

Statement by Chris Berry on behalf of CPRE Hertfordshire as an

Interested Party to planning appeal PINS reference: 6009233

Dacorum Borough Council planning application ref: 25/01880/MOA

Land East of Tring

INTRODUCTION

1. I make this statement on behalf of CPRE Hertfordshire as an Interested Party to the above appeal (PINS reference 6009233: Dacorum Borough Council application number 25/01880/MOA) against the refusal of planning permission for a proposed development of up to 1400 residential dwellings, local centre, schools, open space and associated infrastructure.
2. I have practised as a Member of the Royal Town Planning Institute in both the public and private sectors for over 50 years and am presently employed part-time as Planning Manager for CPRE Hertfordshire which acts to protect the countryside in Hertfordshire. We are active in supporting local organisations and communities to protect, amongst other things, statutorily designated protected open space such as Green Belt from inappropriate development in the wrong places.
3. CPRE Hertfordshire objected to the original application in 2022 and appeared as part of the Rule 6 Combined Objectors Group together with Tring Town Council, The Chiltern Society and Grove Fields Residents Association at the previous appeal inquiry for this proposed development. I make this statement on behalf of CPRE Hertfordshire and in full support of the representations of the organisations who continue to object to this inappropriate and damaging development in the London Metropolitan Green Belt and the immediate setting of the Chilterns National Landscape.

GREEN BELT

4. The Government's commitment to protecting Green Belt land is elaborated in Chapter 13 of the National Planning Policy Framework (NPPF) 2026. The five purposes of the Green Belt are set out in Policy GB2 and, notwithstanding the Council's position, we consider the first, third and fifth of these purposes are

directly relevant to the determination of this appeal. Historically, Green Belt has been a key component of the planning system in Hertfordshire and in terms of the first Green Belt purpose its primary function has been to control the outward sprawl of London as the London Metropolitan Green Belt.

5. In the 1970s, the Green Belt was extended as part of the Hertfordshire County Structure Plan to cover approximately 40% of the land area of the County to continue to provide this protection. The form of the Green Belt in Hertfordshire and its primary purpose reflect the influence of Greater London along the main route corridors leading northwards from the capital, and the major settlements in close proximity, such as Tring.
6. With regard to first of the five purposes of the Green Belt for this area, the primary function of preventing urban sprawl is exercised where pressure for development continues to be significant, including this site. Part of this primary purpose is to maintain the integrity of local settlements and specifically maintaining the rural and historic character of towns like Tring.
7. This application is contributing to the significant enlargement of Tring to the east. Related to this, the third purpose of the Green Belt, to safeguard the countryside from encroachment, is a significant concern in this case, particularly when set in the context of challenging the permanence of the Green Belt and the clear and obvious loss of openness which would result from the construction of 1400 houses and significant associated development.
8. The magnitude of the proposal is a factor in our view and likely to become more so in the light of recent experience since the introduction of grey belt which has already led to significant potential reductions in the Green Belt throughout the County. As is cited frequently, including the oft quoted Samuel Smith Old Brewery (Tadcaster) planning appeal case, openness is a matter of planning judgement which in this case would be hugely impacted by the proposed development.
9. In relation to the fifth purpose of the Green Belt, the NPPF states that brownfield and previously developed land should be used prior to development on Green Belt (Policy GB4:di). The Dacorum Brownfield Register, which appears to be significantly out of date, identifies 72 hectares of brownfield land appropriate for development, and even this would be sufficient to accommodate several thousand units depending on density, notwithstanding the possibility of the implementation of consents since 2025.
10. The emerging Local Plan provides the opportunity for promoting greater use of previously developed land within the built-up areas of the Borough's towns. The Government intends the reuse of previously developed land to be the primary land resource for development, together with unimplemented consents and empty homes, the need for using open countryside such as in this case may be reduced.

11. CPRE Hertfordshire supports fully the concerns and representations made by Tring Town Council with specific regard to potential changes to the Green Belt boundary in the emerging Local Plan. We note particularly the remarks made by the Joint Inspectors following the Dacorum Local Plan Examination in Public that exceptional circumstances have not been demonstrated to remove the site from the Green Belt.

GREY BELT

12. The Government has constantly restated its commitment to the Green Belt including in the NPPF 2024 which provided a significant change in the direction of travel for national Government policy with regard to the future of the Green Belt by the introduction of grey belt. These changes have been reinforced by the latest NPPF 2026 published in August 2026.
13. Grey belt is defined in the NPPF 2026 as:
“Land in the Green Belt comprising previously developed land and any other parcels and/or any other land that, in either case, does not strongly contribute to any of the purposes (a), (b), or (d) (NPPF Glossary).”
14. It is nevertheless clear that the Government’s stated intention is to retain the Green Belt largely in its present form and the constant and increasing attempts to challenge Green Belt protections for residential and other developments lead to many local communities questioning the relevance of the planning system. CPRE Hertfordshire is not opposed to a limited reassessment of Green Belt boundaries where conditions and circumstances have changed from the original designation.
15. The present site self-evidently should not be considered as grey belt in any reasonable definition by virtue of its magnitude, undeveloped nature and contribution to the first purpose of the Green Belt in this location. In our view it is effectively a clear extension of the eastern boundary of Tring and thus constitutes urban sprawl which the Green Belt designation seeks to prevent.
16. Reference may be made to the recent appeal decision at Shafford Knoll Farm in Hemel Hempstead where the Inspector noted that:
“the NPPG identifies sites that make a strong contribution to purpose a) are likely to be free of existing development and lack physical features in close proximity that could constrain development” (ref: APP/A191/W/25/3373146)
17. Further, the appeal decision states:
“Whether, or not, a parcel of land constitutes grey belt , depends on the characteristics of the site itself and its locality (para 21).”
We believe that a similar position is appropriate with regard to the position and the character of this site which is an extensive area of totally undeveloped open land within the immediate setting of the Chilterns National Landscape that should not be regarded as grey belt.

18. With regard to grey belt, it is noteworthy that every major planning application for residential and commercial development within the Green Belt in Hertfordshire made since 12th December 2024 with one exception 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.
19. It is also undeniable in our view 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 purposeful illogicality of the revised NPPF in supporting five purposes of the Green Belt (Policy GB2) and then only permitting three purposes to be considered in applications (NPPF Glossary definition) is in our view unsupportable in this as in every other similar case.

VERY SPECIAL CIRCUMSTANCES

20. The Appellant further argues that, if grey belt is not established, very special circumstances (VSC) exist where the benefits of the scheme would clearly outweigh the harm to the Green Belt. The VSC test should not be solely a mechanistic weighting exercise, but rather clear and powerful reasons related to the conditions and circumstances of the site that warrant a departure from consistent planning policy in favour of respecting and retaining the Green Belt.
21. The judgement regarding the VSC to be demonstrated to clearly outweigh the harm caused by this inappropriate proposed development should relate to the particular circumstances and conditions of this site in the open countryside. We do not believe that the benefits that the Appellant proposes pass the test of VSC in this location when much of what is being promoted would be expected of a large development in any location.

SUSTAINABLE LOCATION

22. Public transport provision to the proposed site is limited and most of the site is in excess of 800 metres from the nearest railway station. Existing bus services are limited and, in common with County bus services generally, unreliable with schedules subject to amendment.

LANDSCAPE

23. A key characteristic of the designated open land affected by the proposal is the quality and extent of the rural landscape in this area which is highly valued by the local surrounding communities by virtue of the Public Rights of Way crossing and

bounding the site. As noted previously and extensively during the appeal, the proximity of the Chilterns scarp is a significant characteristic of this area and views both from and to the site will be seriously affected.

DACORUM LOCAL PLAN

24. We believe that the status of the emerging Dacorum Local Plan and continuing Government consideration of the significance of designated protected land, including Green Belt and grey belt are directly relevant to this inquiry. The inclusion of this site in the emerging Local Plan following the previous appeal decision is deplorable.
25. I have already mentioned the concerns of the Joint Inspectors to the Draft Local Plan with regard to the lack of exceptional circumstances demonstrated to vary the Green Belt boundary in this location. It is further unacceptable to determine this application in advance of the imminent adoption of the Local Plan.
26. We also note the intervention of the Secretary of State with respect to planning decisions and plan-making in this and neighbouring Boroughs and Districts in the County. This challenges the primary responsibilities of Local Planning Authorities for plan-making and decision-taking as identified in the Planning and Compulsory Purchase Act 2004.
27. Central government interventions in this area, in our view lead to residents and businesses losing faith in the local democratic basis of the statutory town and country planning system. We further note that the Secretary of State quotes the parlous state of housing delivery as a justification for his actions and would suggest that the context for the delivery of housing has been unusual since the end of the pandemic. Delivery of housing has been affected by a wide range of supply side factors including construction costs and materials, labour shortages, interest rates and financing constraints as well as constant changes in planning legislation.
28. We believe this situation will change in the future with the imminent adoption of the Local Plan which could make sufficient provision without the allocation of this site, assisted by Government policy and actions to encourage housing provision as a whole as the Council moves rapidly to a new Local Plan preparation and adoption. The constant attacks on the planning system as the primary cause of what is termed the housing crisis are in our view inappropriate and misguided.
29. The complexity of the issues surrounding the planning and provision of housing are ill-served by simplistic repetition of attacks on the planning process and the statutory protection of the countryside. Solutions to the urgent provision of housing in specific sectors are inevitably complex and the wholesale granting of planning consents outside Local Plan allocations on open and undeveloped land is highly damaging in this context.

SUMMARY AND CONCLUSION

30. In summary, CPRE Hertfordshire believes that the quantum of development proposed means that there would be very substantial harm caused to highly valued open countryside which is designated as Green Belt whose designation seeks specifically to prevent the type and magnitude of development proposed in this case. This harm is amplified by the location of the site in the immediate setting of the Chilterns National Landscape.
31. The categorisation of the land as grey belt is entirely inappropriate due principally to its lack of compliance with the first purpose of the Green Belt to prevent urban sprawl. The recent changes to national planning policy and guidance still purport to maintain the significance of the Green Belt designation which is highly appropriate in this location and the Inspector is respectfully urged to dismiss this appeal.

Chris Berry
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CPRE Hertfordshire
23rd September 2026