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Standing up for Hertfordshire's countryside

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

Our Ref:

Your Ref:

15th September 2025 (by email)

Dear Kayleigh Mansfield,

**Planning application no. 25/01880/MOA - Land East of Tring
Hybrid application (with access details of two main access points from Bulbourne Road and
Station Road in Full and the main development on the rest of the site in Outline with all
matters reserved) for the demolition of all existing buildings on the site and the
development of up to 1,400 dwellings (including up to 140 Use Class C2 dwellings); a new
local centre and sports/community hub; primary school; secondary school; and public open
spaces including creation of a SANG.**

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 Dacorum 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). CPRE Hertfordshire was a member of the Combined Objectors Group at the planning appeal inquiry into refusal of the previous application on this site (ref: APP/A1910/W/22/3309923) and the appeal was dismissed for reasons relating to the Green Belt and proximity to the Chilterns National Landscape amongst other issues.
2. It is deeply regrettable that Dacorum Borough Council subsequently reinstated the site allocation into the Draft Local Plan which is presently subject to Examination in Public. This was done without any change in circumstances, policy or local conditions, other than the introduction of a revised "standard method" and the concept of grey belt in the revised NPPF.
3. The Applicant's consultants seek to suggest that revised housing figures introduced simultaneously with the revised NPPF are a relevant consideration. This is however misleading as the Draft Dacorum Local Plan presently subject to Examination in Public

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CPRE Hertfordshire is a Charitable Incorporated Organisation

President: Sir Simon Bowes Lyon, KCVO

Chairman: Peter Waine, OBE

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has been prepared according to the former NPPF requirements and previous “standard method” formula.

4. The extensive Planning Statement accompanying the application is largely a repeat of the material previously presented and rejected by the Secretary of State at appeal, apart from arguing that the site constitutes grey belt which “is not inappropriate for development”. 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 onto open countryside.
5. We entirely refute the assertions that the first and second purposes of the Green Belt have no relevance in this case and that this site constitutes grey belt under the present legal definitions. CPRE Hertfordshire believes that both the first purpose a) for the Green Belt as identified in NPPF paragraph 143 applies in this case, and together with purpose c) regarding encroachment onto the countryside, provide the “strong reason” required to refuse development as noted in the NPPF footnote 7.
6. 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 expansion of other major settlements such as Tring. 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.
7. The proposed development is clearly urban sprawl beyond the built-up area of Tring 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 increasing numbers of applications is considered, as is occurring in Hertfordshire.
8. The proposed development also constitutes a serious encroachment into open countryside, thereby not complying with the third purpose of the Green Belt as stated in the NPPF, paragraph 143. It amounts to a very substantial threat to the integrity of the Green Belt in Dacorum as a whole.
9. It is noteworthy that virtually 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.

10. CPRE Hertfordshire will continue to campaign vigorously for changes in national planning policy and Planning Practice Guidance to redress the illogicality which has arisen in the Government's continued support for the five purposes of the Green Belt, whilst only permitting three of these purposes to be taken into account in planning decisions. Very significant local community opposition continues to development in the Green Belt in this area and we note that there have been over 300 public objections to this application.
11. With regard to the remaining issues in the Planning Statement as contributing to the very special circumstances required in the event that the site is not regarded as grey belt, these constitute benefits which would accrue to any proposed development of this size and function, as noted in the Combined Objectors Group at the previous planning inquiry. 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".
12. 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 request the Council to refuse permission for this inappropriate speculative development.

Yours sincerely,

Chris Berry
Planning Manager