



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

Our Ref:

Your Ref:

9th July 2025 (by email)

Dear Claire Wilson,

Planning application no. 25/0896/FUL
Land at Woodside Road, Woodside Road, Abbots Langley
Construction of 192 no. dwellings (Use Class C3), public open space, landscaping, new vehicular access and pedestrian accesses and associated infrastructure.

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

1. The land identified for this proposed development is designated as London Metropolitan Green Belt in the adopted Three Rivers Core Strategy where development is inappropriate unless very special circumstances are identified which clearly outweigh the harms caused, according to criteria in the National Planning Policy Framework (NPPF).
2. The Applicant's Planning Statement (PS) seeks to justify the proposed development both on the basis of very special circumstances relating to the lack of housing land supply in the emerging Local Plan and the introduction of the concept of grey belt. The PS proceeds to assert that none of the three purposes of the Green Belt which may be identified (see NPPF Glossary definition of grey belt) where development would be inappropriate apply in this case.
3. This follows the now frequent pattern of recent applications, arguing similarly that the revised National Planning Policy Framework (NPPF) has changed the basis for their determination and indicating that the three purposes a), b) and d) noted in paragraph 143 are not sufficient to prevent the granting of permission. CPRE Hertfordshire opposes this interpretation of the grey belt and believes that purposes a) and d) (NPPF Paragraph 143) relating to "unrestricted sprawl" and "coalescence" apply in this case.
4. The urban sprawl referred to in the NPPF should relate as much to uncontrolled growth as a result of the proximity of London, which was a primary objective of the original Green Belt legislation, as to any adjacent major settlement. As noted above, the first



purpose of the Green Belt refers to the effect of urban sprawl emanating from the growth of London as the major development generator in this and the surrounding areas and provides the “strong reason” required in this case to refuse development as noted in the NPPF footnote 7.

5. Notwithstanding the Government’s update to Planning Policy Guidance (PPG) in Feb 2025 (*Assessing Green Belt to identify grey belt land - Paragraph: 005 Reference ID: 64-005-20250225*) which specifically excludes villages from consideration of the merging of settlements in the Green Belt, the proposed site also performs a crucial function in preventing the coalescence of the various settlements north of Watford which include Abbots Langley, Bricket Wood, Chiswell Green and the southern districts of St Albans.
6. CPRE Hertfordshire will continue to campaign vigorously for changes in national planning policy and PPG to redress the imbalances that now exist in assessing the impact of the merging of Green Belt settlements, regardless of the settlement size. Unrestricted development around villages adjacent to and between towns is already leading to the coalescence of larger settlements.
7. It is also not appropriate in our view for such a significant allocation in the Green Belt to be determined outside the Local Plan process which is ongoing. The Green Belt in south west Hertfordshire is under continuous and unrelenting pressure for development which is jeopardising the highly valued benefits which protection brings. Its continual reduction through consents for speculative development is in danger of bringing the planning system into disrepute and we urge the Council to refuse permission for this inappropriate development.
8. It is undeniable that the new planning policy context has provoked a disturbingly high number of new applications and re-applications for sites which were previously refused permission. Whereas a proportion of such applications may warrant consideration for various reasons, the illogicality of the revised NPPF supporting five purposes of the Green Belt (para 143) and then only permitting three purposes to be considered in applications (NPPF Glossary definition) is unsupportable in this and many other cases.

We urge the Council to refuse permission for this inappropriate speculative development.

Yours sincerely,

Chris Berry
Planning Manager