

**Standing up for Hertfordshire's countryside**

Katie Hogendoorn  
Planning and Building Control  
Hertsmere Borough Council  
Civic Offices  
Elstree Way  
Borehamwood  
Hertfordshire  
WD6 1WA

Our Ref:

Your Ref:

25<sup>th</sup> January 2019 (by email)

Dear Ms. Hogendoorn,

**Application No. 18/2361/FUL**

**Redevelopment of 'Wilson House' to provide a consolidated primary years' education facility, including classrooms, assembly hall, dining hall, food preparation and reheating area, library, staff facilities, sports pavilion, waste storage area, external play and formal recreation areas, associated landscape works, temporary access and compound for construction purposes at Wilson House Aldenham School Aldenham Road Elstree Hertfordshire.**

CPRE Hertfordshire object to this application for development in the Green Belt.

We have no reason to dispute the inadequacies of the current Wilson House. However this proposed replacement for the current building is 138% larger in terms of footprint and 256% greater in volume. It will therefore have a substantial impact on the Green Belt.

The Aldenham School site is designated as a Key Green Belt Site (KGBS) in the adopted Hertsmere Site Allocations and Development Management Policies 2016. Within the KGBS there is an approved Infill Envelope within which development is acceptable. Wilson House lies outside that envelope and is consequently entirely within the Green Belt and must be considered under the Green Belt policies in the National Planning Policy Framework and the Hertsmere Local Plan.

In paragraph 6.38 of the Planning Statement the applicant notes that "the scope of 'infill envelopes' for the 'KGBS' may require amendment once the extent of development needs has been established." However that has not yet taken place. As it involves modifying Green Belt boundaries, which the NPPF requires to be done through the Local Plan process, it should not be done through ad-hoc applications such as this.

The Planning Statement recognises that because of the substantial impact on the Green Belt, very special circumstances require to be demonstrated which outweigh the harm to the openness and other harm to the Green Belt. Those are included in para. 6.54 of the Planning Statement.

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CPRE Hertfordshire is a Charitable Incorporated Organisation

President:  
*Sir Simon Bowes Lyon, KCVO*  
Chairman: *Richard Bullen*  
Registered Charity 1162419

Of the six circumstances put forward, two of those refer to policies in the NPPF. We do not consider that the requirements of the NPPF on education and economy can be considered to be 'very special' circumstances in themselves sufficient to outweigh other requirements of the NPPF. (1 and 3) Nor can the fact that the School campus is designated as a KGBS, when the Wilson House site is explicitly excluded from the Infill Envelope, be a very special circumstance. (4) That deficiencies in the schools estate and that the school's expansion needs have been accepted as very special circumstances in the past do not in themselves constitute exceptional circumstances (2 and 5). That the new building will be built to high environmental standards is only what one would expect and is not exceptional (6). Consequently we do not consider that, taken together, the very special circumstances put forward outweigh the harm to the Green Belt.

Given that the proposed replacement for Wilson House is so much larger than the current building, in determining the planning balance the Council will have to satisfy itself as to the need for that level of expansion. The NPPF is clear that local authorities should alter Green Belt boundaries only where exceptional circumstances are 'fully evidenced and justified'.

Yours sincerely

David Irving