



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

Our Ref:

Your Ref:

24th May 2024 (by email)

Dear Max Sanders,

Application no. 24/0442/FUL

Land South of Allum Lane, Elstree

Development of an Integrated Retirement Community (IRC) including the erection of a retirement living complex (comprising apartment, bungalows and an associated facilities building), a doctors surgery, hard and soft landscaping, sustainable drainage systems, highways works including a new access off Allum Lane, and all associated works.

I write with regard to the above application to which CPRE Hertfordshire objects 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 identifies the provision of 150 residential units "provided as a range of apartments and bungalows" and intended for retired people. CPRE Hertfordshire's concerns relate to the residential development of this site, notwithstanding the potential tenure or ownership arrangements of future occupants.
3. The Council should satisfy itself with regard to the legal and other arrangements which may be required to ensure occupation by specific types of residents. We believe that it is inappropriate to suggest that housing for a specific demographic grouping provides any greater weight in the planning balance than that provided by general housing need.
4. The demonstration of very special circumstances should relate to the conditions and circumstances of the specific site and not the general need for a specific use or activity which could be satisfied in other locations. The designation of Green Belt is based on

the five purposes identified in the NPPF and we believe the introduction of sub-categories of land use as justification for development is inappropriate in this context.

5. We note and support several of the issues raised in pre-application discussions by planning officers, including the identification of the impact on openness and issues of coalescence of settlements. Similarly, with our concerns noted above, very specific circumstances as required by the NPPF should not comprise general economic or sustainability benefits which would be reasonably expected of any major development proposal.
6. The site is not included in those being considered for inclusion in the emerging Hertsmere Local Plan as an allocation for housing. Considerable work has been done by the Council to review the sites to be included, a significant number of which are located in Elstree and Borehamwood, and this site is neither necessary nor appropriate for inclusion.
7. The importance of this site in terms of its contribution to the scarce open space remaining in Elstree and Borehamwood emphasises the inappropriateness of development in this location. The adjacent cemetery, heavily wooded recycling centre and clear edge to the built-up area of Borehamwood provide a distinction between urban and rural characteristics which is highly beneficial to local communities and visitors, in line with the intentions of the original Green Belt legislation.
8. The high landscape quality of the site is readily understood and recognised by local communities and the setting of the adjacent Allum Lane Cemetery provides a further justification for the preservation of this area of Green Belt. We would challenge the findings of the LVIA prepared by the developer's consultants that the "adverse impacts on landscape and visual receptors arising from the proposed development are limited and contained"(Planning Statement page 16); this is self-evidently incorrect.
9. There is very considerable local community opposition to this proposal, and it is highly regrettable that, unlike the best practice of neighbouring local planning authorities, the public comments are not visible on the Council's website. We note that, at the time of writing, there have been 156 objections submitted, and 11 representations supporting, but we are unable to review the content of these representations.
10. The Green Belt around Elstree and Borehamwood is under unrelenting pressure for development which is jeopardising the highly valued benefits which protection brings. These benefits are heightened by the presence of a significant public right of way (specifically Hertfordshire County Council Elstree and Borehamwood Footpath 7) which



increases access to the countryside in this area for all, a key campaign mission for CPRE, and we note and support the County Council's objection.

11. We support fully the comprehensive concerns of the Allum Lane Fields Association (ALFA) and local residents and urge the Council to refuse permission for this inappropriate and damaging proposal.

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.