

Emily Stainer  
Development Management  
Welwyn Hatfield Borough Council  
The Campus  
Welwyn Garden City  
Herts. AL8 6AE

Our Ref:

Your Ref:

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

Dear Emily Stainer,

**Application no. 6/2022/0787/OUTLINE**  
**Land adjacent to 52 London Road, Knebworth, Woolmer Green, SG3 6JD**  
**Outline planning application for up to 25 residential dwellings (Class C3), with all matters reserved except layout and access**

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

1. The site lies in the London Metropolitan Green Belt as identified in the adopted Welwyn Hatfield District Plan 2005 in line with the requirements of the National Planning Policy Framework (NPPF). The emerging Local Plan has been subject to an extremely lengthy Examination in Public (EiP) which is not yet resolved.
2. The Inspector's report is still subject to consideration by the Council and extended discussions have taken place between the Inspector and the Council regarding the inclusion of sites on designated protected land. Although this site was identified in the initial Submission Local Plan, subsequent consideration has led to its omission in the present schedule of site allocations.
3. Accordingly, it is clearly premature to determine this application when the land has not been released from its Green Belt designation, and is not likely to be in the revised Submission Local Plan.
4. The Applicant's planning consultants, DLP Planning Ltd, have prepared a relatively brief Planning Statement which is extended significantly by the inclusion of three appendices which restate work done by Welwyn Hatfield Council and correspondence with the Planning Inspector. The Planning Statement rehearses the various correspondence between the Planning Inspector and the Council which is now out-of-date due to the further consideration of allocated sites by the Council.



5. In the light of the Council's further consideration of site allocations, following correspondence with the Minister for Housing seeking clarification of the position regarding the protection of designated land, including Green Belt, it is clear that the Government intends the designation of protected land to continue to be a major constraint on proposed development. The Government's commitment to the Green Belt has been further clarified in the recently published Levelling Up and Regeneration Bill and this has considerable policy weight.
6. The proposed development constitutes a substantial encroachment on the gap between the settlements of Woolmer Green and Knebworth and, by virtue of its location on the edge of the built-up area of Knebworth, will affect the openness of the Green Belt in this area.
7. The consultants state very briefly what they regard as very special circumstances which would need to be demonstrated to overcome the presumption against inappropriate development in the Green Belt. Initially, five factors are listed in paragraph 7.25 of the Planning Statement, to be discussed further in Section 8.
8. In the event, Section 8, in less than two pages, notes only two factors. The provision of market housing is asserted as the initial factor and this is clearly inappropriate, both in terms of the modest number of units proposed and the policy guidance provided by the NPPF.
9. Paragraph 11 and footnote 7 of the NPPF clearly indicate that policy constraints related to designated protected land should be taken fully into account when defining housing targets for Local Plans, and this continuing commitment has been noted above. The second factor noted in the Planning Statement is the provision of affordable housing which is minimal and in any case subject to existing policy which cannot be regarded as exceptional in any circumstance.
10. Section 8 concludes with an unsubstantiated assertion that "the application ....will make an important contribution to the supply of market and affordable dwellings." This is clearly inaccurate and the brief concluding Section 9 merely restates the position on housing land supply and, in our view, entirely misrepresents the intention of Paragraph 11 of the NPPF upon which CPRE has made significant representations both at the EiP and elsewhere.
11. CPRE Hertfordshire supports the Council in its continuing efforts to represent the concerns of local communities with regard to the protection of highly valued and significant open countryside throughout the Borough, and the damaging impacts of inappropriate development. The Applicants fail to demonstrate any very special



circumstances for the removal of this land from the Green Belt and we urge the Council to refuse this application.

Yours sincerely,

Chris Berry  
Planning Manager