



The countryside charity
Hertfordshire

31a Church Street

Welwyn

HERTS AL6 9LW

www.cpreherts.org.uk

office@cpreherts.org.uk

01438 717587

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:

16th February 2022 (by email)

Dear Mr Hunter,

Application No. 20/02412/FP

**Land between 53 and 81 and Land rear of 7-53 Waterdell Lane, St Ippolyts
AMENDMENT: Erection of 52 dwellings including open space, landscaping, local area for
play, and associated highway works (as amended by plans received 17/12/21)**

I write with regard to the above application which constitutes amendments to the original application, mainly in the reduction of the number of units proposed, and alterations to the layout and related matters. CPRE Hertfordshire objected to the original application, and maintains its objections for the following reasons.

1. The site lies within the London Metropolitan Green Belt as defined in the adopted North Herts District Local Plan No. 2 and the proposed development exceeds in both area and quantum of development set out in Policy S1 of the Submission Local Plan currently subject to Examination in Public. In the Planning Statement accompanying the application, the Applicant chooses to discount the current North Herts District Local Plan on the basis that the Submission Local Plan is sufficiently advanced that the application should be considered against the policies included in it.
2. Until such time as the Submission Plan is adopted, the District Local Plan No. 2 remains in force. This proposal is contrary to Policies 2 and 3 of the adopted District Local Plan No. 2 and in our view does not meet any of the exception criteria in Paragraphs 145 and 146 of the National Planning Policy Framework and is thus inappropriate development in the Green Belt.
3. Very special circumstances are required to be demonstrated to outweigh the harm due to inappropriateness and the Applicant cites the Council's inability to demonstrate a five year housing land supply. National Planning Practice Guidance confirms that the unmet need for housing is unlikely to outweigh the harm to Green Belt policies to tip the balance in favour of inappropriate development.

CPRE is working nationally and locally for a beautiful and living countryside

CPRE Hertfordshire is a Charitable Incorporated Organisation

President: Sir Simon Bowes Lyon, KCVO
Chairman: Allan McNab

Registered Charity 1162419



4. CPRE Hertfordshire has also, at the Examination in Public, identified that the household projections for North Herts, issued by the Office for National Statistics (ONS) in June 2020, indicate a significant reduction when compared to the 2014 projections used by the Council. Recent ministerial statements have also re-emphasised the need to protect the Green Belt from inappropriate development.
5. This application is also premature in that it would pre-empt the outcome of the Examination in Public undermining the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan.
6. The application site plan incorporates land which is not part of the designated site as shown on the Local Plan Proposals Maps. This results in a greater land take from the Green Belt than proposed in the Submission Local Plan (a matter which should be resolved through the Examination in Public, not by applications such as this). The proposal is a clear encroachment on the countryside and adds a sprawling residential development on the edge of the existing village.
7. The amended application includes amendments to the Public Right of Way which bisects the site. In our view the revised proposals do not meet the Hertfordshire County Council requirements for maintenance of the existing situation as a minimum, and preferably this central public route should be enhanced as a wildlife corridor, part of a green and blue infrastructure biodiversity and sustainable drainage plan.
8. We noted the original objections of the HMWT to the failure to demonstrate biodiversity enhancement as part of the submissions in accordance with the NPPF. Recent environment legislation (Environment Act 2021) strengthens the requirement to take account of biodiversity gain in development proposals.
9. This proposal adjoining open countryside offers opportunities for significant biodiversity gain which are not demonstrated to any reasonable extent by this application. The barest minimum metric-based proposals are made for a highly sensitive site in a traditional speculative housing layout which is a disappointing response to the developer's stated aims.
10. We note that the current road layout would allow for access onto land in the same ownership. This should be resisted as this land is not designated for development in the Submission Local Plan and the road layout and distribution of the housing units adds to the banal character of the proposal.



11. Many of the comments made in our previous submission remain and we urge the Council to refuse this application.

Yours sincerely,

Chris Berry
Planning Manager