

Mr Edd Evans  
Development Management  
Welwyn Hatfield Borough Council  
The Campus  
Welwyn Garden City  
Herts. AL8 6AE

Our Ref:

Your Ref:

5<sup>th</sup> November 2025 (by email)

Dear Mr Evans,

**Planning application no. 5/2025/1791/MAJ  
Ponsbourne Park, Newgate Street, SG13 8QT  
Redevelopment of land at Ponsbourne Park to provide 26 new dwellings, extensions,  
conversion of existing buildings to residential use, associated car parking and landscaping**

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 Applicant's Planning Statement notes the recent revision of the NPPF and the introduction of the concept of grey belt as the justification for the submission of this application. No attempt is made by the Applicant to demonstrate the 'very special circumstances' which are otherwise required, relating to local conditions which would justify development in this location as opposed to any other Green Belt location.
3. In fact, the local conditions, including the presence of the Chain Way walkway and woodland to the west militate against any suggestion that there are very special circumstances favouring development. Rather, the high quality of the site in landscape and related terms demonstrate that it should be maintained as open countryside.
4. Significant local community opposition continues both generally to development in the Green Belt and this specific application. The proposed development would 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 significant proposed development of 26 dwellings is clearly a separate development beyond the minor built-up area of Newgate Street, the adjoining settlement, 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. The proposed development is clearly urban sprawl beyond the built-up area, and in an unsustainable location, constituting encroachment onto the countryside. Together these issues provide the “strong reason” required to refuse development as noted in the NPPF footnote 7.
8. It is noteworthy that virtually every major planning application for residential and commercial development within the Green Belt in Hertfordshire made since 12<sup>th</sup> 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. In summary, it is undeniable that the new planning policy context created by the 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 three purposes to be considered in applications (NPPF Glossary definition) is unsupportable in this case.
10. This proposed development constitutes a substantial unsustainable development in the Green Belt which should not be cited as grey belt. The recently adopted Local Plan makes appropriate provision for housing in the Borough and it is entirely erroneous to state, as noted in the Planning Statement paragraph 5.10, that the Local Plan “is at very early stages(sic)”.



11. In any case, the existence of unimplemented planning approvals and the availability of unused land in existing built-up areas, as evidenced by recent research by CPRE and others, renders the promotion of unplanned speculative sites as both unnecessary and damaging to the diminishing open countryside. 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.
12. This application is not supported through the Local Plan process and we urge the Council to 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.