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Standing up for Hertfordshire's countryside

Georgia O'Brien
Planning and Building Control
Hertsmere Borough Council
Civic Offices, Elstree Way
Borehamwood
Herts. WD6 1WA

Our Ref:

Your Ref:

15th October 2025 (by email)
CORRECTED VERSION

Dear Georgia O'Brien,

**Planning application no. 25/1347/FUL
Land adjacent and to the rear of 52 Harris Lane, Shenley
Erection of 38 dwellings (including 50% affordable homes) with associated parking,
infrastructure, landscaping and open space, and access from Harris Lane**

I write with regard to the above planning application which is similar to a previous application and dismissed appeal on the same site to which CPRE Hertfordshire strongly 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. CPRE Hertfordshire objected to the previous similar application on 6th July 2022 and there have been effectively no changes to the proposed development in the present application. The refusal of planning permission was appealed and this was dismissed on the basis of the contribution of the site to the Green Belt and the harm not being clearly outweighed by very special circumstances.
3. We support fully the Council's previous position and the Inspector's decision in this matter. Significant local community opposition continues both generally to development in the Green Belt and to this specific application.
4. The Applicant's planning consultants note the recent revision of the NPPF and the introduction of the concept of grey belt as the sole 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.

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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5. The proposed development would clearly constitute a breach of the first and third purposes of the Green Belt as identified in the NPPF (paragraph 143) to prevent urban sprawl and encroachment onto open countryside. Together these provide the “strong reason” required to refuse development as noted in the NPPF footnote 7.
6. We entirely refute the assertion that the first purpose of the Green Belt has 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.
7. The proposed development is clearly development 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.
8. 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.
9. The inappropriateness of the proposed development is heightened by the quality of the Green Belt in this case, as noted by the Inspector in the appeal decision. The Green Belt in the area adjacent to Shenley affected by this proposal is particularly susceptible to degradation and in our view requires management as open countryside for the benefit of the public, both local and visitors, as originally intended by its designation.
10. 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.



11. 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 would be grateful if you could notify us of the date of the appropriate meeting if it is to be determined by planning committee.