

100
YEARS



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Standing up for Hertfordshire's countryside

CPRE Hertfordshire comments on the East Herts New Local Plan Scoping Consultation June 2026

Question 1. What do you consider to be the main challenges and opportunities facing East Hertfordshire over the plan period, and how should the new Local Plan respond to them?

Answer. CPRE Hertfordshire welcomes this opportunity to respond to the Local Plan Scoping Consultation. This question asks about the main challenges and opportunities for East Hertfordshire covering a range of issues, as follows:

Housing

The initial discussion of housing concentrates entirely on the Government's provision of a minimum housing requirement through national housing policy which CPRE, both nationally and in Hertfordshire, challenges robustly. Land for a theoretically derived ("standard method") number of units is determined by central Government on the basis of a political target of the provision of "1.5 million homes" within one parliamentary term and this is both inappropriate and hugely damaging for East Herts.

It reduces the highly complex matter of housing provision to the over-simplistic allocation of land to produce the amount of housing required. Instead, the Local Plan should reflect the multi-faceted complexity of housing provision, taking full account of the specific conditions and circumstances of the District.

The initial discussion of this topic fails to introduce any level of understanding of the range of factors involved in housing provision, including:

- unimplemented housing consents, which should be fully delivered before allocating any new housing land;
- the contribution of previously developed land in the countryside and the opportunity for redevelopment within towns and villages in line with the Government's "Brownfield first" priority;

- empty units, which should be brought back into occupancy; and
- the local East Hertfordshire demographic context.

The East Hertfordshire Brownfield Land Register identifies land for 992 units (updated 2025) which all appear to have planning permission and this appears infeasibly low when compared with neighbouring Boroughs. Informal surveys conducted by CPRE and the London Green Belt Council indicate constant under-enumeration of brownfield sites and the significant potential of previously developed land. Given the Government's priority of "Brownfield first" this should be a primary objective of the Local Plan and identified as a key opportunity.

Green Belt and the Introduction of 'Grey Belt'

CPRE Hertfordshire welcomes the prominence of this topic in the range of issues and notes the significance of the designated protected status of a third of the District area, and its function in separating significant towns such as Stevenage, Welwyn Garden City, Hoddesdon and Harlow. The introduction of grey belt in the National Planning Policy Framework (NPPF) December 2024 has been deeply detrimental to the continued existence of the Green Belt and the principle of protection of the open countryside.

Huge damage has already been done to the Green Belt with the planning consents in 2025 for 11,500 houses in open countryside for seven "garden villages" in Gilston and Hunsdon. The Council fails to mention the contribution already made by the Green Belt in East Hertfordshire which will irrevocably change the rural character of the countryside north of Harlow.

The Government maintains that the five purposes of the Green Belt will be supported, while enabling the purposeful illogicality of permitting only three reasons to be used to defend land which is promoted as grey belt in speculative planning applications. This dishonesty is now further promoted by requiring the Green Belt to be reviewed for grey belt in the Local Plan, where only three purposes of Green Belt will apply.

Grey belt is an existential threat to the Green Belt and should be recognised as such. Initial studies by neighbouring local planning authorities such as Dacorum, Hertsmere and Three Rivers indicate that the government's grey belt policy could cause the disappearance of the Green Belt and there is no reason to doubt that this very real risk also applies in East Hertfordshire.

Employment

CPRE Hertfordshire welcomes recognition of the contribution of the extensive rural areas of the District to sustainable economic and social development. Agriculture remains and is likely to become even more significant in the future following concerns about food security and opportunities for more sustainable farming serving adjacent urban areas, including the capital.

Town Centres

No comment.

Recreation and Leisure

East Herts contains unique rural landscapes including the chalk ridge extending from the Chiltern Hills and north eastwards beyond Royston and into East Anglia affecting the northern part of the District. These rural landscapes should be recognised as key characteristics of the District offering opportunities for recreation and leisure, and should be explicitly protected in a Local Plan policy regarding the Rural Area Beyond the Green Belt.

Open countryside is increasingly recognised as crucial for contributing to good health, well-being and the quality of life for both residents and visitors. The beneficial roles of rural landscapes for recreation and leisure should be emphasised and promoted by planning policy.

Community Facilities and Infrastructure

No comment.

Urban Design and Conservation

The proliferation of standard and banal car-oriented development continues to blight East Hertfordshire and further afield and there needs to be a much stronger emphasis on urban design quality in the countryside. CPRE Hertfordshire supports the introduction of stronger design codes to ensure the reduction of the impact of development on the countryside.

Climate Change

Rather than regarding climate change as a “significant challenge” to be overcome, East Hertfordshire is in a prime position to pioneer innovative solutions to ameliorating its effects. The wider contribution of the countryside to climate change adaptation and mitigation, the maintenance and enhancement of biodiversity and maintenance and enhancement of water courses and catchments (including precious chalk streams) appear not to be adequately addressed.

The proposed Local Plan needs to:

- Acknowledge and take full advantage of the natural environment beyond the specified landscapes and habitats;
- Identify areas of water stress and control, protecting water courses and catchments;
- Utilise the benefits of statutory and policy designations, including specific policies for the Green Belt and for the Rural Area Beyond the Green Belt to recognise the inherent value of the countryside and prevent its further loss and deterioration for residents and visitors.

Environment and Landscape

The Consultation document notes that East Hertfordshire is “predominantly rural” and that the Local Plan “will need to protect and enhance the landscape and natural environment while planning positively for future needs”. Positive planning should include significant protection of the open countryside which is identified as neither a challenge nor an opportunity for the Local Plan.

Internationally significant habitats such as chalk streams are threatened by unsustainable development requirements for water and waste treatment for both residential and commercial developments.

Movement

There is increasing awareness of the problems and issues facing the rural road network which appear to be unaddressed. This affects rural communities throughout the District in terms of safety, accessibility and environmental degradation. Clearly, new development should be located to reduce use of private vehicles and this is particularly challenging for rural areas and should be a priority for the Local Plan.

Sustainability

The statement that “Sustainability has long been a central principle of planning policy” is essentially meaningless without controls on development that are more than lofty aspirations. No indication is given of any specific sustainability initiatives or objectives for the District and as such this remains an empty promise.

Question 2. Are there any other issues, in addition to those identified above, that you think the new Local Plan should address?

Answer. Given the long-term scale of housing and economic development the document appears to envisage, much greater emphasis should be placed on protection of the District's countryside, including the hinterland of the towns and villages, and significant natural features such as the valleys and water courses.

The countryside has very significant intrinsic value which is not reflected in the challenges and opportunities identified. Countryside is widely regarded as an expendable resource without value and this is highly regrettable.

With regard to local environmental conditions and characteristics, there is scant reference to the role of protection of valued landscapes and countryside as a priority objective for the Local Plan. There is no identification of the challenges and opportunities relating to rural communities and this is another major omission. The Local Plan needs to recognise and plan for the specific needs of rural communities, many of which have existed for many generations. Strong policies on the Green Belt and the Rural Area Beyond the Green Belt are essential in East Herts' new Local Plan.

Question 3. What do you consider to be the three most important issues that should be addressed by the new Local Plan to help shape the future of East Herts. Please select three topics from the list below and provide reasons for your choices. Do you think that there are any other challenges or opportunities we should be aware of in relation to the efficient use of land?

Answer: It is inappropriate in our view to talk about a limited number of priorities for a Local Plan which should be a comprehensive document seeking to balance development outcomes against policy objectives, taking account of all aspects of development in both rural and urban areas. It should not be a matter of preference to consider all the options listed that are relevant to the management of development in the future.

Question 4. Is there anything else you would like to tell us that should be considered as part of the new Local Plan?

Answer: The initial discussion ignores entirely the potential contribution of the countryside to the East Herts economy. The significance of the contributions of agriculture, leisure, recreation and retail activity linked to the rural economy are unspecified, and challenges and opportunities are seen only in terms of employment land, urban areas and town centres. This is a major omission.

Question 5. Does the Vision Statement reflect your aspirations for East Herts over the next 20 years? Please explain your views.

Answer: The Vision Statement is an unexceptional statement of objectives for virtually any planning exercise. There is nothing specific to East Hertfordshire and the Vision denotes a classic pro-development stance which may be seen as increasingly inappropriate in the changing conditions and circumstances of the 21st century.

Given the long-term scale of housing and economic development the document appears to envisage, much greater emphasis should be placed on protection of the District's countryside, including the hinterland of the towns and villages, and significant natural features such as the dry valleys of the chalk hills referred to above. The Green Belt should be identified as a key feature of the District for protection.

Question 6. Do you have any suggestion for how the wording of the Vision Statement could be improved?

Answer: The Vision Statement should clearly identify the maintenance and enhancement of the key characteristics of the District which must include the extensive countryside which forms the major part of the land area and the need for its protection.

Question 7. Do you agree that the six themes reflect the key priorities for East Herts?

Answer: The Vision Themes are a simplified re-statement of topics already considered above. They add nothing to the discussion at this stage and their inclusion is likely to confuse people who are responding with concerns about the goals and objectives of the Local Plan as a whole.

Question 8. Are there any themes you think should be changed, added to, or given more emphasis? Please explain your reasons

Answer: The response to Question 7 above also applies.

Question 9. How would you prefer to be engaged in the Local Plan process?

Answer: CPRE Hertfordshire is pleased to be engaged in the Local Plan process by any of the methods proposed.

Question 10: Are there any specific engagement methods you think would be particularly effective in helping people understand and contribute to the Local Plan?

Answer: CPRE Hertfordshire welcomes the range of communications and engagement offered to respondents.

Question 11. How can the council ensure that engagement is inclusive and accessible and that opportunities to participate are available to a wide range of communities and stakeholders?

It is the responsibility of the Council to ensure that engagement with the Scoping Consultation is fully inclusive and accessible. CPRE Hertfordshire welcomes and supports efforts to be inclusive but is unable to comment on whether there is adequate representation of third party interest groups specifically concerned with the environment or countryside without knowledge of which stakeholders have been consulted so far.

Question 12. Is there anything else the council should consider when developing its approach to community and stakeholder engagement of the new Local Plan?

Answer: See answer to Q. 11 above.

Question 13. Do you have any comments on the Sustainability Appraisal/ Strategic Environmental Assessment Scoping document?

Answer. No comment

Question 14. Is there anything else that should be included within the Sustainability Appraisal/Strategic Environmental Assessment Scoping document?

Answer. No comment

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