

Steve Fraser-Lim
Development Management
East Herts District Council
Wallfields
Pegs Lane
Hertford SG13 8EQ

Our Ref:

Your Ref:

17th July 2026 (by email)

Dear Steve Fraser-Lim,

**Planning application no. 3/26/0674/OUT
Land West of London Road, Hertford Heath
Outline planning application with all matters reserved except for means of access from
London Road comprising residential development (Use Class C3), flexible
community/commercial space (Use Class E/F2), open spaces and
other associated infrastructure**

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 for up to 94 dwellings and a flexible community hub is designated as London Metropolitan Green Belt in the adopted East Herts District Plan 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 the primary justification for the submission of this application. They also present a "fall-back position", as is becoming increasingly common with applications of this nature that, in the event of grey belt not being established, very special circumstances can be identified to clearly outweigh the harm caused to the Green Belt in this location.
3. This application is part of a flood of planning applications on the Green Belt being made by developers and land-owners since the revision of the NPPF in December 2024, to the extent that the principle of protection of the countryside, especially in southern Hertfordshire is being very seriously jeopardised. The site is not presently allocated for housing in the adopted Local Plan and this is a speculative application for residential development of a nature that Green Belt legislation is designed specifically to prevent.



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4. Very significant local community opposition continues in East Herts to development in the Green Belt, and this application, as evidenced by the volume of community representations received, including serious concerns raised by Hertford Heath Parish Council. The proposed development would very 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 on undeveloped land beyond the built-up area of Hertford Heath 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. Accordingly, 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.
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. Remaining issues quoted in the Planning Statements follow the now standard approach by applicants to use very special circumstances as a “fall-back position” if grey belt is not established. This is increasingly devaluing the previously rigorous process of establishing the planning balance with regard to the suitability of sustainable development proposals.



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10. The benefits listed in the Planning Statement with minimal justification 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”. It is unclear whether a proposed flexible community hub in this location is supported by the community.
11. As significant as the proposed benefits is the 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. CPRE Hertfordshire supports fully the objection expressed by the Herts and Middlesex Wildlife Trust regarding the impacts on local wildlife and the neighbouring Sites of Special Scientific Interest (SSSIs). These concerns are also raised extensively by local residents, together with the impact on local services and facilities including the local road network.
13. CPRE Hertfordshire also notes the intention to provide 50% affordable housing but this is essentially meaningless without further information and commitments to its provision. With regard to the provision of affordable housing, legally binding agreements between appropriate institutions involved in the provision of truly affordable low cost housing should be required.
14. 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. 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.
15. In summary, it is undeniable that the 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 illogicality of the revised NPPF supporting five purposes of the Green Belt (para 143) and then only permitting



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three purposes to be considered in applications (NPPF Glossary definition) is unsupportable in this case.

16. Southern 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 entirely 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.