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Standing up for Hertfordshire's countryside

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

Our Ref:

Your Ref:

14th March 2018 (by email)

Dear Mr. Allington,

17/04417/OP
Outline application with all matters other than access reserved, for strategic development to the south-east of Baldock, comprising up to 495 dwellings, up to 18.3ha of Use Class 'B' Employment land uses, means of access, open space, nature conservation, recreation, landscaping and associated facilities, following demolition of existing structures
On Land Between The A505 And The Eastern Edge Of Baldock Inc Land Off Royston Road Baldock Hertfordshire

17/04420/OP
Mixed use development comprising up to 2,800 dwellings, a new local centre, two primary schools and a secondary school, a healthcare hub, up to 1,900sqm of 'A' Class land uses (including a supermarket), open space, nature conservation, recreation, landscaping and associated facilities, following demolition of existing structures and vehicular access - outline planning application with all matters reserved other than access.
On Land East Of North Road And North Of The Railway Line Bygrave Road Baldock Hertfordshire

18/00097/OP
Outline Planning Permission for residential development (up to 47 dwellings), access and parking (including new junction on Royston Road), open space, landscaping, alterations to levels, and related works (all matters reserved except access).
On Land East Of 17 Rhee Spring And East Of 1-4 Orwell View Royston Road Baldock Hertfordshire

CPRE Hertfordshire is responding to these applications collectively because, taken together, they represent the intended development of the area North of Baldock which the Council has allocated for residential development in the emerging Local Plan (currently subject to Examination in Public) and they are all submitted on behalf of the same applicant, Hertfordshire County Council.

The documentation accompanying each application is based on the assumption that the Council's emerging Local Plan will be approved after Examination in Public and consequently land north of Baldock will be removed from the Green Belt and the allocation of these sites for residential development will take effect. That is presumptuous.

We oppose these applications for inappropriate residential development in the Green Belt. As the proposals constitute inappropriate development in the Green Belt, contrary to the policies in the National Planning Policy Framework, it is necessary to demonstrate very special circumstances. No such demonstrations are included in the documentation accompanying the applications.

Paragraph 216 of the NPPF sets out that policies in emerging plans can be given weight according to (1) the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given) (2) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given) and (3) the degree of consistency of the relevant policies in the emerging plan to the policies in the Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

In this case, there are significant objections to the relevant policies in the emerging Local Plan which still need to be determined at the Examination in Public. Furthermore, those policies are in substantial conflict with NPPF policies, in particular paragraph 14 (and footnote 9) which states that local plans do not need to meet objectively assessed housing needs in (inter alia) the Green Belt. Accordingly, the emerging Local Plan policies should be given no weight and the application must be considered against the relevant policies of the Council's adopted Local Plan, with which it fails to comply.

We would refer you to our detailed statement on Matter 10: Baldock to the Examination in Public dated January 2018 , our representations on the Submission Local Plan Consultation dated 23 November 2016, and our letter to Simon Ellis regarding the scoping study dated 16 June 2017 for our justification of the above statements.

In summary, the Council has failed to demonstrate that **all** of the identified 'housing need' is either acute or intense. However the Council relies entirely on the assumption in its Green Belt Background Paper, that all of the identified 'housing need' is acute or intense, as this must be shown if the Calverton judgement is used to assess whether exceptional circumstances exist in principle for removal of sites from the Green Belt. Consequently our objections in principle apply to all of the application sites because exceptional circumstances for their removal from the Green Belt have not been demonstrated by either the applicant or the Council.

Sites BA1,BA2, BA3 and BA4 (to which these applications apply) occupy a very large area of attractive countryside on rising land to the north east of the town that is prominent in views from transport routes and in particular from the Chalk escarpment overlooking the town from the south and east, as confirmed by the Council's Landscape Study (CG16a). That

Study states that the area is coherent and largely comprised of undulating historic and unusual countryside in the Bygrave area. The Council's Site Appraisal analysis (HOU13) concludes that the area is not suitable for major development on this scale. The Environmental Statements accompanying these applications indicate that the sites are predominantly Grade 2 agricultural land quality and within the definition of 'best and versatile agricultural land' that paragraph 112 of the NPPF states Council's should avoid allocating for development in Local Plans. They conclude that given the area of agricultural land being lost this is considered to be a substantial magnitude of change. In addition to important ecological, cultural and hydrological impacts that would have to be addressed, the addition of the number of new properties proposed is likely to cause traffic congestion that can only be resolved by highway works of detriment to the historic fabric of the town. The Council's site assessments already confirm that the A507 roman road and White Horse Road / Royston Road junction in the Conservation Area is at capacity, and this junction is the principal access to the nearby town centre, especially from the largest site, BA1.

The nature of harm to the Green Belt in this location would be threefold; the loss of countryside due to encroachment of Baldock; the further sprawl of the town northwards into that countryside; and the removal of the incentive and pressure for urban regeneration through recycling of land within the towns enclosed by Green Belt in the District and the London Green Belt as a whole. In terms of severity of impact, the Council's own Green Belt Review notes that loss on this scale in this location would have a significant negative impact.

We consider that, given the issues currently being considered by the Inspector in the Examination it would be foolhardy of the Council to determine the applications at this time and urge the Council to request that the applicant withdraws them. If they are not withdrawn, the Council must consider them under the current policies pertaining to inappropriate development in the Green Belt in the NPPF and the current North Herts Local Plan, in which case the planning balance is against approval.

Should the Council be minded to pursue these applications, it would constitute a departure from development plan policy which requires reference to the Secretary of State in accordance with Section 32 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

Yours sincerely,



David Irving