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**Standing up for Hertfordshire's countryside**

Ashley Ransome  
Development Control  
East Hertfordshire District Council  
Wallfields  
Pegs Lane  
Hertford  
SG13 8EQ

Our Ref:

Your Ref:

25<sup>th</sup> March 2020 (by email)

Dear Ms Ransome,

**Application No 3/20/0345/FUL**  
**Erection of two detached residential dwellings and creation of**  
**6 off-street car parking spaces on Land Adjacent To South Lodge,**  
**Fanhams Hall Road, Ware, Hertfordshire SG12 7PX**

CPRE have concerns regarding this proposal within the WARE2 -(Land North and East of Ware) designated development area in the East Herts District Plan.

To facilitate WARE2, the Council redrew the Green Belt boundary, removing South Lodge and its curtilage from the Green Belt and locating it within the new development area. This is acknowledged by the applicant in the Planning Statement, where they comment that as the site is now within WARE2 their proposal cannot be considered as inappropriate development. However, they do not appear to have fully understood the implications of Policy WARE2.

Policy WARE2 requires that a Masterplan be produced for the development. The Masterplan Framework was published in September 2019. Part VI of the policy states that: *"In order to ensure that the site is planned and delivered comprehensively, any application for development on part of the site will be assessed against its contribution to the Masterplan, and will ensure that such development would not prejudice the implementation of the site allocation as a whole."* Neither the Planning Statement nor the Design and Access Statement makes reference to the Masterplan, nor gives recognition to the issues contained in it.

In the proposed Masterplan, South Lodge (and consequently this site) sits within the Fanhams neighbourhood, which envisages a community hub formed around a small scale employment area, referencing the character of the nearby Great Cozens farmstead buildings with regard to building form and character. It is not clear how this proposal fits into that vision. Equally the junction on which South Lodge sits is designated as a secondary vehicular access point to the

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WARE 2 development in the master plan framework. It is not clear how this proposal will impact that.

There is also confusion in the Design and Access Statement about the impact of WARE2. There is no recognition that this site will be part of a much larger neighbourhood. The applicant says that they will *“work with the developers of the adjoining field ear-marked for a slightly larger development.”* What is proposed for WARE2 is a mixed-use development site accommodating at least 1,000 new homes, education facilities, employment and retail units. That is not a ‘slightly larger development’. There are repeated references in the Design and Access Statement to the site’s rural character which *“could provide the inhabitants with an ideal opportunity to further patronise the locality’s smaller rural enterprises.”* The applicant appears not to realise that this will no longer be a rural location. Similarly there are statements such as *“we are proposing to thoroughly maximise the wonderful panorama on offer across open fields and wooded copse to both front and rear aspects.”* Those open fields will no longer exist once WARE2 is implemented.

On the specific proposal itself, it will remove all amenity space from South Lodge. Criterion 10 of District Plan Design Objectives (17.2) requires new development to incorporate *“adequate private and public amenity space.”* A development which removes all amenity space from a third dwelling cannot be acceptable.

Despite the assertion that the two proposed dwellings clone much of the ‘vernacular’ detailing of South Lodge, they are actually rather mundane in design and make no reference to Great Cozens as required by the Masterplan Framework.

It may well be that the applicant is unaware of the Masterplan Framework which covers this and other development within WARE2, but the Council has to assess the planning balance for this application against the Policy and the requirements of the Masterplan Framework. The preparation of the final Masterplan is still ongoing and it would be premature to determine this application until that process is complete.

Yours sincerely,

David Irving