

# **HUTCHINSONS**

Planning & Development Consultants

## **EXAMINATION OF THE NORTH HERTFORDSHIRE LOCAL PLAN**

**2011 – 2031**

**Matter 23 – the Green Belt Review work and the site  
selection process**

**Representations on behalf of M Holford and others**

**March 2020**

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## 1           **MATTER 23 – THE GREEN BELT REVIEW WORK AND THE SITE SELECTION PROCESS**

1.1           We continue to act on behalf of Mr M Holford and other residents of Westmill Road, Ickleford.

1.2           These further representations relate solely to the issues raised under Matter 23 by the Inspector. On behalf of our clients we made representations both in writing and at the round-table session on the Green Belt and Ickleford and we request that those representations remain to be considered by the Inspector, but we will not reiterate that content.

1.3           We commented previously on the lack of justification for the methodology in arriving at the Green Belt assessment in respect of the site at Burford Grange, Ickleford (Site Ref 40) in the Green Belt Review, particularly regarding the overall contribution the site makes to Green Belt purposes. In our view the GBR came to the wrong conclusion in determining that the contribution of the site to the Green Belt was “moderate” rather than “significant.”

1.4           The assessment of 2016 in the GBR concluded “*the site is outside settlement boundaries although adjoins existing development on one side. The site is close to Hitchin, however as Ickleford isn’t a town, this isn’t significant in Green Belt terms.*” The assessment indicated that the site played no role in preventing merger of neighbouring towns and therefore the Green Belt in this instance did not serve the purpose set out in Paragraph 134(b) of the NPPF, insofar that it did not prevent neighbouring towns merging into one another.

1.5           The GBR Update carried out in 2018 after the round-table sessions provided a somewhat different interpretation of Paragraph 134(b) of the NPPF, insofar that it uses the assessment criterion of “*preventing the merger of settlements (our underlining) which might occur through a reduction in the distance between them.*”

1.6           Unsurprisingly, therefore, Table 3 of the Update, which provides a revised assessment of potential development sites, recognises for the Burford Grange, Ickleford site (40) that, with regard to the merging of settlements, the contribution to Green Belt purposes is “*significant.*”

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- 1.7 What is surprising, however, is the assessment of the contribution of the site to Green Belt purposes in respect of sprawl and countryside, and subsequently the overall contribution, only being assessed as “*moderate*.” Site 40 at Burford Grange lies within Parcel 12a Oughtonhead, as indicated in the site survey carried out as part of the Update, and that Parcel is identified as making a “*significant*” contribution to Green Belt purposes, both in terms of assisting in safeguarding the countryside from encroachment and the overall contribution to the Green Belt.
- 1.8 In our view this overall assessment is incorrect and unjustified, bearing in mind the findings of the Update site survey and the significant merger implications, now recognised by the Council, of allowing development in the fragile gap between Hitchin and Ickleford, which will be seriously eroded, if the development at Burford Grange is carried out.
- 1.9 We consider that the assessment error should be corrected and full account should be taken of the recognised merger significance. In those circumstances, the criteria referred to in Paragraph 22 of Paper B: Green Belt should be applied to the potential development site at Burford Grange. Apart from adjoining the town of Hitchin, the site meets none of the other criteria and, in particular, it makes no strategic-scale contribution towards identified housing need.
- 1.10 The coalescence of Hitchin and Ickleford is at a critical point and if development at Burford Grange goes ahead, the separate identity of the two settlements will effectively be lost forever. The benefit of a relatively small housing allocation must be balanced against the contribution of the site to the Green Belt and its defined purposes. In those circumstances, that exercise should weigh in favour of the accepted significance of the Green Belt and the allocation of the site at Burford Grange should be deleted.
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