

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

We wish to demonstrate that the Council's site selection process is unsound in relation to the proposed development at IC2 (Ickleford/Oughtonhead). Our point is specifically about a change in Green Belt assessment of the IC2 site and what it means for the Local Plan. LP Section 13.157 (Housing) fails to meet NPPF requirements for altering Green Belt boundaries and permitting development within the Green Belt. **Contravenes NPPF 79, 80, 84, 87, 88, 158.**

Background.

The 2016 SHLAA states that site IC2 (Ref 40) *'would require release from the Green Belt and amendment to village boundary.'* IC2 falls within Parcel 12 of the Green Belt and is referred to as 'Oughtonhead.'

The NHDC Green Belt Review 2016 states that Parcel 12 makes the highest level of contribution to the Green Belt (i.e. 'significant.'). The Review then subdivides Parcel 12 into 4 sub-parcels and again allocates the highest (i.e. 'significant') overall label to each sub-parcel, including sub-parcel 12a, where IC2 is located. The Review states that 12a *'plays an important role in preventing expansion of Hitchin northwards,' 'plays a significant role in safeguarding the countryside' and 'River Oughton flows through. Significant contribution.'*

The Review then goes on to state that the IC2 site only makes a 'moderate' contribution to the Green Belt. There is no justification whatsoever provided for this change of assessment. Thus conditions required under the 'very special circumstances' test as set out in the NPPF are not met.

The Green Belt review Update 2018 (Table 2 summary revised assessment of Green Belt sub-parcels) continues to classify sub-parcel 12a as 'significant' in its contribution to Green Belt purposes but does not refer to any 'very special circumstances' why a greenfield meadow within this sub-parcel is no longer significant and may be built on.

The Sustainability Appraisal documents are apparently ignorant of the site's proximity to the River Oughton, making no reference at all to the chalk river to the south or to Oughtonhead Common itself. Neither does the Appraisal put forward any 'very special circumstances' to justify development on site IC2.

Including IC2 in the Local Plan contravenes the stated aims of the Sustainability Appraisal (Table 1 Sustainability Appraisal Framework, Section 2(a) Land Use and Development Patterns) because it fails the following criteria: *'2(a) Minimise the development of greenfield land and other land with high environmental and amenity value,' and 'promote the use of brownfield sites and if brownfield sites are not available, land of low environmental and amenity value.'*

Paragraph 4.148 of the Local Plan recognises that *'a wildlife corridor which runs in a south-west to north-east direction passing through the northern part of the district which is an important asset of food and habitat for flora and fauna, particularly birds.'* The Green Belt between Hitchin and Ickleford is a significant contributor to this narrow corridor, especially as it contains the Oughtonhead Common Local Nature Reserve. The River Oughton is one of the UK's globally rare chalk streams. This is an ecologically important and sensitive area which should be protected, as clearly demonstrated in submissions to previous consultations on the Local Plan, and also in objections to Cala's application for planning permission in 2019 (19/01106/FP), including Ickleford Parish Council's detailed analysis of environmental factors (<https://bit.ly/37pqwcu>).

In summary, the Local Plan's inclusion of site IC2 for housing development is unsound. This situation should be rectified by removing site IC2 from the list of areas to be built on.

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