

31a Church Street Welwyn HERTS AL6 9LW <u>www.cpreherts.org.uk</u> <u>office@cpreherts.org.uk</u> 01438 717587

Standing up for Hertfordshire's countryside

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

Our Ref: Your Ref:

4th September 2024 (by email)

Dear Alexia Kallini,

Application no. 24/1022/OUT

Land at Bushey Hall Golf Club, Bushey Mill Lane, Bushey Outline planning application for the provision of new homes (Class C3) and community, healthcare and well-being facilities (Use Classes F2, E(e)), along with the creation of accesses, landscaping and associated works to facilitate the development

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 proposed development would clearly constitute a breach of the first and third purposes of the Green Belt as identified in the NPPF (paragraph 143) to prevent urban sprawl and clear encroachment into open countryside. The Green Belt around Bushey is under unrelenting pressure for development which is jeopardising the highly valued benefits which protection brings for the surrounding local communities.
- 3. The Planning Statement identifies very special circumstances including the provision of market housing, affordable housing, open space, community and environmental improvements. None of these relate to the specific conditions and circumstances of the site and benefits but rather to the general situation in Hertsmere and elsewhere.
- 4. Further, they constitute benefits which would accrue to any proposed development of this size and function. They should therefore not be seen as clearly outweighing the harms caused to the growing paucity of open space with its attendant physical and mental health benefits and accessibility to local communities

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- 5. 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. This site was not included in the emerging Draft Hertsmere Local Plan on which extensive public consultation took place in 2021, which led to the initial setting aside of the Local Plan due to the amount of Green Belt land proposed to be allocated.
- 6. The site remains unallocated in the revised version of the Draft Local Plan consulted earlier this year. Notwithstanding the recent Written Ministerial Statement and proposed amendments to the NPPF issued in July for public consultation, it remains that Green Belt boundaries should only be revised through the Local Plan process.
- 7. Legally binding agreements between appropriate institutions involved in community services and facilities, and demonstration of the provision of truly affordable low-cost housing, should be required in any case. This application is not supported through the Local Plan process, comprises an unacceptable use of Green Belt in an area where open space is at a premium 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.