



Georgia O'Brien  
Planning and Building Control  
Hertsmere Borough Council  
Civic Offices, Elstree Way  
Borehamwood  
Herts. WD6 1WA

Our Ref:

Your Ref:

20<sup>th</sup> September 2023 (by email)

Dear Georgia O'Brien,

**Application no. 23/1035/OUTEI - Land North East of Elton Way, Bushey  
Demolition and redevelopment to comprise B8 use of up to 45,000 sq m, including ancillary  
offices.....development will include car parking, creation of servicing areas and provision of  
associated services, including waste, refuse, cycle storage, lighting ...etc  
(Outline Application to include access with all other matters of appearance,  
landscaping, layout and scale reserved)**

I write, with apologies for this late submission, regarding the above application to which CPRE Hertfordshire objects for the following reasons.

1. The site is designated as London Metropolitan Green Belt in the adopted Hertsmere Core Strategy, according to criteria in the National Planning Policy Framework (NPPF), where development is inappropriate and very special circumstances have to be demonstrated for development to be permitted. The applicant's Planning Statement makes no mention of the site's Green Belt designation until paragraph 3.6, suggesting that the site is previously developed land and land-fill.
2. Paragraph 3.6 asserts that the site "mak(ing)es no meaningful contribution to the purposes of the Green Belt" and "is therefore considered to present an opportunity for redevelopment". This is incorrect, particularly in terms of the portion of the site which is open land, and designation as Green Belt specifically precludes development unless very special circumstances can be demonstrated.
3. We note that NPPF paragraph 145 seeks the enhancement as well as protection of the Green Belt and this is clearly a site where the local planning authority should seek improvement rather than development. The growth of multiple low grade uses, admitted by the Applicant to have grown up "in a piecemeal fashion and comprise a series of low quality and utilitarian structures which do not make effective use of the land." (Planning Statement, paragraph 8.35).

4. It is at best arguable that this constitutes previously development land in the sense intended by guidance in the NPPF Sections 11, 12 and 13. The openness of the Green Belt in this location will be severely impacted by the proposed development.
5. Paragraph 8.38 of the PS notes that “Hertsmere is a location where the green belt constrains potential development opportunities(sic)”. That is indeed its purpose and the Green Belt is under increasing threat in Hertsmere and elsewhere.
6. The record-breaking number of responses to the recent Regulation 18 consultation on the emerging Hertsmere Local Plan demonstrated clearly that local communities value highly the Green Belt in Hertsmere. So much so that the Council paused the preparation of the Local Plan pending further consideration of reducing the impact of future development on the Green Belt.
7. It is also clear that the Government intends to retain the Green Belt in its present form. The constant attempts to undermine Green Belt protections for commercial and residential developments are in danger of bringing the planning system into disrepute. The Government’s position is also evolving with regard to protection of the Green Belt in response to local community and local planning authority concerns.
8. As well as Ministerial statements, 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:
  - a. “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 decisions 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;  
“b. “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. The Levelling Up and Regeneration Bill also seeks to rebalance development opportunities to areas where it is needed most, thereby reducing pressure in areas where there are the complementary issues of lack of services and facilities, impacts on the countryside, and congestion and over-heating as is the case in southern Hertfordshire. The mechanistic listing of very special circumstances including the demand for logistics floorspace, economic benefits, location within the M1 corridor, connectivity and related matters should not outweigh the harm to open land



designated to be protected against proposals such as these which can be provided elsewhere.

10. The Green Belt has already been degraded considerably in this area and what is left performs vital functions in maintaining the beneficial division between urban area and open land in a semi-urban environment. Proposals for further industrial use in this area are both unnecessary and damaging without significant improvement in local conditions.
11. This proposal envisages more large-scale inappropriate industrial units covering most of the site and extinguishing any opportunity for enhancement or improvement of the site and the area. We urge the Council to refuse permission for 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.