



The countryside charity
Hertfordshire

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Standing up for Hertfordshire's countryside

Susie Defoe
Development Control
East Hertfordshire District Council
Wallfields
Pegs Lane
Hertford
SG13 8EQ

Our Ref:

Your Ref:

15th May 2020 – amended V2 (by email)

Dear Ms. Defoe,

**Applications Nos. 3/20/0688/FUL, 3/20/0689/FUL, 3/20/0690/FUL and 3/20/0694/FUL
For the Erection of Polytunnels A, B and C and Erection of agricultural storage building with
incorporated office and respite area, creation of new access and formation of hard standing
and associated parking, siting of 2 no. water storage tanks.
On Land Off Ford Lane, Aston, Stevenage, Hertfordshire SG2 7HG**

Whilst recognising that the uses proposed on this site constitute appropriate development under the Green Belt provisions of the National Planning Policy Framework and the East Herts District Plan, CPRE Hertfordshire have significant concerns regarding aspects of the applications. The proposed tree nursery is a use to be encouraged, but there are questions whether this is an appropriate site. It would be much preferred to see the business establish at an existing farm site with established security and water sources that do not impact on a threatened local chalk stream.

CPRE Herts note that the site is one of a number of lots recently advertised with potential for residential development subject to planning. The viability of a wholly new industry may be a legitimate question if there could be subsequent pressures for residential occupancy at the site for business reasons. There must always be a question as to whether applications like this, in isolated open countryside, factor in the potential for highly valuable associated residential use, which would be contrary to NPPF para 79 but for the business.

The Beane Valley is a sensitive landscape in which this development, even though agricultural in nature, will appear as an intrusive element within the open valley floor. The applicant proposes to mitigate this harm through the provision of a tree belt to screen it from Ford Lane. However the development will be prominent from a series of vantage points throughout the valley. In our view a more substantial screening proposal is required which will reduce the impact of the structures and this should form a condition of any approval.

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



East Herts is already one of the most water stressed areas of the East of England (EHDP – Para 23.4). The river itself is a chalk stream of international importance subject to a catchment management plan, intended to improve the flow and water quality, among other objectives. Consequently any development which may impinge on the river must not be detrimental to those objectives. Biodiversity impacts should be minimised or positive net gains delivered under the NPPF 2019. The Environment Bill is bring ing forward requirements to require in every case net biodiversity gain. The impacts on water and the environment may well harm biodiversity contrary to the NPPF.

The proposed development on this site has the potential to impact on the river through water supply and sewage disposal. The operations on the site involve two large volume storage tanks. According to the Planning Statement these will be filled by pumping surface water runoff from the buildings which has been collected in small underground water storage tanks. Those underground storage tanks are not shown on the accompanying drawings nor is their capacity indicated. Filling of the large volume tanks from other sources would impact on the abstraction of both the aquifer and the river.

The office and staff area include a W.C.. According to the Planning Statement this will be connected to a small sewage treatment plant (though the application form says that the method of sewage disposal is unknown.) *“The effluent will either be processed through a drainage field or directed into the River Beane.”* Again the location of this treatment plant is not shown.

Without clear details and approval of any system, the potential for contamination of the river remains a possibility. Any additional discharge of, albeit treated, effluent is likely to add unacceptable levels of nutrients leading to higher risk of eutrophication. Chalk streams are classed as priority habitats in the Natural Environment and Rural Communities Act 2006.

Paragraph 174 of the National Planning Policy Framework requires the Council to promote the conservation of priority habitats and para. 175 states that where significant harm cannot be avoided, then planning permission should be refused. Para 170 and the latest Environment Bill are seeking biodiversity gains with all development whereas this proposal may harm biodiversity.

These are material factors which the Council must satisfy itself on before determining the application.

Yours sincerely,

David Irving