



The countryside charity
Hertfordshire

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Standing up for Hertfordshire's countryside

James Mead
Development Management
East Hertfordshire District Council
Wallfields
Pegs Lane
Hertford
SG13 8EQ

Our Ref:

Your Ref:

2nd December 2020 (by email)

Dear Mr. Mead,

Application No 3/20/2116/ARPN
Change of use of 2 agricultural building to C3 (residential) to create 2 dwellings.
Land Adjacent To Flacks Flower Fields, East End Green,
Hertford, Hertfordshire SG14 2PD

CPRE Hertfordshire have concerns regarding this proposed change of use of agricultural buildings to residential in the Green Belt.

This is a resubmission of application 3/19/1791/ARPN, which the Council refused, with additional information intended to demonstrate that the buildings have been in agricultural use since 1995. Consequently the applicant now considers that the proposal complies with Part Q of the Town and Country Planning (General Permitted Development) (England) Order 2015.

However concerns remain:

Approval was given in 1995 (App. 3/95/1305) for two buildings for private equine use, which is not an agricultural use. That application was implemented to the extent that the external walls of the structures were built, but no further. No roofs were raised nor external finishings or internal partitions implemented. The structures, therefore, bear no relation to the 'existing' elevations in the current application. According to the documentation, since 1995 the structures have been used for lambing etc., essentially sheep-pens or byres. That is not the use for which permission was originally granted.

The structures, as the photographs accompanying the application show, are simply enclosed space, open to the elements. It is highly unlikely that they could be transformed into residential units without significant structural work, building beyond what could be considered as conversion. Consequently they fall outside the provisions of Part Q.

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President: Sir Simon Bowes Lyon, KCVO
Chairman: Richard Bullen

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Both units are adjacent to a watercourse running along the northern edge of the site. According to the Environment Agency flood maps part of the existing footprints for both buildings lie within flood zones 2 & 3. However the authors of the Flood Assessment consider the Environment Agency maps to be inaccurate and have produced their own assessment showing the units outside the flood zones.

Should the Council determine that a full planning application is required, the site plan indicates a substantial area of parking, which will impact on the openness of the Green Belt. Equally, the site plan indicates no amenity area for either unit, or any obvious means of access from the parking area to the second unit. If allowance is made for these necessary elements, the impact of the resulting curtilage will be even greater. In addition, the introduction of residential development into this location will bring with it domestic paraphernalia, which will also impact on the Green Belt.

In terms of sustainability, these units will be car dependent. The site sits in the countryside between villages which have very limited facilities. The nearest significant settlements are Hertford, where the town centre facilities are 3.9km distant and Welwyn Garden City 7km. The nearest bus stops at Letty Green, Birch Green and the B158 are all beyond the acceptable walking distances. NPPF para.103 says that “development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”

The Council will have to satisfy itself on all of these points before determining the current application.

Yours sincerely,

David Irving
Senior Planning Volunteer
CPRE Hertfordshire