



David Elmore  
Development Management  
Welwyn Hatfield Borough Council  
The Campus  
Welwyn Garden City  
Herts. AL8 6AE

Our Ref:

Your Ref:

23<sup>rd</sup> June 2022 (by email)

Dear David Elmore,

**Application no. 6/2022/1097/OUTLINE**

**Land to the North of Bradmore Way, The Brookmans Estate, Brookmans Park  
Outline planning permission with all matters reserved except access, for up to 125  
dwellings, a care facility for up to 60 bedrooms (Use Class C2), and a scout hut (Use Class F2)**

I write with regard to the above application, to which CPRE Hertfordshire objects for the following reasons.

1. The site is located within the London Metropolitan Green Belt as identified in the existing Welwyn Hatfield District Plan 2005, where development is inappropriate unless very special circumstances can be demonstrated according to criteria in the National Planning Policy Framework (NPPF). Whilst the site was allocated for housing in an earlier draft of the Submission Draft Local Plan, the Local Plan continues to be the subject of a long-running Examination in Public and it is not now proposed that this site should be included in the schedule of sites for removal from the Green belt.
2. CPRE Hertfordshire supports fully the Council's present position with regard to this site and notes further the very considerable debate surrounding the status of designated protected land, and specifically Green Belt in this area. The extended period of the Examination in Public (EiP) is testament to the concerns of the Council and local communities with regard to inappropriate development in the Green Belt.
3. CPRE Hertfordshire, together with a wide range of local community and other organisations, has been represented at the EiP and made submissions relating to the housing figures presented in the Draft Local Plan. We, and others, have challenged the basis for the Council's calculation of housing need at the EiP which are based on out-of-date population projections and the amount of land required.
4. It would be inappropriate to determine this application prior to the clarifications being sought by Welwyn Hatfield Council and others, including CPRE, regarding the interpretation of the NPPF and planning guidance, which may affect planning policy on



the significance of designated protected land. We note that the recently published Levelling Up and Regeneration Bill and supporting policy information re-iterates recent Ministerial statements, which have policy weight, that have indicated strong support for the Green Belt, and the continued granting of permissions is inappropriate in these circumstances.

5. The Applicant's Planning Statement devotes considerable attention to a discussion of the lack of housing land supply which has been the subject of extended consideration, as noted in 2. above. No other very special or exceptional circumstances are advanced for permitting this inappropriate development on land which clearly satisfies the requirements for designation as Green Belt.
6. CPRE Hertfordshire and others continue to press for clarification of the technical guidance provided to local planning authorities which has led to uncertainty in the implementation of the policy requirements of the NPPF. In our view, increasingly supported by local communities and their leaders, Paragraph 11 (plus footnote 7) of the NPPF continues to provide local planning authorities with the responsibility to adjust housing need assessment according to policy constraints related to protected land.
7. It remains the case that this proposal constitutes inappropriate development in the Green Belt by virtue of its encroachment on protected countryside, and impacting on the openness of the countryside in this area. Very special circumstances for approval should be related to the conditions of the site rather than generalised matters of housing land supply which could be satisfied elsewhere where they are relevant.
8. CPRE Hertfordshire supports fully the detailed response of the North Mymms Green Belt Association and local residents with regard to the impacts on local services and facilities, wildlife and potential loss of biodiversity. We urge the Council to refuse permission for this inappropriate development proposal.

Yours sincerely,

Chris Berry  
Planning Manager