



Ellie Dilks
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:

12th May 2023 (by email)

Dear Ellie Dilks,

Application no. 5/2023/0605
Land at junction of Roestock Lane & Bullens Green Lane, Colney Heath
Construction of six dwellings with new vehicular access, part removal of hedge,
provision of new landscaping and associated works

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

1. The site is located in the London Metropolitan Green Belt as defined in the St Albans District Local Plan Review. According to criteria in the National Planning Policy Framework (NPPF), development is regarded as inappropriate in the Green Belt unless very special circumstances can be demonstrated to apply.
2. No substantive attempt has been made by the applicant to demonstrate very special circumstances, other than to quote housing need generally in St Albans City and District, and suggest that the proposed development constitutes 'in-filling'. The provision of six units may be seen as 'de minimis' in the context of housing need when set against the harms caused by this proposal.
3. A similar, slightly smaller proposal on this site was refused and a subsequent appeal dismissed for Green Belt reasons, specifically refuting the suggestion of in-filling by referring to the "semi-rural character of the local area". We support fully both the original refusal and appeal decisions, particularly in the light of the cumulative effect of many recent applications for residential development in the Green Belt in the immediate area.
4. The Green Belt in the southern part of St Albans City and District is under very significant pressure, both from planning applications and unauthorised development which has led to the degradation of conditions and the quality of the rural landscape. The NPPF (para



145) and planning guidance emphasise that enhancement as well as protection of the Green Belt should be objectives for local planning authorities.

5. The Planning Statement also suggests a justification for the development based on the achievement of significant biodiversity net gain. Such gains are now an intrinsic part of all development proposals, wherever located, and should not be seen as constituting very special circumstances, but rather as a necessary component of any development.
6. The Government has recently reaffirmed its commitment to the protection of the Green Belt in ministerial statements and commentary related to the NPPF Prospectus and Levelling Up and Regeneration Bill. The proposed development is a clear encroachment onto protected Green Belt countryside and we request the Council to refuse this inappropriate proposal on the basis that very special circumstances have not been demonstrated to clearly outweigh the harm which would be caused.

Yours sincerely,

Chris Berry
Planning Manager

NOTE: We would request that this letter is published on the Council's website as a document relating to this application and should be grateful if you would notify us of the date of the appropriate meeting if it is to be determined by planning committee.