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Standing up for Hertfordshire's countryside

Alexia Kallini
Planning and Building Control
Hertsmere Borough Council
Civic Offices, Elstree Way
Borehamwood
Herts. WD6 1WA

Our Ref:

Your Ref:

23rd October 2024 (by email)

Dear Alexia Kallini,

Application no. 24/1152/OUTEI

Land East of South Mimms Services, St Albans Road, South Mimms

Outline planning permission with all matters reserved (access, appearance, landscaping, layout and scale) for phased development of Data Centre (Use Class B8) comprising of up to 187,000 sqm GEA. Development to include ancillary of offices, internal and external plant and equipment (including flues) and substation (external plant excluded from maximum floorspace). Provision of car parking; servicing areas; associated services (including waste, refuse, cycle storage, lighting); laying out building, routes and open spaces within the development...etc

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

1. The site lies within the London Metropolitan Green Belt as defined in the adopted Hertsmere 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 (PS) presents the general policy context for development and asserts that the national need for data centre capacity provides sufficient justification for the promotion of this speculative development. Subsequently, the PS suggests that very special circumstances can be demonstrated which are again related to the need for data centres and there is a general and incomplete discussion of potential alternative sites which is inconclusive.
3. This is to misinterpret fundamentally the nature of the 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

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Chairman: Allan McNab

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factors relating to this particular site as opposed to other sites either locally or further afield, other than its availability.

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 recently relating to the Local Plan preparation process, in Hertsmeire and elsewhere.
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. Together with concurrent proposals for large-scale residential development adjacent to this site as a southern extension to Potters Bar, and the South Mimms Motorway Service Area, the cumulative effect of these proposals would constitute a massive encroachment on the Green Belt in this area.
8. The PS also comments on the recent public consultation regarding the future of the Green Belt as part of amendments to the NPPF and the introduction of the concept of "grey belt" which is only defined in the most general terms but still applied to this proposal in terms of justification. It is entirely inappropriate to infer any future policy position regarding the quality of Green Belt on the basis of a public consultation exercise, especially where there has been an unanticipated level of public reaction, as in this case.
9. Doubt may also be directed at the justification related to the scale and location of the data centre in this location. Evidence presented By Professor Christopher Ford at the recent public inquiry into a proposed data centre at Abbots Langley (Three Rivers District Council; APP/P1940/W/24/3346061), Hertfordshire, noted the flexibility available for data centre locations to avoid designated protected areas such as Green Belt.



10. Given the significance and impacts of locating large-scale developments such as data centre, similar analysis should be undertaken to establish robust locational criteria within the Local Plan system for any variation of Green Belt boundaries. Moreover, there is a lack of objective and independent assessment of the overall need for datacentres which means that significant decisions for large-scale developments are made on the basis of incomplete information.
11. It appears that no significant attempt has been made to seek a site which provides less harm. This speculative proposal will have a hugely detrimental impact on an area of high landscape value and we urge the Council to refuse permission for this highly inappropriate development of a type which Green Belt legislation was designed to prevent.

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.