

Case Officer  
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:

30<sup>th</sup> November 2022 (by email)

Dear Case Officer,

**Application no. 5/2022/2557**  
**Land North of Boissy Close, Colney Heath Lane, St Albans**  
**Outline application (access sought) - Construction of up to 40 dwellings (including 3 self-build homes) with car and cycle parking, landscaping and associated works**

I write with reference to the above application for speculative residential development, 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 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 in their Planning Statement accepts that very special circumstances are required to be demonstrated and seeks to justify the proposal on the basis of a lack of housing land supply overcoming potential reasons for refusal as stated in Paragraph 11d() of the National Planning Policy Framework (NPPF).
2. The application demonstrates a clear encroachment into open countryside on the edge of the built-up area with significant impact on its openness and character in this location. It constitutes an inappropriate urban extension which the Green Belt designation exists to prevent.
3. 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, especially in the absence of an up-to-date Local Plan. The Government's position is evolving with regard to protection of the Green Belt in response to local community and local planning authority concerns.
4. Recent Regulation 18 public consultations for Local Plans in Hertfordshire have received a record-breaking number of representations from organisations and individuals, including CPRE Hertfordshire, and the majority of these responses are opposing site allocations for

future residential and commercial development in the Green Belt. This has led councils to 'pause' the preparation of their Local Plans pending further consideration of proposals.

5. Recent Ministerial statements, which have policy weight, have reiterated the government's strong support for protection of the Green Belt. These include correspondence between the then Minister of Housing, Christopher Pincher, and Welwyn Hatfield Borough Council on 18<sup>th</sup> November 2021, and comments in a back bench debate called by Daisy Cooper MP which appear in Hansard on 21.11.21.

6. The recently published "Levelling Up and Regeneration Bill Policy Paper: Further information" re-emphasises the Government's support for protection of the Green Belt as follows:

"the increased weight given to plans and national policy by the Bill will give more assurances that areas of environmental importance – such as National Parks, Areas of Outstanding Natural Beauty...- will be respected in decision on planning applications and appeals. The same is true of Green Belt, which will continue to be safeguarded." (Creating beautiful places and improving environmental outcomes; In the Bill: LURB Policy paper, May 2022)"

Further,

"Existing Green Belt protections will remain, and we will pursue options to make the Green Belt even greener." (Creating beautiful places and improving environmental outcomes; Alongside the Bill: LURB Policy paper, May 2022)

7. It is clear that the Government's intention is to retain the Green Belt in its present form and the constant attempts to undermine Green Belt protections for residential developments are in danger of bringing the planning system into disrepute. Recent planning decisions have highlighted the inconsistencies in decision-making in this crucial area of public policy and CPRE Hertfordshire supports the Boissy Park Action Group's response and concerns.

Yours faithfully,

Chris Berry  
Planning Manager