

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

Our Ref:

Your Ref:

6<sup>th</sup> April 2022 (by email)

Dear Mr Hunter,

**Application no. 22/00516/FP**

**Land west of Lucas Lane and east of Headlands, Grays Lane, Hitchin**  
**Erection of nine detached dwellings (2 x 3-bed, 1 x 4-bed and 6 x 5-bed) including garaging, parking, landscaping and creation of vehicular access off Gray's Lane**

I write with regard to the above application, to which CPRE Hertfordshire objects strongly for the following reasons.

1. The site lies within the London Metropolitan Green Belt as defined by the adopted North Herts Local Plan and the proposal is inappropriate development unless very special circumstances are demonstrated according to criteria in the National Planning Policy Framework (NPPF). Notwithstanding the site's proposed allocation in the emerging North Herts Local Plan, the extensive delay in concluding the Examination in Public is testament to the contentious nature of the proposals.
2. Further, there have been significant changes in both circumstances and legislation regarding environmental issues which suggest that, despite the proposed allocation, a re-consideration of this proposal would be appropriate in this case. This is particularly relevant as the Applicant's consultants Savills have specifically omitted the consideration of any very special circumstances, and fall back on the emerging local plan allocation to justify this inappropriate development.
3. Recent Ministerial statements, which have policy weight, have re-emphasised the Government's commitment to protection of the Green Belt, and the Council will be aware of the concentrated efforts being made by CPRE and others to clarify interpretation of the NPPF with regard to designated protected areas. It is clear to us that paragraph 11 of the NPPF, with footnote 7, has not been taken sufficiently into account in the consideration of housing need which has implications for Green Belt release proposals.



4. This proposal is a clear encroachment on Green Belt, extending the built-up area and affecting the landscape and open character of the countryside.
5. It is also clear that the form of housing proposed, large mainly detached dwellings for market sale, make no contribution to satisfying the need for truly affordable housing, and we support local community representations in opposing this provision.
6. Recent legislation, including the Environment Act and Climate Change Acts will make increasing demands on local planning authorities to ensure that carbon reduction and biodiversity net gain requirements are addressed. There is little evidence that speculative development of the nature proposed has taken any real account of the presence of wildlife and need for carbon reduction in the construction and operation of housing.
7. For all the above reasons, it would be premature at best to determine this application and we urge the Council to re-appraise site allocations for housing in the light of changing circumstances and local community responses.

Yours sincerely,

Chris Berry  
Planning Manager