COLNEY HEATH PARISH COUNCIL

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Land adjacent to Colney Heath Football Club, Colney Heath, St Albans

PINS Ref: APP/B1930/W/23/3333685

LPA REF: 5/2022/0599

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| 24 Sep 2024 | Issue to PINS |

COMMENT ON THE DRAFT NATIONAL PLANNING POLICY FRAMEWORK 2024

- 1. Colney Heath Parish Council (CHPC) notes that the achievement of sustainable development remains prominent in the draft NPPF (paragraph 7) and that the presumption in favour of such development is explicit in paragraphs 10 and 11. CHPC further notes that paragraph 11(d) states that where there is no Local Plan, as is the case for St. Albans, permission should generally be granted unless the adverse impacts significantly outweigh the benefits when assessed against NPPF policies, especially those relating to location and the need for affordable homes. CHPC does not believe that Colney Heath village is a sustainable location and has provided ample evidence (CDs 9.11(c) and 9.11(d)) to support that contention.
- 2. With regard to affordability, CHPC does not believe the appeal proposal, which does not meet the 50% minimum specified in paragraph 155 of the draft NPPF, will result in homes which can be afforded by local residents. This is supported by the recent (18th September) data from Rightmove which reveals that the average sale price of properties in the St. Albans area is 17 times greater than the average annual income for the area, and that average rents are the highest in the country outside London at 71% above the national average. Thus even a 20% discount on market prices would have little impact on affordability.
- 3. CHPC believes that in broad terms the intention of the presumption is appropriate but that, for the reasons outlined above, it is not applicable in this particular case.
- 4. CHPC supports the recognition in paragraphs 24 and 27 that co-operation between planning authorities can promote sustainable development. As stated in evidence to the inquiry (CDs 9.11(c) and 9.11(d), Colney Heath lacks the infrastructure required

for sustainability, and CHPC welcomes the possibility that the revised NPPF could result in much needed improvements to the local infrastructure. However, this can only be regarded as a long-term aspiration, and can have no impact on the present appeal.

- 5. Paragraph 98 states that in considering proposals for development, planning authorities should give significant weight to the importance of new, expanded or upgraded public service infrastructure. The present proposal includes no plans for improving the local infrastructure.
- 6. Paragraph 112(a) refers to the need to take a broad and long-term view of public transport requirements if developments are to be sustainable. As demonstrated in CD9.11(d), the public transport provision in Colney Heath is minimal and urgently requires improvements which will facilitate the access of residents to employment, education, medical facilities, shopping, leisure etc. There is nothing in the appeal documents to suggest that approval of the development proposal would have any positive impact on the present situation.
- 7. Paragraph 152 states that under specified conditions developments in the Green Belt should not be regarded as inappropriate. One such condition is where the housing supply has fallen below requirements; this is applicable to the St. Albans area. However, such developments must be able to meet the requirements set out in paragraph 155. These include a requirement for the provision of a minimum of 50% affordable housing in Green Belt locations and improvements to the local infrastructure. Neither of these conditions is met by the present proposal, which should therefore be regarded as inappropriate development.