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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:

30th March 2022 (by email)

Dear Case Officer,

Application no. 5/2022/0599
Land to rear of 96-106 High Street, Colney Heath
Outline app. (means of access) for <45 dws inc. affordable homes, areas of landscaping
& public open space, in points of access, & assoc. infrastructure

I write with reference to the above application for speculative residential development, to which CPRE Hertfordshire objects strongly for the following reasons.

1. The site lies within the London Metropolitan Green Belt as defined in the 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. The Applicant attempts to identify such circumstances in their consultant's Planning Statement, and indeed it is clear that the application is being made to determine the Local Planning Authority's resolve with regard to the protection afforded by the Green Belt.
2. The application demonstrates 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 a clear and inappropriate extension to the built-up area which the Green Belt exists to prevent.
3. The applicant quotes extensively 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. Limited further information is provided with regard to the local circumstances other than to assert that the proposed site makes no appreciable contribution to the Green Belt in this location.
4. Planning legislation requires each application to be determined on its merits and there are no gradations in the protection afforded by Green Belt designation which can only be varied within the Local Plan process. The recent appeal decision referred to above

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CPRE Hertfordshire is a Charitable Incorporated Organisation

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

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has caused significant controversy and concern and it should be noted that the Planning Inspector was at pains to identify the very specific circumstances at Bullens Green Lane, Colney Heath.

5. It may be noted that, since the Colney Heath decision, a similar planning appeal has been dismissed in Broke Hill, Sevenoaks on Green Belt grounds and there is a clear need for consistency in decision-making regarding the significance of designated protected land. Notwithstanding the undoubted delays in the Local Plan process in St Albans, in the absence of an emerging Local Plan, adopted policies should prevail with regard to protected areas.
6. Extensive 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. In the meantime, Government ministers have repeatedly clarified their support for the Green Belt.
7. In response to a parliamentary debate called by Daisy Cooper MP, the Minister for Housing (Hansard, Commons debate, 23rd November 2021) recently stated that “we are committed to protecting the green belt, as we set out in our manifesto”. Recent responses to Welwyn and Hatfield Council and others seeking clarification have re-emphasised this commitment and such Government statements carry considerable policy weight.
8. Clearly, further statements and potential amendments to the National Planning Policy Framework may be anticipated in the near future and in the meantime it is necessary to maintain the protection provided by the Green Belt in such a sensitive location.

CPRE Hertfordshire notes and supports the wide-ranging local community opposition to this proposal and urges the Council to refuse this wholly inadequate and speculative application.

Yours faithfully,

Chris Berry
Planning Manager