

Application Reference:	26/00361/PIP
Address:	Land Adjacent To 1 Ninesprings Cottage Wymondley Road Hitchin Hertfordshire SG4 9QL
Case Officer:	Thomas Howe

Dear Sir / Madam,

I write to object to the above application for Permission in Principle for the erection of one detached dwelling at land south of Wymondley Road, Hitchin.

Having reviewed the submitted **Planning Statement, Design and Access Statement**, and relevant policies in the **North Hertfordshire Local Plan 2011–2031**, it is clear that the applicant’s contention that the site constitutes “*grey belt*” land is fundamentally flawed. Contrary to their assertions, the site **strongly contributes to core Green Belt purposes**, plays a critical spatial role in preventing the outward expansion of Hitchin into the historic village of Great Wymondley, and forms part of a high-value ecological corridor adjoining **Purwell Ninesprings Nature Reserve**.

For these reasons, the proposal conflicts with the NPPF (2024), particularly Sections 13 and 15, and fails to satisfy Policies SP5, NE2, and NE4 of the North Hertfordshire Local Plan.

1. The Site Strongly Contributes to the Green Belt – It Is Not Grey Belt Land

The NPPF defines “*grey belt*” as Green Belt land that **does not strongly contribute** to purposes (a), (b), and (d) of §143. The applicant claims the site’s contribution is only “moderate” and therefore qualifies. This is contradicted by their own cited evidence.

1.1. Strong Contribution to Purpose (a): Preventing Sprawl

The Planning Statement acknowledges the site lies within **Green Belt Sector 10 (Little Wymondley)** and within **sub-sector 10b**, which the **North Herts Green Belt Review (2016)** explicitly identifies as making a **strong contribution** to preventing the expansion of Hitchin southwards.

The applicant argues the site is “small” and therefore its loss is insignificant. However, the NPPF does **not** provide any threshold below which Green Belt importance is diminished. What matters is **function**, not size.

This parcel forms part of the gap between Hitchin and Great Wymondley. Even limited erosion of this gap would materially weaken Purpose (a), especially when considered cumulatively—a key NPPF test.

1.2. Strong Contribution to Purpose (b): Preventing Merging of Settlements

Although the applicant contends the site makes only a “weak” contribution to preventing Hitchin–Stevenage coalescence, they omit the far more locally relevant risk of **Hitchin merging with Great Wymondley**.

- Great Wymondley lies only 800m east of the site.
- The intervening landscape is narrow, visually open, and currently forms a **critical buffer** preventing settlement encroachment.
- Development here would extend the built form south-eastwards, **visually and physically narrowing the remaining gap**.

The North Herts Local Plan (Policy SP5) emphasises the importance of preventing settlement coalescence across all Green Belt areas.

1.3. Purpose (d): Preserving the Setting of Historic Towns

The applicant claims the site has no meaningful relationship with Hitchin’s historic core, and therefore makes no contribution to Purpose (d). This is a misreading of policy.

The Green Belt purpose is **not limited to conservation area adjacency**. It concerns **maintaining the open rural setting of historic towns**—which is precisely what this site, forming Hitchin’s south-eastern rural edge, currently does.

2. The Site Has High Biodiversity Value Which Has Been Materially Understated

The Design & Access Statement concedes that **no ecological surveys have been undertaken** and **no information is available regarding the presence of protected species**. Despite this absence of evidence, the applicant asserts minimal ecological impact.

This is contrary to **NHLP Policies NE2 and NE4**, which require protection and enhancement of local habitats and geological sites.

2.1. Rewilded, species-rich landscape

The site is described as “largely scrubland with scattered trees”—precisely the type of biodiverse rewilded habitat associated with high ecological value.

The site sits adjoining the hydrological and ecological catchment of **Purwell Ninesprings**, a designated Local Nature Reserve. The Reserve is a known hotspot for:

- Chalk stream habitat
- Rare invertebrates and amphibians

- A diversity of bird species

3. The Site is Not Previously Developed Land (PDL) and Therefore Cannot Qualify as Grey Belt

The site is unequivocally described as:

- “Undeveloped land”
- “Scrubland”
- With “no former structures or storage uses” confirmed by historic mapping.

Therefore, the site **fails the first limb** of the grey belt definition (PDL) and must instead be assessed solely on its Green Belt purpose contribution—which, as demonstrated, is **strong**, not weak.

4. The Applicant’s “Small Site” Argument is Unsound and Rests on a Misapplication of Policy

The Planning Statement repeatedly relies on the claim that the site is “small” and “self-contained” to diminish its Green Belt value.

However:

- The **NPPF does not recognise a size-based exception** for Green Belt contribution.
- Case law (e.g., *Calverton Parish Council v Nottingham City Council*) reinforces the need for **proper strategic assessment**, not piecemeal erosion.

Approving development here would set a **dangerous precedent for incremental Green Belt loss** along Wymondley Road. The applicant is splitting the plot he owns and will retain further land to the East of the proposed development, and this will set a precedent for further piecemeal developments along Wymondley Road.

5. The Site Fails NPPF §155 Tests for Non-Inappropriate Grey Belt Development

Even if the site were grey belt (it is not), **NPPF §155(a)** requires that development must *“not fundamentally undermine the purposes of the remaining Green Belt.”*

Given:

- The strong contribution to preventing Hitchin–Great Wymondley coalescence;
- The narrowing of the settlement gap;
- The erosion of rural character;
- The high ecological sensitivity;

the proposal clearly **fails** the §155 test.

6. Conflict with North Hertfordshire Local Plan Policies

SP5 – Countryside & Green Belt

Development must preserve openness and prevent settlement sprawl. This proposal fails on both grounds.

NE2 – Landscape

Development must respect landscape character. Introducing a dwelling on a visually open rural edge conflicts with this policy.

NE4 – Biodiversity & Geological Sites

The absence of ecological survey data conflicts directly with policy.

SP12 – Green Infrastructure

The proposal undermines continuous ecological corridors connecting Purwell Ninesprings to the wider countryside.

7. Flood Risk, Springs, and Lack of Surface Water Management

The proposed development raises significant concerns relating to **localised flash-flood risk**, groundwater emergence, and inadequate surface-water drainage provisions. The site lies close to the **River Purwell**, a chalk stream that is known to be vulnerable to rapid rises in water levels during periods of intense rainfall. The Design & Access Statement confirms that **no flood-risk assessments or drainage studies have been undertaken**, and that information on past land use or hydrological constraints is absent, with the applicant explicitly stating that the Council will need to advise on reserved matters relating to flood risk and ground conditions.

This area is also characterised by **numerous natural springs** associated with the Purwell chalk aquifer system. Springs are known to emerge unpredictably in such landscapes, particularly when ground levels are altered or excavations cut into permeable chalk strata. Any excavation for foundations, driveways, or service trenches therefore carries a material risk of intersecting spring lines or increasing groundwater flow volumes. This can cause **surcharging, waterlogging, or redirection of groundwater flows** towards neighbouring properties, including mine at 2 Ninesprings Cottages.

Despite these known sensitivities, the applicant has provided **no strategy** for managing:

- Surface-water run-off generated by new impermeable areas (roofing, driveway, hardstanding).
- Interception, attenuation, or controlled discharge into local watercourses.
- Groundwater behaviour during and after excavation.
- The cumulative impact of tree removal and soil disturbance on local hydrology.

This approach is inconsistent with the **NPPF's sequential, precautionary requirements for areas affected by groundwater or fluvial inundation**, and conflicts with **North Hertfordshire Local Plan Policies SP12 and NE2**, which require applicants to safeguard water environments, incorporate Sustainable Drainage Systems, and demonstrate that development will not increase runoff or exacerbate local flood risk.

In conclusion, the application should be refused because:

- The site strongly contributes to Green Belt purposes and therefore cannot be classified as grey belt.
- Development would erode the essential rural gap preventing Hitchin's outward sprawl toward Great Wymondley.
- The site has significant ecological value.
- The proposal conflicts with NPPF Section 13 and North Herts Local Plan SP5, NE2, NE4, and SP12.
- The development would potentially increase the flash flooding risk to neighbouring properties along the River Purwell

For these reasons, I respectfully request that the application be refused in full.

Yours faithfully,

Patricia Byford

2 Ninesprings Cottages, Wymondley Road, Hitchin