PEARSON ASSOCIATES

TOWN PLANNING AND DEVELOPMENT CONSULTANTS

12 July 2022

Your Ref: 6/2022/0132/LB
Appeal Ref: 3298284

Mr Jonathan Alcen. Planning Inspectorate

Mr William Myers
Planning Officer
Planning Department
Council Offices
The Campus
Welwyn Garden City
AL8 6AE

Dear Mr Myers

Re: Application for Listed Building Consent and Planning Permission
Northaw House, Coopers Lane, Northaw, Potters Bar EN6 4NG

I am appointed by Dr Jamshed Masani, the owner/occupier of East Lodge, Judges Hill, Northaw EN6 4NL, one of the two original gate lodges to Northaw House. Dr Masani objects to the application for listed building consent and planning permission and to the subsequent appeal.

The current application is objected to. The previous application in 2019 was approved following substantial amendments including the removal of the new gate house and residential development on Pease Lane, close to East Lodge. East Lodge is the original gate house for the estate and to try to create an additional new gate house as well as further residential development in this important Green Belt location cannot be justified and the attempt to do so, by claiming further enabling development is totally unacceptable. This application appears very similar to Application 6/2021/0072/MAJ and 6/2021/0071/LB which was refused on 25/05/2021 on green belt grounds and the effect on the listed building. It is suggested that a similar refusal should apply to this new scheme.

It is a significant overdevelopment within the Green Belt, representing inappropriate development which would have a significant impact on this part of the Green Belt, which designation in this area complies with all of the 5 purposes of the Green Belt set out in paragraph 138 of the NPPF.

It affects the setting and character of the Listed Building by reason of the excessive proposed development.

The proposed new gate lodge on the opposite side of the access adjacent to East Lodge will be an unacceptable and inappropriate development in the Green Belt by the provision of an additional gate lodge, which is seen as a device to simply enlarge the residential development of this important Green Belt site.

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The creation of 4 new properties in the form of 2 blocks of semi-detached houses on East Drive is unacceptable in the continuing ribbon development along East Drive in a manner totally unacceptable within the Green Belt. The development proposed would form a continuous link of residential development from one gateway to the other across the entire site, totally at odds with all green belt policies.

As an additional point, my client is concerned that should another East Lodge gatehouse be granted the existing present gate could be removed or re-positioned. The present gate has been standing for well in excess of 100 years and maintains the site security and security of my client in East Lodge.

My client would like to be represented at the Planning Sub-Committee should the application, in its current form, be recommended for approval.

SUBSTANTIATION OF POINTS MADE ABOVE

In enlarging the arguments made above, I would state the following points.

1. **Significant Overdevelopment within the Green Belt**

- The provision of a significant number of dwellings as enabling development has already been approved to assist the repair and refurbishment to the listed building. to enlarge that further is simply unacceptable and in particular, the creation of additional gate lodges and highly visual linear development across the site represents inappropriate development, which, by definition is harmful to the Green Belt and should not be approved except in very special circumstances (paragraph 147 of the NPPF);

- Enabling development must be the absolute minimum required to achieve the results, in this case the refurbishment of the listed building, in the last application this was the view taken by the council officers and the scheme was amended and reduced, including the removal of the additional gate house and development on Pease Lane. It is considered that insufficient justification has been put forward to reinstate these structures.

- The council should appoint, at the applicant's expense, an independent economic assessment of the proposals to justify the exact amount of proposed development.

- In any event, the proposal of linear development in an exposed position, extremely visually prominent in this hitherto open area of the site should be resisted because of the harm to the Green Belt and if such development is economically justified an alternative location should be found.

2. **The proposed new gate lodge**

- The proposed new gate lodge is a new residential development in a completely hitherto open area of the Green Belt that would be at odds with the purpose of the Green Belt and represents inappropriate development, which is, by definition, harmful.

- My client, the occupier of East Lodge, would suffer substantial loss of residential amenity by reason of the proximity and traffic movement adjacent to his property.

3. **The proposed new two pairs of semi-detached house shown as 28 -31 East Drive Cottages.**

- East Drive was the identification of buildings in this location on a map dating from 1811. It is not a justification for the construction of buildings that affect the openness of the Green Belt that such structures existed in excess of 200 years ago. Especially as these buildings have been demolished for centuries. There is no justification to put back building in such a prominent open position within the Green Belt, forming a ribbon development across the site.

CONCLUSION

1. The current application is unacceptable on a number of counts, all of which are backed by national and local adopted policy.

2. The current application represents a gross overdevelopment of the site and is a visually intrusive form of development.

3. The full extent of the development cannot be justified as "enabling development" and needs to be reduced and justified by an independent economic assessment.

4. The current proposal, in a number of different circumstances, is inappropriate in the Green Belt, does not preserve the openness of the Green Belt and conflicts with the purpose of land being designated Green Belt.

In the circumstances, the application should be refused.

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[redacted]

MR R E PEARSON
B.Sc. Econ., Dip. T.P., M.R.T.P.I.