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**Standing up for Hertfordshire's countryside**

Emily Stafford  
Hertsmere Borough Council  
Civic Offices, Elstree Way  
Borehamwood  
Herts. WD6 1WA

Our Ref:

Your Ref:

17<sup>th</sup> May 2023 (by email)

Dear Emily Stafford,

**Application no. 23/0439/FUL**

**Land adjacent to Lismirrane Industrial Park, Elstree Road, Elstree  
Demolition and redevelopment comprising of E(g)(iii) (Industrial Processes), B2 (General Industry) and B8 (Storage and Distribution) uses with ancillary offices and associated access, car parking, servicing areas and landscaping**

I write with reference to the above application for commercial 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 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 notes that the site comprises 'previously developed land' but the amount of such land is a small proportion of the total site. The clear impression of the site is of an open field and trees, thus contributing to the openness of the Green Belt in this area.
3. Considerable commercial development has taken place nearby in an area which is well used for recreation and leisure activities. This has led to deterioration in the quality of the Green Belt and a considerable reduction in the areas between settlements, causing harm to a main purpose of the designation.
4. It is noted that the site was allocated for commercial development in the recent Regulation 18 public consultation draft of the emerging Local Plan. The record-breaking number of responses from local communities, overwhelmingly rejecting the allocation of Green Belt sites for development, has led to the pausing of the Local Plan preparation for further consideration.

**CPRE is working nationally and locally for a beautiful and living countryside**

**CPRE Hertfordshire is a Charitable Incorporated Organisation**

President: Sir Simon Bowes Lyon, KCVO  
Chairman: Allan McNab

Registered Charity 1162419



5. The Government is also unequivocal in its support for the Green Belt as evidenced by recent Written Ministerial Statements and parliamentary answers, which have policy weight, proposed amendments to the National Planning Policy Framework (NPPF) and the Levelling Up and Regeneration Bill. The latter seeks to rebalance development to areas where it is necessary for economic reasons, thereby reducing pressure on services and facilities as well as highly valued landscapes and countryside.

6. For the above reasons, it is inappropriate to progress with commercial development on the basis of individual planning applications such as this one. Further assessment of the economic, social and environmental factors affecting the emerging Local Plan should re-assert the objectives of the Green Belt as a key determinant of planning policy in Hertsmere in line with local community aspirations

7. The Council has a responsibility to seek ways of enhancing the Green Belt and this is especially necessary where it has been degraded and reduced in size by previous decisions. Consent for this application would result in further encroachment on scarce open countryside in this area and we urge that it be refused.

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.