



Lilly Ruddock
Planning and Building Control
St. Albans City and District Council
Civic Centre, St. Peter's Street
St. Albans
Herts AL1 3JE

Our Ref:

Your Ref:

3rd August 2022 (by email)

Dear Lilly Ruddock,

Application no. 5/2022/1516
Land adjacent 55 Bucknalls Drive, Bricket Wood
Construction of 12 bungalows with associated access, parking,
refuse provision and landscaping

I write with regard to the above application to which CPRE Hertfordshire objects for the following reasons.

1. The site lies in the London Metropolitan Green Belt as defined in the St Albans District Local Plan Review where development is inappropriate unless very special circumstances can be demonstrated, according to the National Planning Policy Framework (NPPF). The Applicant's Planning Statement notes that a previous application was made in 2014 which was refused and dismissed on appeal in 2015.
2. As noted in the Planning Statement, "the (2014) proposal was refused by the LPA on the basis that it comprised inappropriate Green Belt development; would result in a 'significant negative effect' on landscape character and visual amenity; and that in the absence of a legal agreement, the infrastructure needs of the development would not be met." The subsequent appeal was dismissed on similar grounds when the Inspector noted that "the proposal would represent encroachment, irreversibly harming the open nature of the site."
3. The present application suggests recent planning decisions as justifications for this application, quoting supporting assessments and the lack of five year housing land supply as the very special circumstances required to overcome this inappropriate development proposal. The Applicant will be aware that each case is determined on its own merits and the decisions and appeals quoted can in any case be matched by similar cases where the protections afforded by legislation are invoked to prevent inappropriate development (for example at Broke Hill, Sevenoaks and Ellenbrook Fields, Hatfield).



4. Further, the Planning Statement asserts that significant weight should be given to the lack of housing supply in the St Albans City and District Council area. We believe that this position is profoundly mistaken, and recent draft legislation and Ministerial statements, which carry policy weight, continue to re-emphasise the importance of the Green Belt, and that its designation should act as the major constraint intended in the NPPF.
5. The proposed development is a clear encroachment into the countryside, affecting its openness and leading to a reduction in open land between settlements in the immediate area. The Green Belt in the area adjacent to Bricket Wood affected by this proposal is particularly susceptible to degradation and in our view requires management as open countryside for the benefit of the public, both local and visitors, as originally intended by its designation.
6. A plethora of recent planning applications, citing planning appeal and committee decisions, provides the context for a wholesale attack on the Green Belt which is causing considerable local community and wider concerns. Far from providing justification for this application, the withdrawal of the Publication Draft Local Plan offers the opportunity for a wide-ranging review of all previously allocated sites in the light of both changed circumstances and local conditions, and recent and intended legislation.
7. It continues to be the case that Paragraph 11 of the NPPF (and footnote 7) enables Local Plan housing targets to take account of policy constraints relating to designated protected land. Although certain recent decisions have obscured this responsibility by quoting 'housing need' which is itself calculated using outdated population and household projections, it is increasingly clear that Green Belt designation is being recognised again as the constraint on development it should always have been.
8. The recently published Levelling Up and Regeneration Bill and supporting policy information re-emphasises the importance of protection of the Green Belt, and forthcoming amendments to technical guidance should clarify the significance of this protection. It is increasingly clear that where all open land is designated as protected, such as the St Albans City & District Council area, there need to be special measures and the re-balancing of development away from what the Levelling Up and Regeneration White Paper referred to as 'over-heated areas'.
9. The very considerable and growing local community response, together with the potential damage to highly valued open countryside, indicates the need to review previous site allocations. The increasing pressures on local services and facilities from further development are undeniable and these should also be taken into account.



10. The Planning Statement seeks also to justify the proposal on the basis of a reduction of the size of the housing units to bungalows. This is irrelevant when the prime impact of the proposed development is encroachment into the countryside.
11. The site is also immediately adjacent to a Site of Special Scientific Interest and the setting should be maintained. The increasing challenges relating to the loss of biodiversity and the amelioration of climate change mean that such designations should play an increasing role in public policy. The recent enactment of the Environment Act 2021 and Climate Change Acts will require significant actions for the recovery of nature, and already designated areas should play an increasing role in achieving the objectives of this legislation.

We urge the Council to refuse this application for inappropriate development in the Green Belt.

Yours sincerely,

Chris Berry
Planning Manager