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Standing up for Hertfordshire's countryside

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

Our Ref:

Your Ref:

29<sup>th</sup> August 2025 (by email)

Dear Joshua Lemm,

**Planning application no. 25/0972/FULEI**

**Land North of Farm Way Bushey**

**Hybrid planning application for a phased, residential-led, mixed use development. The detailed element comprises the phased construction of residential dwellings (open market and affordable) (Class C3); flexible non-residential uses (Class E and Class F2); community infrastructure including a community park; means of vehicular, cycle and pedestrian access from Little Bushey Lane; alongside associated works including landscaping, play facilities, highway, drainage and utilities infrastructure, and enabling works. The outline component (all matters reserved) comprises the phased construction of residential dwellings (open market and affordable) including self-build / custom build (Class C3); a care home (Class C2); land reserved for a primary school with associated playing fields (Class F1); flexible non-residential uses (including Class E, Class F1, Class F2 and Sui Generis (drinking establishments); vehicular, cycle and pedestrian access from Farm Way and Little Bushey Lane; alongside associated works including landscaping, play facilities, highway, drainage and utilities infrastructure, and enabling works. [For consultation purposes only: Up to 700 dwellings, up to 70-bed care home and up to 1,701sqm on non-residential uses]**

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 Hertsmere Core Strategy where development is stated as being 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 consultants note the recent revision of the NPPF and the introduction of the concept of grey belt as a significant justification for the submission of this application. No other special circumstances are identified relating to local conditions and circumstances which would justify development in this location as opposed to any other similar location apart from issues relating to the Green Belt.

CPRE is working nationally and locally for a beautiful and living countryside

CPRE Hertfordshire is a Charitable Incorporated Organisation

President: Sir Simon Bowes Lyon, KCVO

Chairman: Peter Waine, OBE

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3. This site is not presently included in the emerging Draft Local Plan on which extensive public consultation has taken place. It is not appropriate in our view for such a significant allocation in the Green Belt to be determined outside the Local Plan process.
4. Very significant local community opposition continues to development in the Green Belt. The proposed development would clearly constitute a breach of the first, second and third purposes of the Green Belt as identified in the NPPF (paragraph 143) to prevent urban sprawl, the coalescing of settlements and encroachment onto open countryside.
5. We entirely refute the assertions that the first and second purposes of the Green Belt have no relevance in this case and that this site constitutes grey belt under the present legal definitions. In the case of the London Metropolitan Green Belt, the first purpose of the Green Belt refers as much to the effect of the urban sprawl emanating from the growth of the capital as the major development generator in this and the surrounding areas, as to the sprawl of other major settlements.
6. The proposed development is clearly urban sprawl beyond the built-up area of the adjoining settlement which the Green Belt legislation was designed to prevent. Arguments relating to the inconsequential impact of each individual application on the Green Belt as a whole become seriously inappropriate when the cumulative effect of several applications is considered, as is occurring in Hertfordshire.
7. It is also clear that the effect of multiple planning applications in the Green Belt is leading to the coalescence of small settlements which lead to the effective enlargement of major towns, particularly on the northern boundaries of the London built-up area. Notwithstanding the recent 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 second purpose of the Green Belt is highly relevant.
8. 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 could ultimately lead to the coalescence of larger settlements.
9. This application, by virtue of its size and location will affect very significantly the Green Belt north of Bushey and would lead to the further coalescence of Bushey with Watford.

It will also have a detrimental impact on the limited open countryside west of the M1 which is subject to continuing pressure due to the northern expansion of London.

10. CPRE Hertfordshire thus believes that both the first and second purposes of the Green Belt as identified in NPPF paragraph 143 apply in this case, and together with purpose c) regarding encroachment onto the countryside, provide the “strong reason” required to refuse development as noted in the NPPF footnote 7. Recent planning inquiry, and increasingly Council planning decisions permitting development are demonstrating the hugely damaging impact of the present definition of grey belt on open countryside.
11. It is noteworthy that virtually every major planning application for residential and commercial development within the Green Belt in Hertfordshire made since 12<sup>th</sup> December 2024 has identified the site as grey belt, notwithstanding the quality and character of the landscape or local conditions in each case. This is clearly an unsustainable position and it is becoming increasingly clear that the existing definitions and guidance on grey belt are entirely inadequate to prevent the wholesale removal of highly valued and significant Green Belt protections.
12. The remaining issues quoted by the applicant as contributing to the very special circumstances required in the event that the site is not regarded as grey belt relate to the general housing situation in Hertsmer and elsewhere and constitute benefits which would accrue to any proposed development of this size and function. The now standard practice in major planning applications in the Hertfordshire Green Belt of listing such benefits, including public services and facilities and the like reduces the consideration of such issues to a check-list of items irrespective of the conditions and circumstances of the location and inevitably renders them as less “special”.
13. As significant as the proposed benefits is the growing paucity of open space adjacent to built-up areas with its attendant physical and mental health benefits. The Green Belt in this area is under unrelenting pressure for development which is jeopardising the highly valued benefits which protection brings, and its continual reduction is in danger of bringing the planning system into disrepute.
14. The existence of legally binding agreements between appropriate institutions involved in the provision of truly affordable low cost housing should be required in this case. Given the inadequacy of the official definition to reflect the true state of the housing market in Hertfordshire, affordability for average earning households is generally unattainable in the County.
15. We note the intention to provide 50% affordable housing but this is essentially meaningless without further information and commitments to its provision. There is

significant experience in Hertfordshire and elsewhere of initial commitments to affordable housing not being maintained, generally quoting viability issues, and at the very least the Council should seek robust guarantees regarding affordable housing proposals.

16. In summary, it is undeniable that the new planning policy context created by the revised NPPF 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 case.
17. Southern Hertfordshire is under unrelenting pressure for development and the value of the open countryside that remains increases for local communities and visitors, notwithstanding wider environmental benefits relating to the amelioration of the effects of climate change, maintenance and enhancement of biodiversity, and physical and mental health. This application is not supported through the Local Plan process and we urge the Council to refuse permission for this inappropriate speculative development.

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.