

**North Hertfordshire District Council Local Development Framework**  
**Land Allocations Additional Suggested Sites Issues and Options Paper July 2009**

**Response by CPRE – The Hertfordshire Society**

**General**

We are grateful to the Council for giving the public this opportunity to comment on the additional sites put forward for consideration in response to the January 2008 Land Allocations Issues and Options Paper.

However, we are surprised that the Council felt it necessary to include all these supplementary sites put forward by developers and landowners. Many of them are completely speculative and are clearly contrary to established and emerging policy. We consider that the Council could have dismissed many of them out of hand.

For example, the sites to the south and west of Hitchin which have been promoted in connection with a possible bypass to the south west of Hitchin are completely unjustified. Development in this area was a discounted option in the Core Strategy Preferred Options Paper of September 2007 for the reasons given in that document. The allocation of these sites in the Land Allocations DPD would be completely contrary to the draft Core Strategy, unless the Council is considering changing the Core Strategy, in which case the public should have been informed prior to this consultation.

Nevertheless, our comments on the specific sites to which we object are as follows.

**Comments on specific sites**

We **OBJECT** to all the following sites, for the reasons given.

**Site 1: Land east of Ashridge Farm, Ashwell Street, Ashwell**

This is a greenfield site outside the boundary of the Selected Village of Ashwell (Policy 7 of the current North Hertfordshire District Local Plan 1996). Under draft Core Policy C of the Council's Core Strategy Preferred Options (September 2007) document, land outside the settlement boundary should only be allocated for housing as an exception site in the rural area (for affordable housing). This site should not therefore be allocated for general market housing.

**Site 3: Land west of Claybush Road, Ashwell**

This is a greenfield site and is grade 2 or 3 agricultural land, located outside the existing village boundary. Draft Core Policy C applies as above.

**Site 8: Land south of 120 Station Road, Ashwell**

This is a greenfield site, in agricultural use, lying outside the existing village boundary. Its development would extend the linear development along Station Road into the rural area.

**Site 12: Land north of George IV Public House, London Road, Baldock**

This site is in the Green Belt outside the town boundary. There is no justification for releasing it from the Green Belt.

Site 14: Land west of Weston Way, Baldock

This site is in the Green Belt, and its development would represent a significant extension of Baldock into the Green Belt. Development of this site would be directly contrary to national and local Green Belt policy.

Site 15: Land north of Willian Road, Baldock

This site, adjacent to Site 14, is mainly in the Green Belt, and its development would represent a major extension of Baldock into the Green Belt up to the A1(M) motorway. Development of this part of the site would be directly contrary to national and local Green Belt policy. The remainder of the site appears to be school playing fields just inside the town boundary.

Site 17: Land east of Burrs Lane, Barkway

This is a greenfield site outside the village boundary of Barkway, in the designated Rural Area beyond the Green Belt. This is grade 2 agricultural land, development of which should only be allowed in unavoidable circumstances according to PPS7 paragraphs 28 – 29.

Site 18: Land east of Cambridge Road, Barkway

Again, this is a greenfield site outside the village boundary, and is grade 2 agricultural land.

Site 19: Land west of Cambridge Road, Barkway

This is another greenfield site outside the village boundary, classified as grade 2 agricultural land. Its development would be a significant extension of Barkway into the Rural Area.

Site 20: Land adjoining Lane Farm, Gas Lane, Barkway

This is a greenfield site outside the village boundary, classified as grade 2 agricultural land.

Site 21: Land north of Nuthampstead Road, Barkway

This is a greenfield site outside the village boundary, classified as grade 2 agricultural land. Its development would significantly extend Barkway right up to Nuthampstead Road.

Site 22: Land east of Royston Road, Barkway

This site is adjacent to Site 19, and the same considerations apply.

Site 23: Top Field, Royston Road, Barkway

Again, this is a greenfield site outside the village boundary, classified as grade 2 agricultural land, and its development would be a significant extension of Barkway into the Rural Area.

Site 26: New Hill, Picknag Road, Barley

This is a greenfield site just outside the boundary of the Selected Village of Barley. The land is classified grade 2 agricultural. Its release for development would be contrary to established Rural Area and Selected Villages policy.

Site 27: Churchfields, Pudding Lane, Barley

Again, this is a greenfield site outside the boundary of the Selected Village of Barley. It is grade 2 agricultural land. Its release for development would be contrary to established Rural Area and Selected Villages policy.

Site 28: Land at Clothall House, Ashanger Lane, Clothall

This is a relatively large site in the Green Belt. Its release for development would be contrary to established Green Belt policy and to emerging core policies C and D in the Core Strategy Preferred Options document.

Site 29: Land south of Cowards Lane, Codicote

This is a greenfield site in the Green Belt, just outside the boundary of the Excluded Village of Codicote. In accordance with emerging policies in the Core Strategy Preferred Options, this site should not be released for development, other than possibly as a rural exception site under draft Core Policy E.

Site 31: Land south of Heath Road, Codicote

As for Site 29.

Site 32: Land north east of The Close

As for Site 29.

Site 34: Chesfield Downs, Jacks Hill, Graveley

This site is in the Green Belt north of Graveley. The proposed use is stated as intensification of sports/leisure facilities. This proposal should be tested against national policy in PPG2 paragraph 3.4 concerned with essential facilities for outdoor sport and recreation which preserve the openness of the Green Belt and do not conflict with the purposes of including land in it. This should be done by means of a specific planning application, rather than by allocating the land for this use in a Local Development Document without any fully justified proposal having been made.

Site 35: Jacks Hill Park, Jacks Hill, Graveley

This site is in the Green Belt north of Graveley. The proposal is for an extension of the existing mobile home park up to the A1(M) motorway. In accordance with national policy in PPG2, this would constitute inappropriate development in the Green Belt, unless there are very special circumstances. The most appropriate way to test this would be by means of a specific planning application, rather than by allocation in a Local Development Document.

Site 37: South west bypass, Hitchin

This site, together with sites 94 and 103 (St Ippolyts), is being promoted as a way of funding a south-western bypass of Hitchin. The line of such a road is not indicated, but would presumably run from the A505, to the south of Charlton, between Gosmore and Hitchin, and between St Ippolyts and Hitchin to the A602. Such a bypass has been talked about for many years, but has never been adequately justified either as a local distributor road or as part of a strategic route. It is not in any road programme, so far as we are aware. To allocate land for development in a Local Development Document solely in anticipation of the possibility that a fully worked up case for a bypass might be presented and accepted would be completely inappropriate.

The site is almost wholly in the Green Belt, and its development would conflict with all five of the purposes of including land in green belts given in PPG2 paragraph 1.5: it would be a huge sprawling extension of the built-up area of Hitchin; it would cause the coalescence of the villages of Charlton and Gosmore with Hitchin; it would be a massive encroachment into the

countryside; it would have a dramatic effect on the setting and character of the historic market town of Hitchin; and it would divert pressure away from the need to regenerate existing urban areas.

At nearly 400 hectares, the site is capable of accommodating at least 12,000 dwellings (at the national indicative minimum density of 30 dwellings per hectare given in PPS3). This is far in excess of Hitchin's housing needs, and is about double the housing requirement for the whole of North Hertfordshire District excluding the proposed expansion of Stevenage for the period 2001 to 2021 given in the East of England Plan. It even exceeds the extrapolated housing target of 9,300 dwellings for the period up to 2031, based on an assumption that the annual average rate of provision after 2021 should be the same as for the period 2006 to 2021 (source: East of England Plan policy H1).

For the above reasons, this site should be rejected out of hand.

Site 38: Land at junction of Pirton Road and Crow Furlong, Hitchin

This site is in the Green Belt and is primarily woodland. It is also in an area of archaeological interest. Its development would cause loss of amenity and adverse impact on biodiversity, and has not been justified.

Site 39: Highover Farm, Stotfold Road, Hitchin

This site is in the Green Belt and is classified as grade 2 agricultural land. No real justification to override the presumption against development has been provided.

Site 40: Burford Grange, Bedford Road, Ickleford

This site is in the narrow strip of Green Belt separating Ickleford from Hitchin. Although its existing use is as a house with extensive grounds, its development for housing would have a significant effect on the openness of this part of the Green Belt.

Site 41: Land off Duncots Close, Ickleford

This site is in the Green Belt on the edge of Ickleford. Its release for development has not been justified.

Site 43: Land off Hall Lane, Kimpton

This site is in the Green Belt on the edge of the Excluded Village of Kimpton. Apart from the village hall on the site (would that remain or be reprovided elsewhere?), it is grade 3 agricultural land mainly in use as allotments. No justification for its release for residential development has been provided.

Site 45: Land at Ash Drive (north), Kimpton Bottom

This site is in the Green Belt, and its development for housing would affect the openness of the Green Belt.

Site 46: Land at Ash Drive (south), Kimpton Bottom

As for Site 45.

Site 49: Allotments south of Colemans Road, Breachwood Green

This site is in the Green Belt and is outside the identified village boundary for Breachwood Green proposed in the Core Strategy Preferred Options (September 2007). No justification for its release for development has been provided.

Site 50: Land north of Lower Road, Breachwood Green

As for Site 49.

Site 51: Allotments west of The Heath, Breachwood Green

This site is in the Green Belt. Its release would allow linear development to extend along Heath Road towards Breachwood Green.

Site 52: Land at Deards End, Knebworth

This site is in the Green Belt outside the Excluded Village of Knebworth. It would be a major extension of the village into the Green Belt and countryside, and would contravene some of the purposes of including land in green belts. Excluded Village policy already allows for some development within the village boundary that would assist the vitality and viability of the settlement.

Site 53: Land at Gypsy Lane, Knebworth

This site is in the Green Belt and would extend the village right up to the A1(M) motorway. Together with the nearby Site 52, it would have a capacity of at least 800 dwellings, and there is no justification or requirement for such a large increase in the size of Knebworth.

Site 54: Odyssey Health Centre, Old Knebworth Lane, Stevenage

This site is in the Green Belt. Its development for housing would extend the built-up area of Stevenage beyond the railway line and could set a precedent for further development in this direction.

Site 55: Land north of Old Lane, Knebworth

This site is in the Green Belt on the edge of the village. It is grade 3 agricultural land, in use for agricultural purposes.

Site 56: Land east of Stevenage Road

As for Site 54.

Site 57: Land south of Swangle's Lane

As for site 55.

Site 58: Land north of Watton Road, Knebworth

This site is in the Green Belt on grade 3 agricultural land. Its development would be a significant extension of the village into the countryside and would enclose the recreation ground within the urban area.

Site 62: Land rear of 57 West Street, Lilley

This site is in the Green Belt that washes over Lilley. It is also in the AONB and within an area of archaeological interest. There is therefore a presumption against development.

Site 64: Land east of Priors Hill, Pirton

This is a greenfield site outside the boundary of the Selected Village of Pirton. It is grade 3 agricultural land in agricultural use. Its development would be a significant extension of Pirton and would affect the character of the village.

Site 65: Land west of Back Lane, Preston

This is a greenfield site (not Green Belt as stated in the consultation document for all the proposed sites at Preston) outside the identified village boundary proposed in the Core Strategy Preferred Options.

Site 67: Land north of Chequers Lane, Preston

As for Site 65.

Site 69: Land south of Crunnells Green, Preston

This is a greenfield site outside the identified village boundary proposed in the Core Strategy Preferred Options. Its development would be a significant extension of the village into the designated Rural Area, and into the area which is being proposed as ‘compensatory’ green belt in draft Core Strategy Policy D.

Site 72: Land north of Blacksmiths Lane, Reed

This is a greenfield site in the Rural Area, outside the identified village boundary for Reed proposed in the Core Strategy Preferred Options. The land is grade 2 agricultural and includes an established woodland.

Site 84: Ivy Farm, Baldock Road, Royston

This is adjacent to Site R/r01 in the Land Allocations Issues and Options Paper (January 2008), whose allocation for housing we questioned and suggested that it might be a more appropriate location for a new football ground for Royston FC. Development of Site 84 would extend the built-up area of Royston along Baldock Road towards its junction with the bypass.

Site 85: Land north of Newmarket Road, Royston

This is a large greenfield site outside the designated Development Limits of Royston. Its development would extend the town right up to the bypass. It is within an area identified in the Core Strategy Preferred Options as a discounted option due to its proximity to the ridge line south of Royston, and we strongly support that as a discounted option for development.

Site 86: Land at Gannock Farm, Gannock Green, Sandon

This site is described as residential garden and paddock, but is effectively a greenfield site in the designated Rural Area. In theory, it could accommodate up to 200 dwellings at a density of 30 dwellings per hectare, but that would create an isolated new settlement in the Rural Area. The land is classified grade 2 agricultural.

Site 87: Land north of Rockells Jersey Farm, Green End, Sandon

This land is classified grade 2 agricultural, and is located in an isolated area in the designated Rural Area. The site of 6.22 hectares is being proposed for allocation to provide one agricultural worker’s dwelling. In our view, the appropriate way to deal with this would be by means of a specific planning application, rather than by allocating the land in a Local Development Document.

Site 88: Rockells Jersey Farm, Green End, Sandon

As for site 87.

Site 90: Brookend Farm, Brookend Lane, St Ippolyts

This site is partly in residential use, but a large part of it is pasture land. We see no reason why the latter should be included within the proposed new village boundary.

Site 91: Land north of Brookend Farm, Brookend Lane, St Ippolyts

We see no reason why this grazing land should be included within the proposed new village boundary.

Site 94: Eastern section of Hitchin South West Bypass, St Ippolyts

This site is being promoted together with Sites 37 and 103 as part of the proposal for a south-western bypass of Hitchin which has not been justified or approved. In the absence of a firm commitment to a bypass of Hitchin, it would not be appropriate to allocate this land for development on that basis.

The site is in the Green Belt between St Ippolyts/Gosmore and Hitchin. Its allocation for development would conflict with the purposes of including land in green belts given in PPG2. In particular, development of this site would cause the virtual coalescence of Gosmore and St Ippolyts with Hitchin.

At just over 56 hectares, the site is capable of accommodating around 1,700 dwellings (at the minimum recommended density of 30 dwellings per hectare). This represents a large proportion of the likely greenfield land requirement for the whole of North Hertfordshire District excluding the proposed expansion of Stevenage for the plan period. There is no justification for meeting such a large proportion of the requirement in this location.

Site 98: Land north of Pound Farm, London Road, St Ippolyts

This site is in the Green Belt on the edge of Hitchin. Its allocation for development would extend the built-up area of the town into the countryside and would erode the gap separating St Ippolyts/Gosmore from Hitchin.

The land is grade 3 agricultural and adjoins a wildlife site.

Site 99: Land north of The Crescent, London Road, Gosmore

This site is in the Green Belt and outside the proposed new village boundary for St Ippolyts/Gosmore.

Site 102: Land south of Avenue Farm, Maydencroft Lane, Gosmore

There is no justification for incorporating this area of grassland into the village boundary.

Site 103: Land at Mill Lane, Gosmore

This site also is being promoted as part of the proposal for a bypass of Hitchin. The site is in the narrow strip of Green Belt separating Gosmore from Hitchin, and its development would cause the two settlements to coalesce. The release of this land for development should be resisted at all costs.

Site 107: Land north of Sperberry Hill, St Ippolyts

This site is part residential, but includes a school playing field and pasture land. Only the residential element should be considered for inclusion in the village boundary.

Site 108: Land east of junction of Hitchin Lane and Stevenage Road

This site is in the Green Belt and is grade 3 agricultural land. Its release for development would conflict with the purposes of including land in green belts.

Site 109: Land west of junction of Hitchin Lane and Stevenage Road

This site is in the Green Belt on the edge of Hitchin. Its release for development would extend the built-up area of Hitchin into the Green Belt.

Site 110: Oakfield Farm, Stevenage Road

This site of 28.5 hectares in the Green Belt on the edge of Hitchin would represent a significant extension of the town into the Green belt and countryside. This is entirely contrary to the purposes of including land in green belts, and cannot be justified.

Site 114: Land west of Folly Lane, St Ippolyts

This site is scrubland on the opposite side of Folly Lane from the proposed identified village. There is no justification for including it within the village boundary.

Site 115: Land south of Waterdell Lane, Gosmore

This site comprises allotments and agricultural land. There is no justification for including it in the new village boundary.

Site 117: Land south of Haywood Lane, Hay Green, Therfield

This is an isolated site in the designated Rural Area, on the edge of the small settlement of Hay Green. Its development would be an intrusion into the countryside.

Site 119: Land west of Police Row, Therfield

This is a relatively large site in the designated Rural Area, just outside the boundary of the Selected Village of Therfield. Its development would cause Therfield to join up with the nearby hamlet of Hay Green. This would be contrary to established policy in the current Local Plan of maintaining the existing countryside and villages and their character.

Site 120: Land west of Gypsy Lane (Wymondley Parish)

This site is in the Green Belt on the edge of Hitchin. It is grade 3 agricultural land in use for grazing. There is no justification for releasing it from the Green Belt.

Site 121: Land north of Stevenage Road, Little Wymondley

This site is in the Green Belt on the edge of Little Wymondley, which is a village excluded from the Green Belt in the current Local Plan. Its release for development would extend the village into the Green Belt towards Hitchin.

Site 122: Land south of Stevenage Road, Little Wymondley

The release of this site of more than 26 hectares from the Green Belt would be a massive extension of Little Wymondley up to the A602, more or less doubling the size of the village. Little Wymondley is already under threat from the proposed expansion of Stevenage on its

south eastern side, being adjacent to the SNAP area of search for housing development. It should not be allowed to expand southwards and westwards as well.

Site 125: Land south of Wymondley Road, Hitchin (Wymondley Parish)

Like Site 120, this site is in the Green Belt on the edge of Hitchin. It would be an extension of the built-up area into the Green belt and countryside.

Site 126: Mile End Farm, London Road, Reed

This is an isolated site in the designated Rural Area, alongside the A10 south of Royston. The land is classified as grade 2 agricultural land. Development as a housing estate of around 150 dwellings (5 hectares at the recommended minimum density of 30 dwellings per hectare) would be unsustainable in this isolated location with no local services.