



The countryside charity
Hertfordshire

31a Church Street

Welwyn

HERTS AL6 9LW

www.cpreherts.org.uk

office@cpreherts.org.uk

01438 717587

Standing up for Hertfordshire's countryside

Georgia O'Brien
Planning and Building Control
Hertsmere Borough Council
Civic Offices, Elstree Way
Borehamwood
Herts. WD6 1WA

Our Ref:

Your Ref:

14th February 2025 (by email)

Dear Georgia O'Brien,

Planning application no. 24/1522/OUT

**Land East of Little Bushey Lane and north of The Squirrels, Little Bushey Lane, Bushey
Application for residential development (up to 280 dwellings) with access from Little
Bushey Lane, a mobility / community hub (Class E), along with car parking, drainage and
earthworks, open space and all ancillary and enabling works**

I write with regard to the above major outline planning 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 stated 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 site has been the subject of a previous planning application, a dismissed appeal and a failed judicial review and CPRE Hertfordshire also objected by letter of 5th August 2022. The Applicant's consultant's Planning Statement suggests no substantive changes to any part of the application from the previous submission, apart from a modest reduction in the number of units from 320 to 280.
3. CPRE Hertfordshire concerns remain as previously stated. The Planning Statement quotes the recent revision of the NPPF as justification for this re-submission and promotes no meaningful re-assessment of any of the original reasons for the refusal of planning permission and subsequent appeal dismissal.
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. Very significant local community

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: Peter Waine

Registered Charity 1162419

CPRE Patron: His Majesty The King

opposition continues to development in the Green Belt and the Council is proceeding at an accelerated pace towards Examination in Public and adoption of the Local Plan.

5. 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 encroachment on open countryside. We entirely refute the assertion that the first purpose of the Green Belt has no relevance in this case.
6. This purpose refers to the effect of the urban sprawl emanating from the growth of London as the major development generator in this and the surrounding areas. The proposed development is clearly urban sprawl beyond the built-up areas of surrounding settlements which the Green Belt legislation was designed to prevent.
7. The remaining issues quoted as contributing to the very special circumstances relate to the general housing situation in Hertsmere and elsewhere, and constitute benefits which would accrue to any proposed development of this size and function. The now standard practice in major planning applications in the Hertfordshire Green Belt of listing such benefits, including community centres and the like reduces the consideration of such issues to a check-list of items irrespective of the conditions and circumstances of the location and inevitably renders them as less “special”.
8. The table in section 8.22 Planning Balance of the Planning Statement is a totally inadequate attempt to summarise the issues involved in the judgements to be made that the harm to the Green Belt is “clearly outweighed” by the benefits proposed. No attempt is made to define the harms caused which is a crucial exercise to be undertaken with regard to establishing the planning balance.
9. As significant as the proposed benefits is the growing paucity of open space adjacent to built-up areas with its attendant physical and mental health benefits. The Green Belt in this area is under unrelenting pressure for development which is jeopardising the highly valued benefits which protection brings, and its continual reduction is in danger of bringing the planning system into disrepute.
10. The existence of legally binding agreements between appropriate institutions involved in the provision of truly affordable low cost housing would be required in any case. Given the inadequacy of the official definition to reflect the true state of the housing market in Hertfordshire, affordability for average earning households is unattainable and should not be used as contributing to very special circumstances in the determination of a planning application.



11. It is highly regrettable that we are not able to access the content of the 421 public objections made so far to this application, presumably by local organisations and residents. It is best practice for local planning authorities to provide access to these responses and we note that Hertsmeare exceptionally in Hertfordshire does not provide this information.
12. 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.