

## INVITATION TO COMMENT ON DOCUMENTS EX 156 AND EX 160 (ID 1028210)

### Introduction

I became the Chair of the Northaw and Cuffley Residents Association on 7 March this year. The Committee **are** all volunteers. Our Constitution commits us, inter alia, to monitor the actions of our local Councils and to make them aware of residents' views, support residents who have concerns about planning, highway maintenance, parking, policing, transport and any other similar issues affecting life in the two villages, and collaborate with those who are concerned about encroachment into the surrounding Green Belt. We have almost 500 member households in the two villages which have about 4500 residents.

We **are not** experts in Planning, Air Quality, Law and other aspects of the Draft Local Plan. Therefore this communication is written in layman's language and quotes no precise sections of law, policies or guidance, but states our views based on receiving and reading lots of communications from others who are either very experienced or have relevant qualifications.

At the start of the Local Plan the Borough Council (WHBC) decided that the "pain" should be spread around the Borough based on the populations in each settlement. This is **flawed** because settlements that are already towns can more easily absorb further dwellings without altering the character of the towns. Whereas the character of much smaller villages is changed drastically by the addition of even much smaller numbers of dwellings. This is particularly true in the case of villages like Northaw and Cuffley which are surrounded by much Green Belt.

**The next major problem for us is that we believe sites which WHBC allocated in Phases 1 and 2 should be reviewed in the context of the huge number of sites which came forward as a result of the Call For Sites. Many of those "new" sites are likely to be far less injurious sites for development than those already allocated.**

### Example sites

and

We are particularly concerned about Cuf5, Cuf7, Cuf12, Cuf12a, Cuf13, and Cuf14 which extend Cuffley westwards from Colesdale opposite the KGV playing field and beyond. Another site which is of great concern to us is at Nyn Manor Farm in the heart of open countryside. More details relating to the sites follow as comments on **EX156 and EX160**.

## COMMENTS ON EX 156.

### Cuf17

The first thing to note before getting into the details is that despite having Grade II listed buildings on the site, being surrounded on one and a half sides by Sites of Special Scientific Interest, being a classic example of the ridge and valley landscape, being visually prominent from the whole of Vineyards Road and half of the boundary with The Ridgeway road as well as visible from the Hertfordshire Way, biodiversity concerns, having been clearly described as a very sensitive site in multiple planning processes over the last ten years related to agricultural buildings, and containing land put forward in the 2019 Call for Sites, the report EX156 does not contain one direct mention of Nyn Manor Farm or Cuf17. The lack of specific discussion or analysis might be understandable if the report had rated it "moderate-high" in line with other parts of Area 53.

We believe the Landscape Sensitivity Assessment conducted by LUC for WHBC in July 2019 arrived at a **totally** wrong conclusion on Northaw Common Parkland Area 53 (that includes Call for Sites Land at Cuf17, Cuf17a and Cuf17b). LUC now classifies this land as having moderate sensitivity but this conclusion is totally and clearly at odds with LUC's Green Belt Study Stage 3 of March 2019 which assessed P86 as having a **high harm** rating in the Green Belt. It follows that the assessment of July 2019 is clearly inconsistent and contradictory in its conclusion for Northaw Common Parkland Area 53 and makes no sense at all. LUC said in March 2019 that **"release of this parcel (P86) would therefore lead to encroachment on the countryside..."**

Any development of housing at Cuf17, 17a and 17b would be **highly sensitive** and create a **high** and adverse impact on the Green Belt and the openness of the countryside.

Cuf17, Cuf17a and Cuf17b, can be clearly seen by walkers on The Hertfordshire Way and the undulating and contoured nature of this rural land allows magnificent and major views up to the proposed development and beyond.

Within these sites are ponds, large specimen trees and grassland with ancient histories providing important habitats for many species while maintaining the biodiversity across the whole area.

Northaw Great Wood is an important and historic site of Special Scientific Interest (SSSI) forming a boundary to the sites and it is one of Hertfordshire's largest remaining historic wood and pasture commons.

The sites also lie within the IMPACT RISK ZONE (IRZ) as evidenced by Natural England and it is clear that this is a **high impact** area in terms of landscape sensitivity within Northaw Common Parkland Area 53.

### Conclusion.

**We think major importance should be attached to LUC's Green Belt Study Stage 3 March 2019 Assessment of land at P86 (Cuf17, 17a and 17b) having a High Harm rating in the Green Belt and that the LUC conclusion in their July 2019 Landscape Sensitivity Assessment which is inconsistent with all previous analysis should be ignored.**

## COMMENTS ON EX 160.

The following two quotes come from the Green Gap Assessment by LUC in August 2019.

“There are a number of promoted sites on the steeply sloping land on the western edge of Cuffley (Cuf5,12,13,14,15,16, and Nor2). **Development here would be visually prominent and would intrude into the area between these settlements** although it would not close the gap.” and “There are also some promoted sites on the edge of Northaw (Nor13 and 14) which **if developed would extend development along Northaw Road West**, but would not close the gap.” (emphasis added).

**The sites together start to close the gap** between Cuffley and Northaw by extending Cuffley westwards from Colesdale and extending Northaw eastwards from that existing settlement.

Any development westwards from Cuffley as proposed would be a ribbon development which is contrary to the NPPF. Furthermore there is no natural boundary to the north which is another requirement, and it is in the Green Belt where very special reasons are necessary before being allowed. If allowed we are absolutely certain that the large field behind that strip of land (previously refused planning permission) would very soon also be allowed for development totally ruining the beautiful vista which is now visible to travellers into Cuffley from the West.

### Cuf17

The Green Gap Assessment conducted by LUC in August 2019 analysed the gaps between settlements and their important role in maintaining the pattern and character of settlements. This assessment concludes that for Northaw Common Parkland Subarea 53 (that includes Cuf17, 17A and 17B), **there would be a Moderate to High Landscape Sensitivity to housing development**. It also stated that "Although there are some urbanising influences, the historic parklands and their associated woodlands, the historic and organic field patterns, the distinctive landform pattern, and the historic buildings within the area, **increase moderate to high sensitivity to residential development**"

It is the key piece of land that helps meet the aim of the recommendation on page 105 of “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”. Cuf 17 is this exact type of farmland that meets all of these requirements and should be included. It benefits from farming subsidies as confirmed in the dismissed planning appeal regarding some agricultural buildings 6/2017/1524/FULL. This simply reinforces that it is important, active farmland in the Green Belt. Also the north-west part of Cuf 17 is a key part of maintaining the separation between the ribbon development on the Ridgeway and the eastern extensions of ribbon development from Brookmans Park. It is a very short drive between the two and any further development would have the effect of making the two feel part of one larger system.

### Conclusion

**We fully support and endorse the Green Gap Assessment Aug 2019 analysis and its conclusion** "Although there is a clear physical gap of rural character between the two settlements of Cuffley and Northaw, the area between the settlements is open and **even relatively modest amounts of development would be visually prominent**. The gap is also vulnerable to ribbon development along the roads between the two settlements (Vineyards Road and Northaw Road West) and therefore the settlement would benefit from a Gap Policy Area."