

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

Our Ref:

Your Ref:

30th January 2026 (by email)

Dear Colin Lecart,

**Planning application no. 25/03126/OUT
Land Between Bank Mill Lane and London Road, Berkhamsted
Construction of a retirement (sheltered housing) development (Use Class C3) including 50% affordable housing and communal facilities, and a 75-bed care home (Use Class C2) including the creation of public open space, together with access from London Road, parking, landscaping and all ancillary and enabling works.**

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).
2. The site is not included in the emerging Local Plan which is in the final stages of its Examination in Public. It is not appropriate in our view for such a significant allocation in the Green Belt to be determined outside the Local Plan process, particularly where the preparation of the emerging Local Plan is well advanced, as in this case.
3. The Applicant's Planning Statement (PS) notes the 2024 revision of the NPPF and the introduction of the concept of grey belt as the justification for the submission of this application. The PS then indicates a "fall-back" position with regard to special circumstances which would justify the proposed development in any case.
4. In fact, not only are the special circumstances obligations which would normally be required in any major development of this nature, the specific circumstances of this site militate clearly against the suggestion that they clearly outweigh the harm caused to

the Green Belt. The presence of the River Bulbourne on the site, an example of a globally significant chalk stream, should be regarded as a major constraint on development in terms of habitat and wildlife protection, notwithstanding the risk from flooding.

5. Significant local community opposition continues both generally to development in the Green Belt and this specific application. 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.
6. 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.
7. The proposed development is clearly urban sprawl beyond the built-up area, constituting encroachment onto countryside. The site is self-evidently not grey belt in terms of its landscape character and quality and 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 multiple applications is considered, as is occurring in Hertfordshire.
8. 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.
9. It is undeniable that the new 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 (para 143) and then only permitting three purposes to be considered in applications (NPPF Glossary definition) is unsupported in this and similar cases.

10. A further concern relates to the proposed provision of low cost housing and we note the intention to provide 50% affordable housing. Given the inadequacy of the official definition to reflect the true state of the housing market in Hertfordshire this is essentially meaningless without commitments to legally binding agreements between appropriate institutions involved in the provision of truly affordable low cost housing.
11. Affordability for average earning households is generally unattainable in the County and there is significant experience in Hertfordshire and elsewhere of initial commitments to affordable housing not being maintained. This is generally due to questionable viability issues and at the very least the Council should seek robust guarantees regarding affordable housing proposals.
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.

This application is not supported through the Local Plan process and 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.