



6th March 2026
Delivered by Email

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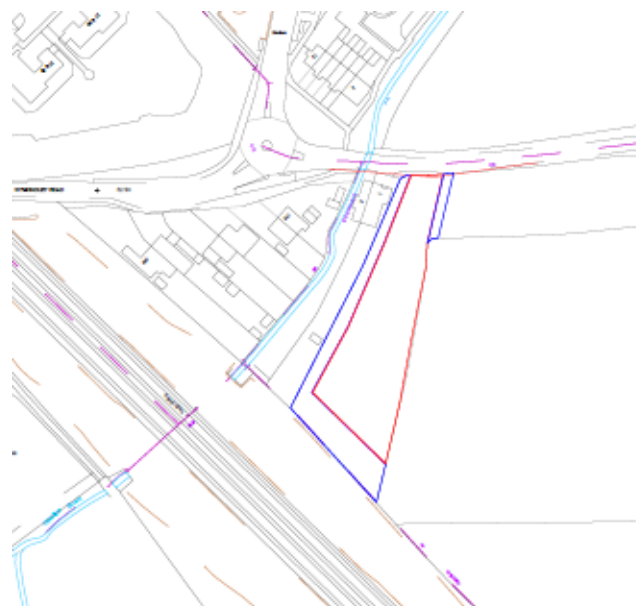
Dear Sir/Madam

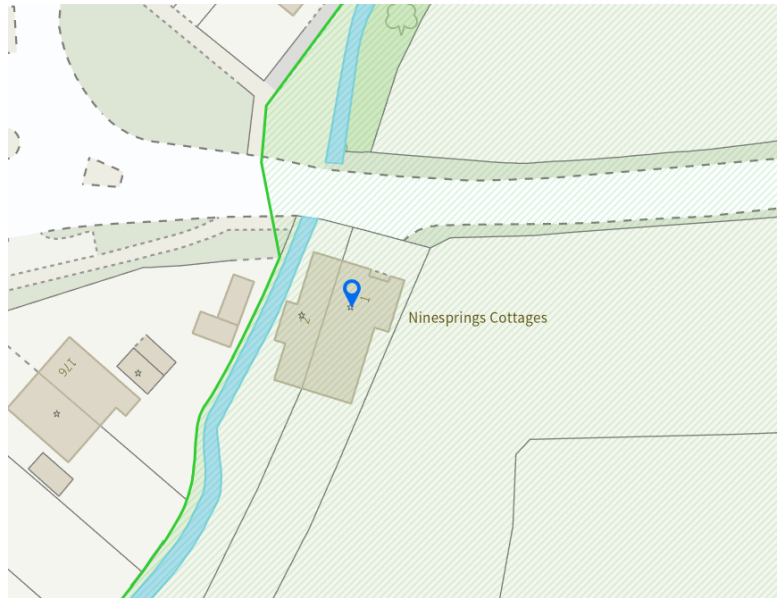
Planning reference: 26/00361/PIP

Address: Land Adjacent to No 1 Ninesprings Cottage, Wymondley Road, Hitchin,
Hertfordshire, SG4 9QL

On behalf of Guy Cozon of No 1 Ninesprings Cottage, Wymondley Road, we seek to raise a strong objection to the proposed development on the adjacent land for the “erection of one detached dwelling”.

The location is designated as Green Belt formed of open fields adjacent the No 1 Ninesprings Cottage, subject to no screening to the wider countryside. The location is typified by its semi-rural location on the periphery of Hitchin, evidently representing a clear boundary distinction from urban to open space.





Policy Context:

The development principle has been sought via a Permission in Principle (PiP) application which is a planning route in England that gives early agreement that a site is suitable for development, before full planning details are submitted. We accept the scope of Permission in Principle is limited to three main matters:

1. Location – whether the site is acceptable for development in that place.
2. Land Use – what type of development is allowed (e.g., housing).
3. Amount of Development – usually the number of dwellings or scale.

The permission in principle consent route has 2 stages: the first stage (or permission in principle stage) establishes whether a site is suitable in-principle and the second ('technical details consent') stage is when the detailed development proposals are assessed.

To all intense purposes the planning application is akin to an outline planning application with all matters reserved and thereby does not cover details such as, but not limited to, layout and design, access and highways, Landscaping, Drainage and Environmental impact. As such the objection shall address the main material land use principle of development in the Green Belt.

The local planning policy within the North Hertfordshire Local Plan 2011-2031 sets out the follow policies of particular relevant to the consideration of this application:

Policy SP1: Sustainable Development in North Hertfordshire

Policy SP2: Settlement Hierarchy and Spatial Distribution

Policy SP5: Countryside and Green Belt



The NPPF (2024) is of primacy in the consideration of the PIP, as set out in the applicants Planning statement addressing and analysis of Grey belt, set out in Para's 155-156, discussed below.

Development Analysis:

Green Belt and Grey Belt considerations

The Framework identifies that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and that the essential characteristics of Green Belts are their openness and their permanence. It goes on to state that 'inappropriate development' in the Green Belt is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

The access gate serving the development site is located on a narrow grass verge with no pedestrian footpath immediately fronting the site. Wymondley Road leads into the junction with St Michaels Road and represents the boundary of the Green Belt and beginning of the built-up settlement of Hitchin to the north of the site. The junction is where streetlamps are located 30 metres away from the site and where clear forms of urban development start.

The site in isolation and taken in context is of a typical rural character of an undeveloped parcel of agricultural land set adjacent two cottages themselves part of designated Green Belt designation on the eastern side of the river.

As per the photos below, there is a clear distinction between where the settlement ends and the countryside begins. The land would change spatially from that experienced as a rural character, to one of residential development if the proposed one dwelling were built out.





The applicant contends that the appeal proposal benefits from grey belt land exemption. The Framework informs that development within the Green Belt is not regarded as inappropriate development in other circumstances where it follows the definition of grey belt land within the Framework and meets the exceptions of paragraph 155 of the Framework.



Para 155 of the NPPF (2024) states

“The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:

a - The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;

b - There is a demonstrable unmet need for the type of development proposed

c - The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework

d - Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below.

For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.

(a) & (b) Impact on the checking unrestricted sprawl of large built-up areas;

The applicant seeks to mitigate concern regarding unchecked sprawl in paras 5.11 and 5.12 of the submitted planning statement via essentially stating the following,

- The parcel of land is a very small component part of the much wider land parcel of Green Belt used to prevent towns joining up and therefore does not result in sprawl and thereby cause harm to the principle of the Green contribution.
- The site is self-contained from the agricultural field and would not extend incongruously into the Green Belt.

It is recognised the parcel of land between the Hitchin and Stevenage (sector 10) is wide and extended, however even piecemeal development would have a effect on the openness and importantly permanence of the Green Belt in this location. There is no attempt to state or demonstrate there would be no adverse impact on the openness of the Green Belt, only to say it’s a small bite of the green belt and so is not materially harmful. If this process were continued in perpetuity, then the preservation of the Green Belt would be in jeopardy.

The reference to the site being self-contained is unclear, what does this mean? The site is an agricultural field that has been left fallow and has no individual defining features that are apparent to indicate a “self-contained” parcel of land.



The development of the land would be a clear encroachment on the countryside and fail to assist in safeguarding the Green Belt. The consideration of the site as Grey Belt would be a flawed assessment and there are clear policy and physical indicators the site does strongly contribute to the purposes of a) of paragraph 143. not accord with sub parts (a) and (b) of para 143 of the NPPF (2024).

Consideration against Para 155 of the NPPF (2024)

Notwithstanding the strong view the site is not designated as Grey Belt, sub parts b) and c) require analysis.

Sub part (b) Housing need

The applicant argues that the Council cannot demonstrate a 5 year housing land supply and 11d is therefore engaged and the presumption in favour of sustainable development weighs in favour of the proposal. North Hertfordshire Council cannot demonstrate a 5 year housing land supply, with the number of years varying between sources. However, the creation of a single new dwelling would be a very limited addition to the housing stock and thereby limited public benefit as a result of the proposal.

Sub part (c) Sustainable location

Para 5.34 of the submitted planning statement contends the potential occupants of the site would not be unduly reliant on the use of the private car for access to the wide range of services and facilities that Hitchin contains.

Future occupiers would inevitably walk on the road alongside vehicles travelling at 30mph-40mph for a short distance before reaching a pavement in one direction. In order to get to local facilities there are limited options, while a bus stops is in close proximity, bus services are only said to operate at limited times, thereby limiting the ability for buses to meet day to day needs for travel from this site. Future occupants would therefore be dependent on use of a private car to meet their day-to-day needs. As such, paragraph 110 of the Framework while recognising that opportunities to maximise sustainable transport solutions will vary between urban and rural areas, there is concern the options available are poor. In short, future occupiers of the site could not operate without access to private cars.

Other matters:

The applicant has referred in their Design and Access Statement to drawings and other material planning matters. As the PIP does not cover these points there is no analysis required at this stage, however, subject to the next stage of the development in the



unfortunate scenario this PIP is approved, we reserve the right to response and comment on those matters.

Conclusion:

The planning officer and department are respectfully requested to refuse the permission in principle application on land use grounds contrary to the essential characteristics of the Green Belts openness and their permanence. Openness has both a visual and spatial dimension and is a key characteristic of the Green Belt and must be preserved.

Your sincerely

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