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Standing up for Hertfordshire's countryside

Mr M Gavin
Planning and Building Control
St. Albans City and District Council
St. Peter's Street
St. Albans
Herts AL1 3JE

Our Ref:

Your Ref:

23rd February 2022 (by email)

Dear Mr Gavin,

Application no. 5/2021/3631
Land at Gaddesden Lane, Redbourn
Outline application (access only) - Construction of up to 300 new homes including
35% affordable new homes, new landscaping, public open space and associated
infrastructure works

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

1. The site lies within the London Metropolitan Green Belt as defined in the adopted St Albans District Local Plan Review which proscribes inappropriate development according to criteria indicated in the National Planning Policy Framework (NPPF) unless very special circumstances are demonstrated.
2. The application is accompanied by extensive supporting information and a Planning Statement which opens by stating that "most of the development can be completed within five years of securing outline planning permission and reserved matters permissions" (para 1.12). This is seen as "a material consideration of very substantial weight, given the continuing major deficit in the five year housing supply position of SADC." We believe this is a serious error in the interpretation of the requirement to take account of designated protected land, as defined in the National Planning Policy Framework (NPPF) paragraph 11, and footnotes.
3. The Applicant's Planning Statement identifies the proposed development as an extension to the built-up area of Redbourn village, in clear violation of a key purpose of Green Belt designation which is to prevent the coalescence of existing settlements.
4. The proposal is a clear encroachment into open countryside beyond the built-up area with severe impact on its openness and character in this location. It is not an infill site and constitutes an inappropriate extension which the Green Belt exists to prevent.

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CPRE Hertfordshire is a Charitable Incorporated Organisation

President: Sir Simon Bowes Lyon, KCVO
Chairman: Allan McNab

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5. Section 6 of the Applicant's Planning Statement seeks to establish the planning balance argument in favour of the proposal on the basis of the Council's own evidence regarding the quality of the site taken "in isolation" (para. 6.3). This fundamentally misconstrues the intention of the legislation regarding Green Belt which covers wide areas to achieve its purposes, and the contribution of this site should be taken in conjunction with the remainder of the designated area.
6. The Applicant also inevitably quotes the recent appeal decision in Colney Heath and the Council's decision at Sewell Park to justify the proposal on the grounds of the inadequacy of the Council's housing land supply and absence of an up-to-date Local Plan. The above appeal decision has caused significant controversy and concern and it should be noted that the inspector was at pains to identify the specific circumstances at Bullens Green Lane, Colney Heath and that this should not be seen as a green light for all Green Belt applications.
7. 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. It may also be noted that a subsequent recent appeal decision at Broke Hill, Sevenoaks, in broadly similar circumstances, established the primacy of designated protected status in determining the appropriateness of development, notwithstanding the lack of a five year housing supply.
8. It would be premature in our view to determine this application when recent communications from the Minister for Housing to Welwyn and Hatfield Council, following the request for clarification on the situation regarding housing targets in Local Plans, and in a parliamentary response to Daisy Cooper MP in November 2021, reiterated the primacy of local planning authority responsibility to determine housing targets for Local Plans.
9. In this context, the likelihood of further legislation in the forth-coming Planning Bill, and the present state of the emerging Local Plan, it is clear that this application should be determined according to existing established policy which ensures the protection of the Green Belt in such a sensitive location.
10. This site was not allocated for development in the withdrawn Local Plan (2020-2036) and the pre-application advice identified the need for very special circumstances to be demonstrated.
11. We profoundly disagree that the proposal does not constitute urban sprawl, nor prevent the merging of settlements, and it clearly affects the setting of Redbourn village. Together with the inapplicability of the five year housing supply in relation to



the protection of designated land, we do not believe that very special circumstances have been demonstrated in this case.

12. This proposal is for market housing of a type that Green Belt legislation was designed to prevent. Further, the stated intention of providing policy compliant affordable housing based on present definitions and criteria is most unlikely to address issues relating to the affordable housing crisis, given the situation regarding land development valuation in this area.

13. CPRE Hertfordshire urges the Council to refuse permission for this wholly inappropriate and speculative application.

Yours sincerely,

Chris Berry
Planning Manager