

Standing up for Hertfordshire's countryside

Scott Volker
Development Management (Planning)
Three Rivers District Council
Northway
Rickmansworth
Herts WD3 1RL

Our Ref:

Your Ref:

22nd May 2019 (by email)

Dear Mr Volker,

Application Ref 19/0618/RSP

**Part retrospective: Creation of an overflow car park including installation of ancillary equipment including erection of access gate, external lighting and of 6.5 metre CCTV pole and close boarded timber fencing
on Land At Rear Of 2-3 Station Road, Kings Langley, Hertfordshire**

CPRE Hertfordshire object to this application for inappropriate development in the Green Belt, contrary to the Green Belt policies in the National Planning Policy Framework and the current Three Rivers Local Plan. Both require the applicant to demonstrate very special circumstances sufficient to outweigh the harm to the Green Belt through inappropriateness or other harm.

The applicant makes the point in the Planning Statement (para 6.3) that case law has established that *“relatively ordinary matters (such as the need for the development) may be given significant weight in the context of the particular case.”* Consequently the case presented is based on this premise.

Essentially the argument is that the uses to which Concept House is now being put, as a centre for tech start-up companies, has resulted in an increased demand for parking. As the Transport Statement puts it : *“The majority of staff travel to Concept House by private vehicle, resulting in a high demand for parking.”* and that *“The need for car parking is therefore demonstrated to be an operational requirement for Concept House.”* The supplementary letter from Sir Hossein Yassaie on behalf of the applicant, suggests that the number of employees will continue to grow. This begs the question of why, when purchasing Concept House, the company did not take into account the restrictions which the on-site parking provision would have on their business model.

Similarly, they should have been aware that the building lay within a Zone 3 discount area and it is not a valid argument to now say that *“a Zone 3 discount is incorrect. It is considered that with regard to the zonal approach to car parking that the application site and Concept House are located within a zone 4 at least and hence it is appropriate to*

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consider 100% of the car parking standard.” It is for the Council to determine that point, not the applicant.

It is contrary to both National and Local policy to encourage proposals which will increase pollution not reduce it. This development will actively facilitate increased car use.

The Council have confirmed, in their correspondence with the applicant, that the works undertaken to construct the car park are an engineering operation, but that does not, in itself, mean that the proposal is appropriate development. The 1.8m. high timber fence, the floodlights and the 6.5m. high CCTV tower all constitute constructions which will impact on the openness of the Green Belt, as will the parked cars themselves. The fact that the latter are “*transient*” does not obviate the inappropriateness. It is a little disingenuous of the applicant to claim that “*apart from the ancillary equipment and fencing, the physical works to create the overflow car park have taken place at ground level where they do not affect openness.*”

It is unfortunate that the applicant commenced the work on this site before applying for planning permission, as harm has already been done. That, however, is no justification to grant planning approval.

We urge the Council to reject this application and to require the applicant to restore the site to its former status.

Yours sincerely,

David Irving