



Case Officer
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:

30th November 2022 (by email)

Dear Case Officer,

Application no. 5/2022/2443
Bricket Wood Sports and Country Club, Paintball Site & Bricket Lodge,
Lye Lane, Bricket Wood
Outline application (access sought) - Demolition of existing buildings and construction
of up to 115 dwellings and creation of new access

I write with reference to the above application for speculative residential development, to which CPRE Hertfordshire objects in its present form, for the following reasons.

1. The site lies within the London Metropolitan Green Belt as defined in the adopted St Albans Local Plan Review which proscribes inappropriate development according to criteria indicated in the National Planning Policy Framework (NPPF) unless very special circumstances are demonstrated. The Planning Statement (PS) accompanying the application accepts that very special circumstances are required to justify the application in noting that "it is undeniable that that the proposal will cause harm by way of inappropriateness" (PS para 7.4).
2. The PS also seeks to justify the proposal by arguing that the site is previously developed land. Whereas part of the site, to the south-west, is clearly previously built up with a number of buildings, the majority of the area marked in red comprises relatively open land with temporary structures for paint-ball and other activities and should not be regarded as previously developed land for the purposes of this application.
3. The Green Belt, though degraded to some extent in this area and affected by the M25 motorway, performs a crucial purpose in providing open land between settlements, preventing the further coalescence of the settlements of Bricket Wood and How Wood. The purpose of Green Belt designation is also to enhance as well as protect open land and this proposals comprises clear encroachment.
4. The Applicant quotes recent decisions at Bullens Green Lane and elsewhere but it should also be noted that the recent appeal decision at Broke Hill, Sevenoaks, in broadly similar circumstances, established the primacy of designated protected status in determining the

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appropriateness of development, notwithstanding the lack of a five year housing supply. Significant representations are being made by CPRE and other bodies to the Government to clarify the technical guidance in the area of housing need with regard to protected areas, especially in the absence of an up-to-date Local Plan.

5. Recent Ministerial statements, which have policy weight, have reiterated the Government's strong support for protection of the Green Belt. The recently published "Levelling Up and Regeneration Bill Policy Paper: Further information" also re-emphasises the Government's support for protection of the Green Belt as follows:

"the increased weight given to plans and national policy by the Bill will give more assurances that areas of environmental importance – such as National Parks, Areas of Outstanding Natural Beauty...- will be respected in decision on planning applications and appeals. The same is true of Green Belt, which will continue to be safeguarded." (Creating beautiful places and improving environmental outcomes; In the Bill: LURB Policy paper, May 2022)"

6. Further,

"Existing Green Belt protections will remain, and we will pursue options to make the Green Belt even greener." (Creating beautiful places and improving environmental outcomes; Alongside the Bill: LURB Policy paper, May 2022)

7. It is clear that the Government's intention is to retain the Green Belt in its present form and the constant attempts to undermine Green Belt protections for residential developments are in danger of bringing the planning system into disrepute.

CPRE Hertfordshire urges the Council to seek a redefinition of this speculative application to include only that part of the site which is clearly previously developed land.

Yours faithfully,

Chris Berry
Planning Manager