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Standing up for Hertfordshire's countryside

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

Our Ref:

Your Ref:

18th January 2019 (by email)

Dear Ms. Poyser,

Application No. 18/03315/OP

Outline application two detached dwellings with all matters reserved except acc<u>ess</u> On land rear of The Croft, Stevenage Road, Little Wymondley, Hertfordshire.

CPRE Hertfordshire object to this application for inappropriate residential development in the Green Belt.

This is essentially a resubmission of Application No. 18/00907/OP for three dwellings, which was withdrawn by the Applicant before determination by the Council.

We are concerned by a number of statements made in the Design, Access and Heritage Statement accompanying the application. The applicant states that "the proposal has been prepared in accordance with the National Planning Policy Framework (NPPF), current policies from the 1996 the NHDC local plan and the emerging LP 2011-2031 currently undergoing public examination. Note has been taken of the draft Wymondley Neighbourhood Plan (2016)." None of those statements are correct.

The site is currently in the Green Belt. Consequently residential development of this type is inappropriate development under the provisions of the Green Belt policies in both the NPPF and the current North Herts Local Plan. Both documents require 'very special circumstances' to be demonstrated which clearly outweigh the harm to the Green Belt through appropriateness or other harm. No 'very special circumstances' are put forward by the applicant.

Policy SP5 of the emerging Local Plan proposes to amend the Green Belt Boundary to include the site within the village settlement boundary and Policy SP2 to allow for development within the settlement boundary, but the site is not designated for housing in the Plan. The Examination in Public of the emerging Local Plan is currently underway. To approve this application would pre-empt the outcome of that examination, contrary to para. 49 of the NPPF.

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The Wymondley Parish Neighbourhood Plan, which is also currently subject to Examination in Public, clearly says that the Wymondley parishioners object to any development on Green Belt land within or surrounding the Parish. (para 7.4) and that the Parish will "*robustly challenge any proposals to change our Green Belt boundaries*." (Policy GB3). In preparing the Neighbourhood Plan the Parish considered a number of potential locations for residential development in the Green Belt. This was not one of them. To approve this application would similarly pre-empt the outcome of the Examination in Public of the Neighbourhood Plan.

Consequently we cannot accept that the proposal has been prepared in accordance with the policies claimed.

The Applicant also states that "The site also formed the most northerly part of the original allocation WY1 in the emerging North Hertfordshire District Local Plan 2011-2031". That is not the case. While this site was originally included as part of Site 122 in the Strategic Housing Land Availability Assessment carried out by the Council as part of the development of the emerging Local Plan, it was not included as part of the proposed development site WY1 in the Submission version of the Local Plan. This site is adjacent to the most northerly part of WY1, as shown on the original submitted local plan, the amended plan in the Statement of Common Ground submitted in Nov. 2017, or MM 384 of the proposed modifications to the Policies map which are currently out for consultation. It is not part of the allocated site.

The drawing accompanying the application does not show ownership boundaries and we presume that the proposed access is across land currently part of the curtilage of The Croft, which is Grade II listed. The development is immediately adjacent to three Grade II listed buildings. It will have an obvious impact on those heritage assets.

On the Bovis Masterplan for Site WY1 (which we accept is not a planning document and therefore speculative) indicates that its access will be to the other side of The Croft. Consequently there will be three junctions on to Stevenage Road in very close proximity to each other (WY1, Elms Close and this site). In highway safety terms, this is problematic.

For the above reasons, we urge the Council to reject this application as both inappropriate and premature development.

Yours sincerely,

David Irving

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