



George Burgess
Planning and Building Control
St. Albans City and District Council
Civic Centre, St. Peter's Street
St. Albans
Herts AL1 3JE

Our Ref:

Your Ref:

22nd June 2022 (by email)

Dear George Burgess,

Application no. 5/2022/0927
Land South of Chiswell Green Lane, St Albans
Outline application (access sought) - Demolition of existing structures and construction of up to 391 dwellings (Use Class C3), provision of land for a new 2FE primary school, open space provision and associated landscaping, etc.

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). It is noted that the site was previously included in site allocations for the withdrawn Publication Draft St Albans Local Plan.
2. This previous proposed allocation is cited in the Applicant's Planning Statement as justification for this application, quoting supporting assessments and the lack of five year housing land supply as very special circumstances. Reference is also made to recent planning appeals and decisions in St Albans and adjacent areas which suggest that housing need considerations can overcome the protection afforded by the designation of land as Green Belt.
3. We believe that this position is profoundly mistaken, and recent draft legislation and Ministerial statements, which carry policy weight, continue to re-emphasise the importance of the Green Belt, and that its designation should act as the major constraint intended in the NPPF. The proposed development is a clear encroachment into the countryside, affecting its openness and leading to a reduction in open land between settlements in the immediate area.
4. 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. A plethora of recent planning 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.

5. Far from providing justification for this application, the withdrawal of the Publication Draft Local Plan offers the opportunity for a wide-ranging review of all previously allocated sites in the light of both changed circumstances and local conditions, and recent and intended legislation. It continues to be the case that Paragraph 11 of the NPPF (and footnote 7) enables Local Plan housing targets to take account of policy constraints relating to designated protected land but certain recent decisions have obscured this responsibility by quoting 'housing need' which is itself calculated using outdated population and household projections.
6. The recently published Levelling Up and Regeneration Bill and supporting policy information re-emphasises the importance of protection of the Green Belt, and forthcoming amendments to technical guidance should clarify the significance of this protection. It is increasingly clear that where all open land is designated as protected, such as the St Albans City & District Council area, there need to be special measures and the re-balancing of development away from what the Levelling Up and Regeneration White Paper referred to as 'over-heated areas'.
7. The very considerable and growing local community response, together with the potential damage to highly valued open countryside accessible to all, indicates the need to review previous site allocations. The increasing pressures on local services and facilities from further development are undeniable and these should also be taken into account.
8. The site also lies in the area identified as part of the Watling Chase Community Forest, originally supported by Hertfordshire County Council, St Albans City and District Council and others, and with the increasing challenges relating to the loss of biodiversity and the amelioration of climate change, this designation should play an increasing role in public policy. The recent enactment of the Environment Act 2021 and Climate Change Acts will require significant actions for the recovery of nature, and already designated areas should play an increasing role in achieving the objectives of legislation.

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

Yours sincerely,

Planning Manager