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Standing up for Hertfordshire's countryside

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

Our Ref:

Your Ref:

28th July 2023 (by email)

Dear Joshua Lemm,

Application no . 23/0937/OUT

Land off Barnet Lane and Furzehill Road, Borehamwood

**Outline planning application for the erection of up to 220 dwellings, including 50% affordable housing, self-build/custom-build plots, green infrastructure (including public open space, play area, landscape planting and sustainable drainage systems), ecological enhancements to Woodcock Hill Village Green, new multi-modal vehicular access from Furzehill Road, emergency, pedestrian and cycle access from Carrington Avenue, and associated works and development.
(Outline Application to include Access, with all other matters reserved)**

I write with regard to the above application, to which CPRE Hertfordshire strongly 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 (PS) accept that very special circumstances are required to justify this application for inappropriate development in the Green Belt.
2. The 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. Notwithstanding the site's proposed allocation for residential use in the 'paused' emerging Local Plan, we would urge the Council to review this allocation both in the light of the scarcity of open green space in this locality and uncertainty regarding the basis for the calculation of housing need in the future.

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CPRE Hertfordshire is a Charitable Incorporated Organisation

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

Registered Charity 1162419



4. CPRE Hertfordshire has been active in the area in full support of the Woodcock Hill Village Green Committee, and its recent appeal by inquiry against de-registration of the Village Green which comprises the western portion of the site. The appeal decision to allow de-registration has been challenged and legal proceedings are continuing with regard to the appropriateness of that decision.

5. This application constitutes a clear encroachment of development onto a rapidly reducing area of green space which is in no way compensated for by the 'replacement village green' proposed by those seeking to de-register Woodcock Hill Village Green. Notwithstanding the different context of the planning inquiry into the Village Green, it was stated frequently during the proceedings that the de-registration was unrelated to future proposals for housing in the area. Whilst obviously legally correct, local community representatives doubted that this would be the case. The present application confirms their fears and CPRE Hertfordshire joins with local residents in their concerns at losing this unique open space which they have stewarded so successfully since its registration.

6. We welcome the recent decision by the Council to refuse permission for planning application no. 23/0053/OUT on land east of Hartfield Lane for Green Belt reasons. That site, together with the application site, constitutes one of the last remaining patches of open countryside in this increasingly built-up area which is accessible to local communities. It is clear from our local involvement that the open land in this location is very highly valued and used in both amenity and landscape terms.

7. As we noted in our representation in respect of the Hartfield Road proposal, 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)

8. Imminent amendments to the National Planning Policy Framework (NPPF) to the method of calculation and role of housing requirements are likely to affect the amount of land which needs to be released from Green Belt in Local Plans in the future. These will affect housing targets and thus the preparation of the emerging Local Plan and the amount of land to be allocated for housing in Hertsmere. For all the above reasons, we urge the Council to refuse this 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.