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**Standing up for Hertfordshire's countryside**

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

Our Ref:

Your Ref:

22<sup>nd</sup> April 2020 (by email)

Dear Mr. Hunter,

**Application No. 20/00667/FP**  
**Erection of six 4-bed dwellings and three 3-bed dwellings including associated parking, turning area, amenity space and alterations to existing vehicular access off High Street. on Land Adjacent To 148 High Street Kimpton Hertfordshire**

CPRE Hertfordshire have concerns regarding the nature of this application. While it is described as a full application, the applicant clearly states that *"The application is being submitted ahead of the adoption of the Local Plan but it is recognised that the Council will not be able to determine the application ahead of its adoption and the release of the land from the Green Belt."*

We are puzzled as to why the Council chose to validate this application. Government guidance says that once a planning application has been validated, the local planning authority should make a decision on the proposal as quickly as possible, and in any event within the statutory time limit unless a longer period is agreed in writing with the applicant. There is nothing in the application to say that a longer period has been agreed, despite the fact that the adoption of the Submission Local Plan is not imminent.

Under present circumstances, this application can only be considered under the current Local Plan. The site lies in the Green Belt, outside the settlement boundary, but within the conservation area. It cannot be construed as a limited infill site. Consequently it is contrary to the Green Belt policies in the National Planning Policy Framework and the North Herts Local Plan. As such the applicant is required to demonstrate very special circumstances sufficient to outweigh harm to the openness and any other harm to the Green Belt. No very special circumstances are presented.

The Submission Local Plan allows for development of 8 units on site KM3 within the village, but not on this site. The applicant presumes that under the Submission Local Plan the

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settlement boundary will be adjusted and the site taken out of the Green Belt. While weight can be given to the policies in the Submission Local Plan, it cannot be taken for granted that the settlement boundary will be redrawn. Consequently the applicant's expectation may be premature.

Given that the Examination in Public of the Submission Local Plan is not yet complete and under the current Local Plan the proposal would be inappropriate development, we do not see why the Council has set a consultation deadline of 23 April and an internal target date of 31 July 2020 for determination of the application.

In our view, the Council should either refuse this application or ask the applicant to withdraw.

Yours sincerely,

David Irving