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Standing up for Hertfordshire's countryside

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:

26th November 2025 (by email)

Dear Nabeel Kasmani,

Planning application no. 5/2025/1832

Land Between Whitecroft Estate and Napsbury Lane, St Albans

Outline application (access only) - Redevelopment of the site to provide new residential dwellings (including 50% affordable homes) inclusive of vehicular access works off Napsbury Lane; publicly accessible open space and playspace; new public access arrangements and improved pedestrian / cycle routes; and other associated works, with all other matters reserved

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 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 a significant justification for the submission of this application. No other special circumstances are identified relating to local conditions and circumstances which would justify development in this location as opposed to any other similar location apart from issues relating to the Green Belt.
3. In fact, the local conditions militate against any suggestion that there are any circumstances favouring development. Rather the high quality of the site in landscape and related terms is demonstrated by the Applicant identifying the significant contribution it makes as it "provides the primary local gap between St Albans and London Colney" (Planning Statement paragraph 2.32) as noted by the Stage 1 Green Belt Review.

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, OBE

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4. This site is not included in the emerging Draft Local Plan on which extensive public consultation has taken place. The Draft Local Plan has recently completed its Examination in Public and the lack of housing land supply will be fully addressed with the adoption of the Local Plan which is likely in 2026. It is not appropriate in our view for such a significant allocation in the Green Belt to be determined outside the Local Plan process.
5. Major local community opposition continues both generally to development in the Green Belt and this specific application. The proposed development would clearly constitute a breach of several purposes of the Green Belt as identified in the NPPF (paragraph 143) to prevent urban sprawl, coalescence of settlements and encroachment onto open countryside.
6. We entirely refute the assertion 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. In the case of the London Metropolitan Green Belt, the first purpose of the Green Belt refers as much to the effect of the urban sprawl emanating from the growth of the capital as the major development generator in this and the surrounding areas.
7. This proposed development is also clearly sprawl beyond the built-up area of St Albans as a major settlement in its own right. Further, the impact of this proposal is heightened by the importance of the site in preventing the coalescence of St Albans and London Colney (see paragraph 3 above) which may be said to contribute to the second purpose of the Green Belt.
8. The proposed development is undoubtedly also encroachment onto the countryside, and CPRE Hertfordshire thus believes that the first, second and third reasons for the Green Belt as identified in NPPF paragraph 143 apply in this case, providing together the “strong reason” required to refuse permission for development as noted in the NPPF footnote 7.
9. We also believe that the quality of the Green Belt affected by this application is relevant in this case. The site lies between two Local Wildlife Sites which increases the significance of this land in the context of the Green Belt as a whole, thus affecting the weight that should be applied in considering the harm caused.
10. It is noteworthy that virtually 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 an unsustainable position with regard to maintaining the principle of protection 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.

11. It is undeniable that the new planning policy context created by the revised NPPF has provoked a disturbingly high number of new applications and re-applications for sites which were previously refused permission. The increasing number of grey belt applications should thus become a factor in the consideration of the appropriateness of development in specific locations. The cumulative impact risks “fundamentally undermin[ing]e the purposes (taken together) of the remaining Green Belt across the area of the plan” (NPPF paragraph 155a).
12. As significant as any proposed benefits of the development 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.
13. Whereas a proportion of such applications may warrant consideration for various reasons, the illogicality of the revised NPPF supporting five purposes of the Green Belt (para 143) and then only permitting three purposes to be considered in applications (NPPF Glossary definition) is unsupportable in this case. CPRE Hertfordshire will continue to campaign vigorously for changes in national planning policy and PPG to redress the imbalances that now exists in assessing the impact of development on Green Belt land.
14. We note also the intention to provide 50% affordable housing but this is essentially meaningless without further information and commitments to its provision. 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.
15. 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. 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.



16. 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 and damaging 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.