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Standing up for Hertfordshire's countryside

Emily Kingswell
Development Management
Welwyn Hatfield Borough Council
The Campus
Welwyn Garden City
Herts. AL8 6AE

Our Ref:

Your Ref:

20th June 2025 (by email)

Dear Emily Kingswell,

Planning application no. 6/2025/0847/OUTLINE

Land adjacent to 52 London Road, Knebworth

Outline application for residential development of 25 dwellings and open space with all matters reserved except access

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 Welwyn Hatfield Local Plan where development is 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 Planning Statement notes that the site is not allocated for development in the Local Plan, and that a subsequent planning application was refused permission (reference 6/2022/0787), but the context has changed sufficiently so "that there is a presumption in favour of granting planning permission for this application". This context refers mainly to the revised National Planning Policy Framework (NPPF) and the introduction of grey belt considerations for Green Belt applications.
3. It is asserted that the site constitutes grey belt and there are no strong reasons to refuse permission on the basis of the revised NPPF definition of grey belt. We oppose this interpretation of the grey belt and believe that purpose a) (NPPF Paragraph 143) relating to "unrestricted sprawl" applies in this case.
4. The "unrestricted sprawl" referred to in the NPPF should relate as much to uncontrolled growth as a result of the proximity of London, which was a primary objective of the original Green Belt legislation, as to the growth of immediately adjoining settlements.

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CPRE Hertfordshire is a Charitable Incorporated Organisation

President: Sir Simon Bowes Lyon, KCVO

Chairman: Peter Waine

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In any case, this proposal would aid significantly the coalescence of the settlements of Knebworth and Woolmer Green.

5. Notwithstanding the recent Government guidance regarding the categorisation of settlements affected by coalescence, we believe that the Council should take account of the impact of further development on Knebworth and Woolmer Green. CPRE Hertfordshire is campaigning to highlight the imbalances that have arisen in the recent changes to planning policy guidance which ignore the impact of development on existing settlements, whatever their size.
6. It is undeniable that the new planning context has provoked a large number of re-applications which were previously refused permission. Whereas a proportion of such applications may warrant re-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 grey belt applications (NPPF Glossary definition) is unsupportable in this case.
7. It is becoming widely acknowledged that the grey belt definition in the NPPF is jeopardising the continued existence of the Green Belt. We urge the Council to recognise the nature and scale of the application and 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.