

Standing up for Hertfordshire's countryside

**ST. ALBANS CONSULTATION DRAFT DETAILED LOCAL PLAN 2016:  
CPRE HERTFORDSHIRE REPRESENTATIONS.**

**Introduction**

1. The following representations by Campaign to Protect Rural England Hertfordshire (CPRE) on the Consultation Draft Detailed Local Plan (the Plan), refer to specific policies and paragraphs in the Plan that we are asking the Council to change or reconsider. These comments are set out in the order in which the relevant text appears in the Plan.
2. The document is provided in 'word' format to enable the Council to directly transfer extracts from our representations into its record of consultation responses, and to quote from our representations in reporting to the Council's decision-makers.

**Matter of Principle**

3. CPRE's principal concern about the Plan results from the Council's continued proposal for the removal of large areas of land from the Green Belt (referred to as 'Broad Locations') for major housing developments, in Policy DLP 13. The promotion of these four development locations is premature pending their consideration at a formal examination of the Council's pre-submission Strategic Local Plan (SLP), and should not be included in a Detailed Local Plan until objections to that Plan have been resolved.

**Introduction**

4. The section in the Introduction on Neighbourhood Plans (NP) should not give general encouragement for them to promote housing development in the Green Belt, either for small-scale schemes of up to ten dwellings, or larger schemes. This is because, in principle, such promotion directly conflicts with national planning policy for the protection of the Green Belt, which such Plans are required to be consistent with. In the event that individual NP's identify very special circumstances for the development of sites in the Green Belt, the case for such action would need to be considered through the relevant NP process.

### Policy DLP 1

5. The criteria in this Policy are ambiguous. A site cannot be both previously-developed land (pdl) and an infill site. The criteria need to distinguish between those that must apply in all cases, and those that are alternatives. In all cases development should not have a greater impact on the openness of the Green Belt.

### Policy DLP 2

6. Part iii) of the policy should be amended to refer to the requirement not to have an adverse impact on the openness 'of the Green Belt', not the openness 'of the area', as currently worded.
7. Table 1 should include a criterion that requires a subjective assessment of the impact on openness, which cannot be determined from the size and dimensions of buildings alone.

### Policy DLP 3

8. Garden Centres, a retail use, are by definition 'inappropriate' in the Green Belt, and the Policy should make this clear, and require very special circumstances to be shown for their expansion as well as for new centres.
9. The Policy should also clarify, through carefully worded definitions, the difference between garden centres (a retail use) and nurseries (a horticultural use).
10. Part i), bullet point 3, of the Policy, should state that extensions to Garden Centres should not detract from 'the openness of the Green Belt', not 'the general open nature' of the Green Belt, as currently worded.
11. The same criteria (in terms of impact on the Green Belt) of Garden Centres should apply to new kennels and catteries in the final part of this Policy, because they are also inappropriate in terms of national planning policy and require very special circumstances to be demonstrated, and should not detract from the openness of the Green Belt.

### **Policy DLP 10**

12. Under Part i) of the Policy, very special circumstances should be demonstrated for the development of the specific proposed site. A general need for the use in the District, is not in itself a very special circumstance.
13. Education development cannot be ‘acceptable in principle’ (as stated in the Policy) because it is by definition ‘inappropriate development’. A different form of wording is therefore required in this policy.

### **Policy DLP 12**

14. CPRE objects to the text preceding the policy supporting the inclusion in Neighbourhood Plans of inappropriate housing developments of up to 30 dwellings in the Green Belt. This support directly conflicts with Green Belt policies as set out in the NPPF.
15. CPRE also objects to part i) of the policy supporting the inclusion in Neighbourhood Plans of inappropriate housing developments for affordable housing of up to 10 dwellings in the Green Belt, without a requirement that any such proposal be supported by a demonstration that very special circumstances exist. This support directly conflicts with Green Belt policies as set out in the NPPF.
16. CPRE similarly objects to part iv) of the policy, which would allow development that would cause ‘limited’ harm to the Green Belt. This undefined term is likely to be difficult to implement, and the onus should be on the avoidance of any harm for a proposal to be supported by this policy.
17. CPRE objects to the final sentence of the policy supporting the inclusion in Neighbourhood Plans of inappropriate ‘market housing’ developments in the Green Belt, with a ‘promise’ that the Local Plan will subsequently amend the Green Belt boundary to remove the site concerned from the Green Belt. Such support and action directly conflicts with Green Belt policies as set out in the NPPF.

### **Policy DLP 13**

18. CPRE objects in principle to the proposed four Broad Locations for Housing Development. The promotion of these four development locations is premature pending their consideration at a formal examination of the Council’s pre-

submission Strategic Local Plan (SLP), and should not be included in a Detailed Local Plan until objections to that Plan have been resolved.

19. Finally, CPRE wishes to be kept informed of progress with the Plan, and is likely to wish to make representations on the pre-submission Plan in due course.

CPRE Hertfordshire: December 2016