply and increase employment opportunities and the wider economy. The Council is currently unable to demonstrate a five-year land supply; the development will assist greatly with tackling the underdelivery of much-needed housing.

- 4.27.2 The application submission and proposed development have been designed to conform with the Strategic Masterplan for the site and considered the residual effects on the surrounding highway network, landscape and visual aspects, existing neighbouring properties, flood risk and water management, heritage assets and environmental issues, during both the construction process and following completion of the development, noting that there would be no significant adverse impacts and weighting attached above. Proposals on the site on areas that fall outside the site allocations shall bring forward recreational, ecological and community uses that would be acceptable on Urban Open Land and the Green Belt as relevant. The proposal would represent a satisfactory configuration with an emphasis on open space provision and promoting wildlife and would provide affordable homes and on-site infrastructure to meet the needs of the development. The collective benefits of the development as described above would be significant.
- 4.27.3 It follows that the proposal would comply with the relevant national and local policies as set out in this report. Accordingly, it is recommended that planning permission be granted.

Alternative Options

None applicable

Pre-Commencement Conditions

I can confirm that the applicant is in agreement with the pre-commencement conditions that are proposed.

5.0 Legal Implications

- 5.1 In making decisions on applications submitted under the Town and Country Planning legislation, the Council is required to have regard to the provisions of the development plan and to any other material considerations. The decision must be in accordance with the plan unless the material considerations indicate otherwise. Where the decision is to refuse or restrictive conditions are attached, the applicant has a right of appeal against the decision.

6.0 Recommendation

- 6.1 That planning permission be **GRANTED** subject to:

A) The completion of a satisfactory legal agreement and the applicant agreeing to extend the statutory period in order to complete the agreement; and

B) Providing delegated powers to the Development and Conservation Manager to (i) resolve outstanding matters including financial contributions and (ii) update conditions and informatives with minor amendments as required;

C) The receipt of an updated consultation response from National Highways recommending approval or raising no objections and the addition of any requested conditions and obligations required by that response; and

D) Conditions as set out below:

Biodiversity Net Gain

- 1 The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for the development of land in England is deemed to have been granted subject to the condition “(the biodiversity gain condition”) that **development may not begin** unless:

(a) either:

(i) a biodiversity gain plan for that overall development has been submitted to the planning authority; and

(ii) the planning authority has approved that plan;

(b) or:

(i) a biodiversity gain plan for the overall development has been approved;

(ii) permission has been granted on an application made under section 73; and

(iii) the earlier biodiversity gain plan for that overall development is regarded as approved under section 73(2C) and (2D) for the purpose of the permission granted under section 73.

A biodiversity gain plan is a plan which:

(a) relates to the development for which planning permission is granted;

(b) specifies the following matters:

(i) information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the onsite habitat and any other habitat;

(ii) the pre-development biodiversity value of the onsite habitat;

(iii) any registered offsite biodiversity gain allocated to the development before the date of submission of the biodiversity gain plan and the biodiversity value of that gain in relation to the development;

(iv) any registered offsite biodiversity gain proposed to be allocated to the development and the biodiversity value of that gain in relation to the development;

(v) any biodiversity credits purchased before the date of submission of the biodiversity gain plan; (vi) any biodiversity credits proposed to be purchased for the development;

(vii) the post-development biodiversity value of the onsite habitat for the overall development; (viii) except in a section 73 case, the post-development biodiversity value of the onsite habitat for each phase of development;

(ix) in a section 73 case, the post-development biodiversity value of the onsite habitat for each phase of development (whether begun or otherwise); and

(x) such other matters as the Secretary of State may by regulations specify

No phase of development may be begun unless the following has been met in respect of that phase:

(a) either: (i) a biodiversity gain plan for that phase has been submitted to the planning authority; and (ii) the planning authority has approved that plan

(a) a Biodiversity Gain Plan has been submitted to the planning authority, and

(b) the planning authority has approved the plan.

The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan if one is required in respect of this permission would be North Herts Council.

There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply.

Based on the information available this permission is considered to be one which will require the approval of a biodiversity gain plan before development is begun because none of the statutory exemptions or transitional arrangements are considered to apply.

Definitions

- 1 Reference to BA1, BA2, BA3, BA10, Walls Field, Urban Open Land within the conditions below shall apply to the areas labelled as such within Figure 1 of the approved Development Specification (Version 12, July 2026).
- 2 “Enabling Works” shall refer to <INSERT DEFINITION HERE>.
- 3 “Phase” shall refer to the individual areas BA1, BA2, BA3, BA10, Walls Field, Urban Open Land and all of the area within unless otherwise expressly stated within the condition.
- 4 “Reserved Matters Area” shall refer to any area and all of that area subject to a single reserved matters application.

Standard Conditions

- 1 The first application for approval of reserved matters shall be made to the Local Planning Authority before the expiration of three years from the date of this permission. The development hereby permitted shall be begun before the expiration of two years from the final approval of the Reserved Matters or, in the case of approval on different dates, the final approval of the last such matter to be approved.

Reason: To comply with the provisions of Section 92 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

- 2 Application(s) for approval of all the Reserved Matters shall be made to the Local Planning Authority no later than 20 years from the date of this permission.

Reason: To comply with the provisions of Section 92 of the Town and Country Planning Act 1990.

- 3 Development shall not commence, except for Enabling Works, development within BA2 and the approved accesses shown on the approved access plans set out in Condition [5], unless:
 - it falls within a Phase and an approved Reserved Matters Area; or
 - the proposed development is identified as development advanced outside a Phase in accordance with Condition [8].

For the avoidance of doubt “Enabling Works” means preparation works to make the site ready for construction. Such works include (but are not exclusively limited to); site or ground clearance and preparation, surveying, environmental and hazardous substance testing and sampling, soil tests, remediation works, pegging out, tree protection, ecological survey and mitigation works, archaeological investigation, site clearance, ground improvement works, construction of boundary fencing or hoardings including for site security, demolition and removal of buildings and other structures, creation of temporary haul roads and enabling works accesses or other works or operations to enable any of these works to take place including site and ground works.

Reason: For the avoidance of doubt and to secure comprehensive, coordinated and sustainable development and to ensure that infrastructure provision and environmental mitigation are provided in time to cater for the needs and impacts arising from the development in accordance with Policies SP1 and SP9 of the North Hertfordshire Local Plan (2022).

Reserved Matters

- 4 No development on any individual Reserved Matters Area shall commence, apart from Enabling Works, until approval of the details of the appearance, landscaping, layout, access and scale (hereinafter called the reserved matters) within that Reserved Matters Area have been obtained from the Local Planning Authority in writing. The development shall be carried out in accordance with the approved details.

Reason: To comply with the requirements of Section 92 of the Town and Country Planning Act 1990 and the provisions of the Town and Country Planning (Development Management Procedure) Order 2015 and to ensure high-quality urban design and coordinated development.

Conformity

- 5 The submission of information to discharge conditions for Phase Framework Requirements (Condition 7) and Reserved Matters applications (Conditions [6] and [9]) shall generally accord with the following approved plans and documents (or such other plans and documents as may be subsequently approved):

- Parameter Plan (reference UAC092-002 Rev R)
- Development Specification (Version 12, July 2026), mitigation requirements contained in the Environmental Statement (October 2025) and Environmental Statement Addenda (February 2026 and May 2026)
- The design principles appended to the Development Specification (Version 12, July 2026)
- Site Wide Strategies
 - Outline Construction Environmental Management Plan (February 2026)
 - Sustainability and Energy Strategy (October 2025)
 - Employment Strategy (October 2025)
 - Green Infrastructure Strategy (February 2026)
 - Drainage Strategy (May 2026)
 - Archaeological Written Scheme of Investigation (January 2026)
 - Historic Environment Management Plan (January 2026)
 - Ecological Mitigation Plan (January 2026)

The development hereby permitted shall be carried out generally in accordance with the application plans and documents listed above, together with the Phase Framework documents approved under Conditions 7 and 8 (where relevant), and reserved matters applications approved by the Local Planning Authority.

Notwithstanding the above and for the avoidance of doubt, this planning permission relates to the development as set out within the maximum floor space limits within the Development Specification but shall not include the following:

- SEND school shown on allocation BA3 on the Parameter Plan (ref: UAC092-002 Rev R);
- Dwellings on BA10;
- Hot food takeaway within the local centre on BA1.

Reason: For the avoidance of doubt and in the interests of proper planning and to inform reserved matters submissions under Section 92 of the Town and Country Planning Act 1990 and in the interests of securing appropriate land use and infrastructure and promoting public health in accordance with Policies SP7 and BA10 of the North Hertfordshire Local Plan (2022) and Policy HC5 of the National Planning Policy Framework (2026).

- 6 Access junctions on North Road (vehicular and bus only) and Clothall Road shall be implemented in accordance with detailed access plans North Road Junction (PC7029-ITP-CE-GB-DR-D-0150 Rev P01) and Clothall Road Junction (PC7029-ITP-CE-GB-DR-D-0152 Rev P02).

Reason: For the avoidance of doubt and in the interests of proper planning and to ensure a satisfactory means of access in accordance with Policy T1 of the North Hertfordshire Local Plan (2022).

Phase Framework Requirements

- 7 Phase Framework submissions for BA1, BA3 and BA10 as shown on the approved Development Specification (Figure 1) and excluding BA2, shall be made to the Local Planning Authority for approval in writing, in advance of the approval of any Reserved Matters Applications in that Phase, unless exception is permitted under Condition 9. The Phase Framework submission for approval will comprise:
- a) Design Code and Regulatory Plan, in accordance with Condition 8;
 - b) Phase Construction Environmental Management Plan in accordance with the approved Outline Construction Environmental Management, including Site Waste Management Plan, Construction Traffic Management Plan and incorporating details and a method statement for interim and temporary drainage measures during the demolition and construction stages;
 - c) A Delivery Plan for the following (where relevant), taking account of the S106 Obligations;
 - i. Schools;
 - ii. Strategic open space, which in the case of BA1 includes Bygrave Common and Eastern Park, and in the case of BA3 includes the Urban Open Land and Green Space East of Clothall Common, including a programme of delivery for the same. This programme shall specify, where strategic open space is to be delivered in phases, a programme of phasing that takes account of the delivery of neighbouring development parcels;
 - iii. All other non-strategic open space outside of development parcels, including a programme for their delivery;
 - iv. Local Centre including community facilities, including a programme for their delivery;
 - v. Health facilities; and
 - vi. Internal transport infrastructure;
 - d) Employment Strategy (BA10 only);
 - e) Ecological Implementation and Mitigation Plan (BA1 only); and
 - f) Hours of operation of non-residential uses excluding educational uses.

Development shall be carried out in accordance with the approved details.

Reason: For the avoidance of doubt and in the interests of proper planning and to inform reserved matters submissions under Section 92 of the Town and Country Planning Act 1990 and to ensure high-quality urban design and coordinated development.

- 8 Phase Design Codes for BA1, BA3 and BA10 as shown on the approved Development Specification (Figure 1) shall be made to the Local Planning Authority for approval in writing in accordance with Condition 7, in advance of the approval of any Reserved Matters Applications in that Phase, unless exception is permitted under Condition 9. The Phase Design Codes for approval shall build upon the design principles appended to the Development Specification and the Growing Baldock Strategic Masterplan and shall supersede the requirements of the emerging North Herts District Design Code. The Codes will comprise:

BA1

- a) Vision and Placemaking Objectives
- b) Regulatory Plan to include:
 - Land use parcels (local centre (including community building), residential, primary schools)
 - Movement and Access – access points, active travel routes, street hierarchy and typologies, indicative locations of bus stops and non-residential parking, public rights of way
 - Green Infrastructure – open space typologies, ecological areas, SUDs corridor, play areas and pocket parks, Baldock Greenway
 - Built Form – key groupings, places, edges and gateways, marker buildings, frontage typologies
- c) Landscape and Public Realm Design
 - Key Landscape Groupings
 - Strategic Open Space (Bygrave Common and Eastern Park, including a detailed specification for the sports facilities in Eastern Park)
 - Non-strategic open space (formal and informal – including Sustainable Drainage Corridor, formal play (LEAPs / NEAPs), land west of North Road, the Green Link, Active Travel Link and Bygrave Road corridor)
 - Internal parcel green infrastructure
 - Materials and planting palette and strategy, including acceptable species and locations of trees adjacent to the railway to ensure no damage to the railway boundary fencing
 - Street furniture
 - Lighting, to maintain dark corridors along retained habitat
- d) Movement and Access
 - Access points
 - Active and Sustainable Travel network including public rights of way
 - Street hierarchy
 - Vehicular, EV and cycle parking
 - Phasing of the closure of Bygrave Road to vehicular traffic, to maximise active travel movements and minimise vehicular movements through Bygrave Road
- e) Built Form
 - Key Places, Edges and Gateways
 - Frontage Character and Urban Design Principles
 - Architecture and Materiality
 - Building, boundary treatment and parking typologies

- Sustainability / Energy
- Technical design – noise mitigation, utilities, refuse and recycling, drainage, ecological measures

BA3

- a) Vision and Placemaking Objectives
- b) Regulatory Plan (including secondary school site, if required)
- c) Landscape and Public Realm Design
 - Strategic Open Space (Urban Open Land, Green Space East of Clothall Common, including a detailed specification for sports facilities on the Urban Open Land, if no school provided on BA3)
 - Non-strategic open space (formal and informal)
 - Internal parcel green infrastructure
 - Materials and planting palette
 - Street furniture
 - Lighting, to maintain dark corridors along retained habitat
- d) Movement and Access
 - Access points
 - Active Travel network
 - Vehicular, EV and cycle parking
- e) Built Form
 - Land use disposition and siting
 - Architecture and Materiality
 - Building, boundary treatment and parking typologies
 - Sustainability / Energy

BA10

- a) Vision and Placemaking Objectives
- b) Regulatory Plan
- c) Landscape and Public Realm Design
 - Landscape framework including SUDs and on plot landscaping
 - Materials and planting palette
- d) Movement and Access
 - Access points
 - Active Travel network
 - Vehicular, EV and cycle parking
- e) Built Form
 - Land use disposition and siting
 - Architecture and Materiality
 - Building, boundary treatment and parking typologies
 - Sustainability / Energy

Reason: To ensure a satisfactory development in accordance with Policies SP9 and D1 of the North Hertfordshire Local Plan and Policy DP3 of the National Planning Policy Framework and to inform reserved matters submissions under Section 92 of the Town and Country Planning Act 1990.

- 9 In respect of BA2, Walls Field, the land to the west of North Road and otherwise in circumstances where it is necessary and/or beneficial to bring forward development outside or in advance of the approval of a Phase Framework Submission (including for infrastructure, demolition and advanced works, access, enabling and protection works, community/ commercial/education/leisure uses and small scale residential (up to 200 dwellings across the site as a whole)) the

Reserved Matters Area subject to this condition shall address all the relevant matters identified as Reserved Matters within Condition 10, and in addition shall include;

- a) A statement justifying why a submission outside of a Phase is necessary and/or beneficial to the delivery of the development; and
- b) A statement showing how the proposed application conforms with the relevant documents referred to in Condition 5.

Reason: For the avoidance of doubt and in the interests of proper planning and to inform reserved matters submissions under Section 92 of the Town and Country Planning Act 1990.

Reserved Matters Requirements

- 10 Plans and particulars submitted for all Reserved Matters applications shall, where relevant, and where not already provided in site wide (Condition 5) or Phase documentation (Condition 7), address and include details below for the relevant Reserved Matters Area:

- a) Compliance Statements demonstrating accordance with the relevant documents referred to in Condition 5, or their respective Phase level documents referred to by and approved under Condition 7;
- b) Tree survey, Arboricultural Impact Assessment and tree protection measures;
- c) Reserved Matters Biodiversity Net Gain Plan and Habitat Management and Maintenance Plan where relevant (in accordance with Conditions 59 and 60);
- d) Existing and proposed ground levels and finished floor levels of all new buildings and confirmation that final building heights are within the parameters of Chapter 7 (Landscape and Visual) of the Environmental Statement dated October 2025 and associated appendices;
- e) Detailed utilities layouts including diversions and foul and surface water drainage scheme in accordance with Condition 19;
- f) Play provision including detailed design and specification of all play equipment areas and surface materials;
- g) Schedule of Affordable Housing provision on development to date identifying residential reserved matters approvals, overall dwelling numbers (market and affordable tenures) and housing mix in accordance with Phase Housing Mix Plan;
- h) provision of adequate water supplies and fire hydrants;
- i) Details of the location, layout, specification, delivery and management / maintenance of open space (and associated parking and supporting infrastructure) and public realm including hard and soft landscaping, planting (species, size and density);
- j) Details of broadband infrastructure including provision of open access ducting for fibre optic cable and next generation mobile technology;
- k) Details of access and parking, including electric vehicle charging points;
- l) Connections for each parcel/use/development including safe walking and cycling connections into the existing highway network;
- m) Details of any electrical sub stations;
- n) Flood Risk Assessment;
- o) Details and locations of bus stops and associated infrastructure;
- p) Lighting details of public and private areas. External lighting within 50m of the railway;

- q) Detailed Construction Environmental Management Plan in accordance with any relevant approved Phase Construction Environmental Management Plan and to include Site Waste Management Plan, Construction Traffic Management Plan and incorporating details and a method statement for interim and temporary drainage measures during the demolition and construction stages;
- r) The design and installation of appropriate physical safeguards to prevent road vehicles leaving the highway onto the railway within development immediately adjacent to the railway;
- s) The design and location of any ecological features;
- t) Noise Assessment indicating noise mitigation measures, where appropriate, in accordance with the Environmental Statement noise chapter and appendices, and the Design Codes approved under Condition [8];
- u) Evidence to demonstrate how Sport England's Active Design principles have been met, where relevant;
- v) Sports pitch specification to meet Sport England Standards;
- w) The detailed specification of the community building (size, location, layout, space to be provided to meet youth and police requirements) as part of the relevant Reserved Matters Area containing the community building;
- x) Ecological Implementation and Mitigation Plan to demonstrate compliance with the principles set out in the site wide Ecological Mitigation plan and the measures for ecological mitigation for BA1, as approved under Condition 7, if relevant;
- y) Confirmation that the Reserved Matters Area does or does not include all or part of an 'area of significant biodiversity enhancement' as identified in the approved Overall Habitat Management and Maintenance Plan;
- z) Healthcare provision in accordance with the approved Healthcare Strategy.

Development shall be carried out in accordance with the approved details.

Reason: To comply with the requirements of Section 92 of the Town and Country Planning Act 1990 and the provisions of the Town and Country Development Management Procedure Order 2015 and to ensure high-quality urban design and coordinated development in accordance with Policies SP7, SP9, SP14, HS3, T1, HC1, NE2 and NE4 of the North Hertfordshire Local Plan (2022).

Housing Mix

- 11 Concurrent with the submission of any reserved matters which delivers housing, a schedule of Affordable Housing and Market Housing Mix detailing the size and type of housing to be delivered within that Reserved Matters application, alongside the housing mix covering size, type and tenure on development to date identifying residential reserved matters approvals, shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that an appropriate range of both affordable and market house types and sizes are provided and the density, scale and character of development is appropriate to its location and surroundings in accordance with Policies HS2 and HS3 of the North Hertfordshire Local Plan (2022).

Sports Facilities

- 12 Prior to the commencement of development within each relevant Reserved Matters Area, including natural turf sports pitches, a Sports Pitch Feasibility Study and construction specification for natural turf pitches, in accordance with Sport

England's Natural Turf for Sport Design Guide (2025) shall be submitted to and approved by the Local Planning Authority. The natural turf sports pitches shall not be constructed other than in accordance with the approved details.

Reason: To secure the provision of community facilities and their long-term management and maintenance in accordance with Policies SP7 and HC1 of the North Hertfordshire Local Plan (2022).

- 13 Prior to use by the community of the sports facilities at the secondary school, if built on site, a Community Use Agreement to ensure such community access to school sports hall and 3G pitch(s) shall be submitted to and approved by the Local Planning Authority. The agreement shall include details of pricing policy, days and hours of use, access, users, management responsibilities, community use parking management and a mechanism for review, together with a timescale in which the Community Use Agreement shall be implemented. The school sports facilities shall not be used by the community at any time other than in compliance with the approved agreement. The approved Community Use Agreement shall be implemented and adhered to in perpetuity in accordance with the details hereby approved.

Reason: To secure the provision of community facilities and their long-term management and maintenance in accordance with Policies SP7 and HC1 of the North Hertfordshire Local Plan (2022).

Stewardship

- 14 Prior to first occupation of the development hereby permitted, a Site-Wide Stewardship Strategy containing details of the following shall be submitted to and approved by the Local Planning Authority:
- a) open space management objectives and principles;
 - b) management of sustainable drainage and water recycling, including a timetable for the implementation of the sustainable drainage scheme, details of SuDS features and connecting drainage structures and maintenance requirements including locations;
 - c) infrastructure adoption principles;
 - d) management arrangements for strategic open space, non-strategic open space, in-parcel open space; and
 - e) management arrangements for community infrastructure.

Development shall be carried out in accordance with the approved details.

Reason: To ensure a satisfactory development and to secure the long-term management and maintenance of community facilities and sustainable drainage systems in accordance with Policies SP7, HC1, NE6 and NE7 of the North Hertfordshire Local Plan (2022).

Land Contamination

- 15 If, during development, contamination not previously identified is found on site, then the Local Planning Authority shall be notified immediately, and no further related work shall be carried out on the relevant part of the Reserved Matters Area until a method statement detailing a scheme for dealing with that contamination has been submitted to and agreed in writing with the Local Planning Authority. There shall be no occupation or use of the Reserved Matters Area in question until the approved scheme for dealing with the identified contamination has been

carried out as approved and a verification report demonstrating the effectiveness of the scheme has been submitted to and approved by the Local Planning Authority.

Reason: To ensure that the site does not pose further risk to human health or the water environment in accordance with Policies NE10 and NE11 of the North Hertfordshire Local Plan (2022).

Noise

- 16 No noise generating plant including mechanical ventilation, refrigeration/air conditioning, refuse compacting/bailing plant from fixed plant serving commercial, education, waste, energy, community, leisure or employment uses, in accordance with BS:4142 shall be installed in any part of the development until full details have been submitted to and approved in writing by the Local Planning Authority. The plant shall be constructed, installed, operated and maintained in accordance with the details approved.

Reason: In the interests of safeguarding the function or residential amenity of surrounding land uses or existing neighbouring properties in accordance with Policy D3 of the North Hertfordshire Local Plan (2022) and Policy P3 of the National Planning Policy Framework (2026).

Construction Practice

- 17 No noise generating construction work (including deliveries to or from the site) shall take place on the site outside the hours of 08:00 and 18:00 Mondays to Fridays and 08:00 and 13:00 on Saturdays, and at no times on Sundays or Bank Holidays unless otherwise agreed with the Local Planning Authority. Exceptions to these hours to allow for rail possession works, highway or utility works, abnormal loads and emergency works will require the agreement of the Local Planning Authority.

Reason: In the interests of safeguarding the amenity of the surrounding area in accordance with Policy D3 of the North Hertfordshire Local Plan (2022).

- 18 Piling, or other foundation designs, undertaken using penetrative methods, shall not be carried out until such time as details have been submitted to, and approved in writing by, the Local Planning Authority as part of the relevant reserved matters application. The development shall be carried out in accordance with the approved details. The scheme shall be based on the information submitted as part of the application and, where necessary, incorporate:
- a) foundation works risk assessment;
 - b) conceptual site model;
 - c) specification of the type, number and depth of piles/foundations;
 - d) a detailed groundwater monitoring programme, where the risk assessment identifies a credible controlled waters risk, including a schedule for submission of interim and final monitoring reports;
 - e) a contingency action plan including the list of potential mitigation measures that will be implemented, should unexpected changes in groundwater quality be noted as a result of piling/foundation works; and
 - f) timing/phasing arrangements.

The approved scheme shall be fully implemented and subsequently maintained, in accordance with the timing/phasing arrangements contained within the approved scheme.

Reason: To ensure that the proposed use of piling or other penetrative foundation does not harm groundwater resources in accordance with Policy NE10 of the North Hertfordshire Local Plan (2022).

Flood Risk and Drainage

- 19 No drainage systems for the infiltration of surface water to the ground shall be installed before the submission of details of drainage systems are submitted to and approved by the Local Planning Authority. Details shall be supported by an assessment of the risks to controlled waters. The development shall be carried out in accordance with the approved details.

Reason: To prevent flooding by ensuring the satisfactory storage or disposal of surface water from the site and to reduce the risk of flooding to the proposed development, future occupants and during construction and to ensure that sufficient capacity is made available to accommodate the development in accordance with Policies NE7 and NE8 of the North Hertfordshire Local Plan (2022).

- 20 Prior to or in conjunction with the submission of each relevant reserved matters application, in accordance with the submitted Flood Risk Assessment (Revision F, AKT II Ltd, 23 September 2025) and Drainage Strategy (Revision D, AKT II Ltd, 24 September 2025), detailed designs of a surface water drainage scheme incorporating the following measures shall be submitted to and agreed with the Local Planning Authority. The approved scheme will be implemented prior to the first occupation of the development within the respective Reserved Matters Area. The scheme shall address the following matters:

- a) Where infiltration is proposed and has not been tested at outline stage, proportionate location specific infiltration testing in accordance with BRE Digest 365 (or equivalent) of the proposed infiltration feature/s, or if infiltration is proven to be unfavourable then an alternative surface water drainage strategy shall be agreed with the Lead Local Flood Authority. The post development runoff rates will be attenuated to the 50% AEP greenfield runoff rate for all rainfall events up to and including the 1% Annual Exceedance Probability (AEP). The discharge location for surface water runoff will be confirmed to connect with the wider watercourse network.
- b) Provision of surface water attenuation storage, sized and designed to accommodate the volume of water generated in all rainfall events up to and including the critical storm duration for the 3.33% AEP (1 in 30 year) and 1% AEP (1 in 100) rainfall events (both including allowances for climate change).
- c) Detailed designs, modelling calculations and plans of the of the drainage conveyance network in the:
 - o 3.33% AEP (1 in 30 year) critical rainfall event plus climate change to show no flooding outside the drainage features on any part of the site.
 - o 1% AEP (1 in 100 year) critical rainfall plus climate change event to show, if any, the depth, volume and storage location of any flooding outside the drainage features, ensuring that flooding does not occur in any part of a building or any utility plant susceptible to water (e.g. pumping station or electricity substation) within the development. It will also show that no runoff during this event will leave the site uncontrolled.

- d) The design of any infiltration / attenuation / detention basin will incorporate an emergency spillway and any drainage structures include appropriate freeboard allowances. Plans to be submitted showing the routes for the management of exceedance surface water flow routes that minimise the risk to people and property during rainfall events in excess of 1% AEP (1 in 100) rainfall event plus climate change allowance.
- e) Finished ground floor levels of properties are a minimum of 300mm above expected flood levels of all sources of flooding (including the ordinary watercourses, SuDS features and within any proposed drainage scheme) or 150mm above ground level, whichever is the more precautionary.
- f) Details of how all surface water management features to be designed in accordance with The SuDS Manual (CIRIA C753, 2015), including appropriate treatment stages for water quality prior to discharge.

Reason: To prevent flooding by ensuring the satisfactory storage or disposal of surface water from the site and to reduce the risk of flooding to the proposed development, future occupants and during construction and to ensure that sufficient capacity is made available to accommodate the development in accordance with Policies NE7 and NE8 of the North Hertfordshire Local Plan (2022).

- 21 Prior to or in conjunction with the submission of any reserved matters application, a detailed SuDS Phase Plan shall be submitted in accordance with any approved Delivery Plan (under Condition 7) shall be submitted to and approved in writing by the Local Planning Authority. The SuDS Phase Plan shall ensure that each phase of development does not exceed the agreed discharge rates for that phase and that source control measures are installed within each phase to adequately address its own surface water runoff. The Plan shall ensure that each SuDS component is adequately protected throughout the implementation period of the development hereby approved. The Plan shall show all exceedance routes throughout the site clearance and construction of the development hereby approved, ensuring flood risk is not increased elsewhere or to the site itself and that the site remains safe for all exceedance event flow routes for the lifetime of the development during rainfall and how property on and off-site will be protected.

Reason: To reduce the risk of flooding to the proposed development, future occupants and during construction in accordance with Policies NE7 and NE8 of the North Hertfordshire Local Plan (2022).

- 22 Prior to the first use of each Phase of the development (identified as BA1, BA2, BA3 and BA10 on the approved Development Specification (Figure 1)) a detailed Verification Report (appended with substantiating evidence demonstrating the approved construction details and specifications have been implemented in accordance with the surface water drainage scheme) has been submitted to and approved in writing by the Local Planning Authority. The Verification Report shall include a full set of drawings showing the approved details as built and photographs of excavations (including soil profiles / horizons), any installation of surface water drainage structures and control mechanisms.

Reason: To ensure that the development achieves a high standard of sustainability and to adequately address flood risk to the proposed residential development and is not increased in accordance with Policies NE7 and NE8 of the North Hertfordshire Local Plan (2022).

Heritage

- 23 No development shall take place within a Reserved Matters Area that contains all or part of an Area of Proposed Archaeological Investigation (Areas 1-8) identified in Figure 3 of the approved Archaeological Written Scheme of Investigation dated January 2026, until the programme of archaeological work in accordance with the approved Archaeological Written Scheme of Investigation within the relevant area has been implemented. The programme shall include the following components, completion of each of which will trigger the phased discharging of the condition:
- a) Fieldwork in accordance with the approved programme of archaeological work which shall be completed in accordance with the approved scheme for each identified archaeological site before other works commence on that site;
 - b) Post Excavation Assessment (to be produced for each site in accordance with the timescales detailed within the approved Written Scheme of Investigation);
 - c) Completion of post excavation analysis; preparation of site archive ready for deposition at a store approved by the Local Planning Authority; completion of an archive report; and the submission of a publication report (to be completed in accordance with the timescales detailed within the approved Written Scheme of Investigation).

Reason: In the interests of protecting heritage assets with archaeological interest in accordance with Policy HE4 of the North Hertfordshire Local Plan (2022).

Trees and Landscaping

- 24 If within a period of five years from the date of the planting of any tree or shrub or any tree or shrub planted in replacement for it is remove or up-rooted or destroyed or dies, another tree or shrub of the same species and size as that originally planted shall be planted as a replacement.

Reason: To ensure a satisfactory appearance to the development and to safeguard the visual character of the area in accordance with Policy D1 of the North Hertfordshire Local Plan (2022) and Policies DP3 and N3 of the National Planning Policy Framework (2026).

- 25 Retained trees, woodland and hedgerows shall receive appropriate protection during the construction phase through the use of tree root protection zones and barriers in accordance with BS5837: 2012 Trees in relation to design, demolition and construction.

Reason: To ensure a satisfactory appearance to the development, to safeguard the visual character of the area and in the interests of promoting ecology in accordance with Policies D1 and NE4 of the North Hertfordshire Local Plan (2022) and Policies DP3 and N3 of the National Planning Policy Framework (2026).

Highways and Access

- 26 Prior to first occupation, a Site Wide Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. This will be a live document that can be updated throughout the life of the development and will include initial site wide targets and measures, identify the Site Wide Travel Plan Co-Ordinator and a Full Travel Plan proforma template (as required by Condition 27).

Reason: To promote the use of sustainable modes of transport to and from the development in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 27 Full Travel Plans for residential, educational or workplace developments shall be submitted to and approved in writing by the Local Planning Authority in accordance with the requirements set out in the site wide Framework Travel Plan and shall include a programme for their implementation. Approved Full Travel Plans shall then be implemented as approved and in accordance with the approved programme.

Reason: To promote the use of sustainable modes of transport to and from the development in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 28 The highway works identified in Conditions 29 to 50 inclusive shall be delivered in accordance with the relevant trigger set out in each respective condition. In the event that the Monitor and Manage process, secured through the S106 agreement, identifies development impacts that do not necessitate delivery of the works in accordance with that trigger, an alternative programme for their implementation shall be submitted and approved by the Local Planning Authority. Development shall be carried out in accordance with the approved alternative programme.

Reason: To ensure a satisfactory access in the interests of highway safety and to promote the use of sustainable modes of transport in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 29 In the event that the permanent vehicular site access into BA1 as identified on the approved Development Specification (Figure 1) has not been delivered, no more than 310 dwellings forming part of the development of BA1 shall be occupied until a temporary access into BA1 from the A507 (North Road) has been delivered at the location of the bus only link indicated on approved plan PC7029-ITP-CE-GB-DR-D-0150 P02.

Reason: To ensure a satisfactory access in the interests of highway safety in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 30 No more than 550 dwellings forming part of the development of BA1 as identified on the approved Development Specification (Figure 1) shall be occupied until the permanent vehicular site access into BA1 from the A507 (North Road), including signal controlled pedestrian and pedestrian and cycle crossings, has been delivered in accordance with approved plan PC7029-ITP-CE-GB-DR-D-0150 P02.

Reason: To ensure a satisfactory access in the interests of highway safety and to promote the use of sustainable modes of transport in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 31 In the event that a temporary access has been delivered in accordance with Condition 30, at the point that the permanent access is delivered in accordance with Condition 31 (at 550 occupations in BA1 as identified on the approved Development Specification (Figure 1)) the temporary access shall be delivered as the permanent bus only link.

Reason: To ensure a satisfactory access in the interests of highway safety and to promote the use of sustainable modes of transport in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 32 No more than 770 dwellings forming part of the development of BA1 as identified on the approved Development Specification (Figure 1) shall be occupied until the permanent bus only link into BA1 from the A507 (North Road) has been delivered in accordance with approved plan PC7029-ITP-CE-GB-DR-D-0150 P02.

Reason: To ensure a satisfactory access in the interests of highway safety and to promote the use of sustainable modes of transport in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 33 No more than 850 dwellings forming part of the development of BA1 as identified on the approved Development Specification (Figure 1) shall be occupied until the all modes railway bridge has been delivered in general accordance with the location indicated on the Parameter Plan UAC092-002 Rev R.

Reason: To ensure a satisfactory access in the interests of highway safety and to promote the use of sustainable modes of transport in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 34 No more than 850 dwellings forming part of the development of BA1 as identified on the approved Development Specification (Figure 1) shall be occupied until the Primary Street connection between the A507 (North Road) and B656 (Royston Road) access junctions has been delivered.

Reason: To ensure a satisfactory access in the interests of highway safety in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 35 No more than 850 dwellings forming part of the development of BA1 as identified on the approved Development Specification (Figure 1) shall be occupied until the active travel railway crossing linking the active travel link in BA1 to BA10 has been delivered in general accordance with the location indicated on the Parameter Plan UAC092-002 Rev R.

Reason: To ensure a satisfactory access in the interests of highway safety and to promote the use of sustainable modes of transport in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 36 No more than 850 dwellings forming part of the development of BA1 as identified on the approved Development Specification (Figure 1) shall be occupied until the A505 and B656 (Royston Road) junction works to provide access into BA1 have been delivered.

Reason: To ensure a satisfactory access in the interests of highway safety in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 37 During the interim period, until a main site access is delivered from North Road (in accordance with Condition 29 and 30), no more than 310 additional dwellings forming part of the development of BA1 as identified on the approved Development Specification (Figure 1) shall be accessed off Bygrave Road.

Reason: To ensure a satisfactory access in the interests of highway safety and to promote the use of sustainable modes of transport in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 38 Onsite high-quality walking and cycling connections will be made between the village of Bygrave and the BA1 highway network (BA1 as identified on the approved Development Specification (Figure 1)). This will be in the form of upgrades to Bygrave Road, within the red line site boundary shown on the approved Location Plan (reference UAC092-001 Revision G).

Reason: To promote the use of sustainable modes of transport to and from the development in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 39 No dwellings forming part of the development of BA2 as identified on the approved Development Specification (Figure 1) shall be occupied until the access into BA2 from the A507 (Clothall Road), including signalised Toucan crossing, north and south bound high quality bus stops with shelters on Clothall Road and footway connection, have been carried out in general accordance with approved plan PC7029-ITP-CE-GB-DR-D-0152 P02.

Reason: To ensure a satisfactory access in the interests of highway safety in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 40 Prior to, or as part of, the submission of any relevant Reserved Matters application for BA3 as identified on the approved Development Specification (Figure 1), appropriate transport information, demonstrating compliance with the TA, shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In the interests of highway safety in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR6 of the National Planning Policy Framework.

- 41 None of the dwellings hereby permitted which form part of the development of BA3 as identified on the approved Development Specification (Figure 1) shall be occupied until an access into the site from Wallington Road has been delivered.

Reason: To ensure a satisfactory access in the interests of highway safety in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 42 In the event that a school is delivered on BA3 as identified on the approved Development Specification (Figure 1) and prior to its occupation, sufficient highways infrastructure will be delivered to support the access and egress into the school site of school buses.

Reason: To ensure a satisfactory access in the interests of highway safety in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 43 No occupation of any building within BA10 as identified on the approved Development Specification (Figure 1) shall take place until the access point onto the B656 (Royston Road) serving that building / parcel has been delivered in general accordance with the principles set out on the approved Parameter Plan and subsequent detailed design as required by condition 10 approved by the Local Planning Authority.

Reason: To ensure a satisfactory access in the interests of highway safety in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 44 No more than 310 dwellings forming part of the development of BA1 as identified on the approved Development Specification (Figure 1) shall be occupied until the improvements to walking and cycling routes along Icknield Way, Letchworth Road, Weston Way, Church Street, Pond Lane and Norton Road have been carried out in general accordance with the principles set out on plan PC7029-ITP-CE-GB-DR-D-0118 P01 contained within Appendix C of the Transport Assessment Addendum (12 May 2026).

Reason: To promote the use of sustainable modes of transport to and from the development in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 45 No more than 850 dwellings forming part of the development of BA1 as identified on the approved Development Specification (Figure 1) shall be occupied until the upgrades to the Whitehorse crossroads junction and the turning ban between the A507 (Station Road) and B656 (Royston Road) have been delivered in general accordance with the principles set out on plan PC7029-ITP-CE-GB-DR-D-0112 P03 contained within Appendix E of the Transport Assessment (PC7029-ITP-XX-XX-RP-TP-0001, Final/05).

Reason: In the interests of highway safety and to promote the use of sustainable modes of transport to and from the development in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 46 No more than 310 dwellings forming part of the development of BA1 as identified on the approved Development Specification (Figure 1) shall be occupied until the A507 (North/Station Road) segregated cycle route between the bus only access and Icknield Way East has been delivered in general accordance with the principles set out on plan PC7029-ITP-CE-GB-DR-D-0111 P03 and PC7029-ITP-CE-GB-DR-D-0112 P03 contained within Appendix E of the Transport Assessment (PC7029-ITP-XX-XX-RP-TP-0001, Final/05).

Reason: In the interests of highway safety and to promote the use of sustainable modes of transport to and from the development in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 47 No more than 550 dwellings forming part of the development of BA1 as identified on the approved Development Specification (Figure 1) shall be occupied until the Pegasus crossing on the A507 (North Road) has been delivered in general accordance with the principles set out in the inset to plan PC7029-ITP-CE-GB-DR-D-0110 P04 contained within Appendix 4.1 of the Environmental Statement Addendum February 2026.

Reason: In the interests of highway safety and to promote the use of sustainable modes of transport to and from the development in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 48 No more than 850 dwellings forming part of the development of BA1 as identified on the approved Development Specification (Figure 1) shall be occupied until the segregated cycle route on the B656 (Royston Road) and Yeomanry Drive has been delivered between Icknield Way East and the active travel crossing (linking BA1 to the B656 (Royston Road)) in general accordance with the principles set out on plan PC7029-ITP-CE-GB-DR-D-0113 P04 submitted in August 2026.

Reason: In the interests of highway safety and to promote the use of sustainable modes of transport to and from the development in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 49 No more than 850 dwellings forming part of the development of BA1 as identified on the approved Development Specification (Figure 1) shall be occupied until the bus gate between Royston Road and Yeomanry Drive has been delivered in general accordance with the principles set out on plan PC7029-ITP-CE-GB-DR-D-0113 P04 submitted in August 2026.

Reason: In the interests of highway safety and to promote the use of sustainable modes of transport to and from the development in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 50 No more than 850 dwellings forming part of the development of BA1 as identified on the approved Development Specification (Figure 1) shall be occupied until integrated signalised crossings and traffic calming have been delivered in general accordance with the principles set out on plan PC7029-ITP-CE-GB-DR-D-0112 P03 contained within Appendix E of the Transport Assessment (PC7029-ITP-XX-XX-RP-TP-0001, Final/05) and PC7029-ITP-CE-GB-DR-D-0113 P04 and PC7029-ITP-CE-GB-DR-D-0114 P04 submitted in August 2026.

Reason: In the interests of highway safety and to promote the use of sustainable modes of transport to and from the development in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 51 No more than 2,370 dwellings forming part of the development of BA1 as identified on the approved Development Specification (Figure 1) shall be occupied until the remainder of the segregated cycle route on the B656 (Royston Road) from the active travel crossing (linking BA1 to the B656 (Royston Road)) to the junction of the B656 (Royston Road) and A505 eastbound slip roads has been delivered in general accordance with the principles set out on plan PC7029-ITP-CE-GB-DR-D-

011 P03 contained within Appendix E of the Transport Assessment (PC7029-ITP-XX-XX-RP-TP-0001, Final/05) and PC7029-ITP-CE-GB-DR-D-0113 P04 and PC7029-ITP-CE-GB-DR-D-0114 P04 submitted in August 2026.

Reason: In the interests of highway safety and to promote the use of sustainable modes of transport to and from the development in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 52 No more than 2,370 dwellings forming part of the development of BA1 as identified on the approved Development Specification (Figure 1) shall be occupied until the Pegasus crossing on the B656 (Royston Road) at the location of the existing bridleway (CLOTHALL 003) has been delivered.

Reason: In the interests of highway safety and to promote the use of sustainable modes of transport to and from the development in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 53 No dwellings forming part of the development of BA2 or BA3 as identified on the approved Development Specification (Figure 1) shall be occupied until improvements to the Wallington Road / Clothall Road roundabout have been delivered in general accordance with the principles set out on plan PC7029-ITP-CE-GB-DR-D-0116 PO4 contained within Appendix E of the Transport Assessment (PC7029-ITP-XX-XX-RP-TP-0001, Final/05).

Reason: In the interests of highway safety and to promote the use of sustainable modes of transport to and from the development in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 54 In the event that BA3 as identified within the approved Development Specification (Figure 1) is developed for the purposes of a secondary school incorporating the relocation of the existing Knights Templar School, a pedestrian and cyclist signage wayfinding improvement scheme to encourage active travel trips to the secondary school shall be submitted and approved in writing by the Local Planning Authority. No occupation of the secondary school shall take place until the improvement scheme has been delivered.

Reason: In the interests of highway safety and to promote the use of sustainable modes of transport to and from the development in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 55 No dwellings forming part of the development of BA3 as identified on the Development Specification (Figure 1) shall be occupied until the footpath connection between BA3 and the A507 (Clothall Road), which forms part of the greenway shown on the Parameter Plan, has been provided as a safe all-weather walking and cycling route linking to the approved crossing point of Clothall Road serving BA2 as identified on the Development Specification (Figure 1).

Reason: In the interests of highway and pedestrian safety and to promote the use of sustainable modes of transport to and from the development in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 56 No dwellings forming part of the development of BA3 as identified on the approved Development Specification (Figure 1) shall be occupied until a footpath connection from BA3 to Hartsfield School has been upgraded to provide safe all-weather walking and cycling route, including the provision of appropriate lighting and directional signage.

Reason: In the interests of pedestrian and cyclist safety and to promote the use of sustainable modes of transport to and from the development in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 57 Prior to first use / occupation of the school, safe walking and cycling routes through Clothall Common connecting BA3 as identified on the approved Development Specification (Figure 1) to the B656 (Royston Road) including the provision of directional signage shall be delivered.

Reason: In the interests of pedestrian and cyclist safety and to promote the use of sustainable modes of transport to and from the development in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

- 58 If not delivered as part of BA2 (in accordance with Condition 51) as identified on the approved Development Specification (Figure 1), prior to first use/occupation of the school, improvements to the Wallington Road / Clothall Road roundabout including upgraded pedestrian and cycle crossing facilities and traffic calming measures will have been delivered in general accordance with the principles set out on plan PC7029-ITP-CE-GB-DR-D-0116 PO4 contained within Appendix E of the Transport Assessment (PC7029-ITP-XX-XX-RP-TP-0001, Final/05).

Reason: In the interests of pedestrian and cyclist safety and to promote the use of sustainable modes of transport to and from the development in accordance with Policy T1 of the North Hertfordshire Local Plan (2022) and Policy TR4 of the National Planning Policy Framework (2026).

Habitat Management and Monitoring

- 59 The development hereby permitted shall not commence until a site-wide Overall Habitat Management and Maintenance Plan (OHMMP) has been submitted to and approved in writing by the Local Planning Authority. The OHMMP shall be prepared in accordance with: (a) the Outline Biodiversity Gain Plan as submitted and approved in accordance with the statutory Biodiversity Net Gain condition, as required by paragraphs 13-15 of Schedule 7A of the Town and Country Planning Act 1990; (b) the approved Green Infrastructure Strategy; and (c) the approved Ecological Mitigation Plan. The OHMMP shall provide the site-wide strategic framework for the delivery, management, monitoring and maintenance of biodiversity net gain across the site as a whole and shall include, as a minimum:

- a) a non-technical summary;
- b) a site-wide plan identifying habitats to be retained, created, enhanced and managed and the areas of significant biodiversity enhancements;
- c) the overarching ecological baseline and identification of the relevant retained ecological assets, habitat corridors and strategic green infrastructure components;
- d) the site-wide target habitat types and target conditions;

- e) the broad habitat creation and enhancement strategy for the Site, including indicative timing and sequencing;
- f) the overarching management and maintenance framework for a period of at least 30 years from the completion of development;
- g) the persons or bodies responsible for implementation, management, monitoring, review and reporting;
- h) the monitoring methodology, reporting framework, review triggers and corrective measures;
- i) a biodiversity tracking schedule setting out how the overall site-wide biodiversity gain objective will be delivered and maintained across the phased development; and
- j) the framework against which reserved matters-specific Habitat Management and Monitoring Plans shall thereafter be prepared and approved.

The development shall thereafter be carried out in accordance with the approved OHMMP.

Reason: To promote wildlife in the interests of biodiversity in accordance with Policy NE4 of the Local Plan and Policy N2 of the National Planning Policy Framework.

- 60 No development within a Reserved Matters Area which includes ‘areas of significant biodiversity enhancement’, as identified in the Outline Biodiversity Gain Plan and as required to be confirmed by Condition 10(y), shall commence until a Phase Habitat Management and Monitoring Plan (‘PHMMP’) for that Reserved Matters Area has been submitted to and approved in writing by the Local Planning Authority. The PHMMP shall be prepared in accordance with: (a) the approved RM Biodiversity Gain Plan for that Reserved Matters Area as submitted and approved in accordance with paragraphs 13-15 of Schedule 7A of the Town and Country Planning Act 1990; and (b) the approved Design Code, where this applies, and is relevant to habitat delivery and management.

The PHMMP for each reserved matters area shall include, as a minimum:

- a) a non-technical summary;
- b) a plan identifying the habitats to be retained, created, enhanced and managed within that reserved matters area;
- c) the ecological baseline for the reserved matters area, informed by up-to-date habitat survey information where necessary;
- d) the target habitat types and target conditions for all retained, enhanced and created habitats within the reserved matters area;
- e) the habitat creation and enhancement works required for that reserved matters area, including implementation timing and establishment measures;
- f) the management prescriptions necessary to maintain and monitor those habitats for a period of at least 30 years from the completion of development;
- g) the persons or bodies responsible for implementation, management, monitoring and review;
- h) a monitoring methodology and monitoring schedule, including review triggers, remedial measures and reporting arrangements; and
- i) a timetable for the submission of monitoring reports to the Local Planning Authority.

The development within each relevant reserved matters area shall thereafter be carried out in full accordance with the approved PHMMP for that Reserved Matters Area. The habitats created, enhanced and/or managed under the approved

PHMMP shall thereafter be managed, monitored and maintained in accordance with the approved PHMMP and the approved monitoring reports.

Reason: To promote wildlife in the interests of biodiversity in accordance with Policy NE4 of the Local Plan and Policy N2 of the National Planning Policy Framework.

- 61 Works, including planting, within Walls Field shall not commence until a Habitat Management and Monitoring Plan for that area, in accordance with the requirements of Condition 61, have been submitted to and approved in writing by the Local Planning Authority.

Any approved planting scheme shall be implemented prior to the occupation of 201 dwellings on any part of the site.

Reason: To promote wildlife and secure net gains in biodiversity in accordance with Policy SP12 of the North Hertfordshire Local Plan (2022).

Article 35 Statement

Planning permission has been granted for this proposal. The Council acted proactively through positive engagement with the applicant during the pre-application stage and the determination process which led to improvements to the scheme. The Council has therefore acted proactively in line with the requirements of the Framework (Policies DM1 and DM3) and in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended).

Informatives

Affinity Water

The construction works and operation of the proposed development site should be carried out in accordance with the relevant British Standards and Best Management Practices, thereby significantly reducing the groundwater pollution risk. It should be noted that the construction works may exacerbate any existing pollution. If any pollution is found at the site then the appropriate monitoring and remediation methods will need to be undertaken. For further information, refer to CIRIA Publication C532 "Control of water pollution from construction - guidance for consultants and contractors".

Being within a water stressed area, it is expected that the development includes water efficient fixtures and fittings. Measures such as rainwater harvesting and grey water recycling help the environment by reducing pressure for abstractions. They also minimise potable water use by reducing the amount of potable water used for washing, cleaning and watering gardens. This in turn reduces the carbon emissions associated with treating this water to a standard suitable for drinking and will help in efforts to reduce emissions in the District.

Environment Agency

- *General advice on Land Contamination Assessments*

We expect land contamination assessments to follow the tiered approach laid out in our Land Contamination Risk Management (LCRM) guidance. The preliminary risk assessment

(PRA) should include historical plans of the site, an appraisal of the environmental setting (including geology, hydrogeology, groundwater and surface water receptors, potential contaminants of concern and source areas), an initial conceptual site model (CSM) describing possible pollutant linkages for controlled waters, and identification of potentially unacceptable risks. Land contamination investigations should be undertaken by suitably qualified and experienced professionals and in accordance with BS 5930: Code of practice for ground investigations and BS 10175: Investigation of potentially contaminated sites – code of practice. Soil and water analysis should be fully MCERTS accredited. Investigation, demolition, remediation, or construction works must not create new pathways or linkages to controlled waters. Clean drilling techniques may be required for boreholes that penetrate contaminated ground.

- *Sustainable Drainage Systems (SuDS)*

Soakaways and other infiltration SuDs must comply with statements G1 and G9 to G13 within The Environment Agency's Approach to Groundwater Protection and should be constructed in line with relevant standards and guidance including the National Standards for Sustainable Drainage Systems standards, the CIRIA C753 SuDS Manual and the Susdrain website. They must not be constructed in contaminated ground where infiltration could re-mobilise contaminants to pollute groundwater. All infiltration SuDS should be designed to maintain a minimum 1.2m clearance above peak seasonal groundwater levels. We do not consider deep infiltration systems (>2.0m below ground level) to be routinely acceptable. Only clean roof water can be directly discharged to infiltration SuDs; systems for the discharge of surface water from hard-standing, roads and impermeable vehicle parking areas must incorporate appropriate pollution prevention measures and a suitable number of SuDs treatment components in line with the environmental sensitivity of the receiving waters. An oil separator/interceptor (or equivalent device) may be required to treat water draining off hard surfaces with a risk of oil contamination.

- *Management of Waste During Construction*

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. Excavated materials recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice subject to certain conditions being met. However, contaminated materials that are / must be disposed of are waste and therefore subject to waste management legislation which includes: Duty of Care Regulations 1991, Hazardous Waste (England and Wales) Regulations 2005, Environmental Permitting (England and Wales) Regulations 2010, The Waste (England and Wales) Regulations 2011. If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12 month period the developer will need to register with us as a hazardous waste producer.

It is recommended that developers:

- Refer to the Environment Agency Groundwater Protection webpages, which include the Groundwater Protection Position Statements;
- Refer to the Environment Agency Land Contamination Technical Guidance, including the Land Contamination Risk Management (LCRM) guidance when dealing with land affected by contamination and for the type of information required in order to assess the risk to controlled waters. The Local Authority can advise on management of risks to human health;

- Consider using the National Quality Mark Scheme for Land Contamination Management, which involves the use of competent persons to ensure that land contamination risks are appropriately managed;
- Refer to British Standards BS 5930 Code of practice for ground investigations and BS 10175 Investigation of potentially contaminated sites – code of practice;
- Refer to Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention published by CL:AIRE, March 2025;
- Refer to Position Statement on the Definition of Waste: Development Industry Code of Practice;
- Refer to Environment Agency Good Practice for Decommissioning Boreholes and Wells; and
- Refer to Environment Agency Dewatering building sites and other excavations: environmental permits guidance when temporary dewatering is proposed.
- *Water Efficiency Advice*

Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills.

The Environment Agency endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments.

For residential developments:

All new residential developments are required to achieve a water consumption limit of a maximum of 125 litres per person per day as set out within the Building Regulations 2010. We recommend that wherever possible and in areas of serious water stress (as identified in our report Water stressed areas - final classification) a higher standard of a maximum of 110 litres per person per day is applied. This standard may already be a requirement of the LPA. A higher standard may be required in future by some LPAs and these should be complied with where applicable.

For commercial / industrial developments:

The Environment Agency recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' or the latest equivalent standards for water consumption. We recommend you contact your LPA for more information.

Network Rail

- *Proposed Bridge Crossings*

A standard bridge agreement (which will include the necessary easement over and under the railway) will be required and liaison with Network Rail's asset protection team to develop a programme of implementation is advised. Given a disruptive possession of the railway will be required to insert the two bridges, this will impact on the phasing of the development, and it should be borne in mind that such possessions have to be booked at least a year in

advance but may be disrupted due to inclement weather conditions or the availability of suitable crane equipment. An element of flexibility should therefore be built in to phasing requirements. The design of proposed bridge crossings will require the approval of Network Rail engineers as part of any bridge agreement.

Given the need for a bridge agreement, it is axiomatic that the developer will have to enter into a basic asset protection agreement with us. If they have not done so already, the applicant is urged to contact the asset protection team (address below) as soon as possible.

- *Fencing*

Given the existing fencing is of the simple stock-proof post and wire variety, it will be necessary for the fencing to be upgraded on either side of the railway to class 1 palisade or paladin fencing on security grounds given the change in use of the land as proposed. This should be at the developer's expense. The S106 agreement should make provision for a sum to facilitate the renewal of the fencing to something more appropriate for an urban setting. An appropriate fence can either be provided and maintained by the developer and being placed alongside NR's own fence or, preferably, the developer pays for the replacement of the existing NR fence, but future maintenance remains with NR.

- *Drainage*

It is imperative that drainage associated with the site does not impact on or cause damage to adjacent railway assets. Surface water must flow away from the railway, there must be no ponding of water adjacent to the boundary and any attenuation scheme within 30m of the railway boundary must be approved by Network Rail in advance. There must be no connection to existing railway drainage assets without prior agreement with Network Rail

- *Landscaping*

It is imperative that planting and landscaping schemes near the railway boundary do not impact on operational railway safety. Where trees and shrubs are to be planted adjacent to boundary, they should be positioned at a minimum distance greater than their height at maturity from the boundary. Certain broad leaf deciduous species should not be planted adjacent to the railway boundary. Any hedge planted adjacent to the railway boundary fencing for screening purposes should be placed so that when fully grown it does not damage the fencing, provide a means of scaling it, or prevent Network Rail from maintaining its boundary fencing. Below is a list of species that are acceptable and unacceptable for planting in proximity to the railway boundary:

- Acceptable: Birch (Betula), Crab Apple (Malus Sylvestris), Field Maple (Acer Campestre), Bird Cherry (Prunus Padus), Wild Pear (Pyrus Communis), Fir Trees – Pines (Pinus), Hawthorn (Cretaeagus), Mountain Ash – Whitebeams (Sorbus), False Acacia (Robinia), Willow Shrubs (Shrubby Salix), Thuja Plicatata "Zebрина."
- Not acceptable: Acer (Acer pseudoplatanus), Aspen – Poplar (Populus), Small-leaved Lime (Tilia Cordata), Sycamore – Norway Maple (Acer), Horse Chestnut (Aesculus Hippocastanum), Sweet Chestnut (Castanea Sativa), Ash (Fraxinus excelsior), Black poplar (Populus nigra var, betulifolia), Lombardy Poplar (Populus nigra var, italica), Largeleaved lime (Tilia platyphyllos), Common lime (Tilia x europea)

There shall be no soakaways within 20m of the railway track.

Rev	Description	Date
All information is copyright protected and may not be used or reproduced without prior permission. Do not scale.		
© Crown copyright and database right 2025. All rights reserved. Ordnance Survey Licence number 100059809. Contains public sector information licensed under the Open Government Licence v3.0.		
Notes: This drawing is for information purposes only. It should not be relied upon for legal nor title purposes. Do NOT scale from this drawing or use in construction. Proper advice should be sought from relevant qualified entities regarding legal and construction issues. Any discrepancies should be immediately reported to the originator of the drawing.		
Client:		

Urban&Civic

Growing Baldock - OPA
Outline Planning Application Boundary

Scale@A1: 1:5,000	Drawn: NMW	Designed: -	Approved: HA
0			250 Meters

Drawing Number: UAC092-001	Revision: E	Date: 05/09/2025
50 North Thirteenth Street, Central Milton Keynes, MK9 3BP 01908 666276 mail@davidlock.com davidlock.com		



This page is intentionally left blank

Location: **Hub Fitness
Unit 1-4
Glovers Court
Hitchin, Hertfordshire
23-25 Bury Mead Road
SG5 1RP**

Applicant: **Mr Fenton Hancock**

Proposal: **Changes to wording of condition 3 of planning permission 87/01900/1 granted 04.02.1988 for erection of single storey building for 6 work shop units and parking spaces. (Revised by plans received 28/01/1988)**

Ref. No: 26/01125/S73

Officer: **Saffron Loasby**

Date of expiry of statutory period: 29th September 2026, further neighbour consultation expires 18th October 2026. The published committee report was written before the expiration of the neighbour consultation period. Responses have been received which are addressed at Section 3 of this report. Any further responses received before the meeting will be reported in an update to this report and made available to view via Public Access.

Extension of statutory period: 2nd November 2026

Reason for Delay: Due to additional neighbour notifications.

Reason for Referral to Committee: Call-in by Cllr Albert

1.0 Planning Policy

1.1 North Hertfordshire District Local Plan (The Local Plan) 2011 – 2031

Policy SP1: Sustainable Development in North Hertfordshire
Policy SP2: Settlement Hierarchy and Spatial Distribution
Policy SP3: Employment
Policy SP6: Sustainable Transport
Policy SP9: Design and Sustainability
Policy SP10: Healthy Communities
Policy SP11: Natural resources and sustainability

Policy ETC1 – Appropriate uses in Employment Areas
Policy D1 – Sustainable Design
Policy D3 – Protecting Living Conditions
Policy D4 – Air quality
Policy NE8 – Sustainable Drainage Systems
Policy NE11 – Contaminated Land
Policy T1 – Assessment of Transport Matters
Policy T2 - Parking

1.2 National Planning Policy Framework (NPPF) (August 2026)

National Planning Policy Framework

Section 4 – Achieving sustainable development
Section 5 – Meeting the challenge of climate change
Section 7 – Delivering a strong, effective economy
Section 12 – Making effective use of land
Section 14 – Achieving well-designed places
Section 15 – Promoting sustainable transport
Section 16 – Promoting healthy communities
Section 17 - Pollution, Public protection and Security
Section 18 – Managing flood risk and coastal change

1.3 Supplementary Planning Guidance

Vehicle Parking at New Development SPD (2011) (Plus Appendix 4 in North Herts Local Plan 2011 – 2031)

Sustainability SPD (2024)

1.4 Neighbourhood Plan

There is no Neighbourhood Plan for Hitchin.

2.0 Relevant site and surrounding site history

- 2.1 17/01719/1 – Change of Use of part of ground floor from B1 to D2 (personal training fitness centre). Conditional permission granted 08/11/2017
- 2.2 90/00146/1 – Temporary siting of a Portakabin – Conditional Permission granted 28/02/1990
- 2.3 87/01900/1 – Erection of single storey building for 6 workshop units and parking spaces. (Revised by plans received 28/01/1988). Conditional Permission granted 04.02.1988

3.0 Representations

3.1 **NHDC Environmental Health** – No objections raised subject to appropriate conditions. The Environmental Protection officer considers that, whilst occasional noise from music, instructors and external activities is audible, this is generally low-level and not excessive in the context of the surrounding commercial area. Conditions are recommended to secure compliance with the Noise and Operational Management Statement and control amplified sound, operating hours, outdoor activities, doors/windows and acoustic mitigation. Further minor acoustic works have also been identified to address noise escape from the premises.

3.2 There have been 9 representations from residents; 1 is of support, 7 are objections to the proposal and 1 comprises details of Noise Nuisance Record Sheets detailing ongoing noise nuisances. 3 are from the same neighbour. In addition to the above a petition has been submitted with 25 names and addresses and Noise Nuisance sheets submitted to the Councils Environmental Health Team dating back to January 2026. The summary of the objections is as follows:

3.3 Material planning considerations

- Noise and residential amenity
- Impact on use and enjoyment of neighbouring properties
- Noise and disturbance from outdoor activities
- Noise transmission from open doors and windows remaining open
- Hours and intensity of operation
- Use of amplified voices/microphones
- Adequacy, effectiveness and enforceability of noise mitigation
- Need for acoustic assessment, background noise survey and sound insulation measures
- Suitability/intensity of the use in proximity to residential properties
- Compliance with Local Plan Policy ETC1 relating to the safeguarded employment area
- Impact on living conditions/compliance with Local Plan policy D3
- Appropriateness of the Section 73 application and adequacy of the application details and plans
- Compliance with existing planning restrictions and the need for precise, measurable and enforceable planning conditions.

Non-material planning considerations

- Individual physical and mental health circumstances and medical diagnoses
- Health and safety legislation and regulatory matters
- Alcohol and café licencing matters

3.4 The letter of support has been received from one neighbour whose garden boundaries abut the application site car park and is very close to the building. The letter advises that any noise disturbance experienced has been communicated with the owner and mitigation put in place promptly. The Hub has recognised that their business has caused frustration for some residents and it has made genuine efforts to address this. At present, noise levels have been comfortable to allow enjoyment of home and garden. Sporadic noise is to be expected when living alongside business uses.

4.0 Planning Considerations

4.1 Site and Surroundings

- 4.1.1 The application site comprises Units 1–4 at Glovers Court, 23–25 Bury Mead Road, Hitchin. Glovers Court forms part of an established employment area containing a range of commercial and employment premises. Vehicular access to the site is obtained from Bury Mead Road, with areas of parking and circulation provided within the wider Glovers Court site.
- 4.1.2 Units 1–4 comprise part of a single-storey building originally permitted as six workshop units under planning permission 87/01900/1. The four units are presently occupied together by HUB Fitness and operate as a fitness facility. Units 5 and 6 do not form part of the gym use and remain subject to the existing employment use restriction.
- 4.1.3 The wider surroundings have a mixed character. Commercial and employment premises extend to the north and east of the application site, including premises fronting Bury Mead Road. Railway infrastructure lies further to the north-east. Notwithstanding the established employment character of the area, residential development lies immediately to the west and south-west of Glovers Court, principally comprising properties within Heathfield Road and Stormont Road.
- 4.1.4 Of relevance to this application is the relatively close relationship between the employment premises and these neighbouring residential properties. The rear gardens of several dwellings on Heathfield Road and Stormont Road adjoin, or lie close to, the boundary of the Glovers Court employment area. The external circulation and parking areas associated with the premises also lie between parts of the building and neighbouring residential properties.

4.2 Proposal

- 4.2.1 Planning permission 87/01900/1 was granted on 4 February 1988 for the “erection of a single storey building for 6 workshop units and parking spaces” at Glovers Court. The current application is made under Section 73 of the Town and Country Planning Act 1990 and seeks to vary the wording of Condition 3 of that permission.
- 4.2.2 Condition 3 of the original permission restricts the use of the workshop units to purposes falling within Class B1 (Business) and Class B8 (Storage or Distribution) of the Town and Country Planning (Use Classes) Order 1987, or any equivalent provision in subsequent legislation. The stated reason for the condition was:

“To safeguard the level of residential amenity currently enjoyed by the occupiers of nearby dwellings.”

- 4.2.3 Following amendments to the Use Classes Order in September 2020, the former Class B1 uses were incorporated into Class E(g) (offices, research and development and certain industrial processes). Ordinarily, movement between uses within Class E, including from E(g) to E(d) indoor sport, recreation or fitness, would not constitute development requiring planning permission. However, the existing Condition 3 restricts the range of uses

permitted at the site and therefore prevents reliance upon the wider flexibility otherwise available within Class E.

- 4.2.4 The applicant consequently seeks to vary Condition 3 to expressly permit the existing gym use within Units 1–4. The proposed replacement condition would restrict Units 1–4 to Class E(d) (indoor sport, recreation or fitness) and Class B8 (storage and distribution), whilst Units 5 and 6 would remain restricted to Class E(g) and Class B8 uses.
- 4.2.5 The effect of the application is therefore not to seek an unrestricted Class E use of the premises, but to amend the historic restriction to specifically allow E(d) gym use within Units 1–4 whilst retaining restrictions over the future use of all six units. The proposed replacement condition retains a residential amenity reason, namely “to safeguard the amenities of nearby residential occupiers.”
- 4.2.6 Accordingly, a principal consideration in determining this application is whether the variation of a condition originally imposed specifically to protect the residential amenity of nearby occupiers to permit the E(d) gym use would remain consistent with that objective, including whether any effects arising from the use can be satisfactorily controlled through appropriate planning conditions.
- 4.2.7 The application has been submitted with one location plan, a Noise Operations Statement, Planning Statement, photos of the site, operational and compliance log and four letters of support (from users of the facility, the landlord and another local business on site).

4.3 **Key Issues**

4.3.1 The key issues are: -

- *Principle of Development* – Whether the proposed variation of Condition 3 to permit Class E(d) indoor sport, recreation or fitness use within Units 1–4 is acceptable in principle, having regard to the site's location within a designated Employment Area, Policy ETC1 of the North Hertfordshire Local Plan 2011–2031, and relevant national planning policy.
- *Impact on Residential Amenity* – Whether the E(d) gym use would result in unacceptable harm to the living conditions of neighbouring occupiers, particularly through noise and disturbance, having regard to the nature and intensity of the use, proximity of neighbouring dwellings, the submitted noise evidence and representations, and the original reason for imposing Condition 3. This includes consideration of the adequacy of the noise mitigation measures and operational controls contained within the submitted Noise and Operations Management Statement.
- *Planning Conditions and Enforceability* – Whether the proposed variation can be made acceptable through necessary, relevant, precise, reasonable and enforceable planning conditions, including controls relating to operating hours, external activities, amplified sound, doors and windows, and the implementation and retention of acoustic mitigation.

Principle

- 4.3.2 The application site lies within a designated Employment Area and Policy ETC1 of the North Hertfordshire Local Plan 2011–2031 is therefore relevant.
- 4.3.3 Policy ETC1 seeks primarily to safeguard Employment Areas for office, research and development, industrial and storage/distribution uses, identified in the Local Plan as B1, B2 and B8 uses. The policy does, however, allow other employment-generating uses where certain exceptions apply. These include where the proposed use would provide benefits comparable to a B-class use in the same location or would make use of premises that would otherwise be likely to remain vacant for an extended period.
- 4.3.4 The supporting text to Policy ETC1 provides some flexibility when considering such uses and requires proposals to be assessed on their individual merits. Relevant considerations include the employment generated, benefits to the community or surrounding businesses, accessibility by non-car modes and, where relevant, the continuing need or suitability of the premises for traditional employment purposes.
- 4.3.5 The planning history and subsequent changes to the Use Classes Order are also relevant. The original permission restricted the six workshop units to B1 and B8 uses. Following changes to the Use Classes Order in 2020, former B1 uses now fall within Class E(g), while indoor sport, recreation and fitness falls within Class E(d). Although E(g) and E(d) are now within the same Use Class, the historic Condition 3 continues to restrict the uses of these premises. The applicant cannot therefore rely on the normal flexibility within Class E and this Section 73 application is required to expressly permit the E(d) gym use within Units 1–4.
- 4.3.6 The fact that E(g) and E(d) are now within the same Use Class does not, however, mean that the gym automatically complies with Policy ETC1. The policy was prepared to protect the employment functions associated with the former B1, B2 and B8 uses. The gym must therefore be considered against the exceptions allowed by ETC1.
- 4.3.7 In this case, the key consideration is whether the gym provides benefits comparable to the employment uses normally supported within the Employment Area. HUB Fitness is an established business which provides employment and a service to the local community. These benefits weigh in favour of the proposal. This must be balanced against Units 1–4 no longer being specifically reserved for the types of employment use traditionally protected by ETC1.
- 4.3.8 The August 2026 National Planning Policy Framework (NPPF) is also a material consideration. It confirms that applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise. Of relevance, Policy E2 gives substantial weight to the economic benefits of commercial development which enables businesses to invest, expand or adapt, particularly where this supports the economic vision and strategy for the area.

- 4.3.9 The NPPF therefore provides support for the economic benefits of allowing an established business to continue and adapt. This weighs in favour of the proposal but does not override the more locally specific requirements of Policy ETC1.
- 4.3.10 On balance, Officers consider that the continued occupation of Units 1–4 by HUB Fitness maintains an active commercial and employment-generating use within the Employment Area. The employment, economic and community benefits provided by the business are considered comparable to those associated with the uses identified in Policy ETC1. The proposal therefore satisfies criterion ETC1(iii). The previous prolonged vacancy of Units 1–4 provides additional support under criterion ETC1(iv).
- 4.3.11 The proposed E(d) gym use is therefore considered acceptable in principle within the designated Employment Area.
- 4.3.12 This conclusion relates only to the principle of the use. Residential amenity must be considered separately, particularly as the original restriction was imposed specifically “to safeguard the level of residential amenity currently enjoyed by the occupiers of nearby dwellings.” Whether the proposed variation is acceptable overall therefore depends on whether the gym can operate without causing unacceptable harm to neighbouring residents.

Impact on residential amenity

- 4.3.13 The application site lies within an established employment area but is close to residential properties in Heathfield Road and Stormont Road. The effect of the proposed use on the living conditions of neighbouring occupiers, particularly in relation to noise and disturbance, is therefore a key consideration.
- 4.3.14 The current application seeks to vary that condition to expressly permit Units 1–4 to be used for Class E(d) indoor sport, recreation or fitness purposes. Therefore, it is necessary to consider whether the proposed use, subject to any necessary controls, would continue to adequately safeguard neighbouring living conditions.

Policy Context

- 4.3.15 Policy D3 of the North Hertfordshire Local Plan 2011–2031 seeks to protect the living conditions of existing and future occupiers, including from unacceptable noise and disturbance. National Planning Policy Framework Policy P3 similarly requires consideration of noise, living conditions and whether development is appropriate for its location.
- 4.3.16 The assessment is therefore concerned not simply with whether a gym is acceptable in principle, but with the way this particular use operates. Relevant considerations include amplified music, coaches' voices, group exercise, external activity and the times at which these activities take place.

- 4.3.17 The applicant has pointed out that the B1 and B8 uses permitted under the existing condition could themselves generate noise through machinery, servicing, deliveries, vehicle movements and loading. Officers acknowledge this point. However, the noise associated with a gym is different in character and timing and must therefore be considered on its own merits.

Representations and Noise Complaints

- 4.3.18 A significant number of representations have been received from neighbouring occupiers concerning the operation of the gym. The principal concerns relate to amplified music and bass, coaches' voices and shouting, group exercise, outdoor activities and the opening of doors while classes are taking place. Residents have also raised concerns about early morning, evening and weekend activity and its effect on the enjoyment of their homes and gardens.
- 4.3.19 Residents have also submitted Noise Nuisance Record Sheets covering a period of approximately five months, together with recordings made using a noise application. A petition has also been received from residents living close to the premises.
- 4.3.20 Officers have carefully considered these representations. They provide important evidence of residents' experiences of the use over an extended period. However, the existence or number of complaints does not demonstrate that the use results in unacceptable harm for planning purposes. The representations, both in support and objection, must be considered alongside the observations and professional judgement of Environmental Health, the characteristics of the surrounding area and the mitigation and operational controls now proposed.

Environmental Health Assessment

- 4.3.21 Environmental Health has been involved with the premises both before and during its operation as a gym. Prior to the conversion of the units, the operator sought advice from Environmental Health regarding the suitability of the premises. The Environmental Protection Officer (EPO) advised that the Planning Service should be contacted to establish whether planning permission was required and discussed potential noise impacts with the operator, having regard to the proximity of residential properties.
- 4.3.22 Following complaints from residents, Environmental Health investigated noise associated with the operation of the gym. This included discussions with the business and visits to the site while the gym was operating. Those discussions resulted in additional measures being introduced to reduce noise escaping from the building, several of which are now incorporated within the submitted Noise and Operations Management Statement (NOMS).
- 4.3.23 During the investigation, the EPO found that noise was occasionally audible from amplified music, coaches' voices and people using the external areas. However, the noise observed was generally considered to be low level, non-intrusive and not excessive in the context of the surrounding area. The EPO also noted the established commercial character of Glovers Court, where a degree of operational noise is to be expected.

- 4.3.24 Further visits resulted in similar observations. Although gym-related noise could occasionally be heard, the EPO did not consider it excessive and noted that other existing background noise, including passing trains and aircraft, could at times mask noise from the premises.
- 4.3.25 Environmental Health has nevertheless identified circumstances where greater noise escape has occurred. Earlier classes involving amplified music appear to have taken place with the former shutter doors open. This allowed considerably more noise to escape from the premises and demonstrates the importance of appropriate operational controls.
- 4.3.26 During a more recent visit while a class was taking place, the EPO identified low-level noise escaping through a poorly sealed rear fire door and unattenuated air bricks. These matters have been raised with the operator and can be addressed through further acoustic mitigation. Importantly, the EPO reported that no other operational noise of note was evident from the boundary of the neighbouring residential properties during that visit.

Noise Mitigation and Operational Controls

- 4.3.27 The submitted Noise and Operations Management Statement (NOMS) contains a range of measures intended to minimise noise from the premises. These include controls over amplified music, bass reduction through audio equalisation, use of a zoned sound system, controls over coaches' voices, restrictions on amplified sound externally and physical improvements to the building.
- 4.3.28 A substantial proportion of the identified physical acoustic mitigation has already been undertaken. Environmental Health advises that the principal remaining matters include improvements to a rear fire exit door, attenuation associated with the air bricks and works to the roof. The roof works are understood to be the responsibility of the landlord and are being undertaken by a third-party contractor rather than the applicant.
- 4.3.29 No standalone technical Noise Impact Assessment has been submitted with the application. Officers acknowledge the concerns raised by residents regarding this. However, this must be considered alongside the direct involvement of the Council's Environmental Health service, including investigation of complaints and observations undertaken while classes were in progress.
- 4.3.30 Environmental Health has not requested a further Noise Impact Assessment as a prerequisite to determining the application and raises no objection to the proposal, subject to appropriate conditions. In these circumstances, Officers consider that it would be difficult to justify withholding planning permission solely because a separate technical acoustic assessment has not been provided.

Hours of Operation

- 4.3.31 The NOMS identifies normal business operating hours of 05:30–21:00 Monday to Friday and 07:00–12:00 on Saturdays. Classes normally operate between 06:00–10:00, 12:00–14:00 and 16:00–20:00 Monday to Friday and between 07:00–11:00 on Saturdays.

- 4.3.32 Officers consider that the timing of customer activity is relevant because noise associated with group exercise, amplified music and coaches' voices has greater potential to cause disturbance during more sensitive periods.
- 4.3.33 Environmental Health agrees that a condition restricting customer hours is necessary. The EPO considers operation until midday on Saturdays to be reasonable and raises no objection to Bank Holiday use, provided the other noise-control measures apply. The EPO has, however, advised that there should be no noise-generating use on Sundays.
- 4.3.34 Officers therefore consider that clearly defined customer operating hours should be imposed by condition. This would provide certainty to both the operator and neighbouring residents and would prevent an unrestricted intensification of the use during noise-sensitive periods.

External Activities

- 4.3.35 The NOMS allows some elements of training to take place externally, including running intervals, loaded carries and the use of portable cardio equipment. Residents have raised particular concerns regarding outdoor activity because it does not benefit from the acoustic containment provided by the building.
- 4.3.36 Environmental Health does not object in principle to outdoor exercise but considers that appropriate controls are required. In particular, amplified sound should not be used externally and noisy activities involving the dropping, throwing or striking of weights or equipment should be controlled. The EPO has also suggested that very early morning external activity should be avoided, with 08:00 identified as an appropriate earliest starting point.
- 4.3.37 Officers agree that this represents a proportionate approach. A complete prohibition on all outdoor activity would go further than officers consider necessary and it is questionable as to whether this would meet the relevant condition tests. While a condition controlling the nature and timing of external activity would directly address its potential impact upon neighbouring residents.

Doors and Windows

- 4.3.38 The opening of external doors during classes has been a particular concern raised by residents. Environmental Health has also identified that greater noise escape previously occurred when amplified music was played with the former shutter doors open.
- 4.3.39 However, the EPO does not consider it necessary or reasonable to require all doors and windows to remain closed whenever the gym is operating. Where significant noise is not being generated, there is no identified acoustic reason why doors should not be opened, including for ventilation.
- 4.3.40 Officers therefore consider that the condition should be targeted towards the circumstances in which it is necessary. Relevant external doors and windows should remain closed during classes involving elevated levels of amplified music, other than as required for access, egress or emergencies. This would address the identified noise pathway without unnecessarily restricting ventilation at other times.

Amplified Sound

- 4.3.41 Environmental Health supports a condition preventing the use of amplified sound externally. This would directly address concerns regarding the transmission of music or amplified speech from the external areas towards neighbouring properties.
- 4.3.42 The EPO also supports a condition controlling the amplified music system within the premises and recommends that this is linked to the arrangements set out within the NOMS. Officers agree that this is necessary to ensure that the sound system and associated noise-control measures are retained and appropriately managed.

Noise and Operational Management Statement

- 4.3.43 Environmental Health recommends that the premises are required to operate in accordance with the submitted NOMS. Importantly, the EPO also recommends that the condition allows the management plan to be amended in liaison with the Local Planning Authority where necessary.
- 4.3.44 Officers consider this to be particularly useful in this case. The investigations undertaken to date demonstrate that relatively specific operational matters, such as the sealing of a door, attenuation of air bricks, management of amplified music or use of external areas, can affect the level of noise experienced outside the premises. Retaining an approved management plan provides a mechanism for those controls to be reviewed and adapted should operational circumstances change.
- 4.3.45 However, Officers also consider that the NOMS should operate alongside, rather than replace, specific planning conditions where a particular restriction is necessary to make the development acceptable. Matters such as customer operating hours, amplified sound externally and the timing and nature of external activities are more appropriately secured through clear conditions. The NOMS can then provide the more detailed operational framework within which the business operates.

Conclusion on Residential Amenity

- 4.3.46 Officers recognise the strength and consistency of the concerns expressed by neighbouring residents. The reported disturbance, particularly from amplified music, coaches' voices, external activity and earlier operation with doors open, is a material consideration and has been afforded significant weight.
- 4.3.47 There is also evidence that noise has escaped from the premises and that improvements have been necessary. Environmental Health's investigations have identified specific noise pathways and the operation of the premises has been modified in response to complaints.
- 4.3.48 The key consideration, however, is whether the use as now proposed can operate without causing unacceptable harm to neighbouring living conditions. In this respect, significant weight is given to the professional assessment of Environmental Health. The EPO has investigated residents' complaints, undertaken observations while classes were taking place and considered the mitigation already introduced. Although gym-related noise was audible, it was generally found to be low level, non-intrusive and not excessive. During the

most recent observation, no operational noise of note, other than low-level noise associated with identified defects in the rear fire door and air bricks, was evident at the boundary of the residential properties.

- 4.3.49 Environmental Health raises no objection to the application and considers that the remaining potential impacts can be satisfactorily controlled through a combination of specific planning conditions and compliance with the NOMS.
- 4.3.50 Officers therefore consider that, subject to those controls, the Class E(d) use would not result in unacceptable harm to the living conditions of neighbouring occupiers. The proposal is consequently considered to accord with Policy D3 of the North Hertfordshire Local Plan and the relevant provisions of the National Planning Policy Framework.

Mitigation, Conditions and Enforceability

- 4.3.51 As the application is made under section 73 of the Town and Country Planning Act 1990, any permission granted would constitute a new planning permission. The Local Planning Authority may therefore impose new conditions if they are lawful and do not fundamentally alter the development originally permitted.
- 4.3.52 In this case, the proposed controls arise directly from permitting the Class E(d) use within Units 1–4 and are intended to manage its effects upon neighbouring residential occupiers. They are therefore directly related to the variation sought and consistent with the purpose of the original Condition 3.
- 4.3.53 Having regard to the advice of Environmental Health, Officers consider that conditions should address:
- the hours during which customers may use the premises;
 - the timing and nature of activities undertaken externally;
 - the prohibition of amplified sound externally;
 - the use and management of amplified music within the premises;
 - the closing of relevant doors and windows during classes involving elevated amplified music;
 - the completion, retention and maintenance of necessary acoustic mitigation; and
 - continued operation in accordance with the approved Noise and Operations Management Statement, including provision for its subsequent review where reasonably required by the Local Planning Authority.
- 4.3.54 This combination of conditions provides a more proportionate and effective approach than either relying entirely upon the NOMS or attempting to prescribe every operational detail through individual planning conditions. The principal restrictions necessary to protect residential amenity would be clearly established by the permission, while the NOMS would provide an appropriate mechanism for the detailed management of noise during the ongoing operation of the business.

4.4 Planning Balance and Conclusion

- 4.4.1 The application seeks to vary Condition 3 of planning permission 87/01900/1 to permit Units 1–4 to be used for purposes falling within Class E(d) and Class B8, while Units 5 and 6 would remain restricted to Class E(g) and Class B8 uses.
- 4.4.2 The proposed Class E(d) use is considered acceptable in principle within the safeguarded Employment Area. It maintains Units 1–4 in active commercial use, generates employment and provides a fitness facility serving the local community. Officers consider that these benefits are sufficient to satisfy the relevant exception within Policy ETC1.
- 4.4.3 The principal issue is the effect of the gym upon neighbouring residential occupiers. This carries particular weight because the condition being varied was originally imposed specifically to safeguard residential amenity. Officers have therefore carefully considered the representations and noise records submitted by residents, together with the operational characteristics of the gym and the findings of Environmental Health.
- 4.4.4 Residents have experienced and reported noise associated with amplified music, coaches' voices, group exercise and external activities. Environmental Health's investigations also confirm that gym-related noise can occasionally be audible and that greater noise escape occurred previously when amplified music was used with doors open. Further minor weaknesses in the acoustic containment of the premises have also been identified.
- 4.4.5 However, Environmental Health's observations found the noise generally to be low level, non-intrusive and not excessive in the context of the surrounding commercial area. During the EPO's most recent visit while a class was taking place, no operational noise of note was identified at the boundary of neighbouring residential properties, other than low-level noise escaping through the rear fire door and unattenuated air bricks. These are matters capable of further mitigation.
- 4.4.6 Environmental Health raises no objection to the application subject to appropriate conditions. Officers give significant weight to that professional advice, particularly as it follows investigation of the complaints, discussions with the operator and observations of the premises during actual classes.
- 4.4.7 Officers consider that the remaining potential impacts can be appropriately managed through conditions controlling customer hours, external activity, amplified sound, relevant doors and windows and acoustic mitigation, together with a requirement for continued compliance with the approved NOMS.
- 4.4.8 This approach does not disregard the experiences reported by neighbouring residents. Rather, it recognises that some noise is associated with the use while considering whether that noise amounts to unacceptable planning harm and whether it can be appropriately controlled. On the evidence available and having regard to the professional advice of Environmental Health, Officers consider that the use can operate without causing

unacceptable harm to neighbouring living conditions provided the identified controls are imposed and observed.

- 4.4.9 In the overall planning balance, the economic, employment and community benefits associated with the continued occupation of Units 1–4 weigh significantly in favour of the proposal. The potential effects upon residential amenity also carry significant weight but are considered capable of satisfactory mitigation through the proposed conditions.
- 4.4.10 The proposed variation of Condition 3 is therefore considered to accord with Policies ETC1 and D3 of the North Hertfordshire Local Plan 2011–2031 and the relevant provisions of the National Planning Policy Framework. Planning permission is recommended subject to the conditions set out below and the reimposition, where necessary, of relevant conditions attached to the original planning permission.

5.0 Legal Implications

- 5.1 In making decisions on applications submitted under the Town and Country Planning legislation, the Council is required to have regard to the provisions of the development plan and to any other material considerations. The decision must be in accordance with the plan unless the material considerations indicate otherwise. Where the decision is to refuse or restrictive conditions are attached, the applicant has a right of appeal against the decision.

6.0 Recommendation

- 6.1 That planning permission be GRANTED under section 73 of the Town and Country Planning Act 1990 for the variation of Condition 3 of planning permission 87/01900/1, subject to the conditions set out below and the reimposition of those conditions attached to planning permission 87/01900/1 which remain relevant and capable of taking effect.

Conditions to be replaced with and added to the original planning permission alongside all original plan numbers

Restricted use — replacement Condition 3

Units 1–4 of the development hereby permitted shall be used only for purposes falling within Class E(d) (indoor sport, recreation or fitness) and Class B8 (storage or distribution) of the Town and Country Planning (Use Classes) Order 1987 (as amended), or in any provision equivalent to those Classes in any statutory instrument revoking and re-enacting that Order, and for no other purpose.

Units 5 and 6 of the development hereby permitted shall be used only for purposes falling within Class E(g) and Class B8 of the Town and Country Planning (Use Classes) Order 1987 (as amended), or in any provision equivalent to those Classes in any statutory instrument revoking and re-enacting that Order, and for no other purpose.

Reason: To safeguard the employment function of the site and the living conditions of neighbouring residential occupiers, in accordance with Policies ETC1 and D3 of the North Hertfordshire Local Plan 2011–2031.

2. Hours of E(d) activity

Units 1–4 shall not be open to customers and no exercise class, personal training session or other Class E(d) sport, recreation or fitness activity involving customers shall take place outside the following hours:

Monday to Friday: 06:00-20:00

Saturday: 07:00– 12:00

Sunday: 10:00-15:00

Outside these hours, access to the premises by employees or contractors shall be permitted only where such access does not involve amplified sound, the use of exercise equipment, building, repair or maintenance works, or any other noise-generating activity audible outside the premises.

Reason: To safeguard the living conditions of neighbouring residential occupiers from noise and disturbance during noise-sensitive periods, in accordance with Policy D3 of the North Hertfordshire Local Plan 2011–2031.

3. Outdoor activities

No exercise or fitness activity associated with the Class E(d) use shall take place within the external areas associated with Units 1–4 before 08:00.

The external areas associated with Units 1–4 shall not be used for any Class E(d) activity involving:

- a) amplified music or amplified speech; or
- b) the dropping, throwing or striking of weights or other exercise equipment.

All other outdoor exercise and fitness activities associated with the Class E(d) use shall be undertaken in accordance with the approved Noise and Operations Management Statement.

Reason: To safeguard the living conditions of neighbouring residential occupiers from noise and disturbance arising from activities undertaken outside the building, in accordance with Policy D3 of the North Hertfordshire Local Plan 2011–2031.

4. External doors and windows

All external doors and openable windows serving Units 1–4 shall be kept closed whenever electronically amplified sound is being played or used within the premises, except for the minimum period necessary to allow access or egress or in the event of an emergency.

Reason: To minimise the transmission of amplified sound from the premises and safeguard the living conditions of neighbouring residential occupiers, in accordance with Policy D3 of the North Hertfordshire Local Plan 2011–2031.

5. Acoustic mitigation

The acoustic mitigation measures identified in the approved Noise and Operations Management Statement, including the works to the rear fire exit door, air bricks and roof

serving Units 1–4, shall be fully implemented within 3 months of the date of this permission.

The acoustic mitigation measures shall thereafter be retained and maintained for so long as the Class E(d) use continues.

Reason: To minimise the transmission of noise from the premises and safeguard the living conditions of neighbouring residential occupiers, in accordance with Policy D3 of the North Hertfordshire Local Plan 2011–2031.

6. Amplified sound system

Any amplified sound associated with the Class E(d) use of Units 1–4 shall only be played through the sound system identified in the approved Noise and Operations Management Statement.

The sound system and associated noise control measures specified within the approved Noise and Operations Management Statement, including the zoning and equalisation settings, shall be retained and maintained for so long as the Class E(d) use continues.

No alteration or replacement of the approved sound system, or alteration to its noise control settings, shall take place unless details of the proposed alteration or replacement have first been submitted to and approved in writing by the Local Planning Authority. Any replacement or altered system shall thereafter be operated in accordance with the approved details.

Reason: To control noise arising from amplified sound and safeguard the living conditions of neighbouring residential occupiers, in accordance with Policy D3 of the North Hertfordshire Local Plan 2011–2031.

7. No amplified sound externally

No amplified sound associated with the Class E(d) use of Units 1–4 shall be played or used within any external area associated with the premises.

Reason: To safeguard the living conditions of neighbouring residential occupiers from noise and disturbance, in accordance with Policy D3 of the North Hertfordshire Local Plan 2011–2031.



This page is intentionally left blank

By virtue of paragraph(s) 7 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

PLANNING CONTROL COMMITTEE

DATE: 22 October 2026

PLANNING APPEALS DECISION

APPELLANT	DESCRIPTION	SITE ADDRESS	REFERENCE	APPEAL DECISION	COMMITTEE/ DELEGATED	COMMENTS
Joseph Campion And Georgia Napper	Erection of one self-build detached dwelling following demolition of the existing semi-detached dwelling including amenity space, landscaping, parking and widening of existing vehicular access/driveway.	11 Kingswood Avenue Hitchin SG4 0PA	26/00109/FP	Appeal Allowed on 03 September 2026	Delegated	The Inspector concluded that the proposal would respect the character and appearance of the area. It would therefore accord with Policies D1 (Sustainable design), D2 (House extensions, replacement dwellings and outbuildings), and SP9 (Design and sustainability) of the North Hertfordshire Local Plan 2011-2031 (Adopted November 2022) (LP) which support proposals that respond positively to the site's local context, and do not harm or have an adverse impact on the character and appearance of the site or the street scene and area.
Curtis Trust Limited	Erection of one detached dwelling	Land Adjacent To 1 Ninesprings Cottage Wymondley Road SG4 9QL	26/00361/PIP	Appeal Allowed on 01 October 2026	Delegated	The Inspector concluded that the proposed development would not be inappropriate development in the Green Belt and is suitable for residential development, having regard to its location, the proposed land use and the amount of development. As the Inspector found the proposal is not inappropriate development, it is consistent with Policy SP5 (Countryside and Green Belt).

						Belt) of the LP which seeks to protect the Green Belt from inappropriate development.
Mr & Mrs Jani	Erection of three residential dwellings and associated works following demolition of no.3 redundant agricultural buildings, demolition of existing cartlodge and partial demolition of existing garage/outbuilding.	Woodcotes Fears Green Sandon SG9 0QZ	25/02883/FP	Appeal Dismissed on 07 October 2026	Delegated	The Inspector stated that the proposal would fail to accord with the requirements of Policies SP6 (Sustainable Transport) and T1 (Assessment of Transport Matters) of the LP and Policy 5 of the Hertfordshire Local Transport Plan 2018-2031 (2018) which seek, amongst other things, to encourage development in locations which enable sustainable journeys to be made to key services and facilities and require that the location and design of proposals encourage movement by sustainable transport modes and reduce travel demand. The Inspector also concluded that the proposed development would have a harmful effect on the character and appearance of the area. In that regard it would conflict with Policy SP9 (Design and Sustainability) and Policy D1 (Sustainable Design) of the LP which require, amongst other things, that developments are well designed and located; and respond positively to local context. It would also be inconsistent with the good-design objectives of the Framework.

**PLANNING CONTROL COMMITTEE
PLANNING APPEALS LODGED**

DATE: 22 October 2026

APPELLANT	Appeal Start Date	DESCRIPTION	ADDRESS	Reference	PROCEDURE
PMC Consultants	08 September 2026	Erection of one 4-bed dwelling following demolition of existing barn (renewal of previously approved planning permission 20/01742/FP granted 16.10.2020)	Barn To The West Of Bedford Road Holwell	25/03110/FP	Written Representations
Critchley	09 September 2026	Single storey front porch extension. Alterations to fenestration.	25 West Lane Pirton SG5 3RA	26/01541/FPH	Householder Appeal Service
Mr Julian McGlynn	11 September 2026	Installation of additional vehicular crossover, front boundary wall and entrance gates (development has commenced).	14 Cashio Lane Letchworth Garden City SG6 1AX	24/02675/FPH	Householder Appeal Service
Mr Paul Moody	16 September 2026	One self build custom dwelling	Land Adjacent To 4 Lower Titmore Green SG4 7JT	25/03014/PIP	Written Representations
Chris and Claire Mortlock	29 September 2026	Two storey side extension to form ancillary annexe and single storey front and rear extensions following demolition of existing garages and carport. Installation of solar panels to side roofslope. External cladding and rear hard landscaping works.	23 The Rowans Baldock SG7 6HL	26/01632/FPH	Householder Appeal Service

This page is intentionally left blank



Appeal Decision

Site visit made on 11 August 2026

by F Bradley BRP (NZ) MRTPI

an Inspector appointed by the Secretary of State

Decision date: 01 October 2026

Appeal Ref: 6009720

Land adjacent to 1 Ninesprings Cottage, Wymondley Road, Hitchin, Hertfordshire SG4 9QL

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant permission in principle.
 - The appeal is made by Mr J Hill, Curtis Trust Limited C/O John Shilcock Limited, against the decision of the North Hertfordshire District Council.
 - The application ref is 26/00361/PIP.
 - The development proposed is described as permission in principle for the erection of one detached dwelling.
-

Decision

1. The appeal is allowed and permission in principle is granted for residential development comprising a minimum of one and a maximum of one dwelling at Land adjacent to 1 Ninesprings Cottage, Wymondley Road, Hitchin, Hertfordshire SG4 9QL in accordance with the terms of the application, Ref 26/00361/PIP, dated 10 February 2026.

Procedural Matters

2. The proposal is for permission in principle. Planning Practice Guidance (PPG) advises that this is an alternative way of obtaining planning permission for housing-led development. The permission in principle consent route has two stages: the first stage (or permission in principle stage) establishes whether a site is suitable in-principle and the second stage ('technical details consent') is when the detailed development proposals are assessed. This appeal relates to the first of these two stages.
3. The scope of the considerations for permission in principle is limited to location, land use and the amount of development permitted. All other matters are considered as part of a subsequent technical details consent application if permission in principle is granted. I have determined the appeal accordingly.
4. I have not used the site address provided in the application form as it did not clearly identify the site. Instead, I have used the address in the Council's decision notice and subsequently used by the appellant in the statement of case as it more accurately reflects the site's location.
5. During this appeal, a new National Planning Policy Framework (the Framework) was published on 17 August 2026. The main parties were given an opportunity to comment on the implications of the revised Framework for the appeal. Both parties provided responses, and I have taken those comments into account in reaching my decision.

Main Issue

6. The main issue is whether the site is suitable for residential development, with reference to whether the proposal is inappropriate development in the Green Belt.

Reasons

Background and policy context

7. The appeal site is within the Green Belt. Policy SP2 of the North Hertfordshire Local Plan 2011-2031 (the LP) sets out the district's settlement hierarchy and spatial distribution for development. The site is outside the settlement boundary of Hitchin where the policy states that development is only permitted if it is supported by an adopted Neighbourhood Plan, noting that Neighbourhood Plans cannot allocate development within or remove sites from the Green Belt. Policy SP5 of the LP reflects the Framework by only permitting development proposals in the Green Belt where they would not result in inappropriate development or where very special circumstances have been demonstrated.
8. The objective of Green Belt policies in the Framework is to prevent urban sprawl by keeping land permanently open. The government attaches great importance to Green Belts, the essential features of which are their openness and permanence. Policy GB2 of the Framework sets out the five purposes of the Green Belt.
9. The Framework, at Policy GB6, goes on to state that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Development in the Green Belt is inappropriate unless one of the exceptions listed in Policy GB7 applies. One exception includes where the proposed development would utilise grey belt land. Grey belt is defined in the Framework as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of the purposes (a), (b), or (d) in Policy GB2.
10. The North Herts Green Belt Review July 2016 (the GBR) identifies the parcel of land in which the appeal site is located as making a strong contribution to the Green Belt purposes through checking the unrestricted sprawl of large built-up areas and preventing neighbouring towns merging into one another. Annex E of the Framework provides considerations for informing judgements of the contribution to the purposes of the Green Belt, to which I refer below.

Purpose (a)

11. The assessment areas that contribute moderately are likely to be adjacent or near to a large built-up area but include one or more features that weaken the land's contribution to purpose (a). Such as, in this case, having physical feature(s) in reasonable proximity that could restrict and contain development and being partially enclosed by existing development, such that new development would not result in an incongruous pattern of development.
12. The site is free from existing development and is adjacent to the town of Hitchin which represents a large built-up area. The site would be partially enclosed by physical features including the existing residential development to the west, the elevated railway line and vegetation to the south and vegetation along the eastern boundary. The development would be broadly in keeping with the pattern of development on the adjacent residential properties fronting Wymondley Road. Due

to the site's partial enclosure and relationship to the adjacent residential development, the proposed development would not result in an incongruous pattern of development. These features would also serve to restrict and contain the proposed development to an extent. Accordingly, the site makes a moderate contribution to purpose (a) of the Green Belt as set out in the Framework.

Purpose (b)

13. The GBR identifies the parcel of land in which the site is located as making a significant contribution to purpose (b) by preventing the merging of Stevenage and Hitchin. The site itself however forms a very small part of the gap between the two towns. Due to its small size and the existing intervening features between the towns, including roads and vegetation, the site could be developed without resulting in the loss of visual separation between the towns. Accordingly, the site makes a moderate contribution to purpose (b) of the Green Belt.

Purpose (d)

14. Hitchin is a historic market town. The parties have not identified any visual, physical or experiential connection to the historic aspects of the town and none were visibly apparent during my site visit. Accordingly, the site does not contribute towards purpose (d) of the Green Belt.
15. To conclude, the site does not strongly contribute to the relevant purposes of the Green Belt and therefore comprises grey belt land.
16. As stated above, Policy GB7 of the Framework sets out categories of development that are not inappropriate in the Green Belt and therefore should not be regarded as harmful to the Green Belt or be required to demonstrate very special circumstances. In this case, part (1)(g) of the Policy is relevant which provides that development must meet four criteria to which I refer below.
17. The proposed development would utilise grey belt land. Due to the scale of the proposed development, its congruity with the settlement pattern and the degree of enclosure, any encroachment into the countryside would be limited. Consequently, and for the reasons given above, the proposal would not fundamentally undermine the purposes of including land within the Green Belt when taken together. Accordingly, criterion i. is met.
18. The Council cannot demonstrate a five year supply of deliverable housing sites, therefore there is an evidenced unmet need for the residential development proposed, hence criterion ii. is met.
19. Policy TR3 of the Framework seeks to ensure that development is located where it can support sustainable patterns of movement, enable good accessibility for different users and make the most of existing and proposed transport infrastructure. There are bus stops and footpaths in close proximity to the site which would be available for use by future occupants to access Hitchin town centre. Due to its proximity to, and access to, different modes of transport, the site would be in a sustainable location.
20. In its response to the implications of the Framework on the proposed development, the Council refers to a lack of footway at the front of the site and potential conflict between pedestrians and cycle users to and from the site and vehicles along the road. Notably this was not a reason for refusal as the Council was satisfied this

matter could be dealt with at the second stage of the permission in principle process and as the site is in a sustainable location. I agree with these conclusions. Even if it was considered as part of this first stage, due to the scale of the development, it would not result in a significant adverse impact on the transport network. Consequently, the proposal accords with Policy TR3 of the Framework and meets criterion iii.

21. The proposed development is not major development therefore criterion iv. is not relevant.
22. As the proposed development meets the relevant criteria in part (1)(g) of Policy GB7, it is therefore not inappropriate development in the Green Belt. Accordingly, there is no need to consider its impact on the openness of the Green Belt.
23. To conclude, the proposed development would not be inappropriate development in the Green Belt and is suitable for residential development, having regard to its location, the proposed land use and the amount of development. As I have found the proposal is not inappropriate development, it is consistent with Policy SP5 of the LP which seeks to protect the Green Belt from inappropriate development. The proposed development would conflict with Policy SP2 of the LP which seeks to restrict development outside the settlement boundary. The weight I attach to this conflict is addressed below.

Other Matters

24. Matters including details of access to the site, ecological impacts, surface water drainage, and design and appearance would be dealt with at the technical details stage. Any potential impacts arising from the overhead lines which are in proximity to the site would also be considered at that stage.
25. Concerns have been raised by third parties about the proposal setting a precedent for further development. In this case, due to the site's degree of containment and relationship with the adjacent residential development, I am satisfied the permission would not set a precedent for similar development.
26. The appellant contends that the site is within Flood Zone 1 and the Council raises no objection on flood risk grounds. While third parties have raised concerns regarding flood risk no technical evidence has been provided to demonstrate that the development could not be carried out within an area of low flood risk.
27. The site is located approximately 500 metres from the edge of Great Wymondley. Due to the distance from the village and intervening fields, the small scale of the proposed development and as the proposed dwelling would be viewed in the context of the adjacent residential development, there would be no appreciable harm to the setting of heritage assets in the village.
28. The Council states that the proposed development conflicts with part (1)(j) of Policy S5 of the Framework. However, part (5) states that the policy does not apply to development proposals within the Green Belt, which should instead be determined in accordance with Policies GB6, GB7 and/or GB8, as appropriate. It further provides that where development would not be inappropriate through the application of Policy GB7, proposals should be approved unless their benefits are substantially outweighed by any adverse effects when assessed against the national decision-making policies in the Framework and having regard to part (2)

of Policy S5. As I have found that the proposal would accord with Policy GB7 and would not constitute inappropriate development in the Green Belt, the decision is to be made by applying the approach set out in part (5) of Policy S5 rather than part (1)(j).

Planning Balance and Conclusion

29. I have identified conflict with Policy SP2 of the LP however I have found that the site is in an accessible location and any encroachment into the countryside would be limited. For these reasons and having regard to part (5) of Policy S5 of the Framework, I give limited weight to the conflict with this policy.
30. I have found that the site is suitable for the proposed development having regard to its location, the proposed land use, and the amount of development. Substantial weight is given to the provision of a new dwelling in accordance with Policy HO7 of the Framework, with the proposal providing a modest contribution to the Council's housing supply. Economic benefits would result from the construction of the proposal, as well as from future occupiers supporting local services and facilities, and together are afforded limited weight.
31. I have not identified any adverse effects that would substantially outweigh the benefits. Accordingly, the presumption in favour of sustainable development, as set out in Framework Policy S3, applies. Furthermore, as the proposed development is not inappropriate development in the Green Belt, it would not conflict with the national decision-making policies referred to in part (2) of Policy S5, which indicate that development proposals should be refused in specific circumstances.
32. The PPG indicates that, unless some other period is clearly justified, the default duration of a permission in principle is three years. I have no reason to consider that a departure from the default duration would be justified in this case.
33. For the reasons set out above, the appeal is allowed.

F Bradley

INSPECTOR

This page is intentionally left blank

Appeal Decision

Site visit made on 10 August 2026

by **MG Garrard LLB (Hons), PGDip.LP, Solicitor**

an Inspector appointed by the Secretary of State

Decision date: 3 September 2026

Appeal Ref: 6008022

11 Kingswood Avenue, Hitchin, Hertfordshire SG4 0PA

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
 - The appeal is made by Joseph Campion & Georgia Napper against the decision of North Herts Council.
 - The application Ref is 26/00109/FP.
 - The development proposed is demolition of the existing semi-detached dwelling and erection of a replacement two-storey detached dwellinghouse with associated amenity space, landscaping, revised vehicular access/driveway and parking, and associated drainage works.
-

Decision

1. The appeal is allowed and planning permission is granted for demolition of the existing semi-detached dwelling and erection of a replacement two-storey detached dwellinghouse with associated amenity space, landscaping, revised vehicular access/driveway and parking, and associated drainage works at 11 Kingswood Avenue, Hitchin, Hertfordshire SG4 0PA in accordance with the terms of the application, Ref 26/00109/FP, subject to the conditions in the attached schedule.

Preliminary Matters

2. The description of development in the Council's decision notice differs slightly from that in the application form. As there is no clear evidence of a formal amendment to the application, I have used the application form description in my formal decision save for removing reference to the use class as that does not describe an act of development.
3. The appeal has proceeded on the basis that the development would qualify for the self-build exemption from the Biodiversity Net Gain (BNG) statutory condition. As no mechanism before me secured the development as self-build, I invited comments from the main parties. Following those submissions, an executed unilateral undertaking under section 106 of the Town and Country Planning Act 1990 (1990 Act) has been provided, and the Council has had the opportunity to comment on it. Its effect is considered below.
4. During the course of the appeal, a revised National Planning Policy Framework (the Framework) was published on 17 August 2026. The main parties were given an opportunity to comment on the implications of the revised Framework for the appeal, and I have taken those comments into account in reaching my decision. References to the Framework in my decision are to the August 2026 version.

Main Issues

5. The main issues are:

- the effect of the proposed development on the character and appearance of the area; and
- whether the proposal would qualify for the self-build exemption from the statutory Biodiversity Net Gain condition.

Reasons

Character and Appearance

6. The appeal site lies within a street that remains predominantly characterised by semi-detached dwellings on one side facing a wide verge and open fields beyond. Many properties have been altered through extensions and remodelling, resulting in variation in their form, appearance and materials. Taken together, these changes have significantly reduced the degree of visual uniformity within the street scene.
7. The proposed replacement of the existing semi-detached dwelling with a detached dwelling would alter the form of development on the plot in contrast to the dwellings to either side. The proposal would follow the established building line and broadly reflect the height of the roofline of surrounding properties. It would retain gaps to the site boundaries on either side, and the plot has generous amenity space to the front and rear. The site would therefore accommodate the proposal without appearing cramped or contrived.
8. The appeal site occupies a position adjacent to a wider break in built development created by the electricity substation. Beyond this point, the street scene becomes more varied as it approaches a road junction, including the presence of a bungalow and properties of differing form and appearance. In this context, the detached form of the proposed dwelling would not unduly interrupt the existing rhythm of the street scene and would assimilate satisfactorily into the existing streetscape.
9. For these reasons the proposal would respect the character and appearance of the area. It would therefore accord with Policies D1, D2 and SP9 of the North Hertfordshire Local Plan 2011-2031 (Adopted November 2022) which support proposals that respond positively to the site's local context, and do not harm or have an adverse impact on the character and appearance of the site or the street scene and area.
10. It would also comply with Policy DP3 of the Framework with regard to its expectation, amongst other things, that development proposals should respond to their context so that they integrate and enhance their surroundings.

Biodiversity Net Gain (BNG)

11. Article 7 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 requires an application for planning permission to state whether the statutory BNG condition would apply and if not, the reasons why. Where BNG applies, further information is required to enable the statutory BNG condition to be applied and later discharged.

12. The application stated that the BNG condition would not apply because the proposal was for self-build and custom build development. That exemption can only be relied on where there is sufficient certainty that the proposal represents self-build or custom build development.
13. A unilateral undertaking dated 19 August 2026 has been submitted in relation to the appeal. The undertaking has been executed by the owner as a deed and is expressed to take effect as a planning obligation under section 106 of the 1990 Act. It secures the dwelling as a self-build dwelling and requires evidence of compliance to be provided following completion and occupation. I am satisfied that this provides sufficient certainty that the proposal would be self-build development for the purposes of the exemption relied on. Accordingly, the proposal would qualify for the self-build exemption from the statutory BNG condition, and I conclude that no conflict with the BNG statutory framework would arise.

Other Matters

14. An interested party has raised concerns regarding two trees within the open area adjoining the electricity substation. The movement of construction vehicles, plant or materials in that area could be appropriately controlled through the demolition and construction method statement condition. This matter does not therefore alter my findings on the main issues.

Conditions

15. I have reviewed the conditions suggested by the Council having regard to the tests in the Framework and the Planning Practice Guidance (PPG). I have amended some of the Council's suggested wording in the interests of clarity. Conditions addressing the statutory implementation period and listing the approved plans are necessary to provide certainty. However, I have removed reference to plans showing existing matters as compliance with those is unnecessary.
16. A demolition and construction method statement condition is necessary to ensure the orderly management of construction activities in the interests of safeguarding the living conditions of neighbouring occupiers, maintaining highway safety and to protect the adjacent open area and trees during demolition and construction. As these measures need to be agreed before any works commence, the condition is necessarily pre-commencement. A separate condition requiring the widened access to be constructed before occupation, and preventing surface water discharging onto the highway, is necessary in the interests of highway safety.
17. Notwithstanding the Council's suggested condition requiring approved landscaping details to be carried out, no landscaping details are before me, and it is not necessary or reasonable in this instance to require such details for the proposed single replacement dwelling on this existing residential site. Having regard to the advice in the Framework and the PPG regarding the removal of permitted development rights, there is no justification to remove the rights suggested by the Council in this location simply because the proposal is for a replacement detached dwelling.
18. The Council suggested a condition relating to contamination. However, as there is no substantive evidence before me that contamination is likely to be present, I am not satisfied such a condition is necessary or reasonable and I have not imposed it.

Conclusion

19. Drawing these matters together, I conclude that the proposal accords with the development plan when read as a whole. Policy S3 of the Framework indicates that proposals which accord with an up-to-date development plan and the policies of the Framework should be approved without delay. No other material considerations warrant a different conclusion.
20. Therefore, the appeal is allowed.

MG Garrard

INSPECTOR

SCHEDULE OF CONDITIONS

- 1) The development hereby permitted shall begin not later than 3 years from the date of this decision.
- 2) The development hereby permitted shall be carried out in accordance with the following approved plans: HD235506 D01 REV09; HD235506 D03; HD235506 D05 REV 09; HD235506 D07 REV 09; HD235506 D09.
- 3) No development shall take place, including any works of demolition, until a Demolition and Construction Method Statement has been submitted to, and approved in writing by the local planning authority. The Demolition and Construction Method Statement shall provide for:
 - i) the parking of site operatives' and visitors' vehicles;
 - ii) loading and unloading of plant and materials;
 - iii) storage of plant and materials used in constructing the development;
 - iv) wheel washing facilities;
 - v) measures to control the emission of dust and dirt during construction;
 - vi) a scheme for recycling/disposing of waste resulting from demolition and construction works;
 - vii) delivery, demolition and construction working hours;
 - viii) measures to protect trees within the adjacent open area during demolition and construction activities, including any necessary protective fencing or exclusion zones.The approved Demolition and Construction Method Statement shall be adhered to throughout the demolition and construction period for the development.
- 4) Prior to the first occupation of the dwelling hereby permitted, the widened vehicular access shall be constructed in accordance with the approved plans. Surface water from the site shall be intercepted and disposed of separately so that it does not discharge onto the public highway. The access shall thereafter be retained in accordance with the approved details.

Appeal Decision

Site visit made on 12 August 2026 by S Jamieson BA(Hons) MPlan MRTPI

Decision by A M Nilsson BA (Hons) DipTP MRTPI

an Inspector appointed by the Secretary of State

Decision date: 7th October 2026

Appeal Ref: 6009246

Woodcotes, Fears Green, Sandon, Hertfordshire SG9 0QZ

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
 - The appeal is made by Mr & Mrs Jani against the decision of North Herts Council.
 - The application Ref is 25/02883/FP.
 - The development proposed is the erection of three residential dwellings and associated works following demolition of no.3 redundant agricultural buildings, demolition of existing cartlodge and partial demolition of existing garage/outbuilding.
-

Decision

1. The appeal is dismissed.

Appeal Procedure and Preliminary Matters

2. The site visit was undertaken by a representative of the Inspector whose recommendation is set out below and to which the Inspector has had regard before deciding the appeal.
3. I have taken the description of development from the Council's Decision Notice as this is more accurate given that the application is for full planning permission and not for amendments to a prior approval.
4. A new National Planning Policy Framework (the Framework) was published on 17 August 2026. Having given the main parties an opportunity to comment on the changes introduced, my decision reflects this recently revised Framework.

Main Issues

5. The main issues are:
 - whether the appeal site is a suitable location for the proposed development having regard to the development plan and site accessibility; and
 - the effect of the proposed development on the character and appearance of the area.

Reasons for the Recommendation

Location

6. The appeal site is located on a narrow country lane, between the villages of Kelshall and Sandon, approximately half a mile from the edge of each of these settlements. There is a residential property that adjoins the site, and some sporadic

development along the lane. The site is otherwise surrounded by agricultural fields. It is therefore evidently within the open countryside.

7. Policy SP1 of the North Hertfordshire Local Plan 2011-2031 (2022) (Local Plan) supports the principles of sustainable development by directing housing, employment and new development to key settlements. This is reinforced by Local Plan Policy SP2 which sets out the settlement hierarchy for the District and seeks to focus development firstly within towns and secondly within five main villages. Thereafter, development is directed to Category A villages, including Sandon, where development is supported within the defined settlement boundary. In Category B villages, including Kelshall, only infill development is supported, provided it does not extend the built core of the village. Development outside these settlements is supported where it is planned for through a Neighbourhood Plan. From the evidence before me, there is no Neighbourhood Plan applicable to the appeal site.
8. As defined under the Local Plan, the site lies within the Rural Areas beyond the Green Belt (RABGB). Local Plan Policy CGB1 confirms that in RABGB, planning permission will be granted provided that the development falls within one of six categories. As the proposal relates to an existing agricultural building, I find no direct conflict with Policy CBG1.
9. Policy CBG4 relates to proposals for the re-use, replacement or extension of existing buildings in the RABGB. This requires that buildings to be converted do not require major extension or reconstruction; the resultant buildings do not have a materially greater impact on openness, purposes or general policy aims of the RABGB than the original buildings; and (*my emphasis*) any outbuildings are sited as close as possible to the main building(s) and visually subordinate to them. Given the proposal relates to the demolition of the existing agricultural building and its replacement with dwellings, it is inconsistent with Policy CGB4.
10. In a similar vein to the above Local Plan policies, Policy S5(1) of the Framework specifies the only forms of development that should be supported outside existing settlements. As a proposal for the demolition of an agricultural building and the erection of new dwellings, the appeal scheme would not constitute the reuse, extension, alteration of an existing building, or the replacement of a building for the same use, as defined within Policy S5(1)(c) of the Framework. According to the glossary of the Framework, it would not fall within the definition of previously developed land and, given the sporadic pattern of development in the vicinity the appeal site, could not reasonably be described as limited infilling. Given the site's location in the open countryside and the significant distance between the appeal site and the nearest villages, which are not served by railway stations, the site is also neither within reasonable walking distance of a well-connected railway station nor physically well-related to such a station or the settlement it serves.
11. While the Council cannot demonstrate a five-year supply of deliverable housing land, Policy S5(j) only supports housing development in such circumstances where the site is physically well-related to an existing settlement (unless the nature of the development would make this inappropriate) and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure. In this case, as explained above, the appeal site is physically separate from both Kelshall and Sandon and is divided from them by intervening countryside. It therefore cannot be regarded as being well-related to either village.

It is also not allocated for residential development. Consequently, the proposed residential development of the site would not fall within any of the categories of development listed within Framework Policy S5.

12. With regard to accessibility, Fears Green comprises a narrow, unlit, national speed limit lane with no footway for most of its length. It thereby would not provide a suitable walking or cycling route, particularly during hours of darkness or inclement weather. During my site visit I also observed that there are no bus stops on Fears Green. Overall, the nature of the local highway network, the distances involved and the lack of a bus service in the vicinity of the site would not be conducive to encourage walking or the use of public transport to access day-to-day local services and facilities in the nearest villages or further afield. As a result, future residents would not have a genuine choice of sustainable modes of transport, contrary to the aims of Policy TR3 of the Framework, and consequently occupiers would be heavily, or solely, reliant on private vehicles. This is the least sustainable mode of travel.
13. In this regard, the proposal would fail to accord with the requirements of Policies SP6 and T1 of the Local Plan and Policy 5 of the Hertfordshire Local Transport Plan 2018-2031 (2018) (LTP) which seek, amongst other things, to encourage development in locations which enable sustainable journeys to be made to key services and facilities and require that the location and design of proposals encourage movement by sustainable transport modes and reduce travel demand.
14. Taking all the above into consideration, the location of the proposed development away from any settlement boundary would be inconsistent with the spatial strategy for the District and would be contrary to the aims of the Local Plan, LTP and the Framework in terms of promoting sustainable patterns of development.
15. Consequently, the appeal site would not be a suitable location for the proposed development having regard to the development plan and site accessibility.

Character and appearance

16. The appeal site comprises a simple arrangement of agricultural buildings including two open-sided, timber storage structures and a vacant poultry shed. The poultry shed is an expansive building, occupying a large area of the site, along its northern boundary. However, its modest height and squat form give it a discreet presence, while its timber and corrugated metal construction give it a notably agricultural appearance. Aside from the occasional dwelling and agricultural building, there is limited development between Sandon and Kelshall and the route is characterised by grass verges, hedgerows and mature trees, with gaps between vegetation providing intermittent views out over open fields. Collectively these elements contribute positively to the distinctly rural character of the area.
17. The proposal would see the removal of the poultry shed and other timber structures, which are somewhat dilapidated. Nevertheless, the erection of three substantial detached dwellings would represent a significant change in the character and appearance of the site. Although the overall volume of built development may be less than that of the existing structures, the proposal would introduce a markedly different form and pattern of development. In particular, the development would extend into the rear of the site, which is presently free from built form, thereby increasing the perception of encroachment into the rural landscape.

18. Furthermore, the largest of the proposed dwellings would incorporate a distinctly contemporary design, characterised by extensive glazing and a large first-floor terrace. While contemporary architecture is not inherently inappropriate in a rural context, in this case the dwelling would read as a conspicuously domestic and visually prominent feature that would sit uncomfortably with the site's agricultural and rural setting.
19. The development would also likely require substantial associated works, including areas of hard surfacing for access, parking, turning and refuse storage, together with domestic boundary treatments and formal landscaping. These elements would reinforce the residential character of the site and erode its existing rural qualities. Collectively, the introduction of domestic curtilages, hard landscaping and associated infrastructure would result in a pronounced urbanising effect that would appear incongruous within its countryside setting.
20. While the proposed dwellings would be set back from Fears Green and would benefit from a degree of screening provided by mature trees and hedgerows, the development would nonetheless remain visible in partial views from the site access, from the nearby public footpath and from wider vantage points across the open fields from the north. In addition, the occupation of the dwellings would introduce a level of domestic activity, external lighting and residential paraphernalia that is currently absent from the site. These features would increase the perception of development within the countryside, particularly during hours of darkness, and would further diminish the site's rural character.
21. While I acknowledge that aspects of the proposed design, including its scale and choice of materials, seek to draw reference from agricultural buildings, these design measures would fail to satisfactorily mitigate the fundamental change that would arise from the introduction of three permanent dwellings and their associated domestic curtilages.
22. Consequently, the proposed development would have a harmful effect on the character and appearance of the area. In that regard it would conflict with Policy SP9 and Policy D1 of the Local Plan which require, amongst other things, that developments are well designed and located; and respond positively to local context. It would also be inconsistent with the good-design objectives of the Framework.

Other Considerations

23. The parties have referred to an extant Class Q Prior Approval (Ref. 24/01733/PNQ) at the appeal site for the conversion of the poultry shed to three residential dwellings. As I have no reason to doubt that this scheme would be implemented if this appeal were to fail, the prior approval scheme represents a realistic fallback position and an important consideration in this case.
24. The fallback permits the conversion of the agricultural buildings to residential use. However, the PPG is clear that the permitted development right does not apply a test in relation to the sustainability of the location. This is deliberate because many agricultural buildings will be in locations where planning permission for new dwellings would not normally be granted. Therefore, the fallback does not establish that the location is sustainable for new residential development.

25. In character and appearance terms, the existing buildings, while large and in a poor state of repair, are characteristic of the surrounding area and of the agricultural land use in terms of their scale, form and appearance. Despite their collectively significant footprint, they assimilate into the landscape. The prior approval works would not fundamentally alter this character because the restrictions on prior approval prevent material changes to the external appearance of the barns. It would result in very limited changes to the external space and the overall domestication of the wider area.
26. While the amendments to the Class Q regime could potentially allow a greater number of residential units to be created within the existing building, and / or for the conversion of the other structures on the site to residential use, no such scheme has been presented and there is insufficient evidence before me to establish either the form that such developments might take or whether they would satisfy all of the relevant limitations, conditions and requirements of the permitted development regime. Even if a more intensive Class Q scheme were capable of being pursued, the proposal is for three substantial, detached dwellings, with significant expanses of glazing, and the domestication of the appeal site through the creation of three separate gardens, driveways and the associated domesticated paraphernalia that would likely follow. It would, therefore, despite any increase in traffic movements, clearly have a more harmful effect on the character and appearance of the rural landscape than the fallback position.
27. There is no evidence before me regarding the value of the appeal scheme compared to the extant Class Q approval. That said, such an assessment is not determinative in the assessment of the planning benefits of the proposal. Nor are the personal aspirations of the appellant in terms of their desire for a new house to live in after their retirement.
28. I note the appeal decisions (Ref. APP/M1710/W/20/3258256) cited by the Appellant. I do not have the full details of that scheme before me. However, it is clear from the appeal decision, and the accompanying costs decision, that the main issue in that case was site suitability, and not the effect of the proposed development on the character and appearance of the area. Given my findings above, this is a fundamental difference when assessing the weight that should be attributed to the fallback position. It is not therefore directly comparable to the appeal before me.

Planning Balance and Recommendation

29. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the appeal be determined in accordance with the development plan unless material considerations indicate otherwise.
30. The Council is unable to identify a supply of deliverable sites sufficient to provide a minimum of 5 years' worth of housing. Indeed, the evidence before me suggests that the Council is only able to demonstrate between 2.6 and 3.3 years' worth of housing land supply. Policy H07 of the Framework indicates that substantial weight should be given to the benefits of providing homes that would help address the evidenced accommodation needs of the community. While the provision of three dwellings would make a small contribution in terms of addressing unmet housing needs, this is an important factor given the Council's housing land supply position.

31. In addition, the proposal would align with some aspects of the Framework insofar as making effective use of land, conserving and enhancing the natural environment, providing energy-efficient dwellings and some socio-economic benefits that would arise from construction and additional support for local services and facilities in nearby villages. In the context of three dwellings however, such benefits would be limited in magnitude and are therefore attributed moderate weight in favour of the proposal.
32. I have also considered the appellant's intention that one of the dwellings would be self-build. However, no planning obligation or other mechanism has been provided to secure the development as self-build or custom housebuilding. Furthermore, there is no substantive evidence before me that the Council is failing to meet its duties in this respect. Accordingly, I attach this benefit limited weight. For the reasons given above, I also attribute limited weight to the fallback position.
33. Against these benefits, the site's location in the open countryside and the absence of any realistic alternative to the car means the development would conflict with the development plan. I give this conflict considerable weight. Independent of that finding, the proposal would also constitute poor design, which adds further weight against the proposal.
34. As the proposal does not fall within any of the categories in Framework Policy S5(1), under S5(4) the proposal should be approved only where exceptional circumstances exist and the benefits would substantially outweigh the adverse effects. No such circumstances exist and the benefits fall short of that test. Accordingly, there are no material considerations indicating a decision should be made other than in accordance with the development plan.
35. For these reasons, and having regard to all other matters raised, I recommend that the appeal should be dismissed.

S Jamieson

APPEAL PLANNING OFFICER

Inspector's Decision

36. I have considered all the submitted evidence and my representative's report and on that basis the appeal is dismissed.

A M Nilsson

INSPECTOR