



The countryside charity
Hertfordshire

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Standing up for Hertfordshire's countryside

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

Our Ref:

Your Ref:

14th April 2022 (by email)

Dear Joanna Woof,

Application no. 5/2022/0589
Former Waterdell Nurseries, Chequers Lane, Garston WD25 0GR
Permission in Principle - construction of 9 affordable dwellings

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

1. The site lies within the London Metropolitan Green Belt as defined in the adopted St Albans District Plan Review according to criteria in the National Planning Policy Framework (NPPF). Development in this area is inappropriate unless very special circumstances can be demonstrated.
2. The substantial accompanying letter to the application, which appears to act as a planning statement, notes the result of pre-application advice on a previous application and suggests that the only remaining issues for this application concern housing need and highways matters. We believe that this is mistaken and that officers' previous concerns regarding the impact of housing development on open countryside in this location remain relevant.
3. Further, the issue of housing need and its relationship with designated protected land is the subject of considerable debate at present due to the inconsistency of technical guidance in the national Planning Practice Guidance (PPG) with frequent Ministerial Statements, which carry policy weight, emphasising the significance of the Green Belt. CPRE Hertfordshire and others have argued that paragraph 11 of the NPPF enables Local Planning Authorities to apply the constraints of protected areas such as Green Belt to prevent development and we believe this would be appropriate in this case.
4. The Green Belt in this area has been subject to considerable degradation in recent years, and further development will inevitably contribute to a loss of openness and

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

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increased encroachment on the countryside. The opportunity should be taken, in the case of previously developed land, to promote forms of development which enhance the Green Belt wherever possible.

5. It is not possible, within present planning legislation, to permit 'affordable housing' as a land use, and so the principle seeking to be established can only be for housing as a use class, subject to Local Plan policies regarding the provision of a proportion of affordable housing where appropriate. This application is therefore misleading in seeking permission for affordable units without definition of what that means in this case and should be refused.

Yours sincerely,

Chris Berry
Planning Manager