



Lee Stannard
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:

7th July 2023 (by email)

Dear Lee Stannard,

Application no. 5/2023/0983
Copsewood, Lye Lane, Bricket Wood (SE side of North Orbital)
Outline (access sought) for residential development of up to 190 dwellings and associated works

I write with reference to the above application relating to a site to which CPRE Hertfordshire has objected previously. Notwithstanding our previous submissions, our objections remain 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 Applicant in their Planning Statement accepts that very special circumstances are required to be demonstrated and seeks to justify the proposal on the basis of a lack of housing land supply overcoming potential reasons for refusal as stated in Paragraph 11d() of the National Planning Policy Framework (NPPF).
2. The application demonstrates a clear encroachment into open countryside on the edge of the built-up area with significant impact on its openness and character in this location. It constitutes an inappropriate urban extension which the Green Belt designation exists to prevent.
3. The Applicant's Planning Statement asserts that the impact on the Green Belt is limited in this location, and quotes the previous application approved. This is irrelevant as each application must be considered on its merits and the present application comprises a very significant increase in the amount of development proposed from previous consents.
4. The Planning Statement quotes previous decisions relating to consents which are becoming a standard approach for speculative residential proposals. Such an approach challenges the legitimacy of the Local Plan process at a time when there is significant



uncertainty regarding potential amendments to the National Planning Policy Framework (NPPF) which are anticipated to be published in the autumn and are likely to impact directly the basis for assessing housing need.

5. CPRE Hertfordshire has noted in previous responses to residential applications in St Albans and elsewhere in south west Herts that 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.

6. Recent Ministerial statements, including the Prime Minister, have reiterated the government's strong support for protection of the Green Belt. The Policy Paper accompanying the Levelling-Up and Regeneration Bill 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)”

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. This area is subject to an increasing number of speculative residential developments which are significantly altering its rural character and we urge the Council to refuse this application.

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.