



The countryside charity
Hertfordshire

31a Church Street
Welwyn
HERTS AL6 9LW
www.cpreherts.org.uk
office@cpreherts.org.uk
01438 717587

Standing up for Hertfordshire's countryside

Nabeel Kasmani
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:

23rd June 2023 (by email)

Dear Nabeel Kasmani,

Application no. 5/2023/0782

**Land to the south of Codicote Road and Cory-Wright Way Wheathampstead
Development of site to provide retirement living accommodation (Use Class C3) comprising
of No. 1 bedroom apartment block comprising of 43 units and 10 bungalows, along with
access alterations, internal service road, communal garden and landscaping**

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. The applicant's consultant's Planning Statement is extensive and seeks to justify the proposal on the basis of very special circumstances relating to the provision of older person accommodation and the lack of a five year housing supply in St Albans. The additional material benefits cited in the Planning Statement amount to no more than a general statement of the benefits of new housing development in socio-economic terms in any location.
3. A previous proposal on this site was refused in 2011, mainly for Green Belt reasons. We support fully the original refusal, to which may now be added reasons relating to the cumulative effect of many recent applications for residential development in the Green Belt in the St Albans CDC area.
4. Wheathampstead is a well-established and historic village with clear edges to its built-up area. The Planning Statement notes that the proposed development lies outside the settlement boundary and is identified as a Landscape Conservation Area. Further, in their response to pre-planning advice, the applicants note the high impact of any development

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: Allan McNab

Registered Charity 1162419



on the purposes of the Green Belt relating to encroachment, safeguarding the setting and character of a historic town, and maintaining the existing settlement pattern.

5. Development in this location, particularly of the highly urban type proposed including significant tarmaced areas for parking would alter significantly the character of this part of Wheathampstead with additional impacts on the countryside beyond. Notwithstanding the expressed need for the form of housing proposed, the requirement to protect the Green Belt in this location should take precedence due to its quality and purpose.
6. The Planning Statement also notes that is no potential for the achievement of biodiversity net gain (BNG) on site. Under the Environment Act 2021, measurable BNG must be demonstrated for all applications (mandatory from November 2023) and the lack of such gain is a serious omission.
7. The Government has recently reaffirmed its commitment to the protection of the Green Belt in ministerial statements and in 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.