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Standing up for Hertfordshire's countryside

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

Our Ref:

Your Ref:

4th September 2020 (by email)

Dear Ms. Saxton,

Application No. 5/2020/1654

Demolition of glasshouses, outbuildings and associated structures and redevelopment to provide nine dwellings with associated amenity space, parking, landscaping and access.

Land At Normead, Lybury Lane, Redbourn Hertfordshire, AL3 7JJ

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

As both the cumulative footprint and volume of the proposed housing is significantly lower than the existing commercial premises, the applicant is correct in saying that the application should comply 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, a third of the development, including the access road, appear not to be on land which is covered by the Certificate of Lawful Use issued in 2016 (5/2016/0996) and certainly does not sit on the footprint of the existing buildings, as advised in the pre-application advice. The Council will have to satisfy itself that the determination of the application does fall within the provisions of NPPF 145(g).

Section 12 of the NPPF and Local Plan Policy 69 require a high standard of design, taking into account the scale and character of its surroundings. The applicant states that they are trying to replicate a stable yard with the properties having the appearance of farm buildings or small barn conversions. That is not the impression given by the drawings accompanying the application. Essentially these are developer's pattern-book houses faced with timber cladding arranged in strict terraces around a car park. The existing glasshouses, whatever their current use, present an appropriate horticultural form in the countryside. The proposed development would introduce a regimented built form which would erode the rural character of the surroundings. This would fundamentally alter the visual impression of openness of the Green Belt by virtue of the estate-like form.

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



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 is in the open countryside, the nearest settlements being Flamstead to the north-west and Redbourn to the south-east. Flamstead village centre is 5km away and Redbourn town centre 2km. The Department of Transport Policy LTN1/04 on Walking and Cycling says *“The mean average length for walking journeys is approximately 1 km and for cycling, it is 4 km.”* and the Chartered Institute of Highways and Transportation ‘Guidelines for Providing for Journeys on Foot’ says that the desirable walking distance is 800m, not the maximum which the Transport Statement quotes. The maximum advised distance to food shops and primary schools is 800 metres and to other facilities is 1.2 kilometres. On the information provided in the Transport Statement the nearest retail facilities are 1.6 km, healthcare 1.7km, secondary education 4.9 km and centres of employment 5.6km. The railway station at Harpenden is 7.5 km away. These are all beyond the recommended limits. Consequently the development will be car dependent.

As the proposed houses are a mixture of three and four bedroom units, we assume that they are intended for family accommodation. Lybury Lane has no speed restrictions and has no footways or lighting until it reaches the outskirts of Redbourn. Consequently it is not appropriate for pedestrian use and is limited for cycling. No one who is elderly or disabled could easily undertake such a journey, and it is extremely unlikely that a parent would allow their child to walk or cycle to school by such a route. These proposals are contrary to the principles contained in Section 9 of the NPPF and in particular paras.108(b) and 110(b) which require that safe and suitable access to the site can be achieved for all users. Department for Transport circular - LTN 1/04 is clear that not only must infrastructure [for walkers] be safe, but, for the well being of users, it must be perceived to be safe. That cannot be achieved here.

In our view this application does not comply with the NPPF, is not sustainable and should be refused.

Yours sincerely,

David Irving