

Standing up for Hertfordshire's countryside

Eilis Edmonds
Development Control
East Herts Council
Wallfields
Pegs Lane
Hertford
SG13 8EQ

Our Ref:

Your Ref:

11th December 2019 (by email)

Dear Ms. Edmonds,

Application No. 3/19/2281 /FUL
Demolition of commercial unit (B8 Use) and other outbuildings and erection of nine dwelling houses, creation of 23 parking spaces and associated external works.
At The Oaks Factory, Rear Of Ginns Road, Stocking Pelham,
Buntingford Hertfordshire SG9 0JD

CPRE Hertfordshire object to this modified resubmission of Application 3/19/0659/FUL which was refused by the Council in May 2019. (That, in turn, followed the refusals of applications 3/18/0890; 0891; 0892 and 0893/ARPN which collectively sought permission for 10 dwellings.)

We recognise that the current application is an attempt to meet the reasons for refusal. The wider housing mix and the more open layout are to be welcomed. However the proposal, in our view, is not in a sustainable location as required by the National Planning Policy Framework and Policies DPS2 and GBR2 of the East Herts District Plan. Nor does it retain the site for continued employment use contrary to District Plan Policy ED1.

The District Plan identifies Stocking Pelham as a Group 3 Village to which Policy VILL3 applies. That policy states that *"limited infill development identified in an adopted Neighbourhood Plan will be permitted."* The Applicant argues that as Stocking Pelham does not have a Neighbourhood Plan, then Policy VILL3 is not relevant. This is a perverse interpretation. VILL3 is not solely dependent on there being a Neighbourhood Plan in place and this proposal does not meet the criteria for Group 3 villages.

This site is some distance outside of the village of Stocking Pelham, which a previous Appeal Inspector has determined *"has little in the way of services and facilities"*. Consequently it will be necessary for residents to travel further afield to access school, medical, retail and social amenities. Ginns Road is unlit with no footway provision on either side. It would be unsuitable for use by the elderly, disabled or children.

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CPRE Hertfordshire is a Charitable Incorporated Organisation

President:
Sir Simon Bowes Lyon, KCVO
Chairman: Richard Bullen
Registered Charity 1162419

The Applicants recognise that, as a result, most movement to and from the site would have to be by car, but argues that as Government policy on the future of private vehicles is to convert to electric cars, this is no longer a sustainability issue. In our view this is optimistic. The Government's intention is to phase out sale of petrol vehicles by 2040, but the ability to do that is unclear. Businesses have been slow to get involved, in part because profit margins remain small and as a result the Government has heavily subsidised the development of charging points and the sale of electric vehicles. As recently as September 2019 the Transport Secretary confirmed the Government wants to pull the plug on the subsidy for electric vehicles. It is likely that purchasers of the proposed properties on the site will continue to use petrol vehicles for the foreseeable future.

Section 3 of District Plan Policy ED1 on Employment states that where development would cause the loss of a site which is currently, or was last, in employment use (which this site is), then it has to be demonstrated that *"The retention of the site or premises for Use Classes B1, B2 and B8 has been fully explored without success. ... Evidence of a period of marketing of at least 12 months must be provided."* In responding to this requirement the applicants simply state that they have *"considered redeveloping the site as a business park, however, there appears to be a general lack of demand in this location with potential tenants preferring to be located on the outskirts of the large towns in the area."* No definitive evidence is presented to back this up apart from a letter from the letting agents of existing commercial building 'C' about their difficulty in finding a tenant for it. The Council should request the detailed evidence required by Policy ED1.

Yours sincerely,

David Irving