



**Hearing Statement- Stage 8
Consideration re Site HS30
(Cuffley, Southern Settlements)**

On behalf of:

King & Co

Representor ID:

863963

In respect of:

Welwyn and Hatfield Local Plan

Examination in Public Stage 8

Date:

April 2020

Reference:

MA/KING & CO/003-04/R003m

APPENDICES

HS30 APX01 2016 Housing Sites Selection Paper

HS30 APX02 HS30 Deliverability Statement

1.0 Introduction

- 1.1 This Hearing Statement is submitted in respect of document EX184B as it pertains to site HS30. This comprises responses to Q168-Q197, Q207-218 and Q226-227.
- 1.2 We reserve the right to respond to the Council's comments in regard to EX184B.

Responses to Key Questions

Policy SADM 33 Sites HS26-31 (Cuf 1, 6,7 & 10 and No 02 & 10)

Matter 1 Environmental Considerations

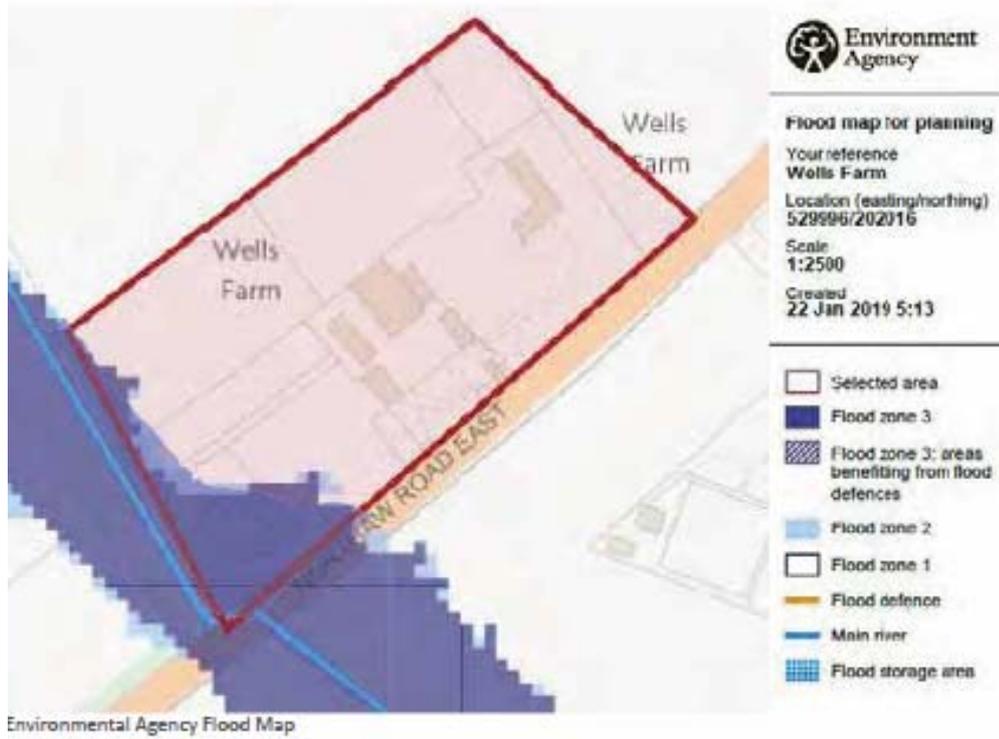
At paragraph 100 the National Planning Policy Framework (NPPF) says that Local Plans should develop policies to manage flood risk from all sources. It also points out at para. 109 that the planning system should prevent new and existing developments from contributing to or being put at unacceptable risk from or being adversely affected by unacceptable levels of water or noise pollution. At paragraph 123 it further points out that planning policies should avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development. There is significant representation against these sites in the context of the possible contribution their development could make to off-site flooding. There is significant representation against these sites in the context of the possible contribution their combined development could make to off-site flooding.

Q168 How would the surface water from these sites be managed comprehensively and individually?

- 2.1 Site HS30 is comprised of mainly previously developed land with built form and hardstanding. Advice from Pinnacle Consulting Engineers confirms that the existing pond within the site may be used for surface water drainage, and recommends soakage testing to determine the suitability of infiltration. The development will include a full SuDS based, LLFA compliant drainage system with appropriate attenuation to limit discharge rates to greenfield runoff.

Q169 Has a flood risk assessment been carried out?

- 2.2 Pinnacle Consulting Engineers have advised that an appropriate FRA report confirming that all built form and estate roads remain within areas at low risk of flooding will be produced at the planning application stage. EA mapping identifies peripheral areas which fall into flood zones 2 and 3, which has informed the design approach below demonstrating that new residential uses will all be outside the areas of higher flood risk.
- 2.3 As per 2.1, engineering advice has informed the SuDS design which will include the use of permeable surfacing materials and attenuation located beneath shared surface roads and the amenity area, in accordance with LLFA requirements. This approach has been proposed at pre-application, and is accepted by logic of its approval through the HELAA (June 2016) process.



Proposed scheme showing residential units located out of the flood zone

Q170 Are there any on or off-site ramifications for flood risk that would result from the implementation of some or all of the proposed developments?

- 2.4 Any flood risk ramifications occurring at the southern boundary of the site will be comprehensively addressed by experienced flood and drainage engineers in a way that is strictly LLFA compliant. The developer has engaged with WHBC through a pre-application process, and it is recognised that the site falls predominantly as being low flood risk.

Q171 If so how are they to be mitigated?

- 2.5 Development of the site would be focussed in the area outside of the flood zone with no changes proposed to increase the topographical levels in the flood zone so that the flow of water during a flood event would remain unchanged or improved on this site so as to not have an adverse effect off-site. The site benefits from an existing retention pond that already provides water storage and acts as a soakaway. The maintenance will be controlled by obligations on the western perimeter of HS30. No further mitigation should be necessary.

Q172 Would the sites' development require a balancing pond?

- 2.6 Yes. As per 2.1 and 2.5, there is an existing depression in the western part of the site that already acts as an occasional "winterbourne". It is intended that this would be retained and enhanced as a pond which will be landscaped to create an attractive amenity space. This will include ecological enhancements and will be accessible to the wider community.

Q173 If so, how extensive would this be and where would it be located?

- 2.7 Please see indicative site layout below that includes reference to the balancing pond in the south-western part of the site.



Q174 How would foul drainage be dealt with?

2.8 Thames Water record mapping confirms that there is foul drainage locally available to the southern and western boundaries of the site, which can accommodate the solus development envisaged. Connection can be dealt with through easement, accompanied with a build over or diversion agreement as necessary.

Q175 Are there any foul drainage constraints that would impede the implementation of any of the developments?

2.9 Dialogue between Pinnacle Consulting Engineers with Thames Water (with specific reference to the more intensive residential use of site HS30) confirm that there is no information to suggest capacity issues in the local network that would prevent the proposed HS30 development discharging into it. If there was a requirement to deliver wastewater upgrades as a consequence of cumulative development, that would need to be factored into any “policy on” approach to development which would be supported.

Q176 What impact would the proposals have on the wider countryside landscape? In particular on Broxbourne Wood, Hoddesden Park Wood and Northaw Great Wood SSSIs?

2.10 Development on site HS30 will not be discernible from the vantage of any of these SSSIs, and

as such their character will not be affected.

- Broxbourne Wood -8.3km to the north-east, with considerable intervening separating feature and at the far side of Hoddesden Park Wood.
- Hoddesden Park Wood- 3km to the north, with all of Cuffley in between
- Northaw Great Wood- 1.9km to the north-west, screened by topography and buildings that front the Ridgeway Distances

2.11 It is recognised in LUC's Landscape Sensitivity Assessment that HS30 formed a small part of a much larger parcel LCA53C designated "moderate-high" landscape sensitivity. This appears wholly excessive in the context of site HS30 which is comprised of built form including numerous larger buildings in employment use which front Northaw Road East.

2.12 We note that the use of site HS30 predates the settlement of Cuffley built out between the 1920s and 1960s (following the arrival of the rail line). Other parts of parcel LCA53C are much more open. The potential for material landscape harm by putting residential uses on this already intensively used site is not credible.

Q177 Is any harm likely to be adverse, to what extent can it be overcome through mitigation?

2.13 The LUC Study recommended some generic approaches to mitigate the potential for landscape harm below its rating of "Moderate-High". These comprise directions to retain mature vegetation and preserve areas of orchards, as well as minimisation of intrusion on sloping landform, rural character and impact on the Hertfordshire Way.

2.14 Site HS30 is extensively developed (including some housing and larger buildings used for employment) and its re-use for housing will create no discernible intrusion or impacts on local character. It is intended to preserve and strengthen vegetated boundaries and to potentially introduce orchard planting. The Hertfordshire Way is nearby and will continue to run between built form and Hempshill Brook. The developer can accommodate any such recommendations so there is no residual adverse impact.

Q178 Would there be any long-term impact on the wildlife at these sites from the development of any of the Cuffley sites?

2.15 The developer has commissioned an ecological assessment of site HS30. Site HS30 is neither located within any statutory designated sites of nature conservation, nor within any Impact Risk Zones.

"The release of the Site for development is considered to result in a low level of impact on ecology and biodiversity. Generally, the Site is of low ecological value being dominated by commercial/residential

properties and managed fields.

- 2.16 Given the above, the release of HS30 will have a negligible impact on any any statutory designated sites.

Q179 If so would there be any potential unacceptable impact that could not be satisfactorily mitigated?

- 2.17 Site HS30's release would not result in unacceptable impact, so no need for mitigation.

Q180 Is atmospheric pollution a potential issue at any of these sites?

- 2.18 Site HS30 does not fall into any AQMA. We have no evidence to suggest that atmospheric pollution would be an issue for site HS30.

Q181 If there would be any, how could it be mitigated?

- 2.19 The proposed development would promote the use of non-car modes which provide effective mitigation to particulate generation. This highly accessible location is in easy walking distance to a mainline train station, local bus connections, places of work, shopping and other services (such as school, park and GP surgery).

Matter 2 Infrastructure

Significant concern has been raised by representors concerning the provision of the infrastructure necessary to develop this site particularly in the context of that required to provide for the needs of its residents but also because of the need for off-site mitigation in particular but not exclusively in relation to the highway network in Cuffley.

Q182) Has the impact of the proposal on local infrastructure been effectively considered?

- 2.20 The Council published a Housing Sites Selection Paper in 2016 (**HS30 APX01**) which had specific and detailed consideration of infrastructure. In addition, the developer has submitted a comprehensive Deliverability Statement (**HS30 APX02**) that responds to all the relevant issues and clarifies capability to implement in years 1-5 of the Plan period.

Q183) If so, what are the outcomes?

- 2.21 The Council and the developer demonstrate a good understanding of the strong local infrastructure which includes:
- local services for education;
 - primary health care;
 - recreation and play facilities; and
 - walkable links to high quality public transport services.
- 2.22 The Council's SA work highlights multiple "significant positives" in its analysis with no evidence of infrastructure deficiencies. HS30 can be delivered without impeding local services, providing CIL contributions that reflect a viable "policy on" approach.

Q184) Have the considerations included the impact of the significant development proposed at Goff's Oak in adjacent Broxbourne?

- 2.23 The developer has had consideration of the Goff's Oak developments which are located considerably to the east of Cuffley train station. It is unlikely that there would be any material traffic flows resultant from the Goff's Oak developments passing site HS30 (applying NTSM forecast factors to base traffic).
- 2.24 In reality, traffic flows to the M25 would gravitate east to the A10 junction. Whilst Goff's Oak residents may use Cuffley station, none of that traffic would pass the HS30 site. In addition, Cheshunt station would be attractive for commuting journeys with direct access to London.

Q185) Is there sufficient capacity within the local schools to provide places for the children likely to be generated by the developments?

- 2.25 The 2016 Housing Sites Selection Paper advises that Cuffley Primary School is a 2 FE school which meets local needs. It adds:

"Primary school capacity for Cuffley needs to be considered in the context of the neighbouring settlement of Goffs Oak and the education authority advises that a limited amount of growth at Cuffley (around 400 dwellings including sites with planning permission) could be accommodated through the expansion of Woodside primary school in Goffs Oak."

- 2.26 We have undertaken further analysis using recent HCC school places data which shows that Cuffley Primary School is essentially meeting existing demand. The HCC modelling of future demand for the PPA allows for development at Goff's Oak. The increased demand will be consequent from that and facilitated by the planned extension of Woodside Primary School.

- 2.27 Regarding secondary school provision, the Housing Sites Selection Paper advises:

"Hertfordshire County Council as the education authority has raised no concerns about a limited amount of growth in Cuffley in terms of secondary school provision. "

Q186) If not, what extra capacity is required and where would it be located?

- 2.28 The evidence base acknowledges that if additional secondary school provision was needed that it would be in Potters Bar. Reviewing HCC school planning data highlights that there continues to be significant residual capacity for the Potters Bar SPA.

- 2.29 In terms of primary school places, HCC advises that the growth in the wider PPA will be accommodated by the extension at Goff's Oak. We envisage that HS30 children would attend Cuffley Primary School, with those living north and east of Cuffley to gravitate to Goff's Oak.

- 2.30 We point out that the yield for site HS30 will typically lead to four school places per year group, so a limited impact upon school places demand.

Q187) Is there sufficient capacity within local health services to meet the primary health care needs of the persons who would reside in the developments?

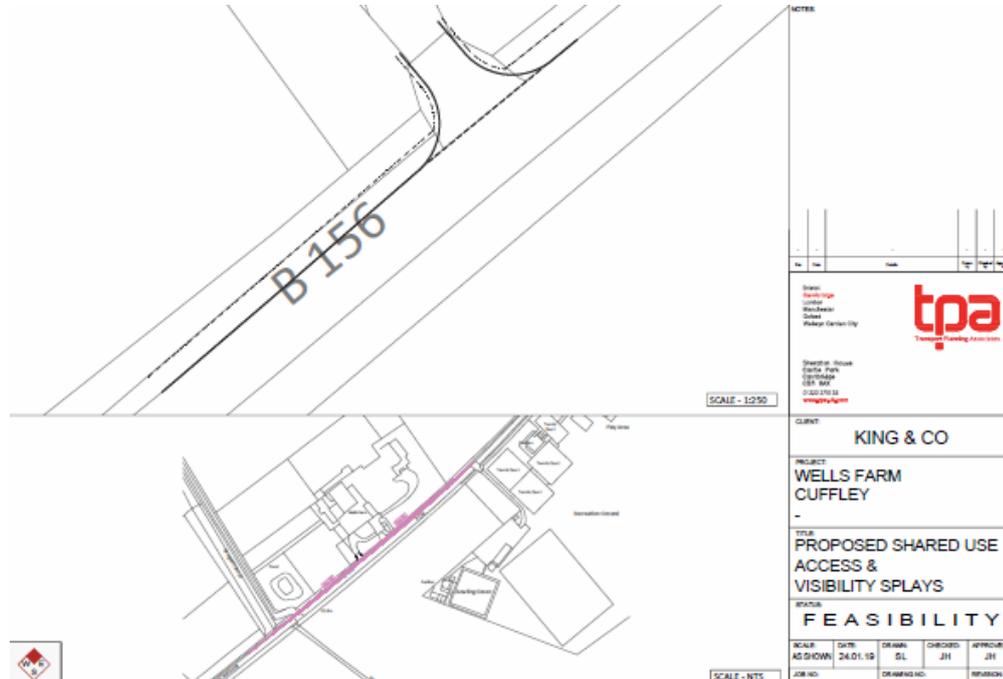
- 2.31 The nearest GP surgery is located at Cuffley Village Surgery in the village centre (circa 950m). The nearest NHS dentist and pharmacy are also located within the village centre. There is no information to suggest deficiency in terms of localised primary health care.

Q188) If not, what extra capacity is required and where would it be located?

- 2.32 We are not aware of any requirement to provide additional capacity for primary health care services. We do not envisage that there would be any additional facilities provided.

Q189) What are the off-site highway ramifications of these proposals?

- 2.33 The developer has commissioned feasibility highways analysis showing that design standard compliant access to the site can be achieved (please see below). The site has been concluded as being acceptable in highways terms by the highway authority through the HELAA. The proposed development of 75 dwellings would not warrant off-site works.



Q190) Without improvements, would there be unacceptable harm to highway safety and/or the free flow of traffic within Cuffley?

- 2.34 The developer has commissioned transport analysis and issued a pre-application submission to WHBC. The transport analysis concluded that:

Traffic volumes associated with a development of the scale being considered would not have a material impact on the volume of traffic on the local road network and how the network currently operates.

To conclude, the preliminary access appraisal has outlined a proposed design compliant means of access for the site and has identified opportunities to access the site by non-car modes of travel. On this basis the site is considered to be viable for residential redevelopment.

- 2.35 The Housing Sites Selection paper refers to highways testing of two growth scenarios. The lower of these (365 dwellings) is greater than the quantum envisaged by all of the development in the Regulation 19 Plan for Cuffley (299 units) including HS30. On the basis of this lower scenario it states:

"Junctions in Cuffley have been tested by the Highway Authority in the context of two scenarios; one assuming a lower level of growth involving around 365 dwellings (including recent planning permissions) and the other assuming a higher level of growth at just under 900 new dwellings.

The Highway Authority advises that there are two junctions of particular concern: the Plough Hill/Station Road/Northaw Road East junction and the Northaw Road/Cattlegate Road junction. These are identified as congested junctions and adding development traffic will exacerbate these problems.

For the lower scenario, the junctions could all operate within capacity, subject to junction reconfiguration resulting in changes to priority."

2.36 We would also note that through pre-application dialogue it was concluded (including discussion with HCC highways officers) that it would be appropriate and positive to use that opportunity to move the 30mph speed limit boundary to the west to accommodate both HS30 and HS29, whilst also slowing traffic speeds going past the Recreation Ground.

2.37 In summary, in the context of site HS30 (individually or cumulatively with other Cuffley Regulation 19 sites) the highway authority has already concluded that it is not necessary for any substantive off-site highway works to be implemented in order to overcome issues pertaining to highway safety or traffic capacity.

Q191) Are the sites' overall viabilities sufficient to be able to support any required highway improvements as well as any other required contributions to additional infrastructure and facilities?

2.38 With regard to site HS30, our position is that the site is capable of meeting reasonable infrastructure requirements and "policy on" implications such as affordable housing in terms of the scheme's commercial viability.

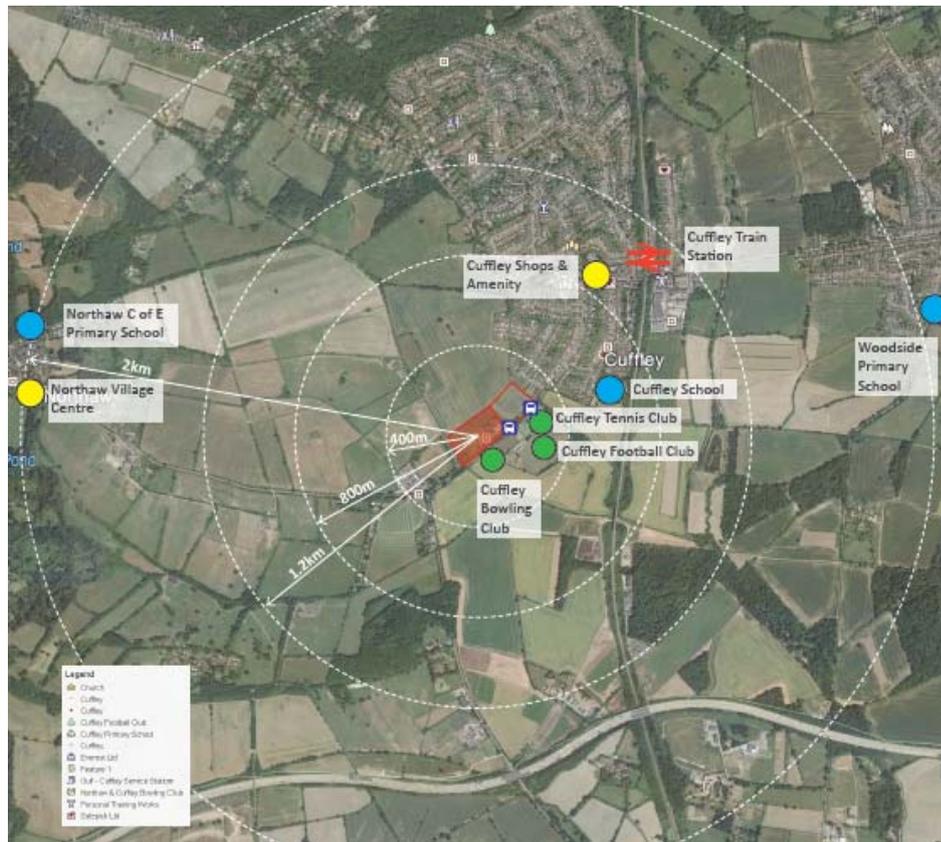
Q192) If not what other options have been considered to try to achieve viable development sites?

2.39 We make no comment but reserve our position to do so.

Matter 3 Sustainability

Q193) Are the sites in a sustainable location for development?

- 2.40 Site HS30 is an eminently sustainable location, very close to the settlement boundary and facilities (all within 800m) include a children’s play area, primary school and bus stops. Read alongside the allocation of site HS29, it will be a natural extension of the settlement to a point which has existing built form opposite the park and sporting facilities which serves the village.



- 2.41 There are opportunities for new residents to complete journeys for work and shopping by non-car modes. The walking route to Cuffley train station goes past Cuffley village Centre providing a range of shops and services. Cuffley provides employment, but the train station provides frequent links to London.

Q194) How far is it to Cuffley railway station and its village centre from a median location on both sites?

- 2.42 The direct line distance from a median location within site HS30 to Cuffley train station is circa 1.06km. In regard to Cuffley village centre it is circa 1.0km on the same basis.

Q195) Are these acceptable walking distances for commuters travelling by train?

- 2.43 We conclude that the walking distance to Cuffley train station from HS30 will be acceptable.

- 2.44 The LUC Addendum SA adopts a threshold of 1400m for a walking route to train station or high frequency bus service, within which a site would be scored as being “highly accessible”.
- 2.45 The walking distance from site HS30 to Cuffley train station is well below the 1400m threshold adopted by the SA Addendum. We give strong weight to the recommendations of WYG empirical research in the context of what would represent an acceptable pedestrian journey. This WYG research cites the National Travel Survey underpinned by empirical survey data (*Wakenshaw, 2015, How far do People Walk?*).
- 2.46 The WYG Paper gives analyses including acceptable walking distances to a train station. It clarifies that the preferable metric is the 85% figure stating:

“When considering the potential walking catchment of a new development, to bus stop or railway station, the 85th percentile distance should be used.”

	Mean (m)	85th Percentile (m)
Walk – As main mode of travel		
UK (Excluding London)	1,150	1,950
London	1,000	1,600
Walk to a Bus Stop		
UK (Excluding London)	580	800
London	490	800
Walk to a Railway Station		
UK (Excluding London)	1,010	1,610
London	740	1,290

Q196) Are these acceptable walking distances to shops and other facilities?

- 2.47 The recommended WYG threshold distance for shopping journeys in this location is 1600m. The walking distance to Cuffley village centre will be much less, so evidently acceptable.

Journey Purpose	Weighted Sample Size	Proportion	Mean (m)	85th Percentile (m)
Commuting	2166	7.1%	1250	2100
Business	290	1.0%		
Education/ Escort	5609	18.5%	1,000	1600
Shopping	5958	19.6%	1,000	1600
Other Escort	1392	4.6%	1100	1600
Personal Business	2730	9.0%	1,000	1600
Leisure	5539	18.2%	1150	1950
Other (including just walk)	6698	22.0%	1450	2400
All	30382	100%	1150	1950

Q197) Have these sites been appropriately assessed in the sustainability appraisal?

- 2.48 The SA sets a 1400m threshold for a walk distance which may be cautious. We conclude that the WYG research (suggesting circa 1.6km) is preferable as it is based on empirical evidence. Either way, Cuffley Station and the village centre are comfortably within both of these distances.

Matter 4 Green Belt

The National Planning Policy Framework stresses that the government attaches great importance to Green Belts and says that Green Belt boundaries should only be altered in exceptional circumstances.

The Council carried out a stage 3 Green Belt Review in 2018/19 in order to ascertain the contribution that a finer grain of sites, than were previously examined, around the urban fringes within the district, made to the different purposes of the Green Belt. In this assessment the overall harm at these sites was considered to be moderate/high (HS28) and high (HS29/30) but the parcels are not identified as areas of most essential Green Belt. In these circumstances:

207) Do sites HS29/30 impinge in a meaningful way upon the existing gap in built development between Cuffley and Potters Bar?

2.49 The LUC Green Gap Study tested gaps between settlements for any need to "protect" that gap. We note that the LUC Study did not feel it necessary to assess the gap between Cuffley and Potters Bar. It instead tests the east-west relationship between Cuffley and Northaw. The gap between Cuffley and Potters Bar is very considerable at circa 3.3km. Long views from Cuffley to Potters Bar would be predominantly from the Ridgeway, not Northaw Rd East.

2.50 We conclude that there would be no meaningful change to the gap between Potters Bar and Cuffley by consequence of developing on site HS30 which is already filled with built form.

208) Do they contribute to the checking of the unrestricted sprawl of large built up areas?

2.51 Site HS30 is extensively developed, so redevelopment for residential use would have no material impact upon sprawl. The allocation of site HS30 and neighbouring HS29 represents a discrete and well-considered extension to Cuffley that creates no material harm.

209) Is there mitigation that could be implemented to reduce any harm to openness?

2.52 The development edges to site HS30 can be strengthened by woodland planting to secure defensible boundaries. There may also be opportunities to enhance the northern boundary by introducing a green corridor that can be made defensible through providing a routeway.

Q210) Is the proposed new boundary to urban development be as robust as the existing one, in the context of visually preventing urban sprawl and maintaining openness?

2.53 The site is already developed and the boundary between open space and development is already well defined by historic hedgerows and trees. This will be further enhanced through the redevelopment of the site. Read in tandem with allocating site HS29, this provides an effective and defensible boundary which will also align with watercourse and the Hertfordshire Way.

Q211) If the boundary is to be moved, is the current proposal the most appropriate location for a new Green Belt boundary.

- 2.54 The proposed Green Belt boundary would absorb an area of already extensively developed built form and also align to defensible boundaries in the form of watercourse and right of way. This is consistent with a wider pattern across the borough where the settlement pattern is strongly influenced by woodlands, reinforced by railway, defined roads and paths and watercourse.

Q212) If not are there other more defensible boundaries that could be chosen?

- 2.55 We are content that the revised boundary, alongside the allocation of site HS29 represents a sensible new boundary that is logical and defensible, especially when considering that this site was developed prior to the settlement of Cuffley.

- 2.56 We also note that it would be entirely appropriate for the local planning authority to release more Green Belt land than is strictly required to meet objectively assessed needs for the Plan period. This can be consequent from a strategy to supply more housing to overcome concerns about non-delivery and also to tackle affordability. This approach was taken through the Guildford Local Plan and found sound by the Inspector, and latterly confirmed through the Courts in December 2019. It can also be used to adopt approaches where this would secure a more natural defensible boundary.

- 2.57 The Council has already identified areas of "most essential" Green Belt which are minimal in terms of coverage across the borough. Other sites must therefore represent a residual opportunity to deliver suitable development that can be well contained by existing absolute constraints and well-established boundary treatments such as historic woodland planting.

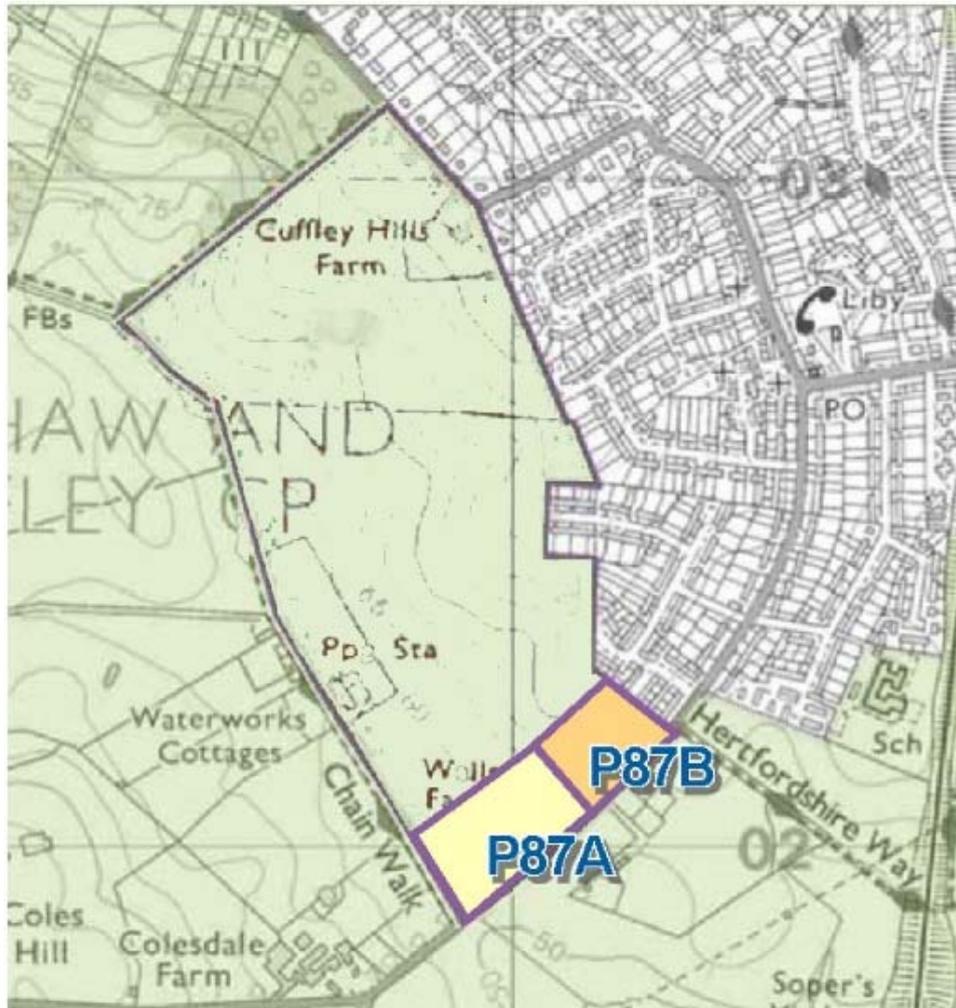
Q213) Is there scope to improve the permanence of any new boundary through the introduction of woodland planting to create enhanced physical features?

- 2.58 Woodland planting is an effective measure to provide strong boundaries. In the context of site HS30, there is merit in safeguarding and strengthening existing boundaries. We propose to enhance all of the existing hedgerow and treelined boundaries with additional planting.

- 2.59 We note that LUC have applied an inconsistent approach to the contribution which woodland planting can make, also failing to recognise the opportunity provided by utilising landscape belts and hedgerow to secure defensible new boundaries.

Q214) Is the overall assessment of high harm a sound interpretation of the contribution that sites HS29/HS30 makes to the purposes and openness of the Green Belt?

2.60 The LUC Study has concluded that the release of these sites represents 'High' harm. Whilst we acknowledge that the release of the entirety of Parcel P87 would represent more considerable harm, it is not credible to argue that the release of this PDL land would represent High harm. We argued that harm arising from the release of HS30 would be at most "Moderate" and arguably lower still assuming a "policy on" approach with mitigation.



- 2.61 This appears to be consistent with the conclusions of officers that underpinned the Regulation 19 Plan. The key mechanism to mitigate harm to openness has been taken by officers through reducing the promoted site Cuf5 to exclude the more open land to the north.
- 2.62 We would also note that there is logical merit in realigning the settlement boundary to follow Hempshill Brook and the Hertfordshire Way (north of Northaw Road East) which then includes this previously developed site and the Recreation Ground to the south.
- 2.63 In addition, we would support an approach where the development edges to site HS30 are strengthened by woodland planting to secure defensible new boundaries.

Q215) Can this level of harm be appropriately applied to the entirety of the sites?

- 2.64 The land assessed under this LUC harm scenario is substantial and heterogenous in character and relative openness. It should therefore have been assessed in a more granular manner which would acknowledge that the release of site HS30 must represent lesser harm because it comprises built form and is already bounded by road, right of way and watercourse.
- 2.65 There is clear merit in allocating site HS29 and HS30 to provide a contiguous extension to the settlement. The assertion of high harm lacks pragmatism and appears inconsistent with the harm rating of other sites.

Q216) In that context, is the allocation of these sites justified, effective and consistent with national planning policy?

- 2.66 We conclude that the allocation of site HS30 can be fully justified, is effective, and is consistent with national planning policy.

Q217) Do exceptional circumstances exist to release this site from the Green Belt and if so, (other than Welwyn/Hatfield's housing need), what are they?

- 2.67 The requirement to meet housing needs has been concluded to represent an exceptional circumstance to warrant Green Belt release. Release of site HS30 results in re-use of previously developed land and would not credibly be greater than "Moderate" Green Belt harm and has been found otherwise acceptable.

Matter 5 Implementation

Q218) When would these sites realistically be likely to be able to deliver dwellings within the plan period?

- 2.68 The developer has prepared and submitted a comprehensive Deliverability Statement that addresses the key issues and clarifies capability to implement in years 1-5 of the Plan period.

- 2.69 In addition, the developer has entered into detailed dialogue with the Council inclusive of a formal pre-application submission which was well received by WHBC Development Control. The developer will be ready to submit an application and construct the development as soon as the Council will accept that application.

Policy SADM 33 Site HS29 (Cuf12) Land north of Northaw Road East

Policy SADM 33 Sites HS30 (Cuf7) Wells Farm Northaw Road East

226) Does the odour pollution from the nearby anaerobic digestion plant weigh against the suitability of these sites for residential development?

- 2.70 The anaerobic digestion (AD) plant is located near Cattlegate Farm, circa 1km to the south-west of these sites. Odour issues are managed by environmental permit and enforced by the Environment Agency. We understand that the AD plant typically runs straightforwardly, but that there have been occasional neighbour complaints and those are investigated and addressed as necessary by the Environment Agency.
- 2.71 The AD plant is already well managed by environmental permit and this should not impede the delivery of much needed housing in Cuffley.

227) Are there archaeological considerations that could affect the delivery of this site?

- 2.72 There is a nearby area of archaeological significance to the south (AAS37) which is identified in relation to cropmarks found at Cattlegate Farm. It is understood that the farmstead was largely rebuilt during the 20th century. As such, any prospect of unrecorded archaeological remains appear very limited. Planning harm to sub-surface heritage assets would only be caused if those land parcels were directly developed. That will not happen as a consequence of development at site HS30.
- 2.73 The Hertfordshire HER identifies that a cropmark of a polygonal enclosure is evident at land considerably south of Northaw Road East. The very northern edge of AAS37 is to the other side of Northaw Rd East.
- 2.74 However, the applicant can (as necessary) provide a desk-based archaeological assessment, which could potentially include mitigation measures as set out in the draft Local Plan.