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**Standing up for Hertfordshire's countryside**

James Langsmead  
Development Management  
East Hertfordshire District Council  
Wallfields  
Pegs Lane  
Hertford  
SG13 8EQ

Our Ref:

Your Ref:

28<sup>th</sup> October 2020 (by email)

Dear Mr. Langsmead,

**Application No 3/20/1794/OUT**

**Outline planning application for: Construction of 2 green energy efficient bungalows with garages, and demolition of existing workshop - all matters reserved.**

**Land Adjacent To Twyford Orchard, Pig Lane, Bishops Stortford,**

**Hertfordshire CM22 7PA**

CPRE have concerns regarding this application for residential development in the Green Belt.

In para. 4.14 of the Supporting Statement, it is stated that “the applicant can confidently argue that the harm caused to the Green Belt by this development would be negligible.” On the basis of the limited information provided to support the application we do not see how that assertion can be made. In the absence of any, even notional, drawing showing what is proposed, it is difficult to determine the full impact of the proposed development on the Green Belt.

The argument presented is that the proposal complies with paragraph 145 of the National Planning Policy Framework as it is the replacement of an existing building in domestic use (145d) and limited infilling or partial development of previously developed land (145g).

However para.145d has the proviso that the replacement building should not be materially larger than the one it replaces and para.145g that the development should not have a greater impact on the openness of the Green Belt than the existing development. Given this, the pursuit of an outline application seems ill advised as the submitted information is inadequate to conclude that the proposal constitutes appropriate development in the Green Belt, a fundamental question for the local planning authority to consider.

With open land to the north, west and south of the site, we do not agree that the proposal constitutes an infill site. The NPPF specifically refers to limited infill in a village. In the case of *R (Tate) v Northumberland County Council* [EWCA Civ 1519], the court held that as there is no

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definition of “infilling” or “limited infilling” in the NPPF, nor any guidance there, to assist that exercise of planning judgment. It is left to the decision-maker to form a view, in the light of the specific facts.

The proposal is to demolish the existing outbuilding on the site and replace it with two 4-bedroom bungalows plus garages. Scaling from drawing A1202 (Existing site plan) the outbuilding has a footprint of approx 156 sq. m. The size of 4-bedroom bungalows varies, but collating information from the English Housing Survey, UK Self Build and Savills, the range is between 140 and 200 sq.m. Consequently, even at the lower end of that scale, two 4-bed bungalows would be 79% greater in footprint and volume than the existing outbuilding. This would have a substantial impact on the openness of the Green Belt.

As a result, we cannot support this application and urge the Council to reject it in its current form.

Yours sincerely,

David Irving