



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

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

Our Ref:

Your Ref:

17th December 2021 (by email)

Dear Sir/Madam

Application no. 5/2021/3194
St Stephens Green Farm, Chiswell Green Lane, St Albans
Outline app (access sought) for demolition of existing buildings, to build up to 330
discounted affordable homes for Key Workers, inc military personnel,
creation of open space & new accesses

I write with regard to the above application to which CPRE Hertfordshire objects strongly for the following reasons.

1. The site lies in the London Metropolitan Green Belt as defined in the St Albans District Local Plan Review where development is inappropriate unless very special circumstances can be demonstrated, according to the National Planning Policy Framework (NPPF).
2. This opportunistic and speculative development proposal is one of many recent applications which follows the successful planning appeal for residential development in the Green Belt at Colney Heath (Bullens Green Lane). The applicant's agent's Planning Statement also quotes the recent planning decision in July 2021 to approve a planning application in the Green Belt (presumably Sewell Park, north of St Albans) as "positive and creative decision-making."
3. Notwithstanding the emphasis on affordable housing provision and the emotive language of the Planning Statement regarding key workers, in essence this is a speculative housing development scheme which would require detailed conditions to ensure that it achieved its stated aims of providing narrowly defined categories of housing. Such conditions are notoriously difficult to enforce and often subject to subsequent applications for amendment during the implementation process.
4. The Planning Statement accepts that there will be damage to the key characteristics of the Green Belt, specifically its openness and encroachment on the countryside. To

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



this should be added the contribution the proposal will make to the reduction in open land between settlements in the immediate area.

5. The Green Belt in the area adjacent to Chiswell Green affected by this proposal is particularly susceptible to degradation and in our view requires management as open countryside for the benefit of the public, both local and visitors, as originally intended by its designation.
6. The plethora of recent applications, citing planning appeal and committee decisions, provides the context for a wholesale attack on the Green Belt which is causing considerable local community and wider concerns. CPRE Hertfordshire continues to press for clarification of the NPPF to ensure that protected areas continue to benefit from that status
7. The NPPF requires local planning authorities to take account of designated protected areas but recent decisions have obscured this responsibility by emphasising the achievement of 'housing need' which is calculated using outdated population and household projections. It is also particularly important where all open land is designated, such as the St Albans City District Council area that the specific characteristics of the site affected are taken into account.
8. The site lies in the area identified as part of the Watling Chase Community Forest and with the increasing emphasis on biodiversity and the amelioration of climate change, it is to be expected that such areas will play an increasing role in public policy. The recent addition of the Environment Act 2021 to the statute book will require significant actions for the recovery of nature, and already designated protected areas will play an increasing role in achieving the objectives of the Act.

We urge the Council to refuse this application for inappropriate development in the Green Belt.

Yours faithfully,

Chris Berry
Planning Manager