

Email from CLASH – Sent 06:25 Saturday 22 April 2023

From: Clash Two <clash.two@yahoo.com>

Sent: 22 April 2023 06:25

To: Planningcomments <planningcomments@stalbans.gov.uk>

Cc: Dutton, Holly <HOLLY.DUTTON@planninginspectorate.gov.uk>

Subject: St Albans: Land to North and South of Chiswell Green Public Inquiry

Please can this be sent to Inspector Boniface as a matter of urgency.

It would be useful to also share with the Council witness Mr Connell and Council Barrister.

The email address provided for Inspector correspondence Holly.dutton@planninginspectorate.gov.uk is not accepting emails.

Thanks

<http://www.savenorthstalbansgreenbelt.org>

Begin forwarded message:

On Friday, April 21, 2023, 12:33 pm, Clash Two <clash.two@yahoo.com> wrote:

Dear Sir,

In the context of the hearings in front of you regarding the Land to North and South of Chiswell Green Public Inquiry.

April 17th: CPRE Witness

We question why the Inspector did not afford the witness Mr Chris Berry from CPRE Hertfordshire the time to fully deliver his comments. He was a witness and not on a R6 party. The CPRE has attended any appeals and been able to deliver their full submission. 20 minutes in the context of two weeks of hearing and neither KC objecting, would appear to be reasonable. CPRE have given effective policy guidance to many local campaign groups and his statement should have been heard in full by those present.

Intention to build on Green Belt:

North KC stated that St Albans District Council SADC "has committed to building on Green Belt" in his opening statements. SADC has not made this commitment. Subsequent cross-examination supports our understanding of this position and we hope you find the same.

Housing Targets:

The South and North KCs, uses the Housing Delivery Action Plan, statement "housing targets will be met in the Local Plan period".

We know, that SADC Local Plan Advisory Group LPAG, does not stand by that statement and the witness Mr Connell, not part of the Local Plan working group and he clearly has not been briefed on the progress of the Local Plan since November 2021, where the

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Standard Method has been under scrutiny. In the September 2022, LPAG have taken the stance that they will be seeking a way to not delivering the housing targets as calculated in the Standard Method using 2014 data and resolved fully on this matter in January 2023. The Housing Delivery Action Plan was already published by this stage and outdated in it's position possibly against the changed and forming view of this Local Authority.

Please see the timeline below:

November 30 2021 LPAG: It was agreed that the new 2022 figure and data on housing completions should be brought to the Committee once available following the next update: this was likely to be in March 2022. [Agenda for Local Plan Advisory Group on Tuesday, 30th November, 2021, 7.00 pm | St Albans City and District Council \(moderngov.co.uk\)](#)

March 2022 LPAG: SADC decides to recalculate the Standard Method using 2016, 2018 and potentially newer data if available: [Agenda for Local Plan Advisory Group on Tuesday, 1st March, 2022, 7.00 pm | St Albans City and District Council \(moderngov.co.uk\)](#)

September 2022 LPAG: SADC resolves Chris White will write to SoS to express frustration at Standard Method 2014 data. [Agenda for Local Plan Advisory Group on Tuesday, 13th September, 2022, 7.00 pm | St Albans City and District Council \(moderngov.co.uk\)](#)

December 2022 LPAG: SoS response stating the the Standard Method is already advisory and that local constraints such as Green Belt must be taken into account. [Agenda for Local Plan Advisory Group on Tuesday, 13th December, 2022, 7.00 pm | St Albans City and District Council \(moderngov.co.uk\)](#)

January 2023 LPAG: Reg 18 consultation shows strength of opinion against Green Belt release. SADC resolve to formerly challenge Standard Method in both plan making and within the NPPF Consultation. Cllr White states he will "stand up for Green Belt". The Local Plan will seek to protect Green Belt. [Agenda for Local Plan Advisory Group on Tuesday, 24th January, 2023, 7.00 pm | St Albans City and District Council \(moderngov.co.uk\)](#)

In summary:

The view taken by the LPAG, began formation in March 2022, when the LPAG reviewed the Standard Method calculation within the context of housing targets. This then progressed with the Leader of the Council formally writing to the Secretary of State to express SADC unwillingness with using the numbers which substantially over estimate need, to deliver housing. NB. This all happened before the Written Ministerial Statement on December 5th and subsequent responses to Parliamentary Questions from many MPs that the Government seeks to protect Green Belt as it is.

Whilst the parties agree that no weight should be applied to the emerging Local Plan, it is very clear that the direction of travel is very much away from delivering the 2014 Standard Method of Housing, therefore any assumptions around the number of houses delivered in any category should not be accepted in this context.

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- Again the air quality report commissioned by the developer did not show the real harm of air quality in the area and deemed the inevitable increase acceptable which is contrary to WHO guideline limits. It did not consider the level of air pollution at this site correctly. The mere consideration of the matter was judged as merits, and this was not something we were able to present at Judicial Review.

We hope that you accept this written submission and evidence. Until seeing the way the South and North KCs have chosen to frame their case evidence, we had no plans to make any submission. However, there is an overwhelming feeling in the community that the real facts must be taken on board and not data from 2006 or proposals from 2015 or indeed any other timeframe as the current situation is very clear: within the context of the Climate Emergency declared by this Council and the direction of travel of the new emerging Local Plan, Green Belt release of any kind should only be considered at a Local Plan level and not during any adhoc speculative applications trying to take advantage of the lengthy process itself. The existing Local Plan, afforded strong Green Belt protection until the decision by Inspector Masters in June 2021, which used the wrong housing delivery figures (concerns of which were raised to the planning inspectorate).

If required, on behalf of our campaign group, I am happy to attend the hearing on Tuesday 25th April to be cross-examined.

Yours faithfully,

Gee Smedley

Team CLASH

www.savenorthstalbangreenbelt.org