



Louise Sahlke  
Development Management  
Welwyn Hatfield Borough Council  
The Campus  
Welwyn Garden City  
Herts. AL8 6AE

Our Ref:

Your Ref:

15<sup>th</sup> June 2022 (by email)

Dear Louise Sahlke,

**Application no. 6/2022/0820/OUTLINE**  
**Emmanuels Farm, Great North Road, Welwyn Garden City, AL8 7TA**  
**Outline permission for residential development of up to 20 affordable units,**  
**including access, layout and scale**

CPRE Hertfordshire objects to the above application for the following reasons.

1. The site lies in the London Metropolitan Green Belt as defined in the adopted Welwyn Hatfield Local Plan and constitutes inappropriate development according to the National Planning Policy Framework (NPPF). CPRE Hertfordshire has responded previously to various applications on this site in 2012, 2016 and 2018, citing Green Belt reasons and the lack of very special circumstances to support development.
2. The present application is for a substantial building containing up to 20 "affordable units" and although identified as an outline application, includes additional information on access, layout and scale which would normally be included in a full application. This places the Council in a difficult position with regard to determination of the application.
3. The Applicant will be aware that it is not appropriate to make an application for "affordable" housing in outline, as this is not a specific category of the Use Classes Order. Affordable housing is generally provided through a Section 106 agreement and linked to a Registered Provider and no indication is given in this outline application that such arrangements are intended.
4. The Applicant's limited Planning Design and Access Statement makes a number of unsupported assertions regarding the proposed development. Paragraph 6.2.2 identifies the proposal as falling within the definition of a "rural exceptions scheme"; again without any supporting evidence or justification with regard to potential residents.



5. The Applicant's consultants further suggest that there is no need to provide evidence of very special circumstances to overcome the objection to inappropriate development by virtue of being "a rural exception scheme." No specific evidence beyond that provided for the Submission Welwyn Hatfield Local Plan is identified to support the need for affordable housing in this location.
6. It would appear that this is another speculative application for this site which would clearly encroach on designated Green Belt, extend the built-up area and affect openness to an unacceptable extent. We support Hatfield Town Council's concerns regarding the suitability and location of the proposed development and would urge the Borough Council to refuse this application.

Yours sincerely,

Chris Berry  
Planning Manager