



The countryside charity
Hertfordshire

9 May 2024

Councillor Nik Oakley
Hertsmere Borough Council

Dear Cllr Oakley,

Thank you for your letter of 7th May in which you note that two statements we make in our initial commentary on the emerging Hertsmere Local Plan are incorrect and suggest that we are misleading local residents. Clearly, we regret that you should think that this is the case, as at CPRE Hertfordshire we seek to maintain the highest standards of accuracy in our submissions.

With regard to our statement that “approximately 600 hectares (are) proposed to be removed for development “ the largest element of this figure relates to Site HEL382 (Bowmans Cross). Page 83 of the Reg 18 re-consultation document states that the site area is 469 hectares, indicated with a red line on the attached plan, and we assume that this, together with similar information for all other site areas quoted, is the potential total area for development and other purposes which would be removed from Green Belt protection.

We recognise fully that “development” as used in this context may also comprise elements of open land for various uses and activities including open space and recreation, and possibly features such as environmental buffers or country parks. These areas may be substantial in some cases but the proportions of such uses and activities will vary as plans become more detailed. What is undeniable is that, on adoption of a Local Plan with this and other sites included, and whether development is intended to take place within or beyond the plan period, the statutory protection afforded by Green Belt designation is removed.

It is therefore reasonable in our view to identify potential allocated sites in their totality, as indicated by the red line plans in the consultation document in each case. This is the basis on which we prepared our chart of sites accompanying the initial statement, and which with very minor amendments, we will submit with our detailed response prior to the deadline.

We will state clearly the basis for our calculations and references to the Local Plan document and indicate that total site areas can include areas which are not eventually built up, together with certain sites which attract specific definitions with regard to existing consents, sites under construction, inseting and so on. It is in our view misleading to suggest that this approach is somehow inappropriate and we will continue to identify what we believe to be the full potential loss of Green Belt protection.

With specific regard to brownfield sites, we note your remarks concerning planning consents but, notwithstanding the capability of verifying completions, it is irrelevant for consultation purposes as consents do not equate to completions in any case. We have simply taken the publicly available figures from the Council’s Brownfield Land Register as updated in April last year as an indication of

the existing position, which we would suggest is likely in fact to be an under-statement of the true opportunities offered by previously developed land in the Borough.

CPRE locally and nationally supports a rigorous review of Green Belt according to criteria which recognises the full value of the countryside as well as development pressures, and we believe that current practice in this area has been entirely inadequate for some time. Until practice is improved we will continue to identify the total area where it is proposed that Green Belt protections will be removed on adoption of the Local Plan.

I am disappointed that you believe our approach is incorrect and misleading and we will be submitting our detailed representation on the consultation document before the deadline. We will promote that widely through our extensive media networks to inform Borough residents of what we believe to be an accurate interpretation of the present Local Plan proposals with regard to the proposed extent of the Green Belt in Hertsmere within the plan period and beyond.

I would be pleased to respond to any further queries or comments.

Yours sincerely

Chris Berry
Planning Manager
CPRE Hertfordshire