



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

Our Ref:

Your Ref:

23<sup>rd</sup> July 2025 (by email)

Dear Sally Robbins,

**Planning application no. 25/01548/MOA**  
**Land West of Blegberry Gardens, Shootersway, Berkhamsted**  
**Outline application for up to 80 dwellings with access from Shootersway, public open space,**  
**landscaping, surface water drainage and associated infrastructure**  
**(all matters reserved except access)**

I write with regard to the above planning application to which CPRE Hertfordshire objects for the following reasons.

1. The land identified for the proposed development is designated as London Metropolitan Green Belt in the adopted Dacorum Core Strategy 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 Statement (PS) seeks to justify the proposed development both on the basis of the recently introduced concept of grey belt and "very special circumstances" relating to the lack of housing land supply in the Core Strategy. The lack of housing land supply is now said to be exacerbated by the requirements of the revised NPPF, which would specify a higher housing need for Dacorum than previously
3. Further, this application follows the now frequent pattern of recent applications, many of which have previously been refused permission, arguing similarly that the revised National Planning Policy Framework (NPPF) has changed the basis for their determination and indicating that the three purposes a), b) and d) noted in paragraph 143 are not sufficient to prevent the granting of permission.
4. The PS introduces the concept of grey belt to add to the demonstration of very special circumstances and proceeds to assert that none of the three purposes of the Green Belt which may be identified (see NPPF Glossary definition of grey belt) where development



would not be inappropriate apply in this case. CPRE Hertfordshire challenges this interpretation of the grey belt and believes that purpose a) (NPPF Paragraph 143) relating to “unrestricted sprawl” applies in this case.

5. In our view, 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 development 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.
6. The site is not allocated in the draft Dacorum Local Plan which has been submitted for Examination in Public and it is not appropriate for significant proposals of this size in the Green Belt to be determined outside the Local Plan process. CPRE Hertfordshire will continue to campaign vigorously for changes in national planning policy and PPG to redress the imbalances that have now arisen both as a result of the revised NPPF, and in assessing the impact of the merging of Green Belt settlements, regardless of the settlement size.
7. CPRE Hertfordshire notes the concerns expressed by Natural England (NE) regarding the impact on land which was initially identified for potential inclusion in the expansion of the Chilterns National Landscape (CNL). The abandonment of the consultation on the CNL is highly regrettable and NE’s comments to this application regarding the need for a landscape and visual assessment of the impact of development re-emphasise the significance of the site.
8. It is undeniable that the new planning policy context 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.
9. CPRE Hertfordshire supports fully the very wide range of concerns raised by local residents, including Berkhamsted Town Council and representatives, regarding access, highways and pressure on local services and facilities and local environmental conditions, amongst other matters.



10. The Green Belt in Hertfordshire is under continuous and unrelenting pressure for development exerted by London which is jeopardising the highly valued benefits which protection brings. Its continual reduction through consents for speculative development is in danger of bringing the planning system into disrepute and we urge the Council to refuse permission for this inappropriate 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.