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YEARS



Campaign to Protect  
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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:

6<sup>th</sup> March 2026 (by email)

Dear Kayleigh Mansfield,

**Planning application no. 25/03159/MOA**

**Land off Hempstead Road, Newhouse Road, Bovington, Hemel Hempstead  
Hybrid Planning Application for a Residential development comprising Outline  
Planning Application for up to 145 dwellings (Use Class C3) including public open  
space, a community orchard, landscaping, play areas, drainage features and  
associated infrastructure. All matters reserved except for access from Hempstead  
Road and Full Planning Application for the change of use from agricultural land to  
12.42 hectares of Suitable Accessible Natural Green Space (SANG), together with a  
vehicular access, carpark, paths, fencing and landscaping**

I write with regard to the above amended 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 Applicant's planning consultants note the 2024 revision of the NPPF and the introduction of the concept of grey belt as a significant justification for the submission of this application. The identification of 'very special circumstances' is then cited as a 'fall-back position' although no special circumstances are identified relating to local conditions, other than the provision of SANG, which would justify development in this location as opposed to any other Green Belt location, and the benefits identified would normally accrue to any application of this magnitude.

3. The site is not included in the emerging Draft Local Plan for which the Examination in Public is presently underway. Full public consultation on the Local Plan has taken place and the lack of housing land supply will be fully addressed with the adoption of the Local Plan in the near future and it is not appropriate in our view for such a significant allocation in the Green Belt to be determined outside the Local Plan process.
4. There is very considerable local community opposition to development in the Green Belt. 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 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.
6. The proposed development is clearly urban sprawl beyond the built-up area of the significant settlement of Bovingdon 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 several applications is considered, as is occurring in Hertfordshire.
7. It is noteworthy that virtually every major planning application for residential and commercial development within the Green Belt in Hertfordshire made since 12<sup>th</sup> 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.
8. CPRE Hertfordshire will continue to campaign vigorously for changes in national planning policy and PPG to redress the imbalances that now exist in assessing the impact of the merging of Green Belt settlements, regardless of the settlement size. Unrestricted development around villages adjacent to and between towns could ultimately lead to the coalescence of larger settlements.

9. CPRE Hertfordshire believes that the first reason for the Green Belt as identified in NPPF paragraph 143 applies in this case, and together with purpose c) regarding encroachment onto the countryside, they provide the “strong reason” required to refuse development as noted in the NPPF footnote 7. 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.
10. Remaining issues quoted in the Planning Statements regarding very special circumstances constitute obligations which would accrue to any proposed development of this size and function. 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”.
11. Notwithstanding the proposed provision of SANG, there is growing paucity of open space adjacent to built-up areas with its attendant physical and mental health benefits. The Green Belt in this area is under unrelenting pressure for development which is jeopardising the highly valued benefits which protection brings, and its continual reduction is in danger of bringing the planning system into disrepute.
12. We note the intention to provide 50% affordable housing but this is essentially meaningless without further information and commitments to its provision. Given the inadequacy of the official definition to reflect the true state of the housing market in Hertfordshire, affordability for average earning households is generally unattainable in the County.
13. There is significant experience in Hertfordshire and elsewhere of initial commitments to affordable housing not being maintained, generally quoting viability issues and at the very least the Council should seek robust guarantees regarding affordable housing proposals. The existence of legally binding agreements between appropriate institutions involved in the provision of truly affordable low cost housing should be required in this case.
14. In summary, it is undeniable that the new planning policy context created by the revised NPPF has provoked a disturbingly high number of new applications. 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.

15. South-west 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.