



Nabeel Kasmani
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:

6th April 2023 (by email)

Dear Nabeel Kasmani,

Application no. 5/2023/0327
Land at Cooters End Lane and Ambrose Lane, Harpenden
Outline application - Construction of up to 550 dwellings including circa. 130 Class C2
integrated retirement homes, 40% affordable housing, early years setting, public open
space, allotments and publicly accessible recreation space etc...

I write with reference to the above application for large-scale 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 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's consultants in their Planning Statement accept that very special circumstances are required to be demonstrated and seek to justify the proposal primarily on the basis of the failure of the Local Plan to plan for required housing, and the lack of an up-to-date five-year housing land supply.
2. The remaining very special circumstances listed in the Planning Statement (PS), apart from the reference to Harpenden as a "Dementia-Friendly town", relate to provision which should be expected of virtually any large-scale residential-led development proposal, and so do not relate to the specific circumstances of this location and site. The application is one of several recent significant proposals for residential development in the Green Belt (37 in Hertfordshire alone since 1st January 2022) which constitute a wholesale challenge by development interests to this highly valued land designation.
3. The application demonstrates a clear encroachment into open countryside on the edge of the built-up area of Harpenden with very significant impact on its openness and character in this location. It constitutes an inappropriate urban extension which the Green Belt designation exists to prevent.



4. Significant representations continue to be 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.
5. Consultation responses to the recently published National Planning Policy Framework (NPPF) Prospectus are being assessed and it is anticipated that amendments to the NPPF will be issued imminently. These are likely to affect the content of housing need calculations and lead to the more accurate assessment of housing need and consideration of local conditions.
6. The NPPF amendments include proposals to give the Standard Method for housing calculating advisory as opposed to mandatory status, and include the influence of local and other characteristics where justified. In several previous representations and at planning inquiries, CPRE Hertfordshire has regularly identified the implications of using out-of-date Census figures which augment future housing numbers inappropriately.
7. Reductions in the rate of population growth have been known about for some time and have inflated housing targets unnecessarily. The implications of these reductions should relate to allocated sites in the abandoned emerging Local Plan, particularly where they have previously been designated protected land such as Green Belt.
8. In addition, recent Ministerial statements, which have policy weight, have reiterated the Government's strong support for protection of the Green Belt and the recently published "Levelling Up and Regeneration Bill Policy Paper: Further information" also 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)"
9. 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)
10. Most notably, the Prime Minister, in a Parliamentary response to Sir Mike Penning, MP for an adjacent constituency to St Albans, said on 25th January 2023:



“He is also right to say that this Government will always protect our precious green spaces. The recent changes in our planning reforms will ensure that we can protect the green belt everywhere.”

11. With regard to the status of the St Albans Local Plan, recent Regulation 18 public consultations for neighbouring authorities’ draft Local Plans, notably Three Rivers, Hertsmere and Dacorum Councils, have elicited record-breaking numbers of public responses opposing the allocation of Green Belt sites for development and have caused each of those authorities to pause their plan preparation process to take account of local concerns.

12. In our view it is highly inappropriate to proceed with the granting of planning permission for designated protected land when it is clear that the basis for assessing and calculating housing need is under imminent review. Using up-to-date Census population projections will clearly affect future housing requirements and a responsive local planning authority should take account of both local community and wider responses regarding the increasing value of protected countryside.

13. 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.

CPRE Hertfordshire urges the Council to refuse permission for this speculative residential development.

Yours sincerely,

Chris Berry
Planning Manager

NOTE: We would request that this letter is published on the Council’s website as a document relating to this application and should be grateful if you would notify us of the date of the appropriate meeting if it is to be determined by planning committee.