



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

Our Ref:

Your Ref:

14<sup>th</sup> February 2024 (by email)

Dear Max Sanders,

**Application no. 23/1795/OUT**  
**49, Longview, and Land to the rear London Road Shenley**  
**Hybrid planning application comprising 1) Outline consent for up to 103 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 (Resubmission of application 23/0677/OUT)**

I write with regard to the above application which is a resubmission of the application to which CPRE Hertfordshire objected strongly in our letter of 23rd June 2023. The principal change in the present application is the reduction of the number of units proposed from 138 to 103, incorporation of formerly separate community facilities and relatively minor changes to the layout and landscaping.

CPRE Hertfordshire maintains its strong objection to this proposal for similar and additional reasons as follows.

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 extensively 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 Applicant's consultants note, with regard to the reasons for refusal of the adjoining site to the south, that "the LPA (sic) relies heavily upon changes to national policy which have not even taken place. Indeed they may never take place." (paragraph 3.3). There appears to be no basis for this assertion which we would challenge.
5. The reasons for refusal are clear and comprehensive and statements of existing national and local policy which are still relevant, and indeed strengthened by the recent amendments to the National Planning Policy Framework (NPPF) which reassert the significance of the Green Belt.
6. 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.
7. As noted previously 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. 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."
9. It is clear from the recently published amendments to the NPPF 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.



10. The application for a specific type of age-related housing is irrelevant to the determination of this matter. The list of “very special circumstances”(VSC) provided in paragraph 6.70 of the PS notes socio-economic benefits, most of which would accrue to any large-scale residential development. They should relate to the specific circumstances and conditions of this location and proposal rather than seek to satisfy a general need which may be accommodated in many locations.
11. The Planning Statement (PS) asserts that the refusal of the application for the site immediately to the south should not set a precedent for this application. The PS is then appended unnecessarily with 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 clearly outweighs any proposed benefits of the development.
12. The PS notes the “overwhelming support of the local community” (paragraph 5.70) for the proposals. This is clearly inaccurate as demonstrated by the number of representations to this and similar residential developments of a type that Green Belt legislation was designed to prevent and we urge 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.