

## Planning Application 3/20/1461/OUT

Lanbrook St Marys Lane Hertingfordbury Hertfordshire

Outline planning for a Continuing Care Retirement Community Comprising up to 168 one- and two-bedroom extra-care apartments, 40 assisted living apartments a village centre building with community and medical facilities, external landscaping and green infrastructure - All Matters Reserved.

Civic Society Hertford Civic Society  
Amenity Group  
Customer objects to the Planning Application  
We wish to object to this application.

The site is in the Green Belt where, subject to certain exceptions, new built development is inappropriate. None of the exceptions apply in this case.

Inappropriate development in the Green Belt should be approved only if there are very special circumstances. No such circumstances have been identified by the applicant. However, permission is sought 'as an exception to policy' on the basis that (i) there is a need and demand for the type of accommodation proposed, and that (ii) the Council cannot demonstrate a five-year supply of land for housing, or will not be able to do so following the disruption caused by the pandemic.

Even if both those propositions were true (which we doubt), the National Planning Policy Framework is quite clear (paragraph 11(d)(i)) that permission should still not be granted, because "the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed." One such policy in the Framework is the policy to protect Green Belt land from development.

Quite apart from the technicalities, this particular stretch of Green Belt performs an obvious and visually important role in separating the town of Hertford from the village of Hertingfordbury, and in providing a rural setting for the village conservation area. The fact that the extent and boundaries of the Green Belt in East Herts were defined in a District Plan adopted less than two years ago, after a meticulous and painstaking process of review, makes it all the more important that those boundaries are robustly defended.

In our view the case for refusing this application on Green Belt grounds is so strong that it is unnecessary to go into detail on other matters, such as traffic, ecology, sustainability, effect on heritage buildings etc. However we note and endorse the objections on these points submitted by many residents of Hertingfordbury, based on their personal knowledge of the village.

We have two further points.

First, the applicant claims that the dwellings proposed would fall within Use Class C2. If that is so, the development would escape the requirement to include affordable housing

under Policy HOU3 of the District Plan because that Policy applies only to Class C3. But Class C2 relates to residential institutions, and it is arguable that the proposed village, with its independently owned properties, does not fall within that category.

Secondly, the application proposes a large number of facilities for residents (wellness centre, restaurant, bar, shop, cafe, library, function room, hairdressing salon, surgery, tennis and badminton courts, ..... ) which would be very expensive to provide and run; indeed it is difficult to believe that with all these 'extras' the scheme would be viable. We appreciate that normally the identity of an applicant is not a material consideration in determining a planning application, but given the questionable viability of the whole scheme it may be relevant in this case to note that the applicant does not claim to have previous experience of either developing or managing any similar retirement village complex. We do not allege any bad faith, but there must be a risk that the developers would find themselves unable to complete the whole of the scheme as planned, and Hertingfordbury could end up with some blocks of flats in a field. Of course conditions could be imposed to prevent this outcome, but they would have to be crafted and enforced with extreme care to be effective.

We urge you to refuse permission.