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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:

11<sup>th</sup> November 2020 (by email)

Dear Mr. Hunter,

**Application No. 20/02359/PIP**  
**Permission in Principle: Erection of up to four dwellings**  
**on Land West Of Pirton Road, Holwell, Hertfordshire SG5 3SS**

CPRE Hertfordshire object to this application for residential development in the Rural Area Beyond the Green Belt and outside the settlement boundary of Holwell, contrary to Policies 6, 7 and 29 of the North Herts Local Plan and policy CGB1 of the Submission Local Plan currently subject to Examination in Public.

As the Examination in Public of the Submission Local Plan is well advanced and the issued modifications have considered the representations made against the plan and have resolved outstanding issues, the policies in the Submission Local Plan can be given significant weight.

Paragraphs 77-79 of the National Planning Policy Framework states that in rural areas, planning policies and decisions made should take account of local circumstances and be responsive to the local needs.

Holwell is a small village. In the current Local Plan it is classed as a Selected village. Policy 7 states that the Council will normally permit development in a selected village if the site lies within the main area of the village as shown on the Proposals Map, provided it meets the criteria in Policy 6 for development in the Rural Area Beyond the Green Belt. This site lies outside the settlement boundary as shown on the proposals maps.

Policy 6 allows for housing to meet an identified rural housing need, with the caveat that the requirements of Policy 29 on Rural Housing Needs are met. Policy 29 requires the proposal to be expressly designed to meet a specific and proven local need which cannot be met in any other way. The local area is defined as (a) the identified parish; and (b) the immediately adjoining parishes (i.e. not the whole of North Herts). In 2015 a Housing Needs survey was conducted for Holwell Parish by Community Development Action for Hertfordshire. It was

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President: Sir Simon Bowes Lyon, KCVO  
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concluded that: *“Following general planning guidance this would lead to a recommendation of up to 6 units.”* In 2017 the Council granted permission for 8 new homes within the village (app. No. 17/02435/1). Those properties are currently under construction and will meet the assessed local need. Therefore, the proposed scheme does not satisfy the exceptions set out in saved Policy 6 and saved Policy 29.

In the Submission Local Plan Holwell is classed as a Category B village. Policy CGB1 will allow infill within the built core of a Category B village. This site remains outside the settlement boundary and is not designated as a development site in the Plan. Policy SP5 seeks to restrict the types and amount of new development that can occur in areas designated as Rural Area Beyond the Green Belt as this area is regarded as some of the highest quality countryside in the District. Development of this site will clearly have an adverse impact on the openness of the Rural Area Beyond the Green Belt and extend the village beyond its settlement boundary.

In the documentation accompanying the application, the applicant goes to great length to demonstrate that the Council does not have a 5-year supply of housing land and cannot guarantee that even after adoption of the Submission Local Plan that there will be an adequate supply of housing. They maintain that is sufficient justification for this development outside the settlement boundary of Holwell.

That argument is premised on the assumption that the Council will continue to have a deficit in the supply of housing. The current Examination in Public is intended to address this point. You will also be aware that the most recent household projections for North Herts, issued by the Government’s Office for National Statistics on 29 June 2020, indicate a significant 14% reduction when compared to the 2014 projections on which the Council’s current assessments are based. This will substantially impact on the Council’s 5 year housing land supply needs going forward. Notwithstanding, the case of *Hunston Properties Ltd EWCA Civ 1610* held that *“the weight to be given to such a housing shortfall is a matter of planning judgment. The weight to be attached to the shortfall may, as a matter of planning judgment, be reduced where a shortfall is inevitable due to a district being subject to policies which restrict development”* (such as protection of the countryside).

Whilst accepting that the accompanying plan is only indicative, it shows these houses being serviced by a small estate road which runs parallel to Pirton Road. This is both superfluous and wasteful in as much as it reduces the ability to provide a footway on the west side of Pirton Road for the use of the residents and the general public. This type of development is also out of synch with the development pattern in Holwell, which is one of residential access being taken directly from the highway.

In terms of sustainability, Holwell is a small village with limited public transport. It and the villages in close proximity to it do not present a wide range of facilities. The nearest



settlement with significant facilities is Hitchin, some 4.5 km away. The residents of these properties would need to rely on the use of cars contrary to the principles contained in Section 9 of the NPPF

In our view this application does not meet the requirement of the policies in either the current or emerging Local Plans and should be rejected.

Yours sincerely,

David Irving