



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

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

Our Ref:

Your Ref:

9th October 2020 (by email)

Dear Mr. Mead,

Application No 3/20/1726/FUL
Erection of storage barn for equestrian storage of feed and machinery.
Foxholes Farm, Burnham Green Road, Burnham Green, Welwyn, Hertfordshire

CPRE have concerns regarding this application for equestrian buildings which under the NPPF amount to inappropriate development in the Green Belt.

The applicant rightly states in the Planning, Design and Access Statement that equestrian use falls within the exceptions outlined in paragraph 145(b) of the National Planning Policy Framework and hence is not inappropriate development in the Green Belt. Similarly, it is covered by Policy CFLR6 of the Local Plan. However NPPF 145(b) requires the facilities to preserve the openness of the Green Belt and Policy CFLR6 that the proposal is sited or landscaped to minimise visual intrusion.

It is the applicant's opinion that as the building will be located on the lowest point of the site it will meet those criteria. We do not agree. This is not a small structure. It will sit at one end of an open field at some distance from the existing farm and the location is clearly visible from a number of points along Burnham Green Road from the entrance to Foxholes Farm along to Thrift Cottage.

R (Lee Valley Regional Park Authority) v Epping Forest DC [EWCA Civ 404] held that the concept of "openness" means the state of being free from built development, i.e. the absence of buildings. As we have mentioned above, with a footprint of 172.5 sq.m., this is not a small structure. It will have a significant impact on the openness of the Green Belt.

Inappropriate development in the Green Belt is by definition harmful. As very special circumstances presented to outweigh the resulting harm to the openness of the Green Belt, the applicant cites the need to store machinery and hay which cannot be accommodated in the existing stables building. The Council will have to satisfy itself on this need before determining the application.

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



It is also stated that as there is insufficient stabling on the site several horses 'live outside' and this building will act as emergency shelter for these horses. This begs the question as to why the applicant is not taking this opportunity to provide appropriate facilities for the welfare of those horses.

It is also claimed that the large number of windows and roof lights proposed are necessary for ventilation for the horses, which is a little implausible if the use is only for emergency shelter. It is unusual for a storage barn to have 10 windows, 12 roof lights and 4 doors, especially when the elevations clearly show large ventilation grilles in the flank walls. The impression given is residential rather than utilitarian in nature.

If this building is required for storage, in visual terms it would be better to locate it adjacent to the other farm buildings or build it as an extension of the existing so that it clusters development and reads as one with the farm complex.

Yours sincerely,

David Irving