

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

Our Ref:

Your Ref:

23rd June 2021 (by email)

Dear Ms Reynard,

Application No. 21/01562/OP
Land to the East of Foxholes and Gainsford House and on the West of Crow Furlong,
Hitchin
Outline planning permission for up to 58 dwellings, a community woodland, associated
car parking, open space, landscaping and new access from Grey's Lane, with all matters
reserved except for access.

I write with reference to the above application to which CPRE Hertfordshire objects strongly for the following reasons:

1. The land identified for this proposed development is located within the London Metropolitan Green Belt as identified in the adopted North Herts Local Plan. 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. Notwithstanding the proposed allocation of this site in the emerging Local Plan as Site HT6, it would be premature to grant permission for this proposal prior to further consideration of Further Main Modifications to the Local Plan, which are presently subject to public consultation. CPRE Herts has consistently opposed removal of land from the Green Belt in this sensitive area and believes that it is unacceptable to make any decisions on proposed development on the Green Belt prior to the adoption of the Local Plan.
3. At a strategic level, CPRE Herts, together with a wide range of local community and other organisations, was represented at the Examination in Public and made submissions relating to the housing figures presented in the Draft Local Plan. We have challenged the basis for the Council's calculation of housing need at the EiP which are based on out-of-date population projections and the amount of land required and these concerns remain. Reductions in the projected number of households in the plan



period require a re-assessment of housing need in the district, and the continuing progress of the Local Plan process would permit a review of allocated sites in designated protected areas such as Green Belt.

4. Recent ministerial statements have re-emphasised the significance of the Green Belt as a primary constraint on development and CPRE Herts urges the Council to reconsider the release of this site from the Green Belt as it is particularly inappropriate in this location. The site is on the clearly defined edge of the built-up area of Hitchin and marks a clear boundary between the urban area and high quality open countryside which should be maintained. Long distance views from the Chilterns AONB will be affected due to the relief of the site and the layout of the proposed development up to the ridge line.
5. The location of the proposed development adjacent to woodland is significant in terms of wildlife and biodiversity. The application does not demonstrate satisfactorily measurable biodiversity net gain as required by the NPPF and the emerging North Herts District Local Plan. Other consultees have noted the significance of these concerns and CPRE Herts supports the provision of the appropriate assessment and proposals to protect and enhance biodiversity on the site and adjacent land in the same ownership.

Yours sincerely,

Chris Berry
Planning Manager