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Standing up for Hertfordshire's countryside

Louise Hart
Planning & Development
Broxbourne Borough Council
Bishops' College
Churchgate, Cheshunt
Herts. EN8 9XQ

Our Ref:

Your Ref:

9th April 2025 (by email)

Dear Louise Hart,

Planning application no. 07/25/0222/F

Land off Newgatestreet Road and Hammondstreet Road Laurel Park EN7 6PH

Hybrid application comprising of part full, part outline for: 1) Demolition of existing buildings and erection of a special education needs establishment (use class F1) including scale, access, landscaping and associated infrastructure (full application); and 2) Outline application for up to 90 homes (use class C3) with all matters reserved except for access.

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 Broxbourne Local Plan where development is 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 recent revision of the NPPF and the introduction of the concept of grey belt as justification for the submission of this application. The consultants note the NPPF Glossary definition and that, in their opinion, the site makes a limited contribution to purpose a) of the Green Belt, and no contribution to purposes b) and d) as identified in the NPPF paragraph 143 and can thus be regarded as grey belt.
3. 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 on open countryside as it is a clear extension of the built-up area along Hammondstreet Road. We entirely refute the assertions 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.

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

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4. The first purpose of the Green Belt refers to the effect of the urban sprawl emanating from the growth of London as the major development generator in this and the surrounding areas. The proposed development is clearly urban sprawl beyond the built-up area of the adjoining settlement which the Green Belt legislation was designed to prevent and, as such, the designation of Green Belt provides the “strong reason” required in this case to refuse development as noted in the NPPF footnote 7.
5. It is noteworthy that almost 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 and risk bringing the planning system into disrepute.
6. The Planning Statement notes that in the event that grey belt is not established, very special circumstances can be demonstrated, including the proposal for a SEND school and affordable housing. 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”.
7. CPRE Hertfordshire believes that these issues are not relevant to the consideration of this application. There is no specific spatial justification for the SEND school in this location and many of the benefits identified would accrue to any proposed development of this size and function. In any case legally binding agreements between appropriate institutions involved in the provision of truly affordable low cost housing and the SEND school should be required.
8. As significant as any proposed benefits is the growing paucity of open space adjacent to built-up areas. Southern 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.