



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

Our Ref:

Your Ref:

16th February 2022 (by email)

Dear Mr Allington,

Application no. 18/01154/OP

Land North of Highover Farm to Stotfold Road, Highover Way, Hitchin

AMENDMENTS: Outline application with all matters reserved other than access, comprising residential led development of up to 700 dwellings of use class C3 (dwellings), approximately 500 sqm of neighbourhood-level facilities, a new 2FE primary school, open space, play space, green infrastructure, and associated accesses, etc

I write with regard to the above long running application from 2018 which has been updated many times since. This recent amendment includes a new Planning Statement which supersedes all previous such documents, due to changes to planning policy at both national and local levels, developer contribution changes and responses to consultation submissions.

I also refer to previous submissions by CPRE Hertfordshire in August 2018 and restated in January 2020. CPRE Hertfordshire continues to object strongly to this proposed development for the following reasons.

1. The site lies within the London Metropolitan Green Belt as defined by the adopted North Herts Local Plan and constitutes inappropriate development according to the National Planning Policy Framework (NPPF). We objected to the removal of this site (HT1) from the Green Belt in the Submission Local Plan at consultation stage, and restated that objection at the Examination in Public.
2. The Examination in Public of the Submission Local Plan has yet to conclude and in advance of its completion, the development of this site is inappropriate and premature. Proposals should be considered under the relevant policies of the NPPF and current North Herts Local Plan.
3. The site forms a significant part of the Green Belt buffer between Hitchin and Letchworth and 'very special circumstances' need to be demonstrated for its release from this protective designation. As noted in our previous submission (August 2018)



neither these very special circumstances nor exceptional circumstances in respect of a planning application, are demonstrated in this application.

4. CPRE Hertfordshire continues to argue consistently, as in the Examination hearings, that Paragraph 11 (and footnote 7) of the NPPF applies in the setting of housing targets by the Local Planning Authority, thereby constraining the calculation of housing need by the 'standard method' or any alternative method. It is therefore not appropriate for the Council to argue that objectively assessed housing need is the only basis for housing targets.
5. The applicant continues to identify 'very special circumstances' with regard to the age of the Local Plan, the strategic nature of the allocation in the Submission Local Plan and the lack of a five year housing supply. These issues are appropriately dealt with in the Local Plan process and so do not constitute very special circumstances within the existing Local Plan.
6. Further, the applicant continues to assert that the proposals do not conflict with the purposes of the Green Belt in terms of encroachment and sustainability and this is clearly incorrect. The proposal imposes a significant area of urban sprawl between Hitchin and Letchworth and the Green Belt specifically proscribes such development.
7. The proposed development is not in a sustainable location in terms of transport, and a wide range of services and facilities provision, as noted in our previous submissions. Due to its distance from public transport links, residents will have to depend almost entirely on the private car for all journeys, adding significantly to the impact of local traffic on already congested rural roads in the area.
8. The proposed development uses substantially Grade 2 agricultural land, with small areas of Subgrade 3a, which is amongst the highest quality agricultural land in Hertfordshire. Grades 2 and 3a are classed in the National Planning Policy Framework as 'best and most versatile agricultural land' and as such should be avoided for development.
9. Recently enacted legislation, including the Environment Act 2021 and Climate Change Acts place additional responsibilities on developers with regard to ameliorating the environmental impacts of development. Enforcement of these responsibilities will increase and this outline application gives no indication that these new objectives for development will be taken into account.



The new circumstances brought about by recent legislation, and the increasing attention being paid to issues of climate change, carbon reduction requirements and the promotion of biodiversity place increasing responsibilities on both local planning authorities and potential developers to achieve truly sustainable development. Together with the requirements to protect designated land, these provide clear and robust reasons to refuse permission for this development, and review the allocation in the Submission Local Plan.

In the meantime, CPRE Hertfordshire has called upon the Government to place a temporary moratorium on the granting of planning permission for major developments in the Green Belt. This would enable a review of the calculation of housing need in the light of the recent changes in population and household projections and the significant changes which are taking place within existing built-up areas which will impact future housing requirements

Yours sincerely,

Chris Berry
Planning Manager