



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

Our Ref:

Your Ref:

26th February 2025 (by email)

Dear Lisa Page,

Application no. 24/1663/FUL
Land Adjacent to Larksmead, Barnet Lane, Elstree
Demolition of existing stables and removal of associated hard-standing and the
construction of an Integrated Retirement Community (IRC) of 90 extra care units (Use Class
C2) with means of access; ancillary communal and care facilities; landscaping and pen
space; and all other associated works and infrastructure.

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 Planning Statement identifies the provision of 90 units in an "Integrated Retirement Community". CPRE Hertfordshire's concerns relate to the residential development of this site, notwithstanding the potential tenure or ownership arrangements of future occupants, and the apparent plethora of similar applications for housing of the proposed type in the area.
3. The Council should in any case satisfy itself with regard to the legal and other arrangements which may be required to ensure occupation by specific types of residents. We believe that it is inappropriate to suggest that housing for a specific demographic grouping provides any greater weight in the planning balance than that provided by general housing need.
4. The demonstration of very special circumstances should relate to the conditions and circumstances of the specific site and not the general need for a specific use or activity

which could be satisfied in other locations. The designation of Green Belt is based on the five purposes identified in the NPPF and we believe the introduction of sub-categories of land use as justification for development is inappropriate in this context.

5. We note the introduction in the Planning Statement (PS) of the concept of grey belt which is now typically identified in virtually every planning application made since the publication of the revised NPPF in December 2024. In the absence of an assessment of the local conditions relating to the quality of Green Belt in this location, reference is made to the legal definition of grey belt as noted in paragraph 155 of the NPPF and the Glossary.
6. No detailed discussion of the grey belt is offered other than the definition in the NPPF paragraph 155 and the Glossary, referring to the significance of three purposes of the Green Belt (NPPF paragraph 143; purposes a), b) and d)) in not providing strong reasons for the designation of grey belt. CPRE Hertfordshire believes that purpose a) of the Green Belt “to check the unrestricted sprawl of the large built-up areas” is directly relevant in this case, referring to the unplanned growth of the metropolis which continues apace.
7. The attempted promotion of the concept of grey belt in virtually every application since the revised NPPF publication is in danger of rendering it virtually meaningless, and it is urgently necessary to undertake a local review of Green Belt conditions to ascertain where grey belt criteria may apply most appropriately. The quality and importance of the Green Belt for local communities in this location means that it should not be regarded as grey belt.
8. Further, this site together with land that is the subject of another Integrated Retirement Community (sic); Hertsmere planning application reference number 24/0442/FUL: Land south of Allum Lane Elstree, forms a substantial corridor for wildlife and the natural environment, constituting a crucial area of open countryside in an area which lacks such provision. The open land between Elstree and Borehamwood performs a critical role in preventing the coalescence of these two significant settlements thus fulfilling purpose b) of the Green Belt and adding to the strength of the Green Belt protection.
9. The site is not included in those being considered for inclusion in the emerging Hertsmere Local Plan as an allocation for housing. Considerable work has been done by the Council to review the sites to be included, a significant number of which are located in Elstree and Borehamwood, and this site is neither necessary nor appropriate for inclusion.



10. The importance of this site in terms of its contribution to the scarce open space remaining in Elstree and Borehamwood emphasises the inappropriateness of development in this location. This and the open land referred to above provides a clear edge to the built-up area of Borehamwood providing a distinction between urban and rural characteristics which is highly beneficial to local communities and visitors, in line with the intentions of the original Green Belt legislation.
11. The high landscape quality of the site is readily understood and recognised by local communities. There is considerable local community opposition to this proposal, and it is highly regrettable that, unlike the best practice of neighbouring local planning authorities, the public comments are not visible on the Council's website.
12. The Green Belt around Elstree and Borehamwood is under unrelenting pressure for development which is jeopardising the highly valued benefits which protection brings. These benefits are heightened by the presence of significant public rights of way which increase access to the countryside in this area for all, a key campaign mission for CPRE, and we note and support the County Council's objection.

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.