## **HUTCHINSONS**

Planning & Development Consultants

#### **Objections to**

**North Hertfordshire District Council** 

Local Plan 2011-2031

**Proposed Submission** 

On Behalf of

Mr and Mrs M Holford, Mrs D Parker, Mrs S Bancroft Livingstone, Mr and Mrs N Dodds, Mr and Mrs D Bunker, Mr and Mrs L Maguire, Mr A Wallace, Mr and Mrs A Saunders and Mr and Mrs N Richardson

COMMENTS ON INSPECTOR'S QUESTIONS REGARDING MATTER 11 ICKLEFORD

January 2018

#### **HUTCHINSONS**

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#### 1 INTRODUCTION

These comments are made in response to the Inspector's questions relating to the proposed housing allocation at Burford Grange, Bedford Road, Ickleford (IC2) and should be read in conjunction with the statement made on behalf of our clients when submitting objections to the Submission Local Plan in 2016.

## QUESTION 11.29: ARE ALL OF THE PROPOSED HOUSING ALLOCATIONS JUSTIFIED AND APPROPRIATE IN TERMS OF THE LIKELY IMPACTS OF THE DEVELOPMENT?

We are instructed only in respect of proposed allocation IC2, but we consider the Council has failed to justify this allocation and has not taken into account the importance of retaining the fragile gap which identifies the separate identities of Hitchin and Ickleford.

Development of this site will erode the fragile gap and make it more difficult to safeguard those separate identities in the future.

### QUESTION 11.30: ARE ALL OF THE PROPOSED ALLOCATIONS THE MOST APPROPRIATE OPTION GIVEN THE REASONABLE ALTERNATIVES?

We would not wish to comment regarding the appropriateness of other sites shown for allocation in Ickleford, but we are strongly of the opinion that allocation is the least appropriate, because of its functional importance as referred to above.

In a situation where the Objectively Assessed Need has been reduced from 14,400 dwellings to 13,800, it is difficult to understand why site IC2, which is so clearly inappropriate, is being retained as a housing allocation.

# QUESTION 11.31 (A): DO EXCEPTIONAL CIRCUMSTANCES EXIST TO WARRANT THE ALLOCATION OF THE SITE FOR NEW HOUSING IN THE GREEN BELT? IF SO, WHAT ARE THEY?

We do not consider any exceptional circumstances exist to warrant the allocation of site IC2, and, if it is necessary to consider allocations in the Green Belt, they should be properly assessed in order of priority.

Our previous statement referred to inconsistencies and anomalies in the process of reviewing the Green Belt boundaries and the importance of retaining and identifying those sites, which it is imperative should remain open and undeveloped. In our opinion IC2 is one of those sites.

### QUESTION 11.31 (B): WHAT IS THE NATURE AND EXTENT OF THE HARM TO THE GREEN BELT OF REMOVING THE SITE FROM IT?

The allocation of site IC2 would create significant harm to the Green Belt by eroding the fragile space between Hitchin and Ickleford and consolidating the northward sprawl from Hitchin, undermining two of the five stated purposes as set out in Paragraph 80 of the NPPF.

## QUESTION 11.31 (C): TO WHAT EXTENT WOULD THE CONSEQUENT IMPACTS ON THE PURPOSES OF THE GREEN BELT BE AMELIORATED OR REDUCED TO THE LOWEST REASONABLY PRACTICABLE EXTENT?

In our opinion the impact of housing on the site of IC2 cannot be satisfactorily ameliorated and any reduction of the Green Belt in this area would be entirely inappropriate.

QUESTION 11.31 (D): IF THIS SITE WERE TO BE DEVELOPEED AS PROPOSED, WOULD THE ADJACENT GREEN BELT CONTINUE TO SERVE AT LEAST ONE OF THE FIVE PURPOSES OF GREEN BELTS, OR WOULD THE GREEN BELT FUNCTION BE UNDERMINED BY THE SITE'S ALLOCATION?

Whilst technically the remaining Green Belt would continue to function, the allocation of site IC2 would undermine the Green Belt purpose of preventing coalescence of settlements to such an extent as to render it worthless.