



The countryside charity  
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**Standing up for Hertfordshire's countryside**

Shaun Greaves  
Planning and Building Control  
North Herts Council  
PO Box 10613  
Nottingham  
NG6 6DW

Our Ref:

Your Ref:

8<sup>th</sup> June 2022 (by email)

Dear Shaun Greaves,

**Application no. 22/00956/OP**  
**Land south of Little Wymondley**  
**Outline planning application for the development of approximately 300 dwellings**  
**(all matters reserved except for access)**

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

1. The site lies within the London Metropolitan Green Belt as defined by the adopted North Herts District Local Plan and constitutes inappropriate development according to the National Planning Policy Framework (NPPF). We objected to the removal of this site (WY1) from the Green Belt in the Submission Local Plan at consultation stage.
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 District Local Plan.
3. The site forms a significant part of the Green Belt buffer between Hitchin and Stevenage and 'very special circumstances' need to be demonstrated for its release from this protective designation. We believe that neither very special circumstances in respect of the planning application, nor exceptional circumstances in respect of the Submission Local Plan, have been demonstrated.
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.

**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

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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 Stevenage and the Green Belt specifically proscribes such development.
7. No mention is made in either the Applicant's Planning Statement or the Pre-Planning Advice provided by Council officers of the agricultural status of the land proposed to be used for development. With the increasing significance of food security and related issues, CPRE Hertfordshire believes that such factors should be part of the consideration of planning applications which use agricultural land.
8. No indication is provided of the quality of the agricultural land affected. This is a significant omission and the use of agricultural land, together with the Green Belt designation, means that the assessment of the suitability of the land for development is incomplete, particularly if the land is found to be Best and Most Versatile according to DEFRA.
9. Recently enacted legislation, including the Environment Act 2021 and Climate Change Acts, places 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.
10. The new circumstances brought about by the recent legislation, and 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 clarification of the technical guidance regarding designated protected



land, a review of the calculation of housing need in the light of the recent changes in population and household projections, and consideration of the significant changes which are taking place within existing built-up areas which will impact future housing requirements.

Yours sincerely,

Chris Berry  
Planning Manager