



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:

12th May 2023 (by email)

Dear Case Officer,

Application no. 5/2023/0405
Land rear of Round House Farm, Roestock Lane, Colney Heath
Outline application (access sought) - Construction of up to 110 dwellings, a community building, new vehicular access and associated works

I write with regard to the above application which is one of several similar applications for residential development in the Green Belt in St Albans City and District to which CPRE Hertfordshire objects for the following reasons.

1. The site is located in the London Metropolitan Green Belt as defined in the St Albans District Local Plan Review according to criteria in the National Planning Policy Framework (NPPF). The NPPF identifies development in the Green Belt as inappropriate unless very special circumstances can be demonstrated to apply.
2. This substantial proposal introduces further development into an area which has been subject to unremitting pressure through numerous recent planning applications. This pressure has been heightened since the allowing of the planning appeal for 100 houses on Bullens Green Lane in June 2021. Since then, the area between Chiswell Green in the west to Colney Heath area in the east (within St Albans City and District) has received thirteen applications since that date, amounting to approximately 1300 units.
3. This unprecedented pressure arises from an interpretation of Green Belt policy which prioritises the provision of housing almost solely on the basis of the lack of an up-to-date Local Plan and five-year housing land supply. Little attempt is made, as in this application, to justify the proposed development on any other basis than to add presumed benefits which would be expected as the planning obligations of any major development in any location.
4. Paragraph 11d) and footnote 7 of the NPPF makes clear that the designation of land as Green Belt constitutes a strong reason for refusing permission but this has been

subsequently over-ridden by planning appeal decisions which have introduced over-riding arguments related to presumed housing need. Notwithstanding the weaknesses of the methodology used to determine housing need, and the utilisation of out-of-date population and household projections, the over-riding of Green Belt reasons for refusal is bringing the planning system into disrepute.

5. The Green Belt in southern Hertfordshire is already degraded, by both planning applications and unauthorised development which has led to significant reduction in the quality of the rural landscape in many locations, for example, the former Butterfly Centre and adjacent land. The further constant reduction of open countryside through development jeopardises the highly valued benefits which the Green Belt brings to residents and visitors alike.
6. This proposal promotes a particular form of housing which is seen as contributing to the very special circumstances which must be demonstrated to outweigh clearly the harms caused to the Green Belt. Increasingly, development proposals are including specific housing types and forms with the apparent intention of over-coming objections by the provision of specialist housing for which there is an undoubted demand, both locally and nationally.
7. In addition to the requirement to maintain the openness and permanence of the Green Belt, it is appropriate to question whether the provision of such specialist housing is suitable in a semi-rural setting where services and facilities are already under severe pressure. Further, such provision would require robust legal reinforcement and investigation of the promoters to ensure compliance with any consents given.
8. We have already noted that the Green Belt in the southern part of St Albans City and District is under very significant threat. The NPPF (para 145) and planning guidance also emphasise that enhancement as well as protection of the Green Belt should be objectives for local planning authorities, and this provides additional pressure for planning enforcement by the local planning authority.
9. The Planning Statement also suggests a justification for the development based on the achievement of significant biodiversity net gain. Such gains are now an intrinsic part of all development proposals, wherever located, and should not be seen as constituting very special circumstances, but rather as a necessary component of any development.
10. The Government has recently reaffirmed its commitment to the protection of the Green Belt in ministerial statements and commentary related to the NPPF Prospectus and Levelling Up and Regeneration Bill, including a response to Daisy Cooper MP for St Albans. The proposed development is a clear encroachment onto protected open



countryside and the very considerable local community response to this application indicates a wide range of concerns including and beyond the impact on the countryside.

11. It is reasonable to see the cumulative impact of the many recent planning applications in the Green Belt in this area as a material consideration in the determination of this application. We urge the Council to refuse this inappropriate proposal on the basis that very special circumstances have not been demonstrated to clearly outweigh the many harms that would be caused.

Yours faithfully,

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.