



PETER GEORGE TOWN PLANNING

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Planning Inspectorate
Temple Quay House
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Dear Sir/Madam,

Final Comments

Appeal by Mr J Hill

Appeal Ref: 6009720: Land Adjacent to 1 Ninesprings Cottage, Wymondley Road, Hitchin, SG4 9QL

The appellant wishes to make the following final comments in response to the interested party representations.

Third Party Representations

The appellant has reviewed the representations submitted by the occupiers of no.1 Ninesprings Cottages. Whilst their comments are noted, they do not raise any matters that alter the conclusions reached within the Appellant's Statement of Case. Many of the issues raised have already been addressed within that Statement, whilst a number of others fall outside the scope of a Permission in Principle (PiP) appeal.

The appellant's response is set out below.

Green Belt Review and 'Grey Belt'



The interested party places significant reliance upon the North Hertfordshire Green Belt Review (2016) (GBR), noting that the wider parcel of land makes a strong contribution to Green Belt purposes (a) and (b).

However, this point was expressly acknowledged within the Statement of Case. The appellant has never disputed the findings of the GBR in relation to the wider parcel. Rather, the statement explains why the appeal site itself, being a very small and self-contained part of that wider parcel, should be assessed against the revised national policy contained within the December 2024 National Planning Policy Framework (the Framework).

The appeal does not seek to disregard the GBR. Instead, it explains why the conclusions reached in respect of a much larger strategic parcel are not determinative of the contribution made by this individual site.

Purpose (a) - Checking unrestricted sprawl

The interested party argues that the site represents the "last defensible boundary" to Hitchin and that development would extend the settlement into open countryside.

However, as set out within the Statement of Case, the appeal site is not an isolated projection into open countryside but is physically contained by existing residential development to the west, an established hedgerow to the east, and mature vegetation together with the railway corridor to the south. These existing features create a high degree of self-containment such that the development of a single dwelling would not materially undermine the wider Green Belt function of the Sector 10.

The interested party also suggests that the eastern hedgerow does not provide a defensible boundary. However, the appellant's case does not rely upon the hedgerow in isolation. Rather, it is the combination of the existing residential development to the west, the established hedgerow to the east and the mature vegetation and railway corridor to the south which together create a contained parcel that is physically and visually distinct from the wider countryside.

The appellant therefore maintains that, assessed against the Planning Practice Guidance (PPG), the site makes no more than a moderate contribution to Purpose (a).

Purpose (b) - Preventing neighbouring towns merging



The interested party suggests that the Statement of Case ignores the relationship with Great Wymondley. Respectfully, this is not the case. Green Belt Purpose (b) is concerned with preventing **neighbouring towns** from merging. Accordingly, the SoC assessed the site's contribution to maintaining the separation between Hitchin and Stevenage, consistent with both national policy and the GBR. As explained therein, the appeal site forms only a very small part of the wider gap between those settlements and does not adjoin both settlements. It therefore cannot reasonably be regarded as making a strong contribution to Purpose (b).

Moreover, Great Wymondley is a village rather than a town and therefore does not fall within the scope of Purpose (b). Furthermore, the appeal site is located immediately adjacent to the edge of Hitchin and remains well separated from the edge of Great Wymondley. The development of a single dwelling on the appeal site would not materially diminish the physical or visual separation between the two settlements, nor would it undermine the wider strategic function of the Green Belt in this location.

Purpose (d) - Historic towns

Purpose (d) concerns preserving the setting and special character of **historic towns**.

As explained within the Statement of Case, the appeal site has only an opaque relationship with Hitchin's historic core and the Council's own Green Belt Review confirms that Sub-sector 10b has no direct relationship with Hitchin's historic centre. Accordingly, the site cannot reasonably be regarded as making a strong contribution to this Green Belt purpose.

In terms of the interested party's concerns regarding the impact on the Great Wymondley Conservation Area, the site is a considerable distance to the west of Great Wymondley, its conservation area and listed buildings. Accordingly, it is not considered that the proposed residential development of the site would have any impact on heritage assets belonging to Great Wymondley.

Ecology

The interested party refers to the ecological value of the site and its proximity to Purwell Ninesprings Nature Reserve.



Whilst these comments are noted, ecological impacts are not matters for determination at the Permission in Principle stage.

Detailed ecological assessment, biodiversity impacts, mitigation measures and any necessary surveys would be matters for Technical Details Consent should Permission in Principle be granted. This distinction is also recognised within the Council's own delegated report, which confirms ecological matters are Stage 2 considerations.

Flood risk

The interested party suggests that part of the site lies within Flood Zone 2 and that this prevents the site meeting the definition of Grey Belt. However, the appeal site was assessed using the Environment Agency Flood Map for Planning and appears to be located wholly within Flood Zone 1.

Furthermore, flood risk is another matter that would properly be considered at Technical Details Consent should Permission in Principle be granted, as recognised within the Council's own delegated report.

Future development of adjoining land

The interested party expresses concern that approval would establish a precedent for future development elsewhere within the appellant's wider landholding. Each planning application must be considered on its own planning merits. Permission in Principle for one dwelling on the appeal site would not predetermine the outcome of any future application on adjoining land. This is not therefore a material consideration in determining the present appeal.

Housing need

Finally, the interested party argues that one dwelling would make only a negligible contribution to housing delivery.

Whilst one dwelling is inevitably modest in numerical terms, national policy does not require an individual proposal to make a substantial contribution to housing supply before Paragraph 155 can apply. Indeed, footnote 56 to the Framework expressly states that, in relation to housing proposals, demonstrable unmet need exists where the authority cannot demonstrate a five-year supply of deliverable housing sites.



The Council's own published Five-Year Housing Land Supply confirms that it currently has only a 2.6-year supply of deliverable housing land. Accordingly, there is a demonstrable unmet need for the type of development proposed and the proposal thereby satisfies limb (b) of Paragraph 155 irrespective of the number of dwellings proposed.

Conclusion

We respectfully request that the Inspector takes the above comments into account when considering the appeal.

Yours sincerely,

Tom Donovan BA (Hons) MA MRTPI, Director

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