



**Campaign to Protect
Rural England
Hertfordshire**

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Standing up for Hertfordshire's countryside

Carl Griffiths
Development Management
Welwyn Hatfield Borough Council
The Campus
Welwyn Garden City
Herts. AL8 6AE

Our Ref:

Your Ref:

7th September 2026 (by email)

Dear Carl Griffiths,

**Planning application no. 6/2026/0108/OUTLINE
Land to the north of New Road Stanborough, Welwyn Garden City
AMENDMENTS: Outline Planning Application for up to 100 dwellings (including affordable
housing), open space, sustainable drainage systems (SuDS), vehicular access point and
associated infrastructure, with all matters reserved except for access**

I write with regard to the above amended 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 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 as opposed to any other similar location apart from issues relating to the Green Belt.
3. It is noted from the papers for the Welwyn Hatfield Council Cabinet Planning and Parking Panel that it is not proposed that this site is allocated in the emerging Draft Local Plan so this is a speculative proposal. It is not appropriate in our view for such a significant allocation in the Green Belt to be determined outside the Local Plan process. In addition, the emerging (Regulation 19) Draft Local Plan lists Stanborough as a Tier 5 settlement in the Green Belt and states that such settlements are 'not generally considered to be sustainable locations'.



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4. 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 (GB2) 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 proposed development is clearly urban sprawl beyond the built-up area of 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. It is noteworthy that virtually every major planning application for residential and commercial development within the Green Belt in Hertfordshire made since 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 will continue to campaign vigorously for changes in national planning policy 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.
9. CPRE Hertfordshire believes that the first reason for the Green Belt as identified in the NPPF (GB2 1a) applies in this case and provides a strong justification for challenging the definition of grey belt in this case. 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.
10. As significant as any proposed benefits is the growing paucity of open space adjacent to built-up areas with its attendant physical and mental health benefits. The Green Belt in this area is under unrelenting pressure for development which is jeopardising the highly



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valued benefits which protection brings, and its continual reduction is in danger of bringing the planning system into disrepute.

11. 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.
12. 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.
13. In summary, it is undeniable that the planning policy context created by the 2024 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 and then only permitting three purposes to be considered in applications is unsupportable in this case.
14. 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.

We urge the Council to refuse permission for this inappropriate speculative development.

We understand that this application will be considered at the Council meeting on Thursday 10th September and would be grateful if this objection could be reported to the Members before the meeting, with our apologies for the late submission.

Yours sincerely,

Chris Berry
Planning Manager