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Standing up for Hertfordshire's countryside

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:

28th April 2023 (by email)

Dear George Burgess,

Application no. 5/2023/0317
Land South of Cross Lane, Harpenden
Outline app (access, landscaping, layout, appearance and scale etc) for up to 31 dwellings -
40% affordable and 60% custom and selfbuild houses

I write with reference to the above application for affordable and custom-build houses, 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 Planning Statement (PS) accompanying the application accepts that very special circumstances are required to justify the application in this location and quotes seven factors which are regarded as providing the necessary justification for development.
2. Four of the seven factors identified relate to the provision of various types of housing due to the lack of a five-year housing land supply which relates to the whole of the St Albans City and District. The remaining factors identified relate to biodiversity net gain, improved access to the Green Belt and socio-economic benefits.
3. None of the above factors relate to the specific conditions or circumstances of the site. Biodiversity net gain is becoming a necessary obligation for all developments, access to the Green Belt is available wherever there is development adjacent, including the present location, and socio-economic benefits accrue to any development regardless of location.
4. This proposal constitutes a clear encroachment onto open countryside, with impacts on its openness and rural characteristics, and a clear extension of the built-up area of Harpenden.

CPRE is working nationally and locally for a beautiful and living countryside

CPRE Hertfordshire is a Charitable Incorporated Organisation

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

Registered Charity 1162419

5. 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.

6. Recent Ministerial statements, which have policy weight, have reiterated the Government's strong support for protection of the Green Belt. 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)"

7. This position has been re-emphasised recently by the Prime Minister in a parliamentary response to Sir Mike Penning MP for the adjacent Local Planning Authority of Dacorum, when he said:

"He (Sir Mike) 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."

8. The significance of the Green Belt in this area is also heightened by the cumulative effect of several residential applications in St Albans, Harpenden and surrounding settlements. It is becoming reasonable to suggest that the cumulative effect on the Green Belt should become a material consideration in the determination of applications, prejudicing the integrity of the Green Belt in this area.

9. Further, the recently published NPPF Prospectus for public consultation includes amendments which remove the requirement for Local Planning Authorities to review Green Belt boundaries purely to accommodate housing need calculated on the basis of the standard or alternative methods. This is relevant for St Albans where the Local Plan is in preparation and we urge the Council to refuse this application.

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.