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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:

4th October 2023 (by email)

Dear Joshua Lemm,

Application no. 23/1123/FUL

Land North of Watford Road and West of High Street, Elstree Extra care development (Use Class C2) comprising age-restricted homes with community facilities, associated access from Watford Road, parking, landscaping, public open space and other associated works. [For consultation purposes only: 141 homes proposed].

I write, with apologies for the delay in responding, with regard to the above application to which CPRE Hertfordshire objects strongly for the following reasons.

- 1. The land identified for this proposed development is designated as London Metropolitan Green Belt in the adopted Hertsmere Core Strategy where development is seen as inappropriate unless very special circumstances are identified which clearly outweigh the harms caused, according to criteria in the National Planning Policy Framework (NPPF).
- 2. The Planning Statement seeks to identify very special circumstances including the need for specialist housing for older people in Hertsmere, the lack of available alternative sites, lack of five year housing supply, freeing up of family housing elsewhere in the Borough, and some economic and well-being benefits. Of these proposed benefits, only the freeing up of family housing elsewhere in the Borough and lack of available local sites may be said to relate in any way to the local conditions and circumstances of the site.
- 3. The remaining issues quoted relate to the general planning situation in Hertsmere and elsewhere, or constitute benefits which would accrue to any proposed development of this size and function. They should therefore not attract any significant weight in the planning balance as they constitute obligations which would be expected of a similar development in any location.

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- 4. To set against the local factors relating to specialist housing need and lack of alternative sites is the growing paucity of open space with its attendant physical and mental health benefits. The Green Belt around Elstree is under unrelenting pressure for development which is jeopardising the highly valued benefits which protection brings.
- 5. The recent record-breaking response to the Regulation 18 Draft Local Plan consultation indicates the depth of local community concern with regard to the proposed loss of Green Belt. This has been further strengthened by recent statements from the Council leadership indicating that site allocations in the emerging Local Plan would respect designated protected land.
- 6. CPRE Hertfordshire believes that it would be highly inappropriate to determine this application while there is such uncertainty regarding the emerging Local Plan. We urge the Council to refuse permission for this proposed 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.