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Standing up for Hertfordshire's countryside

Samuel Miller
Planning and Building Control
St. Albans City and District Council
St. Peter's Street
St. Albans
Herts AL1 3JE

Our Ref:

Your Ref:

2nd April 2025 (by email)

Dear Samuel Miller,

Planning application no. 5/2025/0111

Land bounded by Rivers Colne and Ver and Radlett Road, Frogmore

Outline application (all matters reserved) - a mixed-used development comprising approximately 183 new dwellings (Class C3), up to 579sqm of workspace (Class E(c), E(g)), up to 410sqm of community space (Class F2(a), F2(b), F2(b) and up to 265sqm café (Class E(b)), along with approximately 14ha of open space, associated access and routes, hard and soft landscaping and car and cycle parking.

I write with regard to the above planning application to which CPRE Hertfordshire objects for the following reasons.

1. The land identified for this proposed development is designated as London Metropolitan Green Belt in the adopted St Albans City and District Local Plan Review where development is stated as being inappropriate unless very special circumstances are identified which clearly outweigh the harms caused, according to criteria in the National Planning Policy Framework (NPPF).
2. The Applicant's planning consultants note the recent revision of the NPPF and the introduction of the concept of grey belt as justification for the submission of this application. No other special circumstances are identified relating to the local conditions and circumstances which would justify development in this location as opposed to any other location apart from issues relating to the Green Belt.
3. This site is not included in the emerging Draft Local Plan on which extensive public consultation has taken place. The Draft Local Plan has been submitted for Examination in Public and the lack of housing land supply will be fully addressed with the adoption of the Local Plan.
4. Very significant local community opposition continues to development in the Green Belt. The proposed development would clearly constitute a breach of the first and third

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CPRE Hertfordshire is a Charitable Incorporated Organisation

President: Sir Simon Bowes Lyon, KCVO

Chairman: Peter Waine

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purposes of the Green Belt as identified in the NPPF (paragraph 143) to prevent urban sprawl and encroachment on open countryside.

5. We entirely refute the assertions that the first purpose of the Green Belt has no relevance in this case and that this site constitutes grey belt under the present legal definitions. The first purpose of the Green Belt refers to the effect of the urban sprawl emanating from the growth of London as the major development generator in this and the surrounding areas.
6. The proposed development is clearly urban sprawl beyond the built-up area of the adjoining settlement which the Green Belt legislation was designed to prevent. As such the designation of Green Belt provides the “strong reason” required in this case to refuse development as noted in the NPPF footnote 7.
7. It is noteworthy that every major planning application for residential and commercial development within the Green Belt in Hertfordshire made since 12th December 2024 has identified the site as grey belt, notwithstanding the quality and character of the landscape or local conditions in each case. This is clearly an unsustainable position and it is becoming increasingly clear that the existing definitions and guidance on grey belt are entirely inadequate to prevent the wholesale removal of highly valued and significant Green Belt protections.
8. The remaining issues quoted as contributing to the very special circumstances required in the event that the site is not regarded as grey belt relate to the general housing situation in St Albans and elsewhere and constitute benefits which would accrue to any proposed development of this size and function. The now standard practice in major planning applications in the Hertfordshire Green Belt of listing such benefits, including public services and facilities and the like reduces the consideration of such issues to a check-list of items irrespective of the conditions and circumstances of the location and inevitably renders them as less “special”.
9. As significant as the proposed benefits is the growing paucity of open space adjacent to built-up areas with its attendant physical and mental health benefits. The Green Belt in this area is under unrelenting pressure for development which is jeopardising the highly valued benefits which protection brings, and its continual reduction is in danger of bringing the planning system into disrepute.
10. The existence of legally binding agreements between appropriate institutions involved in the provision of truly affordable low cost housing should be required in this case. Given the inadequacy of the official definition to reflect the true state of the housing

market in Hertfordshire, affordability for average earning households is generally unattainable in the County.

11. We note the intention to provide 100% affordable housing but this is essentially meaningless without further information and commitments to its provision. There is significant experience in Hertfordshire and elsewhere of initial commitments to affordable housing not being maintained, generally quoting viability issues and at the very least the Council should seek robust guarantees regarding affordable housing proposals.
12. South-west Hertfordshire is under unrelenting pressure for development and the value of the open countryside that remains increases for local communities and visitors, notwithstanding wider environmental benefits relating to the amelioration of the effects of climate change, maintenance and enhancement of biodiversity, and physical and mental health. This application is not supported through the Local Plan process and we urge the Council to refuse permission for this inappropriate speculative 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.