



Max Sanders
Planning and Building Control
Hertsmere Borough Council
Civic Offices, Elstree Way
Borehamwood
Herts. WD6 1WA

Our Ref:

Your Ref:

21st October 2022 (by email)

Dear Max Sanders,

**Application no. 22/1539/OUT
Land south of Shenley Hill, Radlett**

Erection of up to 195 new homes (40% affordable), safeguarded land for the expansion of Newberries Primary School and provision of a new medical centre, along with associated access, landscaping and parking. Outline application to include the matter of ACCESS (with the following matters reserved: APPEARANCE, LANDSCAPING, LAYOUT and SCALE)

I write with reference to the above application for speculative residential development, to which CPRE Hertfordshire objects strongly for the following reasons.

1. The site lies within the London Metropolitan Green Belt as defined in the Hertsmere Core Strategy which proscribes inappropriate development according to criteria indicated in the National Planning Policy Framework (NPPF) unless very special circumstances are demonstrated. The Applicant in their Planning Statement seeks to identify very special circumstances in terms of an assessment of the Green Belt, the provision of housing and other obligations.
2. The National Planning Policy Framework states that the boundaries of the Green Belt can be varied only within the Local Plan process. The emerging Hertsmere Local Plan has been shelved following the record-breaking public response to the Regulation 18 consultation with the overwhelming reason for the opposition being the impact of the allocation of Green Belt land for future development.
3. It is entirely inappropriate to suggest that very special circumstances can be demonstrated by an assessment of Green Belt characteristics related to a single site proposal. Designation of Green Belt is based on criteria which has led to the whole of the Hertsmere Borough Council non built-up area being included in the protected area.
4. Further, the provision of housing by the proposal does not constitute very special circumstances above and beyond any other proposal for housing in the Borough. Similarly,

planning obligations relating to the proposals are no more than would be expected from any similar proposal for housing and so do not constitute very special circumstances.

5. The application demonstrates a clear encroachment into open countryside beyond the built-up area with severe impact on its openness and character in this location. It constitutes an inappropriate urban extension which the Green Belt designation exists to prevent, preventing the coalescence of settlements and maintaining the character of the open countryside.

6. Significant representations are being made by CPRE and other bodies to the Government to clarify the technical guidance in the area of housing need with regard to protected areas, especially in the absence of an up-to-date Local Plan. The Government's position is evolving with regard to protection of the Green Belt in response to local community and local planning authority concerns.

7. Recent Ministerial statements, which have policy weight, have reiterated the Government's strong support for protection of the Green Belt. These include correspondence between the then Minister of Housing, Christopher Pincher, and Welwyn Hatfield Borough Council on 18th November 2021, and comments in a back bench debate called by Daisy Cooper MP which appear in Hansard on 21.11.21.

8. The recently published "Levelling Up and Regeneration Bill Policy Paper: Further information" re-emphasises the Government's support for protection of the Green Belt as follows:

"the increased weight given to plans and national policy by the Bill will give more assurances that areas of environmental importance – such as National Parks, Areas of Outstanding Natural Beauty...- will be respected in decision on planning applications and appeals. The same is true of Green Belt, which will continue to be safeguarded." (Creating beautiful places and improving environmental outcomes; In the Bill: LURB Policy paper, May 2022)"

Further,

"Existing Green Belt protections will remain, and we will pursue options to make the Green Belt even greener." (Creating beautiful places and improving environmental outcomes; Alongside the Bill: LURB Policy paper, May 2022)

9. It is clear that the Government's intention is to retain the Green Belt in its present form and the constant attempts to undermine Green Belt protections for residential developments are in danger of bringing the planning system into disrepute. Recent planning appeal decisions have highlighted inconsistencies in decision-making in this crucial area of public policy.



10. In this context, the likelihood of further legislation in the forth-coming Levelling Up and Regeneration Bill, and the present state of the emerging Local Plan, it is clear that this application should be determined according to existing established policy which ensures the protection of the Green Belt in such a sensitive location. We profoundly disagree with the assertion that the proposal does not constitute urban sprawl, nor prevent the merging of settlements.

11. Together with the inapplicability of the five year housing supply in relation to the protection of designated land, we do not believe that very special circumstances have been demonstrated in this case. CPRE Hertfordshire urges the Council to refuse permission for this wholly inappropriate and speculative application.

Could I request that this response is added to the Council's website as a consultation document to enable viewing by the public. We are very disappointed to note that other responses are not being published on the website and have previously raised concerns about this with the Council.

I would also be grateful if you would notify me when the application is going to be discussed at committee.

Yours sincerely,

Chris Berry
Planning Manager