



The countryside charity  
Hertfordshire

31a Church Street

Welwyn

HERTS AL6 9LW

[www.cpreherts.org.uk](http://www.cpreherts.org.uk)

[office@cpreherts.org.uk](mailto:office@cpreherts.org.uk)

01438 717587

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:

17<sup>th</sup> March 2021 (by email)

Dear Mr Rea,

**Application no. 21/00434/HYA**

**Hybrid application for a residential development to provide a total of up to 84 dwellings together with associated access from London Road, including provision of a roundabout, associated parking, landscaping, open space and ancillary works comprising: Phase 1 - Application for full planning permission for the erection of 36 dwellings; Subsequent Phases - Application for outline planning permission all matters reserved except for access on the remaining part of the site for the erection of up to 48 dwellings.  
Land North of Pound Farm, London Road, St Ippolyts, Hitchin**

I write with reference to the above application for proposed residential development within the Green Belt. CPRE Hertfordshire objects to this application for the following reasons.

1. The land identified for this proposed development is located within the London Metropolitan Green Belt as identified in the existing North Herts Local Plan No. 2 (Saved Policies). The National Planning Policy Framework (NPPF) as revised in February 2019 requires land designated as Green Belt to be kept "permanently open" (para. 133) and "inappropriate development should not be approved except in very special circumstances" (para. 143).
2. CPRE Hertfordshire consistently opposes the removal of land from the Green Belt and notes that no 'very special circumstances' have been established by the applicant for development in this sensitive area. The site constitutes a clear extension into open farmland and countryside of the Hitchin urban area which has a distinct southern boundary in this location.
3. Notwithstanding that the site is allocated as HT2 in the Submission North Herts Local Plan, CPRE Hertfordshire, together with a wide range of local community and other organisations, was represented at the Examination in Public (EiP) and made submissions relating to the housing figures presented in the draft Local Plan. We challenged the basis for the Council's calculation of housing need at the EiP which are based on out-of-date household projections and the amount of land required.

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CPRE Hertfordshire is a Charitable Incorporated Organisation

President: Sir Simon Bowes Lyon, KCVO  
Chairman: Richard Bullen

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4. We further believe that it is unacceptable to make any decisions on proposed development on the Green Belt prior to the adoption of the new North Herts Local Plan. The NPPF (in paragraph 49) provides a special justification for the prematurity of a decision on a “substantial” planning application with “cumulative effect”, and “when the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area”.
5. Together with the latest household projections published in 2018 for North Herts which mark a significant reduction from those issued in 2014 on which the Draft Local Plan is based as noted above, these factors suggest a review be undertaken of sites allocated for housing, particularly in protected areas and where the Green Belt functions as a gap between settlements, as in this case.

Yours sincerely,

Chris Berry  
Planning Manager