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Standing up for Hertfordshire's countryside

Robert Freeman
Planning & Development
Dacorum Borough Council
The Forum, Marlowes
Hemel Hempstead
Herts. HP1 1DN

Our Ref:

Your Ref:

31st July 2024 (by email)

Dear Robert Freeman,

Application no. 24/01424/MOA

**Land at Shaffold Knoll Farm, Lower Road, Nash Mills, Hemel Hempstead
Outline Planning Application for construction of 33 dwellings (Use Class C3) and (up to) a
70 bed care home (Use Class C2), with new access to Lower Road and pedestrian links
to canal tow-path (landscaping reserved)**

I write with regard to the above 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 Dacorum Core Strategy where development is seen as 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 Planning Design and Statement (PDAS) by the Applicant's consultants seeks to identify very special circumstances on the basis of the lack of a five year housing supply, specialist accommodation for older people in Dacorum, and the freeing up of family housing elsewhere in the Borough. Limited economic benefits relating to modest employment onsite are noted, as are minor benefits with regard to off-road recreational opportunities.
3. Of these proposed benefits, only the freeing up of family housing elsewhere in the Borough may be said to relate in any way to the specific local conditions and circumstances of the site and the amount of housing released by either families or older people in Dacorum is likely to be very modest. Otherwise, the purported benefits are minor or would accrue to any proposed development of this size and function. They should therefore not attract any significant weight in the planning balance.

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CPRE Hertfordshire is a Charitable Incorporated Organisation

President: Sir Simon Bowes Lyon, KCVO
Chairman: Allan McNab

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4. In any case, benefits need to clearly outweigh the harm caused by inappropriate development in the Green Belt as required by the NPPF. We believe this is demonstrably not the case in this application and the significance of this open site is increased considerably by its location next to the Grand Union Canal in the River Gade valley and the lack of immediately adjacent development.
5. The Green Belt in this area, south of Hemel Hempstead continues to be under unrelenting pressure for development of all kinds which is jeopardising the highly valued benefits which protection brings. The Green Belt performs a crucial role in preventing urban sprawl and the coalescing of settlements, in this case Hemel Hempstead and Kings Langley.
6. Significant local community opposition continues to development on the Green Belt and further encroachment on protected open land between existing settlements is unacceptable. The PDAS suggests that the context of the site is largely built-up along Lower Road and this should constitute a reason for consent; “an acceptable bridge development between the (mostly) residential form lining Lower Road to the south, and the commercial/community uses buildings/land uses to the north”.
7. This description challenges fundamentally the purpose of the Green Belt which is to maintain open space for its inherent benefits. The site is not “tightly defined by development to the south” and the suggestion of “infilling” is entirely inappropriate. There are clear gaps between development in this area and the opportunity for enhancement of the Green Belt, as required by the NPPF should be considered, rather than further development.
8. Proposed development of this magnitude should also be considered as part of the Local Plan preparation process to ensure the appropriate provision of timely environmental and social infrastructure. This site is not included as an allocation in the emerging Draft Local Plan which is presently in preparation following public consultation which drew massive opposition to development on protected land and we urge the Council to refuse permission for this 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.