

Response to Landscape Sensitivity Assessment EX156, July 2019
by Land Use Consultants for Welwyn Hatfield BC

by SAVE SYMONDSHYDE
November 2019

1. This is a response by Save Symondshyde to the LUC *Landscape Sensitivity Assessment*, July 2019. An email from the Programme Officer on 6th October invited comments on various new documents, including EX156.
2. We found the *Landscape Sensitivity Assessment* to be interesting but of peripheral relevance to the key questions facing the Local Plan, which are about which sites to allocate. The *Assessment* is based on Landscape Character Areas (LCAs) which cover often substantial tracts of land. The commentary provides illustrations of the points made and acknowledgement of variation in circumstances around each Landscape Character Area, but usually fails to get to grips with the character, sensitivity and capacity of prospective land allocations specifically. We therefore found this document much less useful than the Borough Council's earlier *Landscape Sensitivity and Capacity Study* (e.g. Part 3 in June 2016).
3. Our principal interest is obviously the site and surroundings of the proposed allocation of a new village at Symondshyde. This allocation falls into two LCAs in approximately equal parts: LCA31 De Havilland Plain (SE portion) and LCA32 Symondshyde Ridge (NW portion). The boundary between the two LCAs is formed by Footpath 50 (which runs from Symondshyde Lane, past Dogsheart Spring, towards Cromerhyde Farm). LUC divides its assessment of LCA31 between areas close to and away from the built-up area of Hatfield, with only the latter being directly relevant to the Symondshyde proposed allocation. The LUC assessments of the two LCAs are discernibly different, as follows.
4. The summary of LCA31 on 'sensitivity to development away from the urban edges' (page 56) is as follows (excluding references to parts of the LCA remote from the Symondshyde proposed allocation):

"For the most part the area lacks distinctive landscape character, although visual openness, lack of settlement and pockets of BAP Priority Habitat deciduous woodlands do create some sensitivity. The evidence of mineral extraction reduces the sensitivity where it has altered the field pattern and limited the coverage of habitats. Most of the area to the north of Coopers Green Lane is therefore of a **low-moderate** landscape sensitivity to residential development."
5. Unlike the Council's own *Landscape Sensitivity and Capacity Study* Part 3 in June 2016, the LUC *Assessment* was clearly influenced by the sand and gravel working taking place within LCA31 between the Symondshyde new village allocation site and Coopers Green Lane. Temporary earth bunds are visible in View 6, for example. This land will of course be restored before a new village would proceed and, at that time, the landscape would be superior to the one which LUC staff experienced. The restored land will fall away gently from the north towards Coopers Green Lane (see the document *Stanborough and Symondshyde - Minerals Technical Paper* EX51). The longer term sensitivity of the site to development is therefore likely to be more highly rated than LUC's *Assessment*.

6. The summary of LCA32 on 'sensitivity to development' (page 66) is as follows (excluding references to parts of the LCA remote from the Symondshyde proposed allocation):

"Woodland is a dominant feature within the area, but although this would in places limit the visual impact of new development it also, through isolating areas from the wider landscape, adds to perceptual qualities of remoteness and tranquillity.... The undeveloped nature of the area, tranquil perceptual qualities, high coverage of BAP Priority Habitat deciduous woodlands and the extensive network of public rights of way, result in the area having **moderate-high** sensitivity to residential development."

7. We continue to be astonished that the Borough Council should consider appropriate a huge housing allocation in the form of a new village where half the land in question is described in landscape terms as "having **moderate-high** sensitivity to residential development". The LUC report *Landscape Sensitivity Assessment* reinforces the unsoundness of the allocation and therefore of the Plan.

8. The WHBC *Landscape Sensitivity and Capacity Study Part 3* was still more emphatic in its assessment in June 2016. This reviewed the new village site, identified then as 'HAT15'. Details given in Appendix 6 to Part 3 show that the landscape sensitivity of HAT15 was identified as having:

- * 'High Sensitivity' (the second-highest rating out of four), defined as "likely to be unable to accommodate development without extensive degradation of character. Mitigation measures may not be able to fully address detrimental impacts" (page 15);
- * 'High' Landscape Value (the second-highest rating out of four), defined as "Development could be accommodated within the landscape but mitigation measures may not be sufficient to address the detrimental impacts" (page 16); and as a result
- * 'Low Capacity' within the landscape (the second-lowest rating out of five), defined as "development is likely to have an adverse effect on the quality, character and value of the landscape" (page 17).

These are summarised on pages 68 and 69 of the main Part 3 report. The main report concluded as follows (page 46, with our emphasis added):

"The area was assessed as having a high level of sensitivity to change and a high landscape value score. This indicates that the area is likely to be unable to accommodate development without extensive degradation of character. Mitigation measures may not be able to fully address detrimental impacts of change.

The area was assessed as having a low capacity to accommodate housing and associated development with development likely to have an adverse effect on the quality, character and value of the landscape (it is significant to note that the total landscape value score for the area was only 0.6 into the high category due to the

differing Agricultural Land Classifications of the site). Mitigation is unlikely to be sufficient enough to address the significant impact on the landscape.”

9. The 2016 study identified the serious unsuitability of the Symondshyde site for development in terms of landscape sensitivity, landscape value and landscape capacity to accommodate development. So far as using the landscape character areas are concerned, in LUC’s 2019 assessment, the character of the Symondshyde Ridge, LCA32, is in our view clearly closer to the perception of the site of the proposed allocation than is LCA31. The advice available from the Council’s 2016 study seems to us far more pertinent than the broad assessment of character areas now supplied by LUC.

10. Both the WHBC and the LUC assessments are founded on reasonable principles, but the different methodologies have produced different results. The July 2019 area-based approach by LUC separates out eight different criteria for landscape sensitivity assessment, but there is nothing to stop parts of a LCA falling into all the three categories for assessment (low, moderate and high). That is understandable across a whole character area but is not a great help for deciding whether a specific site has the capacity to accommodate dwellings. The LUC approach falls short of providing the specific advice needed. The LUC methodology is also based in large part on a format published by Natural England as recently as June 2019, so this is a methodology which cannot have had time to bed down with practice and experience.

11. In our view, the understanding of landscape sensitivity and capacity has not been helped at the site level by the new LUC report of July 2019. Any assessment based on Landscape Character Areas is likely to suffer from difficulties at the boundary between LCAs: landscape character and sensitivity rarely change abruptly at a boundary and more usually they change over some distance. That is the position at Symondshyde. The LUC *Assessment* is confusing for the purposes of the Local Plan preparation and should be set to one side. The information contained in the Council’s own earlier work on this subject should be preferred and relied upon instead, at least in the case of Symondshyde.

Save Symondshyde
2 Cromer Hyde Lane
Welwyn Garden City
Herts.
AL8 7XE

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