

Standing up for Hertfordshire's countryside

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

Our Ref:

Your Ref:

23rd May 2018 (by email)

Dear Ms. Humphries & Ms. Hogendoorn,

Application No. 17/2493/OUT
Outline planning application for the provision of a 2 form entry primary school to include access (All other matters reserved).
On Land Off Cowley Hill Borehamwood Hertfordshire

and

Application No. 17/2494/OUT
Outline planning application for the erection of 58 dwellings to include access, layout and scale. (All other matters reserved, Revised Application form received 18th January 2018) On Land North Of Potters Lane Borehamwood Hertfordshire

CPRE Hertfordshire has concerns regarding these applications. We are responding to both together as Application 17/2494/OUT is for the enabling development to fund the development of Application 17/2493/OUT and consequently both are inextricably linked. In addition the Supporting Planning Statements for both are identical.

Both the new school and the enabling development to fund it will result in significant harm to the openness of the Green Belt, contrary to the Green Belt provisions in the National Planning Policy Framework, and Green Belt Policy CS13 in the current Hertsmere Local Plan. They are also contrary to the Green Belt Policies in the Site Allocations and Development Management Policies Plan adopted in November 2016.

Paragraph 4.87 of the Site Allocations and Development Management Policies Plan specifically states that "new (redeveloped) school premises on a single site for Hertswood Academy are being developed; the infilling envelope has been amended to reflect the anticipated requirements of the Academy arising from any future expansion." This proposal goes well beyond that, proposing school development on open Green Belt land on one side of Hertswood Academy and the enabling development on the other. The sole 'very special circumstance' given to justify the harm to the openness and other harm to the Green Belt is educational need.

While we accept that there are pressures which require further 2-form entry primary school capacity, as outlined in the Educational Needs Study, a site has already been proposed for that purpose at Maxwell Park. These applications do not adequately present and analyse alternative ways to meet that educational need. In his judgement when dismissing new school development in the Green Belt and associated enabling residential development in Bishops Stortford (APP/J1915/A/11/2149483 et al.), the Secretary of State set store by the fact that such options had not been fully and rigorously assessed. Unless they are, it cannot be demonstrated that encroachment into the Green Belt has been minimised.

While it could be argued that any new housing would contribute to the Borough's local housing need, the Government has repeatedly made it clear that: " unmet need ... for conventional housing is unlikely to outweigh harm to the Green Belt or other harm to constitute the very special circumstances justifying inappropriate development in the Green Belt."

As 17/2494/OUT is for enabling development it is normal practice for approval of enabling development to be restricted to the minimum amount of development required to ensure the purpose for which it is intended. There is no viability assessment accompanying the application. In its absence we have no means of judging the validity of this aspect of the proposal. The Council will have to satisfy itself that the number of houses proposed is no greater than those required to provide funding for the provision of the new facilities, before considering the applications.

We urge the council to reject these applications as unnecessary and inappropriate development in the Green Belt.

Yours sincerely,

David Irving