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Standing up for Hertfordshire's countryside

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

Our Ref:

Your Ref:

8th July 2024 (by email)

Dear Emily Stafford

Application no. 24/0692/OUTEI

Land South of Elstree Road and East of Heathbourne Road Bushey Heath

Outline application (with all matters reserved except access) to reclaim a previous landfill site to create a phased Intergenerational Continuing Care Community development based on principles of social prescribing and Age Friendly place-making. The development will comprise of: a range of types and tenures of C2 and C3 residential units; C2 care facilities; clubhouse building; other buildings and lifestyle facilities providing a range of Class E, F1, F2 and sui generis uses;...etc

I write with regard to the above major 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 application comprises what the developer's consultants describe as an "Intergenerational Community" to be known as Heathbourne Green. It is further noted that Heathbourne Green "seeks to provide a range of purpose-built specialist housing for older people" and "will set a new bench-mark for intergenerational living".
3. The Planning Statement eventually indicates that the application is for 1,300 housing units in various formations and tenure types, comprising effectively a new community forming an urban extension of Bushey Heath. Proposed development of this magnitude should be incorporated as part of the Local Plan preparation process to ensure full coordination with the provision of infrastructure, services and facilities.

CPRE is working nationally and locally for a beautiful and living countryside

CPRE Hertfordshire is a Charitable Incorporated Organisation

President: Sir Simon Bowes Lyon, KCVO
Chairman: Allan McNab

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4. This site is not included in the emerging Draft Local Plan on which extensive public consultation has taken place, leading to the initial setting aside of the Draft Local Plan and subsequent re-consultation on a revised version. Significant local community opposition continues to development on the Green Belt and further encroachment on protected open land between existing settlements is unacceptable.
5. The Applicant's consultants cites the previous existence of land-fill as evidence to justify the assertion that the site is previously developed land (PDL). No land-fill activities have taken place in this location for over 30 years and it is inaccurate to say that proposed development is "reclaim"(ing) the site when it has already returned to open land for grazing and hay production.
6. CPRE Hertfordshire contends that the reversion to open countryside fulfils the National Planning Policy Framework (NPPF) requirement for Local Planning Authorities to seek opportunities to enhance the Green Belt (paragraph 150) where they may arise. This site demonstrates such an opportunity, leading to the improvement of highly valued open land where it is scarce.
7. The proposed development would clearly constitute a breach of the first and second purposes of the Green Belt as identified in the NPPF (paragraph 143) to prevent clear encroachment on open countryside and the coalescence of settlements, in this case, of Bushey Heath and Elstree. The open countryside in this case is crossed by the London Loop walkway with vistas and rural landscape which would be utterly compromised by development.
8. The application envisages the provision of circa 4,000 parking spaces which is excessive and entirely inconsistent with achieving the objectives of a sustainable community. The absence of adequate public transport, and distance from railway stations means that there is likely to be significant recourse to private vehicle usage, which is incompatible with national and local policies to reduce the dependence on cars for environmental reasons.
9. It is reasonable to suggest that an innovative development proposal should seek more actively to reduce private car usage, particularly for increasingly elderly residents. The Planning Statement notes that it is intended that residents should regard Heathbourne Green as a permanent residential location as they age, and the lack of public transport is thus likely to become even more relevant in the future.
10. The Planning Statement identifies very special circumstances to justify development in the Green Belt which include 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 may be said to relate in any way to the local conditions and circumstances of the site, and it is likely that the amount of housing released by either families or older people in Hertsmere would be very modest.

11. The remaining issues quoted relate to the general housing 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 in this case.
12. In any case, 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 Bushey Heath and Elstree is under unrelenting pressure for development which is jeopardising the highly valued benefits which protection brings.
13. This application is accompanied by very extensive technical documentation, including engineering and related detail which is irrelevant to the consideration of the planning issues for an outline application. In our view, there is insufficient evidence of agreements and the necessary cooperation between public and private sector institutions which would enable the achievement of the stated objectives of the present application.
14. The existence of legally binding agreements between appropriate institutions involved in medical and social care, and the provision of truly affordable low cost housing, as envisaged for the small proportion of such units to be provided, would be required in any case and, in their absence, this application comprises an unacceptable use of Green Belt in an area where open space is at a premium.
15. Proposed development of this nature should be located within existing settlements or incorporated into the Local Plan preparation process to ensure the appropriate provision of timely environmental and social infrastructure. This application is not supported through the Local Plan process and we urge the Council to refuse permission for this 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.