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Standing up for Hertfordshire's countryside

Steve Fraser-Lim
Development Management
East Herts District Council
Wallfields
Pegs Lane
Hertford SG13 8EQ

Our Ref:

Your Ref:

17th February 2023 (by email)

Dear Steve Fraser-Lim,

Application no. 3/22/2406/FUL - Land North and East of Ware (WARE2)

Hybrid planning application, comprising: a) Outline approval for a residential-led mixed-use development for up to 1,800 new market and affordable homes, including self-build and custom build homes and around 3 hectares of new employment provision, mixed-use local neighbourhood centres, new retail, business, commercial and community uses, new and expanded primary schools, with early years facilities and new secondary school provision, new public open space and outdoor sports facilities, including all an weather 3G sports pitch, the provision of plots for Travelling showpeople, new ecological areas, allotments, woodlands and other public areas, etc..

I write with reference to the above application, which we recognise follows the allocation of the site for development in the adopted East Herts District Plan. Notwithstanding that the principle of development is established by District Plan policies, we remain concerned by many aspects of the proposals which we believe will become increasingly significant and should be taken into account in decision-making.

In addition, we note that the context is changing rapidly with regard to how housing targets for Local Plans are considered and believe that such concerns should be reflected in the determination of both outline and detailed applications for allocated sites. Recent proposed amendments to the National Planning Policy Framework (NPPF) are likely to be introduced in the near future and will have significant implications for Local Plans and planning applications.

The NPPF amendments include proposals to give the Standard Method for calculating housing advisory as opposed to mandatory status, and include the influence of local and other characteristics where justified. Up to date population figures should also be used instead of the out-of-date projections which are presently utilised and these will be gradually introduced to provide more realistic projections.

CPRE is working nationally and locally for a beautiful and living countryside

CPRE Hertfordshire is a Charitable Incorporated Organisation

President: Sir Simon Bowes Lyon, KCVO
Chairman: Allan McNab

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In several previous representations and at planning inquiries, CPRE Hertfordshire has regularly identified the implications of using out-of-date Census figures which augment future housing numbers inappropriately. Reductions in the rate of population growth have been known about for some time and have inflated housing targets unnecessarily.

The implications of these reductions should relate to allocated sites, particularly where they have previously been designated protected land such as Green Belt and Areas of Outstanding Natural Beauty. Notwithstanding the allocation of sites with anticipated numbers of units, it would be appropriate at the planning permission stage to adjust the release of units in line with demonstrated requirements to reduce the amount of land release prior to a review of future Local Plan requirements.

Such a review should take place as soon as possible, so that the implications of the NPPF amendments can be taken into account. This may enable an assessment of the potential for re-designation of protected land where appropriate and a partial review of the District Plan may be appropriate where it is clear that less previously protected land is needed which could lead to a reduction in the granting of large-scale consents.

These comments may also be taken in the context of recent Government statements regarding support for Green Belt designations. For example, recently the Secretary of State (SoS) for Levelling Up, Housing and Communities published a Statement on 6th December 2022 which noted “It will be up to local authorities, working with their communities, to determine how many homes can actually be built, taking into account what should be protected in each area—be that our precious Green Belt or national parks” (Hansard: Planning System and Levelling Up Bill: Community Control. 6.12.22).

The East Herts District Plan, Chapter 9: states that development North and East of Ware (WARE2) should incorporate “Garden City design principles” in a Masterplan. The Town and Country Planning Association (TCPA), the national organisation promoting Garden City principles states:

“ The Garden City Principles are an indivisible and interlocking framework for their delivery, and include:

- *Land value capture for the benefit of the community.*
- *Strong vision, leadership and community engagement.*
- *Community ownership of land and long-term stewardship of assets.*
- *Mixed-tenure homes and housing types that are genuinely affordable.*
- *A wide range of local jobs in the Garden City within easy commuting distance of homes.*



- *Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy communities, and including opportunities to grow food.*
- *Development that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains, and that uses zero-carbon and energy-positive technology to ensure climate resilience.*
- *Strong cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods.*
- *Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport.”*

Banal car-oriented residential estate type developments with the provision of standard units and elements of green-washing are completely inadequate responses to the challenges of “Garden City design principles”, the Government’s “beauty” agenda, climate change and biodiversity loss. Such challenges will only increase in the future as further legislation on these issues is introduced and existing statutes are enacted.

No indication is given in the proposals of a full understanding of what “A Sustainable Urban Extension” (Design and Access Statement, JTP consultants) means, nor “sustainable ways of living” (DAS, page 2). Even at this stage, the strength of local community objection should be taken into account, which includes issues such as the considerable loss of agricultural land, the impact on local social and physical infrastructure of all kinds.

CPRE Hertfordshire urges the Council to reconsider the multiple impacts of proposed development on the scale proposed. It should seek both to define in considerably more detail the future sustainability of the proposals and examine opportunities to reduce the quantum of detailed consents granted in the light of the issues raised in this representation.

Yours sincerely,

Chris Berry
Planning Manager

NOTE: We would request that this letter is published on the Council’s website as a document relating to this application and should be grateful if you would notify us of the date of the appropriate meeting if it is to be determined by planning committee.