

Standing up for Hertfordshire's countryside

Tom Rea
Planning and Building Control
North Hertfordshire District Council
Council Offices
Gernon Road
Letchworth Garden City
Herts SG6 3JF

Our Ref:

Your Ref:

2nd August 2019 (by email)

Dear Mr. Rea,

Application No. 19/01669/FP
Erection of 14 dwellings including new vehicular access off Sperberry Hill (serving 5 dwellings) and new vehicular accesses off Stevenage Road (serving 9 dwellings)
On Land west of Ryefield, Stevenage Road, St Ippolyts, Hertfordshire

As you are aware, the Inspector conducting the Examination in Public of the Submission North Herts Local Plan has asked the Council to reconsider its proposed release of Green Belt. This application would, in effect, alter the Green Belt Boundary in advance of any decision on the quantum of housing required on Green Belt land or its location. Paragraph 136 of the National Planning Policy Framework is clear that amendments to Green Belt boundaries must be made through the Local Plan process, not by decisions made on individual planning applications. Consequently to determine this application at this stage would pre-empt the findings of the Examination in Public and, in our view, would prejudice balanced decisions on the scale and location of housing in the North Herts.

We accept that the site is designated for housing in the Submission Local Plan (Site SI2), however until that plan is adopted it lies in the Green Belt, outside the current settlement boundaries. Consequently, for the reasons set out above, it must be determined against the Green Belt policies in the NPPF and North Herts Local Plan No. 2, neither of which it complies with. Presumably because the applicant assumed that the adoption of site SI2 would proceed unhindered, there is no Planning Statement accompanying the applications and the Design and Access Statement makes no reference to compliance with either Local Plan No. 2 or the Submission Local Plan.

Even were the Council to proceed to determine against the provisions of either plan, there are elements of the proposal with which we have concerns:

The bulk of the housing will be accessed off Stevenage Road, which will also become the principal pedestrian route to access the village, the school and the bus stop. Para. 9.8 of the Submission Local Plan requires that “ *Development proposals should consider how the scheme will integrate with the existing circulation patterns particularly pedestrian, cycle*

and public transport. Safe and secure pedestrian and cycle routes should be provided both within the site and linking into the wider network.”

Stevenage Road is a single track lane for most of its length. It has no footways, requiring pedestrians to walk in the road, and is inadequately lit (there are only three lighting columns along the entire length of almost half a kilometre, clustered around the entrance to East View.) As the HCC design guide, Roads in Hertfordshire, points out, Provision for pedestrians has too often been overlooked despite the fact that it is the principal form of travel for trips under 1 mile. Footways must be safe, convenient, secure, attractive and nuisance-free. It also emphasises that access should be provided for those of all ages and all abilities. Apart from a vague reference to a potential footway in Stevenage Road in the Design and Access Statement, this key sustainability aspect is not addressed in the application.

The Transport Statement barely covers pedestrian movement. On other modes of transport it rightly states, at para. 4.13, that the nearest bus stop is 1.1km from the site, (but omits to say that is along a road with no footway or lighting) and the goes on to state that “ *The bus stop provides regular services to Hitchin and Welwyn Garden City.*” And, at para. 4.16, that “ *it is considered that travel by bus can represent a feasible alternative to the private car for local journeys.*” However, the first bus in the morning is at 8:03 and the last in the evening at 18:11. The frequency throughout the day is a bus every two hours. There is no direct bus connection to the station in Stevenage. This level of service is hardly conducive to either commuting or reaching centres of employment in Hitchin, Stevenage or Welwyn Garden City.

Under the current Local Plan No. 2, this proposal would represent development which would cause significant harm to the openness of the Green Belt, for which no very special circumstances sufficient to outweigh that harm have been presented. Under the Submission Plan it would not meet the Council’s sustainability tests. The determination of the application at the present time would be premature and would be prejudicial to the outcome of the ongoing Examination in Public. Consequently it should be resisted by the Council.

Yours sincerely,

David Irving