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Standing up for Hertfordshire's countryside

Harriet Sanders
Planning and Building Control
St. Albans City and District Council
St. Peter's Street
St. Albans
Herts AL1 3JE

Our Ref:

Your Ref:

1st July 2020 (by email)

Dear Ms. Sanders,

Application No. 5/2020/1114

Demolition of commercial building and construction of three detached bungalows with associated parking, access and amenity space (resubmission following withdrawal of 5/2020/0314)

Brickfield Farm, Coles Lane, Kinsbourne Green, Harpenden, Hertfordshire

CPRE Hertfordshire have concerns regarding the sustainability of this application for residential development in the Green Belt.

As both the cumulative footprint and volume of the proposed bungalows is significantly lower than the existing commercial premises, the applicant is correct in saying that the application complies with National Planning Policy Framework para. 145(g) which permits the redevelopment of previously developed land which would not have a greater impact on the openness of the Green Belt than the existing.

However, NPPF para 7 says that the purpose of the planning system is to contribute to the achievement of sustainable development, NPPF para 8 emphasises minimising pollution, and moving to a low carbon economy and 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.*"

This development would result in a small group of three houses sitting in the Green Belt at some distance from any other settlement. As each house contains three bedrooms, we assume that they are intended for family accommodation. The nearest social, retail, health and educational facilities are in Harpenden, over 4 kilometres away along the most direct route. In the Institute of Highways and Transportation 'Guidelines for Providing for Journeys on Foot' the acceptable walking distance is 1km and the desirable 800m. (The absolute maximum distance for a fully mobile person is 2km.) Department of Transport 'Policy LTN1/04 on Walking and Cycling' says "*The mean average length for walking journeys is approximately*

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

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1 km and for cycling, it is 4 km.” There are no bus services serving the site. Coles Lane has no footways or lighting, consequently it is not appropriate for pedestrian use and limited for cycling. Consequently it cannot be considered that the location offers a choice of transport modes. As a result, the majority of journeys will be by car. This is not sustainable.

NPPF para.108(b) requires that *“safe and suitable access to the site can be achieved for all users.”* And Para 110(b) requires that the development *“address the needs of people with disabilities and reduced mobility in relation to all modes of transport.* Clearly, given the lack of footway and lighting on any route to the site, this cannot be achieved.

A site to the north west along Coles Green has seen a redevelopment for housing which has clearly harmed the character of the countryside, let down by a complete absence of landscape design, as well as placing dwellings in an unsustainable location (photo below). The mistakes of that decision should be learned from.

In our view this application is not sustainable and should be refused.

Yours sincerely,

David Irving



Photo of Cole Green Lane (NW of Brickfield Farm)