



Suzanne O'Brien
Development Management
Three Rivers District Council
Three Rivers House
Northway, Rickmansworth
Herts. WD3 1RL

Our Ref:

Your Ref:

8th June 2022 (by email)

Dear Suzanne O'Brien,

Application no. 22/0601/OUT - Land at rear of 17- 49 Church Lane, Sarratt
Outline application: Erection of up to 78 new dwellings, a new Doctors Surgery and Scout HQ with vehicular access onto Sarratt Road (Appearance, Layout, Landscaping and Scale as reserved matters)

AND

Application no. 22/0602/OUT - Land adjacent 97 Church Lane, Sarratt
Outline application: Erection of up to 9 new homes, associated access, parking and landscaping (Appearance, Layout, Landscaping and Scale as reserved matters)

CPRE Hertfordshire objects strongly to the above applications for the following reasons.

1. Both applications constitute inappropriate development in the London Metropolitan Green Belt and are contrary to the policies of the adopted Three Rivers Development Plan and the National Planning Policy Framework (NPPF) in respect of impact on the Green Belt and on the setting of the Chilterns Area of Outstanding Natural Beauty (AONB).
2. We are responding to both applications together as they have been linked by the Applicant, with regard to proposed Section 106 undertakings relating to the provision of a doctor's surgery and new Scout headquarters building. CPRE Hertfordshire believes that this linkage is highly inappropriate and conflates issues which should be considered separately.
3. The conditions for each site are quite different in scale, location and impact; requiring separate consideration in planning terms but the supporting documentation for both applications is essentially the same and the justifications for the developments are similar. Issues relating to the impact of the proposed developments on the countryside are so serious that they should not be linked to the provision of modest



community services, which may be located in more appropriate locations, if they are needed at all.

4. The larger site (Application no. 22/0601/OUT) is currently open farmland outside the Sarratt village boundary and not included in the current Three Rivers Site Allocation LDD. It lies entirely within the Green Belt and as such, under the provisions of the NPPF and the Three Rivers Development Plan, the applicant has to demonstrate very special circumstances sufficient to overcome the resulting harm of development to the Green Belt and the setting of the AONB.
5. The smaller site (application no. 22/0602/OUT) is also in agricultural use and no attempt is made by the Applicant to consider the specific circumstances of this site and location with regard to planning considerations, as opposed to those relating to application 22/0601/OUT. The factors affecting this smaller site are different from the larger application, but in any case constitute inappropriate development in the Green Belt by virtue of encroachment and impact on the openness of the countryside.
6. As well as protection of the Green Belt, the NPPF notes the need to protect the setting of the AONB. Paragraph 176 notes: “development within their setting should be sensitively located and designed to minimise adverse impacts on the designated areas”. The relatively isolated nature of the larger site (application no. 22/0601/OUT) will have a particularly significant impact on the setting of the AONB.
7. To put the locations of these sites in context, in the Final Report of the Landscapes Review of National Parks and AONBs commissioned by the Government and published in September 2019, the point is made that the Chilterns AONB is of such significance that the report recommends that it is re-designated as a National Park (pages 119-121).
8. In discussing the Chilterns AONB the report notes that “ *In the south east of England, in particular, the pressure of development is immense and may only get greater. Some national landscapes, the Chilterns for instance, risk changing very fast as a result and mostly not for the better. We shouldn’t just accept this as sadly unavoidable.*”... “*The ‘exceptional circumstances’ provision in the National Planning Policy Framework, which was intended to limit development in national landscapes, is being used to argue for major development instead, on the grounds that no other sites outside AONBs are available. We believe strongly that this is in contravention of the purpose of designation.*”(pages 102 and 107). These applications fall into this description by virtue of their location within the setting of the AONB.



9. The documentation accompanying both applications is extensive, but essentially the Applicant argues that the planning balance rests on: “first, the principle of development, both in respect to the sustainability of the site and Green Belt considerations, and secondly other technical and development management considerations that relate to whether development at the site can be demonstrated to be deliverable” (Planning Statement). We believe this to be a profoundly mistaken position, particularly with regard to the deliverability aspects of proposed development which are inappropriate by virtue of the designated protected status of the land.
10. With regard to the principle of development in the Green Belt, CPRE Hertfordshire has argued consistently in both Examinations in Public of Local Plans in Hertfordshire, and in representations to planning applications, that the intent of Paragraph 11 (and footnote 7) in the NPPF is clear with regard to the protection of designated land. Recent planning appeal decisions in favour of residential development and the proposed allocation of Green Belt sites in Local Plans in preparation have led to a weakening in these protections in the face of arguments relating to housing need.
11. The Applicant considers that the sites do not make a significant contribution to the Green Belt and are effectively poorly performing and not contributing to the landscape quality. We profoundly disagree with this assertion, as do extensive local community and public comments, and further note that it is not the quality of Green Belt land which is protected but the function it fulfils as open countryside.
12. The arguments used by the Applicant are frequently applied by developers to urban edge sites in the Green Belt; if accepted they form a circular argument. The site is released from the Green Belt and the next site up then becomes the urban edge and the same argument is then applied to that and the Green Belt is gradually eroded.
13. In addition, the Council is developing its emerging Local Plan and considering the results of the significant public response to the Regulation 18 consultation. As well as dramatic reductions in future household projection for Three Rivers which should now be taken into account, the impact that these proposals will have on the Green Belt and the setting of the AONB, may have a significant effect on the Local Plan process by predetermining decisions about the scale, location and phasing of new development.
14. Key elements in the applications are the proposed provision of a doctor’s surgery and Scout headquarters building in a Section 106 agreement and these are also cited as constituting very special circumstances for approval. Notwithstanding the possible need for these facilities, which is doubted by many local community responses to



these applications, their relationship to the proposals for development is tenuous at best.

15. Both facilities are modest in size with regard to land take and, if required, should be located where they are not part of a proposed development in the Green Belt. The Council should ascertain the need for these facilities and the legitimacy of their relationship to the proposed developments
16. These applications are not a binary choice. Each application should be considered on its own merits and we urge the Council to refuse them both on the grounds of their impact on the Green Belt and setting of the AONB.

Yours sincerely,

Chris Berry
Planning Manager