

Standing up for Hertfordshire's countryside

Ms Fiona Dunning  
Development Control  
East Hertfordshire District Council  
Wallfields  
Pegs Lane  
Hertford  
SG13 8EQ

Our Ref:

Your Ref:

30<sup>th</sup> November 2018 (by email)

Dear Ms. Dunning,

**Application No 3/18/2518/FUL**  
**Erection of 2no. Four bed dwellings with double garages, new vehicular access and landscaping**  
**on Land adjacent to Widford Rise, Hunsdon Road, Widford, Ware, Hertfordshire SG12 8RZ**

CPRE Hertfordshire opposes this application for inappropriate residential development in the Rural Area beyond the Green Belt, contrary to Policy GBR2 of the newly adopted East Herts District Plan.

The site is a field adjacent to Hunsdon Road between the villages of Widford and Hunsdon.

The applicant states that this is an infill site, and hence development is permissible under Policy GBR2. They also rightly state that there is no definition of 'limited infilling' in the new District Plan. Consequently they argue that "*given that the application proposes only two dwellings, positioned between existing housing along Hunsdon Road, it is submitted that it meets the definition of a limited infill development.*"

By that definition any field between two settlements could be classed as infill, which would be a nonsense. There is no definition of 'limited infilling' in the East Herts District Plan, nor, for that matter in the National Planning Policy Framework. However, following case law, the common usage adopted for countryside locations is "*the infilling of a small gap within an otherwise built-up frontage or group of houses.*" That is not the case here. The Planning Inspectorate has held that where a site "*does not form part of an otherwise continuously built up frontage, and is not largely surrounded by developed land, it does not represent an infill site.*" (APP/Z4718/W/15/3139295. Feb 2016). This site is neither part of a continuously built up frontage nor surrounded by developed land.

In 2015 the Court of Appeal held (in Wood Vs. Secretary of State) that the status of a site should be determined by how it appears as a matter of fact on the ground. On the ground this site is rural land from beyond the end of the cottages on the east side of Widford Road north of Hunsdon to the junction of Abbots Lane and Levenage Lane which forms the

southern edge of Widford. The B180 along this stretch is clearly a rural road, with the widely separated individual houses of Chapel House and Widford Rise along its length. Consequently it cannot be considered as displaying a continuously built up frontage.

Under Policy VILL1, development will be permitted in Hunsdon provided that it will not represent an extension of ribbon development or an addition to an isolated group of buildings. As stated above, this site is not in Hunsdon, but if developed it would represent an addition to an isolated group of buildings and represent ribbon development along the B180. Widford is a category 3 village in which identical caveats are included in Policy VILL3.

The proposal is not for affordable housing and so Policy HOU4 on Rural Exception Sites is not applicable.

For all these reasons we urge the Council to refuse this application.

Yours sincerely,

David Irving