

Emma Barral
Development Management
Welwyn Hatfield Borough Council
The Campus
Welwyn Garden City
Herts. AL8 6AE

Our Ref:

Your Ref:

20th March 2026 (by email)

Dear Emma Barral,

**Planning application no. 6/2026/0021/OUTLINE
105 Northaw Road West, Northaw, Potters Bar
Outline permission for the erection of up to 30 dwellings on land to the rear of 105 Northaw
Road West including alterations to the existing site access with
all matters reserved apart from access**

I write with regard to the above planning application to which CPRE Hertfordshire strongly 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 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 whole of the site is allocated as a Local Wildlife Site (LWS) in the Local Plan and thus completely inappropriate to be considered for development of any kind. It is also in a relatively isolated location on the eastern edge of the small village of Northaw with limited access to services and facilities.
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 (paragraph 143) to prevent urban sprawl, the coalescing of settlements and encroachment onto open countryside.
4. 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.

5. The proposed development is clearly urban sprawl beyond the built-up area of the adjoining small settlement of Northaw 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.
6. We also believe it is self-evident that a designated Local Wildlife Site should never be considered as grey belt which was apparently originally conceived as previously developed land. The extension of the definition of grey belt illustrated by this case indicates the significant danger to designated protected land which needs to be curbed. 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.
7. 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.
8. CPRE Hertfordshire thus believes that both 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, provides 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.
9. The remaining issues quoted in the Planning Statement as constituting very special circumstances are entirely inadequate, constituting obligations which would accrue to any proposed development of this size and function. It is also perverse to suggest that environmental improvements to the remaining Local Wildlife Site should constitute very special circumstances when 40% of the LWS is proposed for development. In any case, including certain aspects of grey belt as special circumstances is a completely circular argument and clearly inappropriate.
10. We note the intention to provide 50% affordable housing but this is essentially meaningless without further information and commitments to its provision. Given the inadequacy of the official definition to reflect the true state of the



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housing market in Hertfordshire, affordability for average earning households is generally unattainable in the County.

11. 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. The existence of legally binding agreements between appropriate institutions involved in the provision of truly affordable low cost housing should be required.
12. In summary, it is undeniable that the new 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 three purposes to be considered in applications (NPPF Glossary definition) is unsupportable in this case.
13. 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.

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.