

George Kent
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:

4th February 2026 (by email)

Dear George Kent,

**Application number 5/2025/2240
Land to South of Scout Farm House, 10 Dunstable Road, Redbourn
Permission in Principle - Construction of a minimum of two and
a maximum of seven dwellings**

I write with regard to the above planning application which is also similar in scope and location to application number 5/2025/2239; these constituting applications for permission in principle which require a lower level of information provision than a full application. CPRE Hertfordshire objects to both these applications for the following reasons.

1. The land identified for this proposed development is designated as London Metropolitan Green Belt in the adopted St Albans 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 2024 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. Notwithstanding the previous use of the land for horticultural purposes, the wholesale identification of edge of settlement locations as grey belt is devaluing significantly the significance of the Green Belt and this and similar locations. 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.

4. 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. In this case, the inappropriateness is exacerbated by the indication of the small number of substantial units planned for the site.
5. We support fully Redbourn Parish Council concerns regarding the indicated low density for the site which will make no effective contribution to addressing the need for affordable housing in the area. Very significant local community opposition continues to development in the Green Belt and the damaging implications of the wholesale application of grey belt are becoming increasingly apparent.
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. Arguments relating to the inconsequential impact of each individual application on the Green Belt as a whole become seriously inappropriate when the cumulative effect of multiple applications is considered, as is occurring throughout Hertfordshire with damaging impacts on villages which are experiencing considerable additional speculative development.
7. In summary, it is undeniable that the new planning policy context created by the 2024 revised NPPF has provoked a disturbingly high number of new applications and re-applications for sites which were previously refused permission. Whereas a proportion of such applications may warrant consideration for various reasons, the purposeful 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.
8. 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.