



Ruth Ambrose
Planning and Building Control
St. Albans City and District Council
St. Peter's Street
St. Albans
Herts AL1 3JE

Our Ref:

Your Ref:

12th March 2021 (by email)

Dear Ms Ambrose,

Application No. 5/2021/0423

**Outline application (access sought) – Residential development of up to 150 dwellings together with all associated works (resubmission following invalid application 5/2020/3096)
Land to rear of 112-156B Harpenden Road, St Albans**

I write with reference to the above application and note that this is a resubmission of a previous invalid application. CPRE Hertfordshire believes that the proposed residential development is unacceptable with regard to the rural character of the area and the requirements of both national and local Green Belt policy and we object strongly to this proposal for the following reasons.

1. The entire site is designated as Metropolitan Green Belt as identified in the St Albans District Local Plan Review. The National Planning Policy Framework (NPPF) as revised in February 2019 requires land designated as Green Belt to be kept "permanently open" (para. 133) and "inappropriate development should not be approved except in very special circumstances" (para. 143).
2. In our opinion there are no 'very special circumstances', as required by the NPPF 2019 to justify its release from this designation. The existing inner boundaries to the Green Belt are well defined to the north of St Albans and the site comprises open countryside which fully satisfies the five purposes of the Green Belt as identified in the NPPF (para. 134).
3. The proposal would clearly extend urbanisation to the north of St Albans into a tract of open countryside. The applicant promotes six 'very special circumstances (VSC)' for the removal of the site from Green Belt in their Planning, Design and Access Statement which we regard as invalid. These are discussed below in turn using the applicant's numbering.
4. **VSC 1: Housing Supply and Delivery.** Recent Ministerial statements, culminating in the Government response to the consultation on the White Paper "Changes to the current planning system" re-emphasise the protections to the Green Belt afforded by Paragraph 11b



of the NPPF. On December 16th 2020, the Government statement noted, in response to consultation submissions which suggested that:

“in some places the numbers produced by the standard method... (of assessing housing need)... pose a risk to protected landscapes and the Green Belt”.

The Government replied...

“We should be clear that housing need is never a reason to cause unacceptable harm to these places.”

and further...

“Within the current planning system the standard method does not present a ‘target’ in plan-making but instead provides a starting point for determining the level of need... it does not override other planning policies, including the protections set out in paragraph 11b of the NPPF, or our strong protections for the Green Belt.” (Govt website 16.12.20)

Notwithstanding the level of potential supply presently identified by the Council, it is clear that protected areas such as Green Belt should not be considered for housing provision.

5. VSC 2: Provision of Affordable Housing. The proportion of affordable housing either needed or supplied by an application is not relevant when the principle of housing development in a protected area is proscribed by local and national policy as noted above.

6. VSC 3: The Age of the Local Plan. Similarly, the age of a Local Plan is not relevant when national policy and guidance on development in protected areas is clear. We are aware that the Council has recently issued a Call for Sites in advance of the preparation of a new Local Plan and there should be no release of Green Belt land prior to an assessment of the available sites for housing in the future.

7. VSC 4: The need for Green Belt releases to include the application site. This is similar in content to VSC 1, and remarks already made above regarding the role of ‘targets’ apply, together with the protections afforded by local and national policy.

8. VSC 5: The provision of other benefits. The provision of benefits, which would be required in relation to any substantial residential development, do not constitute a VSC and are not relevant to this application.

9. VSC 6: The early delivery of housing, especially affordable housing. Granting planning permission does not ensure the early delivery of much needed housing, as is apparent by the high number of consented schemes which have not been implemented through the country. Without a legally binding agreement to provide housing according to a schedule of construction this is merely an assertion of intent and does not constitute a VSC for development in a protected area.



10. The history of dismissed appeals on this site in 2012 and 2015 indicate the significance of the Green Belt in this location. Subsequent Government advice and statements, the most recent as noted above, have strengthened the protection to be afforded to the Green Belt. The previous appeals quoted by the applicant comprise very different circumstances in each case and are not relevant to this application.

11. The site constitutes farmland which is Grade 2 or 3a and the NPPF (para 170(a) seq.) states that Local Plan policies should avoid the use of high quality agricultural land and allocate land of least environmental and amenity value. Local evidence and inspection indicates that the land has been continuously farmed for a considerable period.

In conclusion, and in the light of the recent Call for Sites by the Council and commencement of the new Local Plan preparation process, we believe it would be entirely inappropriate to approve this application against local and national policy as strengthened by recent Government statements.

Yours sincerely,

Chris Berry
Planning Manager