

Claire Wilson
Development Management
Three Rivers District Council
Three Rivers House
Northway, Rickmansworth
Herts. WD3 1RL

Our Ref:

Your Ref:

9th October 2026 (by email)

Dear Claire Wilson,

Planning application no. 26/1274/FUL
Land between Bell Lane and Millhouse Lane, Bedmond
Construction of 40 residential units (Class C3); associated access, parking,
landscaping and public open space

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 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 the primary justification for the submission of this application. No attempt is made to identify very special circumstances 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 grey belt.
3. The site is not allocated for development in the emerging Draft Local Plan on which public consultation on the Pre-Submission Regulation 19 has taken place and the lack of housing land supply will be fully addressed with the adoption of the Local Plan in due course. It is not appropriate 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 and third purposes of the Green Belt as identified in the NPPF (Policy GB2) to prevent urban sprawl, the coalescing of settlements and encroachment onto open countryside.



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5. 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.
6. The proposed development is clearly urban sprawl beyond the built-up area of Bedmond 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 noteworthy that virtually every major planning application for residential 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 for open countryside.
8. CPRE Hertfordshire believes that the first reason for the Green Belt as identified in Policy GB2 applies in this case, and together with purpose c) regarding encroachment onto the countryside, provides ample reason to refuse permission for development. It should be noted that the emerging Local Plan allocates sites for 138 units on three sites surrounding Bedmond and the addition of a further 40 units constitutes an unacceptable cumulative impact on a Green Belt village.
9. Remaining issues quoted in the Planning Statements regarding benefits constitute planning obligations 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".
10. 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



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valued benefits which protection brings, and its continual reduction is in danger of bringing the planning system into disrepute.

11. We further note the intention to provide 50% affordable housing but this is essentially meaningless without further information and commitments to its provision. 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.
12. 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. 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 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 purposeful illogicality of the revised NPPF supporting five purposes of the Green Belt (Policy GB2) and then only permitting three purposes to be considered in applications (NPPF Glossary definition) is unsupportable.
14. 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

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.