

Scott Volker  
Development Management  
Three Rivers District Council  
Three Rivers House  
Northway, Rickmansworth  
Herts. WD3 1RL

Our Ref:

Your Ref:

11<sup>th</sup> March 2026 (by email)

Dear Scott Volker,

**Planning application no. 25/2197/OUT**  
**Land adjoining Notley Farm, Bedmond Road, Abbots Langley**  
**Outline application: Erection of up to 93 dwellings with associated access, parking, amenity space and landscaping (Appearance, Layout, Landscaping and Scale as reserved matters)**

I write with regard to the above outline 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 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 2024 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.
3. 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.
4. 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



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capital as the major development generator in this and the surrounding areas, as to the sprawl of other major settlements.

5. The proposed development is clearly urban sprawl beyond the built-up area of Abbots Langley 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.
6. 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.
7. 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.
8. The proposed development is a clear extension of the built-up area of Abbots Langley north towards Bedmond. As such it contributes significantly to filling the gap between these two significant settlements which have already received very considerable recent development.
9. CPRE Hertfordshire believes that the first and second reasons for the Green Belt as identified in NPPF paragraph 143 apply in this case, and together with purpose c) regarding encroachment onto the countryside, they 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.
10. As significant as any 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.



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11. 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.
12. 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.
13. 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.
14. South-west 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.

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

Yours sincerely,

Chris Berry  
Planning Manager