



Welwyn Hatfield Council Local Plan Examination:- Consultation on Additional Documents

On behalf of
SDS Ltd & Taylor Wimpey North Thames

1.0 Introduction

- 1.1 These comments are made on behalf of SDS Ltd and Taylor Wimpey North Thames; the former being the promoters of the land associated with Cuf5/Cuf 12 (at Northaw Road East, Cuffley) and the latter being the preferred developer (who are already in contract with land owners to deliver the emerging HS29 allocation site).
- 1.2 They deal with documents EX156 (Landscape Sensitivity) and EX160/A/B (Green Gap Assessment) in relation to their relevance to Cuffley generally and specifically to the promoted land parcels at Northaw Road East, Cuffley. They are supported by expert landscape and visual assessment work provided by LVIA Ltd, which also supplements the previous expert Green Belt analysis provided by Pegasus Planning.

2.0 Comments on Green Gap Assessment

- 2.1 There are four separate assessments that have been undertaken by the Council's consultants which relate to Cuffley, as follows:-

- i) Area between Cuffley and Goffs Oak (Broxbourne)
- ii) Area between Cuffley and Crews Hill (Enfield)
- iii) Area between Newgate Street and Cuffley
- iv) Area between Northaw and Cuffley

The first two fall in the category of being '*between specified settlements and settlements outside the borough boundary*', with the second two being '*between specified settlements and potential inset villages*'. The promoted sites (at Cuf12/Cuf5) form part of iv) above and that particular assessment is therefore of direct relevance to the consideration of these land parcels.

- 2.2 In three out of the four assessments above (including iv), the consultants are recommending that a gap policy designation is introduced, although it is noted that paragraph 1.8 of the report states that:- '*These policy areas may be refined once sites have been allocated*'.
- 2.3 The recommendations to introduce a gap policy designation for both i) and iii) are fully understood and accepted, since the separation distances involved are already very tight at 0.4km and just over 700m respectively (at their closest points), and any small incursion of development within them is therefore likely to lead to coalescence, detrimental to the Council's overall objective of maintaining the settlement pattern of the district. Regarding ii) however, we are concerned that the report has given

insufficient weight to the existing recreational value of the land and its rural character generally, within an area that provides a clear strategic green belt function.

2.4 Within this assessment area, it is noted that the recent 'Call for Sites' exercise resulted in '*land to south east of KGV playing fields*' being promoted as a potential residential allocation. There would be no logic in favouring that land over Cuf5 in that it would result in a loss of rural character; lead to an irregular settlement boundary; and cause serious harm to Green Belt purposes through its reduction in the strategic gap between the settlement and the London Borough of Enfield and resulting in sprawl into the open countryside to the south of Cuffley. A gap policy designation would therefore be complementary to the role of the Green Belt within this particular area.

2.5 Turning to the iv) analysis, it is instructive that the report recognises that:- '*The rural area between Northaw and Cuffley is relatively large, with its narrowest part a distance of just less than 1.6km apart at its closest point*'. Within this area, the report identifies the following aims:-

- Preserve the sense of separation between the two settlements and retain the area of open and rural character that defines the area, comprising undulating farmland, well maintained hedgerows and copses;
- Ensure there is no greater inter-visibility between one settlement edge and the other (making sure to consider the winter situation without leaves on trees) – topography and vegetation can provide a screening function; and
- Conserve and enhance areas of ecological importance including the four Local Wildlife Sites and areas of BAP Priority Habitats; and
- Seek opportunities to extend and enhance the existing long distance recreational routes and footpaths

2.6 These are all issues that were dealt with in previous discussions on the Cuf5 masterplan as part of the Planning Performance Agreement (PPA) with the LPA. Each point is addressed in turn below:-

- The exclusion of Cuf5 from the consultants' proposed gap policy area would still allow for a resultant distance between the new revised western edge of Cuffley and the eastern edge of Northaw of just over 1km. This adjustment to the proposed gap policy area would logically adopt the Hempshill Brook running along the western boundary of the subject site as the new edge to Cuffley, involving a robust and permanent landscape feature.
- In terms of the issue of 'inter-visibility' between the settlements, the accompanying updated landscape/visual impact assessment (undertaken by LVIA Ltd) considers a number of key views, including those looking towards the site from Northaw to the west, and includes recommended landscape mitigation measures to be incorporated within any scheme proposals, as set out at chapter 11 of their report. Key elements that would assist with this particular aim include boundary planting (including new

trees and retention of existing hedges); imposing zonal height limitations to proposed built form; the creation of a central open space orientated in a broadly north/south axis augmenting the line of existing mature oak trees with additional tree planting; street tree planting along the internal roads; and ornamental planting within residential curtilages.

- The Cuf5 masterplan includes an extensive ecological buffer zone along its western boundary including attenuation ponds and robust landscaping. This would provide the opportunity to create additional habitats, particularly riparian vegetation along the brook. There are no Local Wildlife Sites or BAP Priority Habitats that will be affected by the proposals. The existing low-grade farmland is relatively sterile from a bio-diversity perspective and there would be significant bio-diversity gains derived from the masterplan proposals, as highlighted by the previous positive engagement with RSPB (Royal Society for Protection of Birds).
- The Cuf5 proposals took the opportunity of connecting up with the nearby long-distance footpath (Hertfordshire Way) by facilitating a proposed footbridge link at the north west corner of the site.

3.0 Comments on Landscape Sensitivity Report

- 3.1 The accompanying report by LVIA Ltd updates the material previously provided with the outline planning application (ref:- S6/2014/1697/PP) by ACD Landscape Consultants, in line with current legislation and guidance. It also reflects the change in planning circumstances regarding the emerging allocations at HS29 & HS30. Ten key view-points were selected (from a range of distances and visual receptors) for assessment purposes based on best practice and as informed by their extensive fieldwork.
- 3.2 Based on their expert assessment, the landscape sensitivity of the subject site (included within parcel 53c) has been over-stated by LUC. It is also noted that LVIA Ltd consider the land to the south of Northaw Road East to be of similar sensitivity (see para 13.1.3) rather than being less so. As noted earlier, in our opinion, LUC have placed insufficient weight on the importance of the existing sports and recreational role of this land.
- 3.3 The report finds that:- *‘The site has an assessed medium landscape sensitivity and a medium magnitude of landscape impact. The significance of landscape character is moderate adverse (ie. not material).’* It proposes a comprehensive mitigation strategy to be incorporated into a new masterplan, which upon implementation, would mean that the overall residual impact on the landscape could be considered as having a moderate overall effect on the surrounding landscape character and major/moderate residual effects from one of the assessed view-points.
- 3.4 Chapter 9 of their report considers ‘landscape character’ of the wider area generally including at sub-regional level. Key characteristics of the wider area that are of particular relevance to the subject site have been highlighted in bold (See 9.2 Sub-Regional Character at page 22). In particular, it notes the major influence of the M25 on this area, as follows:-

‘The sight and sound of the M25 and the settlement of Potters Bar present a major impact on the south of the area.’

- 3.5 Assessing the site specific character within this sub-regional context, paragraph 9.2.11 states that:- *'The character of the site may be summarised as marginal agricultural fields situated adjacent to existing residential development and transport corridors. The change of use to a (residential-led) mixed use development of this scale will be of a similar character to that of its immediate and wider context. Therefore, the overall receptor is judged to be a low susceptibility to the type of change proposed.'*

4.0 Conclusion & Way Forward

- 4.1 For the above reasons, the exclusion of the Cuf5 site from any adopted gap policy area would have no impact upon the sense of separation between Cuffley and Northaw, thereby ensuring that the existing settlement pattern and character would be maintained.
- 4.2 The landscape sensitivity of the subject site is medium/moderate as demonstrated by the accompanying LVIA report and an extension of the HS29 allocation (to embrace either the part Cuf12 or full Cuf5 option) would cause only moderate impact on the landscape.
- 4.3 Moreover, the allocation of a larger area at this site would represent a logical extension of the settlement westwards, providing robust physical and defensible boundaries, at the gateway to Cuffley.
- 4.4 We trust that the Inspector and the Council will find these further representations of assistance in the further progression of the Local Plan.