

REPRESENTATION IN RESPONSE TO THE GREEN BELT BOUNDARIES APPROACH DOCUMENT

**REGARDING LAND AT HS29 (LAND N OF NORTHAW
ROAD EAST, CUFFLEY)**

FOR MAGENTA PLANNING

ON BEHALF OF

SUSTAINABLE DEVELOPMENT SOLUTIONS LTD &

TAYLOR WIMPEY NORTH THAMES

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APPENDIX 1 – Indicative Landscape Strategy (Drg P18-1984_01)

APPENDIX 2 – March 2020 Reps in response to the Council’s Proposed Omission of HS29 (prepared by Woolfe Bond and Pegasus Group)

1. Introduction

- 1.1 This representation is made on behalf of Sustainable Development Solutions Ltd and Taylor Wimpey North Thames, who are in control of land identified as housing allocation HS29 at land north of Northaw Road East, Cuffley. The site currently lies within the Green Belt, and as result the content of the Council's document published in December 2020 entitled 'Green Belt Boundaries Approach', is very relevant to the site and comments are made accordingly.
- 1.2 It is noted that the document includes reference to some of the allocations being proposed by the Council for deletion from the Plan. Allocation HS29 is one such allocation, and comment is made on this at Section 3 of this representation.

2. Assessment

2.1 The Green Belt Boundaries Approach document clarifies in its introduction that development should be designed to minimise impact upon Green Belt purposes, and that this can be achieved through substantial tree planting.

2.2 The document sets out a proposed general approach to the treatment of the boundary edges of Green Belt allocation sites based upon the following considerations:

- Built development is inappropriate development in the green belt (with a number of exceptions) but open space, tree planting and structural landscaping are not.

- Where a site is to be released from the green belt it is appropriate to maximise the delivery of new homes on that site in order to minimise the need to release green belt elsewhere.

- Many sites to be allocated are part of a larger landholding which would allow boundary strengthening to occur on adjoining land.

- There will be exceptions to this general approach where appropriate.

2.3 Such considerations are thought to be reasonable and appropriate.

2.4 The document then concludes that allowing for such considerations, as a general rule the tree-planting and other strategic landscaping needed to strengthen the Green Belt boundary will take place adjoining but outside the development allocation, and within the Green Belt. Such a conclusion is considered entirely appropriate, albeit there are some exceptions which need to be allowed for which the document references.

2.5 The intention to maximise the potential of the sites to accommodate development effectively adheres with the NPPF's guidance on such matters, paragraph 117 of which states that:

'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.'

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- 2.6 The document then lists the sites at which Green Belt planting/strengthening should be mainly adjoining but outside the site boundary, and therefore within the Green Belt. Allocation HS29 (Cuf12 North of Northaw Road East) is included within the list of 9 such allocations. Such an approach is supported and for reasons set out below is entirely appropriate for the site in question.
- 2.7 The land at HS29 is in the same ownership as that which adjoins the site directly to the north. Agreement has therefore been confirmed with the landowner that land would be made available for an appropriate tree planting area directly to the north west of the allocated site. Plan No.P18-1984_01 has been prepared to illustrate how this can be undertaken effectively and is included at Appendix 1.
- 2.8 The proposed indicative planting takes a lead from other areas of planting nearby, incorporating species found within the Welwyn Hatfield Landscape Character Assessment, Area 53 (Northam Common Parkland), within a planting belt that is approximately 15m deep. Whilst the current western edge of Cuffley does not benefit from any such screening, meaning a very hard built edge is currently apparent when approaching from the west, there are other edges of Cuffley which benefit from notable tree planting which enclose and soften the built development, thereby enhancing the character and appearance of the village within the wider landscape.
- 2.9 The introduction of a significant planting belt to the north western edge of the allocation at HS 29, and the associated strengthening of the existing planting at the neighbouring allocation at HS30, would enhance the setting of built development within the landscape compared to that which currently exists at the western edge of Cuffley. As a result, the proposed planting adjacent to HS29, whilst required by the housing allocation, would provide a wider landscape benefit beyond appropriately accommodating the allocation itself.
- 2.10 It is therefore considered that the Council's Green Belt Boundaries Approach is a correct one, and the implementation of it at HS 29, as illustrated by the plan at Appendix 1, offers the opportunity for notable biodiversity and landscape enhancements. This is considered to further justify the appropriateness of the allocation at HS29.

3. Appropriateness of Allocation HS 29

- 3.1 It is recognised that this representation is required to focus upon the content of the Green Belt Boundaries Approach Document (EX223). Towards the end of the Document reference is made by the Council to their recommended deletion from the Plan of a number of allocations. As such, reference in our representations to the Council's suggested deletion of HS29 (Cuf 12) is considered appropriate and justified. This is especially so given that the Council's proposed deletion of HS29 is based upon their assessment of Green Belt harm, which is one of the issues that the Green Belt Boundaries Approach Document is itself attempting to address. The two are therefore directly related.
- 3.2 The Council's own introduction to the Green Belt Boundaries Approach Document clarifies that substantial tree planting can help minimise the impact of any associated development on Green Belt purposes and confirms that this is relevant with regards the Calverton test, which considers when exceptional circumstances to warrant Green Belt boundary amendments may be present.
- 3.3 A full representation on the issue of omission was made on behalf of Taylor Wimpey North Thames in March 2020, in response to the Council's Proposed Changes to the Plan. For ease of reference the full representation is included at Appendix 2, and is summarised as follows, with associated reference to the Green Belt Boundaries Approach document:
- 3.4 The Council proposed the removal of allocation HS29 based upon it purportedly causing High Harm to the Green Belt in the Stage 3 Green Belt Study by LUC. However, such a finding was flawed for the following reasons.
- 3.5 Firstly, the Council's finding is based upon the much larger parcel (P87) of which it forms part, making a significant contribution to safeguarding the countryside from encroachment, as explained within the Stage 3 Addendum. However, the vast majority of parcels across the District are also recorded as making a significant contribution to safeguarding the countryside against encroachment, yet the Council have chosen to proceed with many allocations within such parcels. This is therefore no reason to omit HS29.
- 3.6 Secondly, the Stage 3 Green Belt Study identifies the most essential parts of the Green Belt, ie those parts of the Green Belt in which development would cause greatest harm to the purposes of the Green Belt. The site at HS29 does not fall

within, or even near to, the most essential parts of the Green Belt as identified by the Study itself.

- 3.7 The Stage 3 Study also highlights that harm to Green Belt purposes is just one factor to consider when allocating sites for housing.

Summary

- 3.8 This representation has explained how the Council's Green Belt Boundaries Approach will assist in ensuring the allocations have an appropriate impact upon the Green Belt, minimising potential harm to Green Belt purposes. In the case of HS29 the associated planting, as shown on Drg P18-1984_01 (Appendix 1) has the potential to also offer wider landscape benefits, adjacent to a very hard and unattractive urban edge that is currently apparent.
- 3.9 It is therefore unreasonable, misleading and inconsistent for the Council to suggest that they should omit previously identified sites and not attempt to achieve their housing requirement due to harm to the Green Belt. The Council's own Green Belt study has identified sites that could come forward to provide housing without requiring any development on the most essential parts of the Green Belt. Site HS29 is one such sustainable site. The release of the Council's Green Belt Boundaries Approach Document has clarified that appropriate planting, as can take place adjacent to HS29, will minimise the harm to the Green Belt purposes.
- 3.10 It is therefore strongly recommended that HS29 be retained as a housing allocation in order to help the Council get closer to achieving their OAN housing requirement in an appropriate, sustainable manner, and when accompanied by the introduction of tree planting in adherence with the Green Belt Boundaries Approach document, any potential harm to the Green Belt will be minimised.

APPENDICES 1 & 2

ISSUED

SEPARATELY