

**Standing up for Hertfordshire's countryside**

Our Ref:

Your Ref:

Hazel Izod  
Neighbourhood Services (Development Control)  
East Hertfordshire District Council  
Wallfields  
Pegs Lane  
Hertford SG13 8EQ

20<sup>th</sup> September 2017 (by email)

Dear Ms. Izod,

**Application No. 3/17/1922/OUT**  
**Outline planning for up to 40 dwellings all matters reserved except for access.**  
**on Land West Of Acorn Street Hunsdon Hertfordshire**

CPRE Hertfordshire objects to this proposal for inappropriate development in the Rural Area Beyond The Green Belt, outside of the village boundary of Hunsdon.

The proposals are contrary to Local Plan policies GBC2, GBC3 and OSV2 and Policy GBR2 of the Submission District Plan. It has previously been determined by the Planning Inspectorate (in considering the development of land at Hare Street, Buntingford) that *"the thrust of LP Policies GB2 and GB3 is to protect the countryside from unnecessary development, which is an aspiration of the Framework. I therefore consider this aspect of the policies to be in conformity with the Framework and capable of attracting significant weight."* (APP/J1915/A/13/2205582, APP/J1915/A/13/2205581 and APP/J1915/A/13/2199777). Equally, the recent Supreme Court judgement (Suffolk Coastal DC v Hopkins Homes Ltd (2017 UKSC 37)) has clarified that existing Local Plan policies still retain substantial weight despite lack of a 5 year housing land supply. The policies in the Submission District Plan can now also be accorded significant weight.

Policy VILL 1 (vi) of the Submission District Plan states that prior to a Parish Council preparing a Neighbourhood Plan, development in the villages will be limited to the built up area as defined on the Policies Map. This site is outside the village boundary as defined on the plan policy maps of both the Local Plan and the Submission District Plan and is not included as a development site on the latter. It is clearly within the Rural Area Beyond The Green Belt, within which housing development of this nature is not permitted.

Notwithstanding its designation as a Group 1 village in the Submission District Plan, as we have pointed out responding to other recent, similar applications affecting the village, the sustainability of development in Hunsdon is questionable. East and North Herts Clinical Commissioning Group consider that health services in the village are already overstretched.

**President:**  
*Sir Simon Bowes Lyon, KCVO*  
**Chairman:** *Richard Bullen*

The Primary school is already under pressure and one cannot just keep adding to its catchment and assume all will be well. Retail provision within the village is very limited and the majority of shopping visits take place elsewhere. Similarly, people have to go elsewhere for leisure and recreational activities. Most residents have to go outside the village for employment and, as the Council's officers have stated in relation to previous applications, "Hunsdon is not in a particularly sustainable location in terms of the levels of facilities for sustainable transport."

In relation to the economic viability of the land, para. 6.60 of the Planning Statement says that "*the site is not of the highest quality and most versatile agricultural land*". This is not strictly true. The National Planning Policy Framework defines best and most versatile agricultural land as "*Land in grades 1, 2 and 3a of the Agricultural Land Classification*" and NPPF para. 112 states that development of this land should be avoided and due weight given to its economic value. Paras. 3.2.2 to 3.2.4 of the Agricultural Land Assessment indicates 50% of the site is Grade 3a with pockets of Grade 2. (Western half) and 50% is Grade 3b (Eastern half). Consequently the Council is required to take this into account when assessing the planning balance.

We note the applicant's interpretation that the requirement in para 10.2.3 of the Submission District Plan that Group 1 villages will need to accommodate "*at least a 10% increase in housing stock*" as being the minimum requirement. That does not mean that these villages are open for any level of speculative development. To do so makes the concept of setting a quota for the villages meaningless.

We urge the Council to reject this application.

Yours sincerely,

David Irving