



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

Our Ref:

Your Ref:

20th November 2024 (by email)

Dear Trevor Faulkner,

**Application no. 24/1211/OUT
Land South of Shenley Hill Radlett**

Outline permission (with all matters reserved except for means of access) for the erection of up to 195 new homes (50% affordable), safeguarded land for the expansion of Newberries Primary School and provision of a new medical centre, along with associated access, landscaping and parking.

I write with reference to the above application for this speculative residential development, to which CPRE Hertfordshire continues to object strongly. We note that the application is in all aspects similar to a previous application on this site, reference number 22/1539/OUT, which was refused permission, and the subsequent appeal dismissed.

1. The site lies within the London Metropolitan Green Belt as defined in the 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 in their Planning Statement seeks to identify the site as "Grey Belt" which in its view comprises the very special circumstances required to justify the proposed development.
2. The term "grey belt" has been introduced by virtue of a public consultation on proposed changes to the NPPF which provides a draft definition relating to previously developed land or land which makes a relatively weak contribution to the purposes of the Green Belt. It is suggested that such "grey belt" may be released for development.
3. Notwithstanding the consultative status of the proposed amendments to the NPPF, thus attracting no weight in the planning balance, the NPPF states that the boundaries of the Green Belt should be varied only within the Local Plan process. The emerging Hertsmere Local Plan was paused temporarily following the record-breaking public response to the Regulation 18 consultation with the overwhelming reason for the opposition being the impact of the allocation of Green Belt land for future development.

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

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4. It is entirely inappropriate in our view to base this re-submission entirely on a proposed change to the NPPF which is still subject to consideration and, judging from the magnitude of the response to the proposed amendment, likely to be subject to further changes prior to publication. No further circumstances are suggested which would clearly outweigh the harm caused to the Green Belt
5. CPRE Hertfordshire supports strongly the Inspector's dismissal of the previous appeal on the basis of the impact on Green Belt and notes that no substantive changes have been made to this application. We regard this application as a waste of resources and note that the site is still not included in potential allocated sites in the emerging Hertsmere Local Plan which is being prepared for submission for Examination in Public shortly.
6. Similarly, we note that the planning obligations relating to the proposals are no more than would be expected from any similar proposal for housing and so do not constitute very special circumstances. We repeat our previous concerns that remain relevant to this application as follows.
7. 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.
8. Significant representations are being made by CPRE and other bodies to the Government to clarify the technical guidance in the area of housing need with regard to protected areas, especially in the absence of an up-to-date Local Plan. The Government's position is evolving with regard to protection of the Green Belt in response to local community and local planning authority concerns.
9. It is clear that the Government's intention is to retain the Green Belt largely 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. Certain recent planning appeal decisions have highlighted inconsistencies in decision-making in this crucial area of public policy and we welcome the clarity of the Inspectors' decision in this case.
10. In this context, it is clear that this application should be determined according to existing established policy which ensures the protection of the Green Belt in such a sensitive location. We profoundly disagree with the assertion that the proposal does not constitute urban sprawl, nor prevent the merging of settlements.



11. CPRE Hertfordshire urges the Council to maintain its position with regard to this wholly inappropriate and speculative application and refuse permission.

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.