

Inspector Boniface

Thank you for giving Keep Chiswell Green the opportunity to represent the residents of Chiswell Green and to participate in this Inquiry.

Before we start, we wish to make it clear that we are not anti-green field development *per se*, and given that approximately 98% of local residents support Keep Chiswell Green, and we do not all live in properties bordering one of the appeal sites, our motivation is not – as has been alleged by one appellant - Nimbyism.

We also fully support the building of new homes where this is done in a planned, holistic way, taking broader needs into consideration, supporting new developments with the appropriate infrastructure, in locations where there are employment, leisure and retail opportunities. It is our view that this is best done at a local level where local needs can be best anticipated, and under the umbrella of the Local Plan process, where all aspects of fulfilling the needs of population growth can be accommodated. It may be that a local planning authority decides that it is necessary and appropriate to release land from the Green Belt in order to accommodate local needs, and where this is done with thought and careful consideration, consultation as appropriate with the local population, Keep Chiswell Green supports necessary Green Belt release.

Keep Chiswell Green does not, however, support developer-led, speculative applications. Keep Chiswell Green sympathises with large developers tasked with targets to meet, profits to generate, shareholders to satisfy. However, the Metropolitan Green Belt should not be sacrificed to satisfy these corporate pressures.



Keep Chiswell Green also sympathises with individual landowners who see their land as an asset, a personal asset to be bought or sold like any other asset. However, where this land has been designated by elected leaders as Green Belt land for the benefit of previous, current and future generations, we cannot support the pursuit of individual gain, even for altruistic motives.

In our opinion, the harm that will be done to the Green Belt, and the other harms that will result from these developments, grossly outweigh any benefits that they may produce. It is accepted by all the parties that development on the Green Belt is inherently inappropriate and therefore harmful, but in their enthusiasm to promote the supposed benefits of the developments, the appellants have overlooked or minimised the other harms that will result.

And that is the crux of this Inquiry – does the harm that will be done to the Green Belt and any other harms that will result from the developments clearly outweigh any benefits that these developments may bring ?

It is our unwavering opinion that the benefits do not clearly outweigh the harms and it is this that the local residents of Chiswell Green have tasked us with demonstrating to you.

The harm to the Green Belt is unequivocal, but what is not factored into this harm are the benefits that the local population has derived over many years which will be lost to them if permission is granted for these applications.



In addition to the visual amenity enjoyed daily by residents from their homes and from journeys in the village, this area of Green Belt has hosted 3 separate types of horse-riding function – a riding school, a livery yard, and a polo pitch. All these amenities are being lost, not just to local residents, but also residents of the wider St Stephen Parish and St Albans City and District. Additionally, for generations, local children have enjoyed walking with their parents to visit the horses in the field along Chiswell Green Lane – a free and healthy activity which has been a welcome distraction for parents of energetic children for over 40 years.

The pleasure of the visual amenity of this area of Green Belt will also be lost to other groups including cycling groups, the Scouts, who use this area regularly for activities, and runners; the national Annual St Albans Half Marathon appeals to runners from across the country and is routed through Chiswell Green Lane where an attraction of the route is that the runners are flanked on both sides by the greenery of the countryside.

No doubt Scout-leaders will find alternative locations for activities, as will local cyclists and runners, but the attraction of this area is that it is Green Belt, it's *in* the countryside, and I'm sure you will agree, we all feel better to be out in nature. Many residents in Chiswell Green reported the benefits to their mental health of the access they had to the countryside over the period of the pandemic, as well as appreciating the opportunities the space offered for physical health and exercise.

<https://www.youtube.com/watch?v=-v-MNE46DW4>

This area of Green Belt is home to much wildlife which has been significantly underplayed by the appellants, both of whom claim biodiversity net gains, but have failed to make thorough assessments of



the extensive range of birds, animals and insects, including protected species, which already provide biodiversity in this area. When the builders move in, where does the wildlife go? It will not be reassured by moving a field or two over. The prolonged disruption that would be created by these developments is likely to cause all the animals to flee, beyond the boundary of Noke Lane and out into the wider countryside, no doubt killing a number of them in the process.

Inspector Boniface, we are just local residents. We do not have the might of the developers behind us to provide dedicated time and expertise, and unlimited funds to investigate any aspect of these applications which concerns us. But we know what we see and hear, and daily, those of us who live near the appeal sites and the wider Green Belt area enjoy the proximity to an extensive range of wildlife including badger, bats, deer, foxes, rabbits, owls, pheasants, greater and lesser spotted woodpeckers and many, many more. The harm to the local population would be the loss of this wildlife; while the appellants tick boxes by purchasing off-site credits for schemes such as the planting of conifers in remote parts of Scotland, the harm to the local biodiversity would be extensive and irreparable.

But the harm doesn't stop there; local residents already struggle to find a dentist – there's isn't one in Chiswell Green village. The wait time to get through to the local doctors' surgery in the morning to make an appointment is about 40 minutes, by which time, there are no more appointments available. Adding an increase in the local population of approximately 50% will only exacerbate these problems, particularly when the local surgery's expansion programme, which will take it to the absolute capacity of the site, is only going to allow it to cater for its existing patient list. The sheer enormity of these proposed developments



in relation to the size of the existing village will have a significant impact on the local population and risks creating a stand-alone community that does not integrate with the existing villagers.

The pressures on the supply and disposal of water to meet the needs of the existing population in this area are already immense, and resulted in the discharge of effluent into the River Ver for as many as 139 days in 2021¹. The River Ver is an internationally-protected chalk stream of which there are only 200km in the world. The residual nitrate levels in the river which result from these discharges have caused the chalk stream to be in a very poor state, in particular as regards the insects at the bottom of the food chain which are not as plentiful as they were and the reduction of which causes a knock-on effect up the food chain.

¹ *Bishop of St Albans, House of Lords 7th July 2022, "ChurchInParliament.org"*

Speaking of insects, the harm that would result from permitting the development of these appeal sites would have a significant effect on the Royal Entomological Society, whose head-quarters are also on Chiswell Green Lane. RES moved into the Mansion House, previously the head-quarters of the Royal National Rose Society, because of the wealth of insects and butterflies in the area that had resulted from the existence of the Butterfly World on the adjacent site. Development of the appeal sites can only have a negative effect on the insects and therefore on the RES.

Of greater concern is the impact that granting permission on even one of the appeal sites will have on the wider Green Belt area in Chiswell Green. Each site will set precedent for the development of other sites in the area, and act as a "gateway" to open up this part of the Green Belt to a further 740 new dwellings within the Noke Lane boundary, or nearly 2,000 new dwellings to extend the reach to the next boundary road. We can be

sure that the sites adjacent to the two application sites are poised to submit their own applications for development as we speak.

And, of course, new dwellings bring with them additional vehicles. Despite the initiatives proposed by the appellants to attempt to change the travel behaviour of any new inhabitants, the great appeal of living in Chiswell Green is its ease of access to the strategic road network; that is its USP. That aside, the appeal sites are also not sustainable in transport terms and the communities will be car-based dormitories, bringing crippling congestion to a village that is already at the mercy of any traffic disturbance on the wider strategic road network. The appellants are relying heavily on the fact that Herts Highways has not objected to either application, but in context, as was expressed by Cllr Hill during the Planning Development Committee meeting at which the application for Land to the South was determined,

"So I've been on various planning committees for almost 12 years now, and I don't think I've ever known Highways mount an objection to anything. And frankly, I mean, the idea that traffic would not be made far worse, having travelled along that road many times myself before, is farcical."

Cllr Hill's experience was supported by his peers, who are well aware from their own personal experiences, of the significant problems that exist with traffic in Chiswell Green. On the basis of this situation, combined with the significant exacerbation that could be expected if even one of the two developments were to be granted, it is clear that the impact on the local area from the traffic that would be generated by either new development would be "severe".

Green land is an essential resource in our attempts to mitigate climate change and this portion of the Green Belt is essential to the residents of



Chiswell Green for its role in cleaning the air of pollution to which local residents are subjected by the position of the village in the middle of M1, M25, A414 and A405.

Comparatively, the benefits purported by the appellants are spurious; there is little employment in the area, and that which there is is largely that of shop assistant or restaurant-worker. In an area with one of the highest house prices in the country, while there is no debate that affordable housing is needed, there is considerable debate as to whether the affordable housing being offered by both appellants would actually be affordable to those in the relevant income category, even with an “*at least*” one third discount.

In relation to the land being offered by the appellant for the southern site for a school, the late change from land for a 2FE primary school to land for a school of any kind confirms that a 2FE primary school is not necessary now, and is not likely to be in the foreseeable future. Copies provided by Mr Hunter of his correspondence with Hertfordshire LEA also confirm that the LEA cannot see a specific use for the land as it is not large enough for the type of SEND provision for which they have a need. As no use is currently anticipated for the land, it is not beyond the realms of possibility that this land will be sold by the LEA for further housing and the financial benefits from the sale used for other purposes. The provision of land for a school cannot then be seen as a benefit.

The Green Belt boundary has endured in Chiswell Green since its designation in the 1950’s and has acted as a strong and permanent boundary to stop encroachment into the Green Belt. The regulatory need to preserve the Green Belt causes developers to think more broadly about where they build and encourages them to look at brownfield sites, rather



than just taking the easy option. To this extent, the Green Belt is performing its task to assist in the regeneration of urban areas, and whether the land is being used for crop production or grazing, it is capable of supporting agriculture as it has done.





Inspector Boniface, it is our view that the harm to the Green Belt and the many other harms that will result from these developments, significantly outweigh any benefits claimed by the appellants. By the time these developments would be ready for occupation, the local district's deadline of net-zero by 2030 will be upon us while these developments will be coming online in unsustainable locations with unsustainable life-choices for their inhabitants. We urge you to consider the society of the future, where the 20-minute community genuinely offers its inhabitants desirable and net-zero opportunities for employment, leisure, shopping and family.



KEEP CHISWELL GREEN

Opening Statement

Keep Chiswell Green believes that neither of these developments fits that mould.

Finally, to conclude on the benefits of the Green Belt and the harm that would be done to it, I will let the land speak for itself.

Thank you, Sir, for your attention.

<https://www.youtube.com/watch?v=sbzSJ9E2I6c>