

Louise St John Howe
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Dear Ms Howe,

Re. Welwyn Hatfield Local Plan Examination: Parcel Dig 1

Further to the publication of the Landscape Sensitivity Assessment for Welwyn Hatfield Local Plan (July 2019 - Examination document reference Ex156) which was made available for public review on 20th August 2019 following clear direction by the Inspector to do so in his letter of 8th August 2019, our client has requested that we review this document and assess the implications for the assessment of Parcel Dig 1 for residential development.

It is stated that the Landscape Sensitivity Assessment (LSA) was undertaken alongside, but discrete from, the LUC Green Belt, Green Corridor and Settlement Gap studies. It is therefore perplexing why all documents were not available at the same time, in order that an efficient and coordinated response to the promotion of parcels could be made by all the interested parties. Indeed the Inspector in his letter of 8th August is quite rightly critical of the Council's piecemeal and protracted approach to evidence production to date which is wholly unhelpful for the public seeking to properly engage with the process.

At section 1.3 of the Landscape Sensitivity Statement (LSA) it is stated:

'The overall aim of this study was to undertake a robust and transparent comparative assessment of landscape sensitivity by landscape character area, to inform decision making in relation to site selection as part of the Local Plan review process. This information provides useful context for more detailed assessment of specific site options and Section 3 of this report includes a diagram that indicates how the assessment can be used when appraising a specific site. It is a strategic-level study undertaken at a scale of 1:25,000; more detailed Landscape and Visual Impact Assessment (LVIA) will be required on a site by site basis in relation to the development of any specific site and to inform masterplanning'

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At paragraph 2.24 of the LSA it is stated that:

‘Whilst landscape sensitivity assessment results provide an initial indication of landscape sensitivity, they should not be interpreted as a definitive statement on the suitability of individual sites for a particular development or land use change. All proposals will need to be assessed on their own merits.’

And at paragraph 3.3 of the LSA it is stated:

‘As this is a borough-wide study it cannot assess the landscape on a field by field basis. It considers sensitivity of landscape character areas, or subdivisions of them, to the ‘principle’ of 2-3 storey residential development.’

In summary, the aim of the LSA was to undertake an assessment of each landscape character area and to provide context for a more detailed assessment of site specific options. The authors of the LSA acknowledge that more detailed LVIA will be required on a site by site basis.

Turning to the Landscape Character Area in which the Dig 1 parcel is located, it is noted that Area 42: Tewin, Dawley and Lockley Estate Farmland has been subdivided into three sub-character areas i.e. 42, 42a and 42b.

Sub area 42b covers a substantial tract of land both to the east and west of Digswell, with Parcel Dig 1 forming a very small part of the sub area.

The sensitivity to development on the edge of Digswell (42b) is described on page 130 of the LSA as:

*‘The prominent open sloping landform, rural setting with wooded features on the skyline, historic parkland character associated [sic] with the Lockley estate and extensive network of public rights of way make the settlement edges to the east and west of Digswell **moderate-high** in sensitivity to residential development. This is reduced slightly, to **moderate**, in close proximity to the settlement in the larger arable field to the east of Digswell, but where the terrain provides strong eastwards views towards open countryside there is a stronger rural character.’*

Selected key sensitivities are stated in the LSA to include:

- Minimise intrusion on the prominent sloping landform.
- Retain uninterrupted views towards the wooded skyline.
- Maintain historic parkland character
- Maintain the extensive network of public rights of way.

Having previously carried out a detailed LVIA¹ of potential development on the Dig 1 parcel of the quantum of residential development proposed, I strongly disagree that the sensitivity to residential development is ‘Moderate’. I conclude following detailed analysis and our own criteria, based on best practice guidance, that the landscape sensitivity of the Dig 1 parcel is ‘High’.

¹ Submitted on behalf of the Digswell Action Group by email on 17th June 2019 as evidence to duly made representations to the Consultation on sites promoted through the Call for Sites 2019.

In addition, it is clear that development of the parcel would have an adverse impact on a number of the stated key sensitivities in the LSA, including intrusion on the prominent sloping landform, interrupting views of the historic viaduct from public rights of way and eroding the setting of the historic Tewin Water Registered Park and Garden. Furthermore, both parts of the physical route of the public rights of way and the rural setting experienced by users of the rights of way would be adversely affected by development of the Dig 1 parcel.

I am unclear how LUC, with the methodology presented, could reach robust assessment conclusions on the sensitivity of a very small parcel of land within a sub area, that conveniently coincides with the Dig 1 parcel boundary. The approach taken by LUC, contradicts their previously stated aim of a strategic level assessment, which is to be used *as 'context for more detailed assessment of specific site options'* and noting *'more detailed Landscape and Visual Impact Assessment (LVIA) will be required on a site by site basis in relation to the development of any specific site'*.

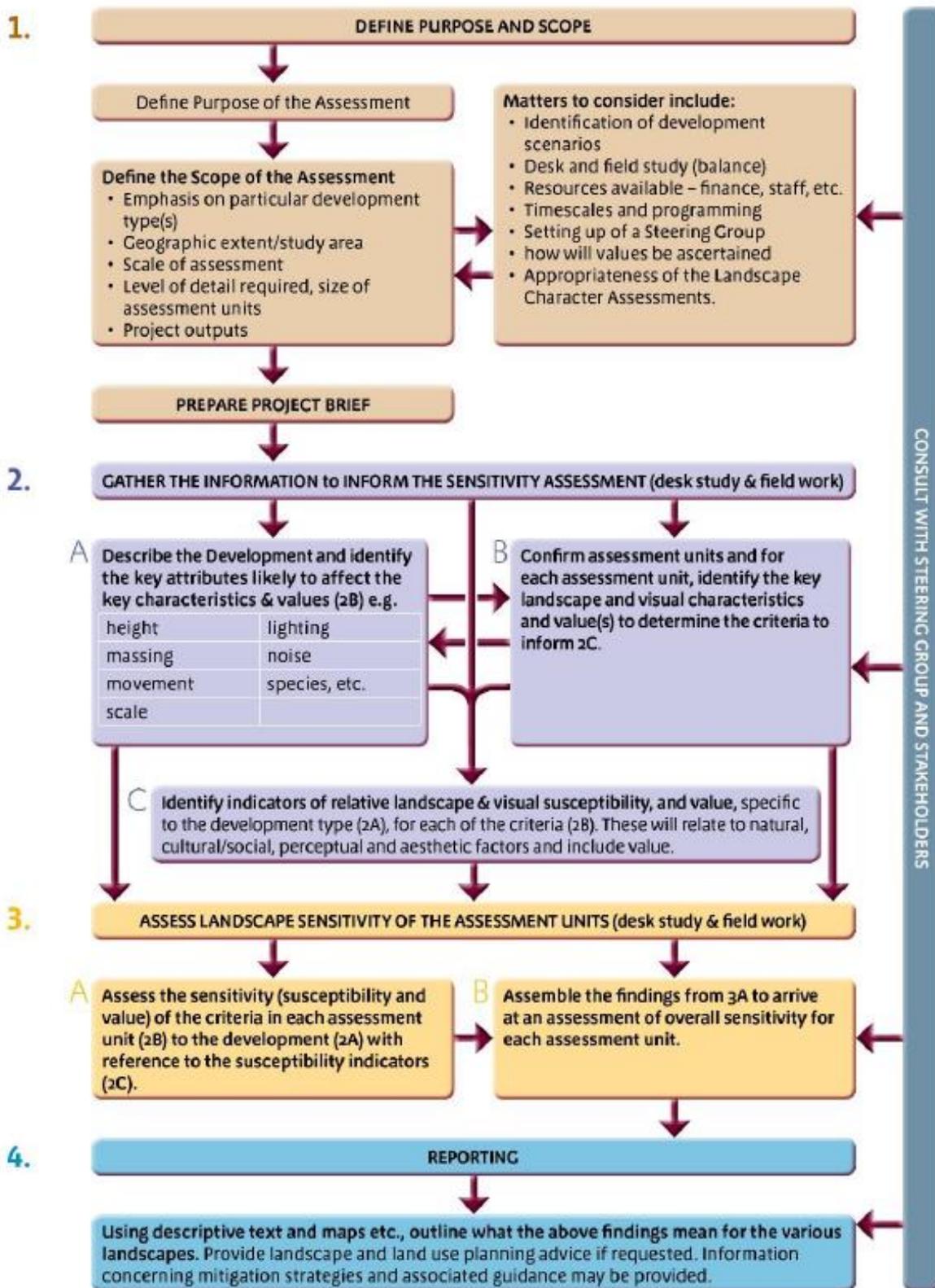
The methodology adopted in the LSA is simplistic and does not follow the guidance set out by Natural England in *'An Approach to landscape sensitivity assessment – to inform spatial planning and land management'* (June 2019). An extract of the approach as Figure 3 from this publication is reproduced overleaf.

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Figure 3 The process of Landscape sensitivity assessment



The key concerns I have with the LSA are that the Landscape Sensitivity criteria are reached which don't adequately and transparently address stage 2A of the process i.e. what are the key attributes of the '2-3 storey residential development'?

In terms of landscape key characteristics and values these are not explicitly stated in the LSA for each Character Area, although some relevant information is included under the sensitivity criteria headings at Table 2.3 of the LSA and each character area assessment.

Page 15 of the Natural England (June 2019) publication states:

'Each one of these development types will have a range of key attributes associated with it for example height, number (that is number of turbines or houses - not number of developments) size, density, massing, linearity, colour, movement, lighting, noise, species characteristics etc. Therefore hypothetical development scenarios will need to be described to identify these, as will any land management changes / interventions, depending upon the focus of the assessment. They will inform indicators of relative susceptibility (2C), and be used to assess landscape sensitivity at Step 3.'

The LSA does not identify the key attributes as required by Natural England and some of the relevant indicators of relative landscape and visual susceptibility and value as set out as Stage 2C above have been missed e.g. the setting of a Registered Park and Garden, even though the designation itself is identified on the inset map.

The assessment approach required under stage 3A requires the sensitivity criteria to reference the susceptibility criteria, however this is only carried out for Landscape Character Area 42, not sub area 42b. Applying our knowledge of Parcel Dig 1 to the criteria, we conclude the following in Table 1 overleaf, noting that this table is a condensed version of the assessment in the LSA, with criteria and analysis simply copy and pasted from the published assessment, as appropriate to the Dig 1 parcel.

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Table 1: Summary of LCA 42, relevant to the Dig 1 parcel, using criteria and analysis from the published LSA

Category	Moderate	High
Landform		Strongly undulating south-facing slope descending to the River Mimram along the southern boundary, with prominent localised hilltops.
Landscape Pattern and Time depth	Majority of fields are arable and moderate to large in scale, but woodland blocks, many of them Ancient Woodland, increase the landscape sensitivity pattern.	
'Natural' Character	The relatively large arable fields that occupy much of the area have limited natural character, with limited hedgerow connectivity, but for the most part they are located within a well-wooded context which increases their sensitivity.	
Built Character	Majority of the area is undeveloped with occasional farmsteads. The Grade II* listed Welwyn railway viaduct is visible in views to the south from elevated hilltops.	
Recreational value	Public access is well provisioned in the area with an extensive network of local public rights of way, particularly in the east providing connections between Digswell, Burnham Green and the village of Tewin. An area at Harmer Green is open access common.	
Perceptual aspects	The area has rural perceptual qualities despite being surrounded by built development, as woodland blocks and the undulating landform help to enclose areas, providing a sense of remoteness.	
Settlement setting		The assessment area provides a rural visual setting to surrounding settlements, with the rolling agricultural hills and wooded skyline forming an attractive backdrop for the settlement edges of Oaklands and Digswell. Higher ground also provides a rural backdrop to eastward views over Welwyn.
Visual prominence		Many parts of the area are elevated and strongly undulating, resulting in localised visual prominence. The rollong [sic] hills and woodland blocks form distinctive skylines.

Using the above criteria it is clear that Parcel Dig 1 should have been allocated a Moderate-High evaluation as the rest of Parcel 42a and not 'downgraded' to a Moderate level with no transparent justification and only brief comment at page 130, as follows:

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With respect to which criteria LUC applied to lower it from a Moderate-High to a Moderate level, it is clear that the proximity to existing development is the only indicator acknowledged in the LSA. It is accepted that in theory, the indirect influence of established built development could reduce the built character sensitivity from a High to a Medium rating, thereby potentially affecting the overall rating. However, if that was the case this factor must apply to all undeveloped land adjoining the existing settlement, not just the Dig 1 parcel, particularly as the Dig 1 Parcel does not have defensible landscape boundaries to the open countryside. It is clear that such a potential reduction in sensitivity for the land covered by the Dig 1 parcel would not be appropriate on the following basis:

- The Parcel is located on elevated land without any defensible landscape boundary to the open countryside;
- The Parcel is bounded by a public right of way and; and
- The Parcel is in the setting of a Registered Park and Garden.

Taking the above factors into account, it is clear the Parcel Dig 1 is highly sensitive, in principle, to new residential built development.

In conclusion I have serious reservations on the robustness of the Landscape Sensitivity Assessment prepared by LUC, both in terms of aspects of its methodology in accordance with Natural England best practice guidance and the application of an opaque methodology to the landscape covered by the Dig 1 parcel.

It is disappointing that our detailed Green Belt and Landscape and Visual Impact Assessment work submitted on 17th June 2019 has not been considered by LUC in finalising their July 2019 assessment when it is exactly what their methodology calls for.

Should the Local Plan proceed to Examination we would respectfully ask that we are afforded the timely opportunity to meet with LUC to discuss the detailed assessment of Parcel Dig 1 in light of the significant work the Digswell Action Group has now commissioned from Pleydell Smithyman. This is in the interests of reaching a Statement of Common Ground in advance of Examination to assist the Inspector and reduce unnecessary debate during valuable Examination time.

I look forward to hearing from you at the earliest opportunity to organise a mutually convenient meeting date.

Yours sincerely,

Neil Furber BSc (Dual Hons) Dip LA CMLI (Associate Director)

On behalf of the Digswell Action Group

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