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Standing up for Hertfordshire's countryside

James Kenyon
Planning and Development
Broxbourne Borough Council
Bishop's College
Churchgate
Cheshunt
EN8 9XQ

Our Ref:

Your Ref:

26th June 2020 (by email)

Dear Mr. Kenyon,

Application No. 07/20/0429/F
Erection of residential dwelling house
On Land To The East Of Stanford House,
Burnt Farm Ride, Goffs Oak, Hertfordshire EN7 5JA

CPRE Hertfordshire oppose this application for inappropriate residential development in the Green Belt contrary to the Green Belt policies in the National Planning Policy Framework and the recently adopted Broxbourne Local Plan.

The applicant bases their proposal on the fact that they have extant approval for conversion of an existing barn on the site under Class Q of the Town and Country Planning (General Permitted Development) (England) Order 2015. (07/20/0122/PNAGR-RES, approved in March 2020).

However Class Q (now Class MB following recent revisions to the Act) only permits reasonable building operations (including partial demolition and rebuilding) to convert a barn to a house, but only within the envelope of the existing structure. Works that amount to substantial demolition and reconstruction or replacement of the existing fabric would go beyond what is allowed.

In other words, the extant approval does not permit the complete demolition of the barn and the construction of a new house in another location, which is what is proposed here. To do so would subvert the planning process. Consequently this application should be considered against the Green Belt policies in the National Planning Policy Framework and the Broxbourne Local Plan.

The example cited by the applicant to support their case (Uttlesford UTT/15/2910/FUL) is not directly comparable. In that case an existing house was being replaced by another of smaller footprint and the site was not in the Green Belt. This is a new development on a Green Belt site, and the footprint of the proposed dwelling is approximately 37% greater than the approved barn conversion.

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: Richard Bullen

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In the Design and Access Statement the applicant considers that the garage and utility room are ancillary to the house and so should be discounted from the permitted floor area. However both are an integral part of the building and directly accessible from it and, in both plan and elevation are clearly part of the structure. As stated above, they form approximately 37% of the ground floor plan area.

Consequently the proposal does not meet the criteria for exceptions to inappropriateness in NPPF 145 (d) and (e) and Policy GB1 of the adopted Local Plan, as both spatially and visually it will impact on the openness of the Green Belt. As such it requires the applicant to present very special circumstances sufficient to outweigh the resulting harm to the Green Belt. No such circumstances are formally presented, though the applicant does refer to the design quality and setting of the building being superior to the existing barn.

Similarly the applicant refers to NPPF para. 79, which covers isolated homes in the countryside, implying that the application should be considered as truly outstanding, and would significantly enhance its immediate setting. However this is not an isolated home in the countryside. Almost all of the buildings at Burnt Farm have been converted by the applicant into residential accommodation and the site is now an enclave of residential units of which this would be yet another. The aesthetic quality of the new design is a matter of individual judgement, but does not appear to us to be exceptional nor of a design sympathetic to its rural setting or that of its neighbours. In terms of sustainability the Council must form a view on whether in the use of materials, methods of construction or its contribution to protecting and enhancing the environment, the proposal is truly innovative.

Among those other buildings at Burnt Farm are three Grade II listed buildings. Under Section 16 of the NFFP the Council has a duty to conserve sites and buildings of historic value and obligations under the Planning (Listed Buildings and Conservation Areas) Act 1990, in respect to decision-making on such sites.

The immediately adjacent Stanford House itself, demonstrates that satisfactory barn conversion can be achieved within the established cluster of buildings and a similar approach to the approved barn would avoid further encroachment of the countryside and not result in harm to the Green Belt.

We urge the Council to reject this application.

Yours sincerely,

David Irving