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**Standing up for Hertfordshire's countryside**

Leanne Pogson  
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:

25<sup>th</sup> April 2025 (by email)

Dear Leanne Pogson,

**Planning application no. 5/2023/1923**

**Land Between The Alban Way and Colney Heath Lane, St Albans**

**AMENDMENTS: Outline application (access sought) - Construction of up to 190 dwellings to include 50% affordable housing and 10% self-build and custom housing, a minimum of 6ha of public open space, landscaping, biodiversity habitat, formation of new access etc**

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 inappropriate unless very special circumstances are identified which clearly outweigh the harms caused, according to criteria in the National Planning Policy Framework (NPPF).
2. CPRE Hertfordshire previously objected to this application by letter of 10<sup>th</sup> November 2023 and noted that the site was not in the Regulation 18 Draft Local Plan, neither is it allocated in the Regulation 19 Submission Draft Local Plan submitted for Examination in Public. We objected on the basis of the protection offered by Footnote 7 and Paragraph 11 of the NPPF and the significance of the Green Belt in this location, notwithstanding the need for housing land supply.
3. The Applicant's Addendum Planning Statement (APS) now seeks to justify the proposed development both on the basis of very special circumstances relating to the lack of housing land supply in the Local Plan Review and the introduction of the concept of grey belt. The lack of housing land supply is now said to be exacerbated by the requirements of the revised NPPF, which specify a much higher housing need for St Albans City and District (SACD).

**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: Peter Waine

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4. Further, the APS introduces the concept of grey belt to add to the demonstration of very special circumstances and proceeds to assert that none of the three purposes of the Green Belt which may be identified (see NPPF Glossary definition of grey belt) where development would not be inappropriate apply in this case.
5. In our view, the proposed development would clearly constitute a breach of the first and third purposes of the Green Belt as identified in the NPPF (paragraph 143) to prevent urban sprawl and encroachment on open countryside as it is a clear and substantial extension of the large built-up area of St Albans.
6. In any case, the first purpose of the Green Belt also 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. 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 and, 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. The proposed development site also performs a crucial function in preventing the coalescence of the settlements of St Albans and Colney Heath and the unique character of St Albans as a historic city should affect the consideration of any development in its setting. It is not appropriate in our view for such a significant allocation in the Green Belt to be determined outside the Local Plan process.
8. The Green Belt in south west Hertfordshire is under continuous and unrelenting pressure for development which is jeopardising the highly valued benefits which protection brings. Its continual reduction through consents for speculative development is in danger of bringing the planning system into disrepute and we urge the Council to refuse permission for this inappropriate 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.