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Standing up for Hertfordshire's countryside

Claire Westwood  
Development Management  
Three Rivers District Council  
Three Rivers House  
Northway, Rickmansworth  
Herts. WD3 1RL

Our Ref:

Your Ref:

19<sup>th</sup> July 2023 (by email)

Dear Claire Westwood,

**Application no. 23/1068/OUT**

**Parcel of Land North of Mansion House Farm, Bedmond Road, Abbots Langley  
Demolition and clearance of existing buildings and hardstandings to allow for the  
construction of a data centre of up to 84,000 sqm (GEA) delivered across 2no. buildings,  
engineering operations and earthworks to create development platforms, site wide  
landscaping and the creation of a country park. The data centre buildings include ancillary  
offices, internal plant and equipment and emergency back-up generators and associated  
fuel storage. Other works include an ancillary innovation, education and training centre of  
up to 300 sqm, internal roads and footpaths, cycle and car parking, hard and soft  
landscaping, security perimeter fence, lighting, drainage, substation, and other associated  
works and infrastructure (all matters reserved).c**

I write with regard to the above application, to which CPRE Hertfordshire objects for the following reasons.

1. The site lies within the London Metropolitan Green Belt as defined in the adopted Three Rivers Core Strategy according to criteria in the National Planning Policy Framework (NPPF). Development in the Green Belt is inappropriate unless very special circumstances can be demonstrated to clearly outweigh the harm caused by the proposal.
2. The Applicant's Planning Statement lists twelve issues which it asserts amount to the very special circumstances required. Primarily, the Applicant promotes this proposal as a special case due to the urgent requirement for data centres as a national priority which they see as weighing very substantially in the planning balance.
3. This is to misinterpret fundamentally the nature of very special circumstances relating to proposals in the Green Belt. Notwithstanding a requirement for data centres as key elements of future economic growth, there appear to be no specific locational factors relating to this particular site as opposed to other sites either locally or further afield, other than its availability.

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CPRE Hertfordshire is a Charitable Incorporated Organisation

President: Sir Simon Bowes Lyon, KCVO  
Chairman: Allan McNab

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4. It is reasonable to suggest that this availability arises from the site's status as Green Belt which may be said to have prevented its consideration for development up until now. The principal issue under consideration is the designated protected status of the land and the harm which would be caused by any development in this location.
5. It is undeniable that the Green Belt, especially in southern Hertfordshire is presently subject to unprecedented pressures from proposed development of all kinds, including residential, commercial and for energy generation. This has led to significant public reaction which has been expressed through consultations relating to the Local Plan preparation process.
6. The National Planning Policy Framework (NPPF) is clear that alterations to Green Belt boundaries should take place only through the Local Plan process, and not by individual planning applications. The constant pressure of applications on designated protected land is in danger of bringing the planning system into disrepute.
7. This proposal would have a substantial impact on the openness of the Green Belt. The provision of an associated "country park" is irrelevant as this would use land which is open countryside, and thus already fulfilling the purposes of the Green Belt.
8. Other factors promoted as providing very special circumstances include employment provision, building quality, social benefits, climate change and the lack of alternative locations. We believe that the majority of these elements would relate equally to a similar development in another location without statutory protection and they should not be regarded as having significant weight in this case.
9. CPRE Hertfordshire believes that this proposal constitutes highly inappropriate development of a type which Green Belt legislation was designed to prevent. The intention of the Government to protect the Green Belt is clear through recent Ministerial statements, imminent amendments to the NPPF and the Levelling Up and Regeneration Bill and we urge the Council to refuse this application.

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.**