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Standing up for Hertfordshire's countryside

Paul Chaston
Planning and Building Control
North Herts Council
PO Box 10613
Nottingham
NG6 6DW

Our Ref:

Your Ref:

12th November 2025 (by email)

Dear Paul Chaston,

**Planning application no. 25/02401/OP
Land South of Turnpike Lane, Ickleford
Erection of up to 100 dwellings with means of access from Turnpike Lane including
associated landscaping, drainage, car parking; infrastructure and all ancillary
and enabling works following demolition of all existing structures
(all matters reserved except means of access).**

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

1. The land identified for this proposed development is designated as London Metropolitan Green Belt in the adopted North Herts Local Plan where development is stated as being inappropriate unless very special circumstances are identified which clearly outweigh the harms caused, according to criteria in the National Planning Policy Framework (NPPF).
2. The Applicant's Planning Statement notes the recent revision of the NPPF and the introduction of the concept of grey belt as the justification for the submission of this application. In addition, the identification of 'very special circumstances' is then cited "for completeness" (Planning Statement section 7.3) although no such special circumstances are identified relating to local circumstances or conditions which would justify development in this location as opposed to any other Green Belt location.
3. In fact, the local conditions, including the presence of the River Oughton, a vitally important natural chalk stream, and the significance of the site between the built-up area of Hitchin and the village of Ickleford militate against the suggestion that there are special circumstances favouring development of any kind. Rather the high quality of the site in landscape and related terms demonstrate that it should be maintained free of 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: Peter Waine, OBE

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CPRE Patron: His Majesty The King

4. This site is not included in the adopted North Herts Local Plan and it is wrong to suggest, as noted in the Planning Statement, that there is a “substantial need for housing in North Herts in the absence of an up-to-date Development Plan”. The Local Plan is up-to-date and subject to imminent review and it is entirely inappropriate for such a significant allocation in the Green Belt to be determined outside the Local Plan process.
5. Very significant local community opposition continues both generally to development in the Green Belt and to this specific application. The proposed development would clearly constitute a breach of the first, second and third purposes of the Green Belt as identified in the NPPF (paragraph 143) to prevent urban sprawl, the coalescing of settlements and encroachment onto open countryside.
6. We entirely refute the assertion that the first purpose of the Green Belt has no relevance in this case and that this site constitutes grey belt under the present legal definitions. In the case of the London Metropolitan Green Belt, the first purpose of the Green Belt refers as much to the effect of the urban sprawl emanating from the growth of the capital as the major development generator in this and the surrounding areas, as to the sprawl of other major settlements.
7. The proposed development is also clearly development beyond the built-up area of the adjoining major settlement of Hitchin which the Green Belt legislation was designed to prevent. Notwithstanding the recent update to Planning Policy Guidance (PPG) in Feb 2025 (*Assessing Green Belt to identify grey belt land - Paragraph: 005 Reference ID: 64-005-20250225*) which specifically excludes villages from consideration of the merging of settlements in the Green Belt, CPRE Hertfordshire strongly believes that the Council should take account of the impact of development proposals with significant impact on vulnerable stretches of Green Belt countryside in narrow gaps between settlements which lead to their merging and the effective expansion of the town of Hitchin.
8. The effect of multiple planning applications in the Green Belt is leading to the coalescence of small settlements which leads to the effective enlargement of larger towns, as in this case. The proposed development is thus urban sprawl beyond the built-up area, contributing to the coalescence of the settlements of Ickleford and Hitchin and also constitutes encroachment onto the countryside.
9. Together these issues provide the “strong reason” required to refuse development as noted in the NPPF footnote 7. Arguments relating to the inconsequential impact of each individual application on the Green Belt as a whole become seriously inappropriate when the cumulative effect of several applications is considered, as is occurring in Hertfordshire. In our view, the provision of NPPF paragraph 155 a) applies in this case in

that the proposed development would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the North Herts Local Plan.

10. It is noteworthy that virtually every major planning application for residential and commercial development within the Green Belt in Hertfordshire made since 12th December 2024 has identified the site as grey belt, notwithstanding the quality and character of the landscape or local conditions in each case. This is clearly an unsustainable position and it is becoming increasingly clear that the existing definitions and guidance on grey belt cannot prevent the wholesale removal of highly valued and significant Green Belt protections.
11. The remaining issues quoted in the Applicant's Planning Statement section 9 as constituting very special circumstances required in the event that the site is not regarded as grey belt are entirely inadequate, constituting obligations which would accrue to any proposed development of this size and function. As significant as the proposed benefits is the growing paucity of open space adjacent to built-up areas with its attendant physical and mental health benefits.
12. We note the intention to provide 50% affordable housing but this is essentially meaningless without further information and legal commitments to its provision. Notwithstanding the inadequacy of the official definition of affordable housing to reflect the true state of the housing market, there is significant experience in Hertfordshire and elsewhere of initial commitments to affordable housing not being maintained, generally quoting viability issues. At the very least the Council should seek robust guarantees regarding affordable housing proposals.
13. CPRE Hertfordshire supports fully the concerns and detailed responses of Ickleford Parish Council and local residents. The Green Belt in this area is under unrelenting pressure for development which is jeopardising the highly valued benefits which protection brings, and its continual reduction is in danger of bringing the planning system into disrepute.
14. In summary, it is undeniable that the new planning policy context created by the revised NPPF has provoked a disturbingly high number of new applications and re-applications for sites which were previously refused permission. Whereas a proportion of such applications may warrant consideration for various reasons, the illogicality of the revised NPPF supporting five purposes of the Green Belt (para 143) and then only permitting three purposes to be considered in applications (NPPF Glossary definition) is unsupportable in this case.



15. Hertfordshire is under unrelenting pressure for development and the value of the open countryside that remains increases for local communities and visitors, notwithstanding wider environmental benefits relating to the amelioration of the effects of climate change, maintenance and enhancement of biodiversity, and physical and mental health.

This application is not supported through the Local Plan process and we urge the Council to refuse permission for this inappropriate speculative development.

Yours sincerely,

Chris Berry
Planning Manager

NOTE: We would request that this letter is published on the Council's website as a document relating to this application and should be grateful if you would notify us of the date of the appropriate meeting if it is to be determined by planning committee.