



Joanna Woof
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:

21st February 2025 (by email)

Dear Joanna Woof,

Application ref 5/2024/2007

**Land Between The White Barn and 42 Tollgate Road, Colney Heath, St Albans
Erection of 30 dwellings, creation of a new vehicular access, two new public open spaces, a
local area of play, a locally equipped area of play, a temporary structure community
building for nature watching, associated landscaping, internal roads, parking**

CPRE Hertfordshire wishes to object to the above speculative planning application and would make the following points.

1. The site is located in the London Metropolitan Green Belt in the adopted St Albans District Local Plan Review where development is inappropriate according to the National Planning Policy Framework (NPPF). The application falls short of showing the very special circumstances that need to be demonstrated for development on this site in Colney Heath to overcome the inevitable harm to the Green Belt.
2. Neither the adopted St Albans District Local Plan Review nor the emerging St Albans Draft Local Plan allocate the site for development. The emerging Draft Local Plan seeks to preserve the countryside, open views and the intrinsic identity of existing Green Belt settlements with a preference to develop on the edge of the larger towns and extended villages.
3. The Draft Local Plan sets clear criteria for a hierarchy of settlements for housing development in Policy SP4 through the sustainable use of land in urban areas including brown field sites and then allocated areas of the Green Belt to achieve maximum efficiency of layouts, energy and sustainable movement to reduce car use. This proposed development located outside Colney Heath does not meet those criteria.



4. The applicant's Planning Statement seeks to justify the proposed development as an "infill site" in Colney Heath village and thus not subject to Green Belt protection. This is self-evidently not the case as the site is only bound by housing to part of the north and southeast boundaries.
5. There is one group of buildings at the south-west corner of the site, beyond which is open countryside, as are the other boundaries. It is entirely inappropriate to suggest that the proposed development constitutes limited infill in any sense.
6. The applicant notes that the new level of housing land supply required by the revised NPPF is not being met by the Council's Draft Local Plan that is to be formally examined by an Inspector this year. The Draft Local Plan meets the previously calculated requirements of housing supply and CPRE Hertfordshire vigorously argues that it is for the Council to consider how it intends to meet the revised targets, building them into future planning and undertaking full community consultation.
7. The key purposes of the Green Belt become more significant the closer one comes to London and Colney Heath, lying fully within the Green Belt should not be under threat from random speculative development. It is important to preserve the character of the existing settlements, especially Colney Heath in this case.
8. The proposed development clearly constitutes encroachment on the surrounding countryside. A principal purpose of the Green Belt aim is to preserve the countryside's openness and permanence and this development would remove openness on a permanent basis.
9. The site affords views from the village across open countryside of the Colne Valley from North Mimms to Colney Heath Common and this is a clear breach of Draft Local Plan Policy NEB10 which should be respected. While it is acknowledged that the developer intends to plant over 200 trees, this will exacerbate the impact of development on the open views from the site and the village.
10. The application provides some eleven affordable homes to meet the housing need as perceived by the developer. We would draw the Council's attention to the views of the local Parish Council in this respect and the lack of properly researched local evidence to support the immediate local need.
11. A key component of the Draft Local Plan is sustainable transport. This is essential as part of meeting the climate challenge and in a practical way avoiding making an already very congested area even worse. Policy TRA1 sets this out very clearly with the principle of reducing car use and insisting on public transport for new developments.



12. The developer promotes an image of a sustainable solution but that is not local reality. The objections from residents and local organisations set out the reality of living in Colney Heath with the need to use cars to reach the majority of essential services; thereby not meeting the criteria set out in Policy TRA1.
13. The development site is close to important listed properties and land. Whilst noting that the development is held back from direct conflict with the Grade 2 farmhouse and barn it is nevertheless in its setting and disrupts views to and from the listed buildings. It is also in proximity (some 800m) to the Grade 1 park land again disturbing the setting of the park thereby failing to meet the criteria of Local Plan Policy HE1 for designated heritage sites.
14. Notwithstanding the developer's claims to achieve biodiversity net gain of 10% as required by the St Albans Local Plan using current criteria, this is at the very low end of expectations. This site is currently a site rich in natural indigenous plants and bird life with its proximity to the river, and the building of some 30 houses with patios, natural and artificial lawns will cause huge disturbance.
15. Biodiversity is affected by considerations relating to the proximity of the River Colne. Building close to the River Colne in the Colne valley disrupts views across the river and can alter the essential natural flows of water from the catchment land to the river adding to the challenges of achieving a development in harmony with the natural landscape.

CPRE Hertfordshire believes that this development proposal should be refused permission in respect of policies relating to the Green Belt, sustainable transport and heritage. It is not compliant with the Local Plan housing hierarchy and development objectives and will detrimentally change the environment for the village of Colney Heath and its setting with relation to the Colne valley.

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.