



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

Our Ref:

Your Ref:

23<sup>rd</sup> June 2023 (by email)

Dear Emily Stafford,

**Application no 23/0677/OUT**

**49 Longview and land to the rear, London Road, Shenley, Radlett**

**Hybrid planning application comprising 1) Outline consent for up to 138 age restricted dwellings (over 55yrs) (Use Class C3) along with a community centre, vehicular and pedestrian access, internal road, landscaping, drainage and other associated works and infrastructure (All matter reserved except access and layout and, 2) Full consent for the demolition of the existing dwelling Longview and alterations to 49 London Road to include the demolition of the existing garage and erection of a replacement garage**

I write to express our concern with regard to the above application 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 accept 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 which was due to a 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. The PS refers to the recent refused application immediately south of this site which was refused for five reasons. CPRE Hertfordshire supports fully the decision of the Council in this matter, and regards the present application as broadly similar in most respects.



4. 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.
5. The Planning Statement suggests that the Council “in refusing planning permission (for application no. 22/1826/OUTE1), the LPA relied heavily upon changes to national policy which have not even taken place”. Notwithstanding that this statement is incorrect in fact, it is prudent for the Council to be aware of significant imminent changes to Government guidance which may have far-reaching implications for large-scale housing developments.
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 where Local Plans have become out-of-date. 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. As noted above, the recent Regulation 18 public consultation for the Hertsmere Draft Local Plan received a record-breaking number of representations from organisations and individuals, including CPRE Hertfordshire, and the majority of these responses opposed site allocations for future residential and commercial development in the Green Belt. This has led Hertsmere Council to ‘pause’ the preparation of their Local Plan pending further consideration of proposals.
8. Recent Ministerial Statements, which have policy weight, have reiterated the Government’s strong support for protection of the Green Belt. 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.
9. Furthermore, local community concerns were reflected in the statement by former Hertsmere BC Leader Councillor Bright in January 2022 that “the potential decimation of large swathes of green belt (sic) has been too much for local people and local councillors to accept.”
10. The application for a specific type of age-related housing is irrelevant to the determination of this matter. The demonstration of very special circumstances should



relate to the conditions of the site and location rather than seek to satisfy a general need which may be accommodated in many locations.

11. The Planning Statement asserts that the refusal of the application for the site immediately to the south should not set a precedent for this application. The Applicant then continues to cite a large number of previous decisions but we agree that applications should be considered on their own merits and the overwhelming harm to the Green Belt in this location outweighs the proposed benefits of the development.

12. In conclusion, this proposal is for inappropriate market housing of a type that Green Belt legislation was designed to prevent. CPRE Hertfordshire urges the Council to refuse permission for this wholly inappropriate and speculative application.

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.