



Mr Adam Ralton
Development Management (Planning)
Three Rivers District Council
Northway
Rickmansworth
Herts WD3 1RL

Our Ref:

Your Ref:

24th March 2021 (by email)

Dear Mr Ralton,

Application No. 19/0646/OUT

Outline Application: Construction of new Motorway Service Area (MSA) to comprise: amenity building, 80 bedroom lodge, drive-thru coffee unit, fuel filling station with retail shop, together with associated car, coach, motorcycle, caravan, HGV and abnormal load parking, alterations to the A41 including construction of a new roundabout and vehicular access, works to the local highway network and at Junction 20 of the M25 motorway.

**Provision of landscaping, signage, infrastructure and ancillary works. (Acc'd by Environmental Statement with matters of Appearance, Landscaping and Scale reserved)
Land South Of Junction 20 Of M25 And West Of A41 Watford Road Hunton Bridge Herts**

I write with reference to the submission of additional information on the above application. CPRE Hertfordshire wrote in objection to this application on 22nd May 2019 and this objection is maintained in the light of the new information which does not affect our principled opposition to this proposed development in the Green Belt. CPRE Hertfordshire's main concerns remain as identified in our previous letter of objection which may be summarised as follows.

1. The land identified for this proposed development is located within the London Metropolitan Green Belt as identified in the Three Rivers Core Strategy Local Development Document 2011. The National Planning Policy Framework (NPPF) as revised in February 2019 requires land designated as Green Belt to be kept "permanently open" (para. 133) and "inappropriate development should not be approved except in very special circumstances" (para. 143).
2. The applicants have provided five instances of "very special circumstances" which they regard as outweighing the harm caused to the Green Belt by the proposed development, viz:
 - i. Paragraph 146 of the NPPF accepts implicitly that some transport infrastructure may be provided in the Green Belt.
 - ii. 46 current Motorway Service Areas (MSA) are located in the Green Belt.



- iii. Possible alternative sites between Junctions 16 and 17 have been discounted in favour of a site at Junction 20.
 - iv. Department of Transport(DoT) Circular 02/2013 sets out the need and safety cases for MSAs on the strategic road network.
 - v. Significant benefits arising from a MSA in business and employment.
3. Each of these “very special circumstances“ are challenged as follows:
- i. Paragraph 146 of the NPPF specifically states that the “other forms of development (which can include “local transport infrastructure“)...are...not inappropriate in the Green Belt provided they preserve its openness“. The proposed site is highly prominent from many directions including Kings Langley and the surrounding open countryside and this impact will be exacerbated through light pollution from its 24 hour operation.
 - ii. The fact of other MSAs being in the Green Belt is not a very special circumstance. Each planning application is considered on its merits and local conditions and does not set a precedent for any other proposal.
 - iii. Discounting other sites is similarly irrelevant to the consideration of this application and the local pertaining circumstances and conditions.
 - iv. Need and safety concerns, and the guidance of DoT Circular 02/2013 do not constitute very special circumstances relating to harm to the Green Belt. In any case, the DoT circular provides guidance for service areas between junctions accessible from the motorway and avoiding “the creation of additional traffic at existing junctions“.
 - v. There are no significant service or employment benefits from this proposal as opposed to other options, nor, it is suggested, within the area which is well served by existing facilities.
4. The proposed development will have a detrimental impact on biodiversity. Reference is made in the previous submission to the the Herts and Middlesex Wildlife Trust (WHWT) response which we support fully. The mitigation measures proposed by the applicant are merely aspirational and inadequate.
5. Our previous submission identified significant traffic implications for the existing road network and junctions. These have been highlighted extensively by other respondents and the additional traffic infrastructure information is for others to assess in detail.
6. The substantive additional information provided by Croft Transport Planning and Design consultants in January 2021 comprises, amongst other information, updated traffic assessments and proposals for further road works to increase capacity and circulation, including a new roundabout on the A41. Far from improving conditions, or reducing harm as required by the NPPF, such additional road provision will increase



the detrimental impact of this proposed development in a sensitive Green Belt location.

In conclusion, our position remains as one of strong opposition to an unnecessary MSA in an entirely inappropriate and prominent position in the Green Belt. We urge the Council to refuse this application.

Yours sincerely,

Chris Berry
Planning Manager