



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

Our Ref:

Your Ref:

3rd March 2023 (by email)

Dear Joshua Lemm,

Application no. 23/0053/OUT

**Land lying to the East of Hartfield Avenue and fronting onto Barnet Lane, Elstree
Residential development of up to 76 dwellings, with associated landscaping, amenity space,
Self-Build plots, sustainable urban drainage (SuDs), and associated works. (Outline
Application to include Access, with all other matters Reserved)**

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

1. The site lies within the London Metropolitan Green Belt as defined in the adopted 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's consultants in their Planning Statement accepts that very special circumstances are required to justify this application for inappropriate development in the Green Belt.
2. The Planning Statement (PS) makes clear that this application is in direct response to the inability of the Council to demonstrate an up-to-date five year housing supply of deliverable sites. The PS also notes the recent 'pausing' of the emerging Local Plan due to record-breaking public response to the allocation of Green Belt land for development, and cites the likely delay to plan preparation as a justification for this application.
3. CPRE Hertfordshire has been active in the area in full support of the Woodcock Hill Village Green Committee, and their recent appeal inquiry against de-registration of the village green. The decision of the appeal to allow de-registration has been challenged legally and the High Court decision is awaited.
4. Our local involvement has demonstrated the wide community support for one of the last remaining patches of open countryside in this increasingly built-up area. Although not

fulfilling all the purposes of the Green Belt it is clear that the open land in this location is highly valued in both amenity and landscape terms.

5. Notwithstanding the site's proposed allocation for residential use in the 'paused' emerging Local Plan we would urge the Council to review this allocation in the light of the scarcity of open green space in this locality. In any case it would seem prudent to delay a decision until the future of the Woodcock Hill Village Green is known as this may affect what is required to provide appropriate local community accessible open space.

6. It is also 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. 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)

7. The recently published National Planning Policy Framework (NPPF) Prospectus for public consultation also contains potential amendments to the calculation and role of housing requirements which are likely to affect the amount of land which needs to be released from Green Belt in Local Plans in the future. In the meantime, the adopted Core Strategy provides the justification for the refusal of this speculative residential development.

Yours sincerely,

Chris Berry
Planning Manager

NOTE: We would request that this letter is published on the Council's website as a document relating to this application and should be grateful if you would notify us of the date of the appropriate meeting if it is to be determined by planning committee.