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Standing up for Hertfordshire's countryside

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

Our Ref:

Your Ref:

29th August 2025 (by email)

Dear Lisa Page,

Planning application no. 25/0885/OUTEI

Land South of Harper Lane, Radlett

Hybrid planning application comprising: (1) Outline planning application for a residential development (up to 200 dwellings), community building, associated works including infrastructure, blue and green infrastructure and landscaping/drainage attenuation. All matters reserved except for access; and (2) Full application for the demolition of and relocation of the existing Bowls Club and demolition and relocation of any buildings associated with the football club and relocation and replacement of the existing football pitches (plus associated works) together with associated facilities, infrastructure, car parking and access.

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 site, comprising 32.5 hectares, lies within the jurisdictions of both Hertsmere Borough Council and St Albans City and District Council. It is composed entirely of open agricultural land, playing fields and woodland.
3. The Applicant's planning consultants in their Planning Statement (PS) seek to suggest that previous adjacent development of the former Harperbury Hospital and surrounding area is somehow relevant to consideration of this application. This is not the case and the PS introduces 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.

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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4. No other very special circumstances are identified relating to local conditions and circumstances which would justify development on this site as opposed to any other similar location apart from issues relating to the Green Belt. The site is approximately four kilometres from local services and facilities at Radlett and should not be promoted as a sustainable location.
5. This site is not included in the emerging Draft Local Plans for either Local Planning Authority on which extensive public consultation has taken place. The Draft Local Plan for St Albans is presently undergoing Examination in Public and the lack of housing land supply will be fully addressed with the adoption of the Local Plan. The emerging Hertsmere Local Plan is at a late stage of preparation and it is not appropriate in our view for such a significant allocation in the Green Belt to be determined outside the Local Plan process.
6. 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.
7. 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.
8. 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 southern Hertfordshire.
9. 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, CPRE Hertfordshire strongly believes that the Council should take account of the impact of development proposals with significant impact on



vulnerable stretches of Green Belt countryside in the narrow gaps between small settlements which lead to their merging and the effective expansion of larger towns.

10. This application, by virtue of its size and location will affect very significantly the Green Belt surrounding London Colney, Shenley and Radlett, south of St Albans. It will also impact the infilling of open countryside south of the M25 which is subject to continuing pressure due to the northern expansion of London.
11. 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.
12. It is noteworthy that virtually every major planning application for residential and commercial development within the Green Belt in Hertfordshire made since 12th 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.
13. 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 St Albans 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”.
14. 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.
15. 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.

16. 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.
17. 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.
18. 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.