



KEEP CHISWELL GREEN

**ST ALBANS CITY AND DISTRICT COUNCIL
LOCAL PLAN EXAMINATION
Stage 1**

**Response to Targeted Consultation
regarding the
Duty to Co-operate**

**by
Keep Chiswell Green**



13th June 2025

Duty to Co-operate

1. Thank you for the opportunity to comment on the further information provided by St Albans City and District Council with regard to the Duty to Co-Operate. SADC has maintained the position put forward during the Stage 1 Hearings – that they have communicated widely and collaboratively to try to identify other planning districts that may be able to accommodate at least some of the St Albans housing allocation.
2. What is most noticeable is that all the districts with whom SADC has communicated are within Hertfordshire, are all Green Belt districts, and each has difficulties in meeting their own housing targets.
3. It was therefore almost inevitable that none of these districts would be able to accommodate additional housing on behalf of St Albans.
4. Keep Chiswell Green maintains its position that the Duty to Co-Operate does not limit a local planning authority to co-operating only with its adjacent and neighbouring districts, and that SADC should have looked more widely to see whether there are any other planning authorities who might have the capacity and willingness to accommodate housing on our behalf.
5. It is our understanding that there are 130 planning authorities in England that have no, or very little, Green Belt. Whilst we are not suggesting that SADC should have approached all 130 authorities, we assert that approaches to a number of authorities outside Hertfordshire would have been pertinent. We highlight, by way of example, two authorities that might have been considered.
6. East Devon District Council has no Green Belt, has significant open countryside, excluding AONBs and protected zones, and away from coastal areas. It has a robust housing supply, is already meeting its own targets, and has planning flexibility to consider additional housing.
7. Dorset Council also has no Green Belt designation, but does have extensive rural land outside its coastal AONBs. It is meeting its 5-year housing land supply and may also have flexibility to accommodate additional housing.
8. Whilst we accept the argument that local people should not be forcibly relocated to distant parts of the country, there are a great many people from the Home Counties who relocate voluntarily to areas such as Devon and Dorset, an option made more desirable by the possibility of working from home.
9. We also highlight the option of “new towns” which were very successful after the Second World War, particularly for their then progressive and extensive use of cycle routes and housing built around green areas. The social and health benefits typified by children all having a communal space in which to play outside their own homes and the ability to travel by active methods are even more relevant in today’s environment,

and the creation of a new town would bring genuine economic benefits to the area, both in its construction and occupation.

10. Paragraph 146 of the National Planning Policy Framework (NPPF) is clear: exceptional circumstances must exist to justify any changes to Green Belt boundaries, and only after *all reasonable options for meeting housing need have been fully explored* (our emphasis). We believe that the actions carried out by SADC under the Duty to Co-operate do not satisfy the NPPF stipulations.
11. We have not seen any evidence that SADC discussed the possibility of a new town in Hertfordshire or in any other area with any other planning authorities. In this era of pressure on land and on housing, we assert that the traditional ways of thinking are no longer fit for purpose and a more creative approach is required.
12. Keep Chiswell Green also holds that utilising such extensive quantities of Green Belt to meet our housing allocation is in direct contravention of the Green Belt purpose to preserve the setting and special character of historic towns. It is therefore all the more necessary for our local planning authority to look to satisfy a significant quantity of our housing allocation outside the District to minimise the impact that new housing would have on the exceptional national and international heritage value, and the setting and special character of our historic city. We refer to our Local Plan Examination Hearing Statement of April 2025 paragraphs 37 to 46 for further detail on this assertion.
13. In conclusion therefore, while we accept that SADC has entered into discussions with adjacent and neighbouring districts about the option for other districts to take some of our housing allocation, we assert that these discussions have been perfunctory, and that no meaningful initiatives have been undertaken that could genuinely result in a re-distribution of housing away from the District.

Thank you for your attention

Keep Chiswell **Green**

13th June 2025