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Standing up for Hertfordshire's countryside

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

Our Ref:

Your Ref:

17th December 2025 (by email)

Dear Georgia O'Brien,

Planning application no. 25/1108/OUT

Land on the South Side of Dagger Lane Elstree

Development to comprise flexible B2/B8 (Industrial, Storage and Distribution) up to 17,000sqm gross external, including ancillary offices. In addition to the above the development will include car and cycle parking, creation of servicing areas and provision of associated services, routes and open spaces within the development, together with all associated works and operations including, but not limited to: earthworks and engineering operations. This application is for a phased development capable of coming forward in distinct and separable phases and/or plots in a severable way.

(Outline application to include access with all other matters of appearance, landscaping, layout and scale reserved).

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 Statement notes the 2024 revision of the NPPF and the introduction of the concept of grey belt as the justification for the submission of this application. The identification of 'very special circumstances' is then cited as a fall-back position although no such special circumstances are identified relating to local conditions which would justify development in this location as opposed to any other Green Belt 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

Registered Charity 1162419

CPRE Patron: His Majesty The King

3. The proposed development would clearly constitute a breach of the first purpose of the Green Belt as identified in the NPPF (paragraph 143) to prevent urban sprawl and encroachment onto open countryside. 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.
4. 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. 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.
5. The proposed development is clearly urban sprawl beyond the built-up area and constitutes encroachment onto the countryside. Together these issues provide the “strong reason” required to refuse development as noted in the NPPF footnote 7.
6. 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.
7. In summary, it is undeniable that the planning policy context created by the 2024 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.
8. 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.