



The countryside charity
Hertfordshire

31a Church Street

Welwyn

HERTS AL6 9LW

www.cpreherts.org.uk

office@cpreherts.org.uk

01438 717587

Standing up for Hertfordshire's countryside

Rachael Collard
Development Control
East Hertfordshire District Council
Wallfields
Pegs Lane
Hertford
SG13 8EQ

Our Ref:

Your Ref:

27th March 2020 (by email)

Dear Ms. Collard,

Application No 3/20/0245/FUL

Erection of 61 dwellings (including 24 affordable dwellings) accessed from Manor Links, together with associated highway works, landscaping, ecological enhancement works, utilities, drainage infrastructure and parking on Land East Of Manor Links (BISH9), Bishops Stortford, Hertfordshire

CPRE Hertfordshire recognise that this proposal is for the development of site BISH9 which is identified as a suitable site for residential development in Policy DPS3 of the East Herts District Plan and Policy BSEM2 of the Bishop's Stortford Neighbourhood Plan. The Masterplan for the site was approved by the Council in January 2020.

However we wish to comment on the development as proposed in this application:

Policy DPS3 envisages around 50 dwellings on this site. The 61 dwellings proposed is 22% higher than that envisaged. This is not insignificant and is demonstrated by a series of pinch points in the submitted layout.

To be specific, Plot 1, which is a 2-bed bungalow attached at an angle to a block of six 1-bed flats, has its rear wall one metre from the boundary. This wall contains the window to a habitable room, resulting in overlooking on to and from the rear gardens of properties in Manor Links. This is unacceptable. The plot contains **no** amenity land for the bungalow. This is also unacceptable.

Plots 8 and 17 are similarly built close to the boundary to the adjoining golf course. In this case the narrow space between the flank walls of the houses and the golf course is shown as filled with shrubbery. It would be impossible to maintain that shrubbery from either of the houses, and it could only be done from the Golf Course, but there is no indication in the documentation of how that would be done or who would take responsibility for it.

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

Registered Charity 1162419

Plots 49 to 56 form two terraces with only the width of the access road to the adjoining car parking separating them. The master bedrooms of each house face each other across this access road, with obvious overlooking and privacy issues.

While the quantum of Affordable Housing is met, section V of District Plan Policy HOU3 is not. Section V requires that *"the affordable housing units should be integrated into the open market housing development ... and 'pepper-potted' across the site in clusters."* That has not been followed here. All of the market housing is located in the centre of the site. The affordable houses are on the extreme periphery, in two groups (plots 1-7 and 47-57), isolated from the market housing.

We share the concerns of Herts and Middlesex Wildlife Trust at the inadequacy of the ecological information provided. The Ecological Appraisal is clearly marked as 'preliminary'. It identifies protected species on the site and both it and the Reptile Survey recommend further survey work and the drawing up of mitigation strategies. Evidence that this has been done is not included in the documentation. According to some of the neighbourhood responses, habitats for protected species have already been damaged by site clearance.

The transport assessment seems to have been developed based on the notional 50 dwellings in Policy DPS2. The Council should satisfy itself that the assumptions made will accommodate the higher movements generated by 61 dwellings.

Connectivity for walking and cycling within and beyond the site is regrettably poor. The proposed footpath link between north and south parts of the site appears very limited and almost designed to fail. A wider link that positively invites movement through the scheme, allows cycle use too and safeguards sightlines, with 'secured by design' principles, is needed and the layout may need to be amended to provide for this.

Finally, while we are not qualified to comment in detail on the proposed surface water drainage arrangements, we note the concerns of Bishop's Stortford Town Council and local residents which have been posted on the Council's website and urge the Council to satisfy themselves on this point before determining the application.

Yours sincerely,

David Irving