



Andrew Hunter
Planning and Building Control
North Herts Council
PO Box 10613
Nottingham
NG6 6DW

Our Ref:

Your Ref:

12th August 2022 (by email)

Dear Andrew Hunter,

Application no. 22/01688/OP
Land between London Road and Chalk Hills, Baldock
Outline planning application for 16 dwellings with all matters reserved
except means of 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. The proposed site is not allocated in the emerging Local Plan which is still awaiting the finalisation of its Examination in Public, and CPRE Hertfordshire has consistently opposed removal of land from the Green Belt in this sensitive area. The NPPF is clear that variation of Green Belt boundaries should take place through the Local Plan preparation process and only in exceptional circumstances.
3. Recent Ministerial statements and the recently published Levelling Up and Regeneration Bill (LURB) have re-emphasised the Government's support for protection of the Green Belt. Most relevantly in this case, correspondence between the then Minister of Housing, Christopher Pincher, and Welwyn Hatfield Borough Council on 18th November 2021 led the Minister to reply:
"We are firmly committed to protecting and enhancing the Green Belt... We have ensured strong protections through national policy to safeguard this important land for future generations and I want to reassure you that these protections will remain firmly in place." (Correspondence from Department for Levelling Up Housing and Communities to Leader WHBC, 18.11.21)



4. Further, in reply to a Back Bench Committee debate called by Daisy Cooper, MP for the neighbouring district council area of St Albans, Mr Pincher stated:
“I assure the hon. Member for St Albans that we are committed to protecting and enhancing land for future generations and that we are committed to protecting the green belt, as we set out in our manifesto. We will continue to uphold those strong protections, and I look forward to further debates, whether in this Chamber or in the main Chamber, to demonstrate that our policies are biting. (Hansard 21.11.21)

5. The recently published “Levelling Up and Regeneration Bill Policy Paper: Further information” re-emphasises the Government’s support for protection of the Green Belt: “the increased weight given to plans and national policy by the Bill will give more assurances that areas of environmental importance – such as National Parks, Areas of Outstanding Natural Beauty...- will be respected in decision on planning applications and appeals. The same is true of Green Belt, which will continue to be safeguarded.” (Creating beautiful places and improving environmental outcomes; In the Bill: LURB Policy paper, May 2022)

“Existing Green Belt protections will remain, and we will pursue options to make the Green Belt even greener.” (Creating beautiful places and improving environmental outcomes; Alongside the Bill: LURB Policy paper, May 2022)

6. It is clear that the Government’s intention is to retain the Green Belt in its present form and the constant undermining of Green Belt protections for residential development is in danger of bringing the planning system into disrepute. Recent Planning Committee and appeals decisions, such Bullens Green Lane, St Albans have highlighted the inconsistencies in decision-making in this crucial area of public policy.

7. The Applicant’s Planning Statement asserts that there are ‘very special circumstances’ as required by the NPPF, which may be summarised as:
 - provision of market housing
 - provision of 37.5% affordable housing;
 - proposed extension of Weston Hill Nature Reserve
 - sustainability credentials of the site
 - socio-economic benefits to the surrounding area.

8. These assertions profoundly misinterpret the requirements of ‘very special circumstances’ which relate to the specific conditions of the site rather than general planning provisions which could be applied to any similar development proposal elsewhere. The strong protection afforded by Green Belt designation provides a major policy constraint which is accepted elsewhere in the Applicant’s submission.



In conclusion, this proposal constitutes a clear encroachment on the Green Belt, extending the built-up area and affecting the openness of the countryside in this location. We urge the Council to refuse permission for this damaging speculative application.

Yours sincerely,

Chris Berry
Planning Manager