

Elstree and Borehamwood Green Belt Society
Briefing Note for Planning Application 25/1615/FUL
Land to the Southwest of Vale Avenue, Borehamwood

Introduction

We urge the Planning Committee to **refuse permission** for development of 98 homes on the Land Southwest of Vale Avenue. This site is within the Green Belt, and we believe the proposal is an inappropriate and harmful incursion onto it. While the planning officers' report recommends approval, we believe this is based on a misinterpretation of national and local policy.

1. The "grey belt" Argument

***The planning officers say:** The site meets the definition of grey belt because it is on the suburban edge and makes a "weak contribution" to the strategic functions of the Green Belt.*

We say: This site is not a "disused car park" or "derelict land". It is an area of natural beauty consisting of grassland, scrub, and emerging woodland. According to **Paragraph 143** of the National Planning Policy Framework (NPPF) (December 2024), two core purposes of the Green Belt are to "check the unrestricted sprawl of large built-up areas" and to "safeguard the countryside from encroachment". Developing this site would result in an irregular "finger" of housing into the countryside, directly contradicting these goals. We believe it is incorrect to label a locally-cherished landscape as grey belt simply to meet housing targets.

2. Protected Assets and Exclusions

***The planning officers say:** There are no areas or assets of particular importance that provide a "strong reason" for refusing development.*

We say: The definition of grey belt in the **Annex 2 Glossary** of the NPPF (December 2024) explicitly excludes land where policies relating to "assets of particular importance" provide a strong reason for refusal. This list of assets, found in **Footnote 7 (Page 6)** of the NPPF, includes Local Green Spaces and sites of biodiversity importance.

This land was a registered part of the Woodcock Hill Village Green from 2008 until 2022. While the developer has legally moved the Village Green status to other land, this specific site remains an asset of significant community and ecological importance. Its history as a Local Wildlife Site (LWS) and the presence of protected species, such as bats and reptiles, mean it should be protected, not built over.

3. Impact on Woodcock Hill Village Green

***The planning officers say:** The scheme includes "naturalistic" buffers to help the development transition into the neighbouring open space.*

We say: The proposal fails to respect the character of the land that remains as the Woodcock Hill Village Green. The Green is not just a flat "open space"; it is a rich landscape

of mature trees, thick shrubbery, and grassland that provides a sense of "wild nature". The applicant's own Landscape and Visual Impact Assessment (LVIA) admits that for people using the paths on the Green, the visual impact will be "Moderate to Major Adverse". High-density housing, including buildings up to three storeys high, will loom over the Green, destroying the tranquillity that residents currently enjoy.

4. **The Planning Balance: Harm vs Benefits**

The planning officers say: *Even if the site is not considered grey belt, the benefits of the scheme—particularly providing 98 homes—clearly outweigh the harm to the Green Belt.*

We say: This argument ignores the stringent standards set by the government. Under **Paragraph 11(d)(i)** of the 2024 NPPF, the "presumption in favour of sustainable development" (the "tilted balance") is entirely disengaged when policies for protected areas, such as the Green Belt listed in **Footnote 7**, provide a "strong reason" for refusing development.

Furthermore, **Paragraph 153** of the 2024 NPPF states that "inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances". The lack of a five-year housing land supply in Hertsmere does not automatically justify destroying the permanence and openness of the Green Belt. Once this land is built on, its character is lost forever.

5. **Conflict with Local Policy**

The planning officers say: *The development layout and design would respond to the character of the area.*

We say: The proposal violates Hertsmere's own Local Plan. Policy CS13 and Policy ADM26 (Site Allocations and Development Management) require developments in the Green Belt to maintain "visual and physical openness". Building 98 homes is a massive visual intrusion into the Elstree Ridge and Slopes (Landscape Character Area 23), which is defined by its "wooded skyline".

The applicant's own Biodiversity Net Gain (BNG) Report admits that the "replacement land" offered in the Village Green exchange provides only a "limited uplift" and does not adequately compensate for the loss of habitat on this specific site.

Conclusion

We understand the pressure to build more homes, but that must not come at the cost of our most important environmental protections. The officers' report relies on a flawed "grey belt" classification and fails to give proper weight to the permanence of the Green Belt and the integrity of the Woodcock Hill Village Green.

We urge the Committee to uphold the principles of the Green Belt and REFUSE this application.