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Standing up for Hertfordshire's countryside

Peter Quaile
Planning & Development
Broxbourne Borough Council
Bishops' College
Churchgate, Cheshunt
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Our Ref:

Your Ref:

6th November 2026 (by email)

Dear Peter Quaile,

Planning application no. 7/26/0828/O
Land at Jones Road, Goffs Oak
Outline planning permission with all matters reserved (except for access and Phase 1 landscaping for which detailed approvals are sought) for the residential development of up to 225 private and affordable dwellings; together with open spaces including natural green space; a minimum of 10% biodiversity net gain; a new vehicular and pedestrian access off Jones Road; and other associated ancillary works and 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 is designated as London Metropolitan Green Belt in the adopted Broxbourne Local 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 a significant justification for the submission of this application. No other special circumstances are identified relating to local conditions and circumstances which would justify development in this location. The site is not identified as an allocated site in the Local Plan and it is entirely inappropriate in our view for such a significant allocation in the Green Belt to be determined outside the Local Plan process.

3. Very significant local community opposition continues 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 (Policy GB2) to prevent urban sprawl and encroachment onto open countryside.

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4. We strongly 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 definition. 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.

5. The proposed development is clearly urban sprawl beyond the built-up area of Goffs Oak 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 at Goffs Oak and across the Local Plan area.

6. It is noteworthy that virtually every major planning application for residential 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.

7. 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.

8. CPRE Hertfordshire thus believes that the first reason for the Green Belt as identified in NPPF Policy GB2 applies in this case, and together with purpose c) regarding encroachment onto the countryside, provide strong reasons to refuse development on this site. 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.

9. The remaining issues quoted in the Planning Statement section 9 as constituting very special circumstances required in the event that the site is not regarded as grey belt are entirely inadequate, constituting 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

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of items irrespective of the conditions and circumstances of the location and inevitably renders them as less “special”.

10. We note the intention to provide 50% affordable housing but this is essentially meaningless without further information and commitments to its provision. 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.

11. 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.

12. In summary, it is undeniable that the planning policy context created by the NPPF 2024 and subsequent revision in 2026 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 NPPF supporting five purposes of the Green Belt and then only permitting three purposes to be considered in applications is unsupportable in this case.

13. The effect of this illogicality is devastating for the Green Belt and the continuing granting of planning consents is damaging and unnecessary in the light of the failure to use previously developed land and unimplemented planning permissions. Recent research by CPRE indicates that 1.54 million homes could be provided on “brownfield land“ across England, thereby reducing the need to use designated protected open land.

14. 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. 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.

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This application is not supported through the Local Plan process and we urge the Council to refuse permission for this inappropriate speculative development.

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.