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From: Jonathan Collins [mailto:Jonathan@kingandcompany.co.uk]
Sent: 14 October 2022 18:46
To: Mark Peacock <m.peacock@welhat.gov.uk>
Cc: Mark Aylward <mark@aylwardplanning.co.uk>
Subject: 2020/3451/MAJ Wells Farm

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Dear Mark

We have been informed that our Wells Farm application will be re-determined on Thursday 20th October and you will be representing it to the planning committee. I thought I would therefore address some of the issues raised by members at the previous committee.

Greenbelt Harm

Some members suggested that this site is an area of High Harm to the greenbelt and should not be developed. This site resides in Parcel 87 which has been designated by the Council as High Harm and we agree that the vast majority of this 117 acres parcel is an open hillside that is open to views from the road coming from Northaw and warrants its High Harm rating if it were all to be developed. However, our site is 1.17 acres which is only 1% of the High Harm parcel and it already has buildings on it that cannot be seen from any public vantage points except the entrance to the site itself off the main road (see attached our visual impact assessment

demonstrating this). It is also important to note that the Inspector has decided that the HS30 site within this parcel should not be concluded as being High Harm (see below).

EX273 paras 145-147 (letter from Inspector dated June 2021)

"I discussed these sites in my Interim report at paras. 123 to 125. The sites were not individually assessed in the stage 3 GB report but formed the southern end of a much larger parcel (P87) that extended northwards. HS29 cannot be seen from most of the larger parcel and HS30, which in part is previously developed land and contains a number of buildings, has a mature hedge along its north-western boundary, which helps to screen the views of the existing built development from the wider GB. The Stage 2 GB assessment found that HS30 did not contribute significantly to any of the national GB purposes and had moderate or strong boundaries. However, it also noted that it was detached from Cuffley. Because of the topography and the existing hedge, both sites could be satisfactorily screened from the wider GB. In consequence I do not consider a high harm assessment to be appropriate for these two sites."

Ten months later, the Inspector concluded the HS30 is now found sound and, if the Local Plan was to progress without its inclusion, the whole Plan would need to be withdrawn:

EX285 para 10 (letter from Inspector dated April 2022)

"I have given further consideration, as to the soundness of the other four submitted sites that I was unable to conclude on in my Stage 9 Round-Up notes (EX273). In the context of the subsequent information that you have provided for the Examination, including your letter of 31 January 2022 and for reasons that I would explain in my final report, I have now found another two sites (HS29 and HS30) to be sound, subject to the agreed modifications to the site-specific considerations and two other sites (HS24 7 and SDS6 8) to be unsound. The three sites referred to above as being sound should remain in the plan subject to the agreed MMs and be included in the revised housing trajectory. If your Council does not accept this, then it has no course open to it now, other than to withdraw the plan."

Again, it is worth reiterating that and the application site is much smaller than HS30 and any Green Belt harm arising would be further reduced. Furthermore, the site is Previously Developed Land and is a suitable for development as an exception within Green Belt Policy.

Built volume in the Greenbelt

Some members, including Cllr Broach, have expressed concern about the increase in volume in the greenbelt making it contrary to design policies.

The proposed 14 homes have a footprint that is 6% smaller than the existing buildings on the site. However, efficient houses are two storeys and most of the commercial buildings are one storey and as your report states, "a significant increase in volume is acknowledged". As you can see from the attached volumetric analysis, the proposed increase in volume from the existing is 60%. It is worth understanding that, if we were to undertake all the PD development on the existing buildings, the increase in volume would be 13%. However, as you state in your report by quoting the appeal case, "the concept of openness of the Green Belt is not narrowly limited to the volumetric approach" but includes a number of factors including "the visual impact on the aspect of openness". Again, this takes us back to the visual impact assessment which demonstrates that this would be negligible. The only place where the development would be appreciated would be a fleeting glimpse up the access drive from the road. In fact, the

development would have less impact than the existing cottage on the road.

We believe that effects upon openness have been robustly assessed in your report which says “the site is situated close to the bottom of a steep valley and is well screened ... The only clear view of the site from a public right of way is directly opposite the site entrance, although this is a short glimpsed view as the site is set well back from the road with the principal building visible being the existing cottage ... just outside the development boundary.” Furthermore, “The proposal would replace buildings that have large individual footprints with much narrower proportioned buildings which helps to break down the scale and more closely replicate the linear barn aesthetic of traditional farmsteads.”

This last point counters the argument that an increase in built volume is poor design. We would draw members attention to the award-winning designs we have already delivered in the borough and the proposals before them as illustrated in the attached CGI. These have been arrived at with a lot of thought to deliver high quality homes suitable for 21st century living.

Prematurity/need for development in the greenbelt

Cllr Shah was suggesting that this development is premature because the Council are planning to adopt a plan for 12,775 homes therefore these houses are not needed. There are a number of points here which should be clarified, but principally, it should be remembered that any Local Plan will need windfall sites to be delivered to achieve the housing target. Indeed, the proposed Local Plan that is currently being considered by the Inspector will require circa 1,000 windfall homes to be delivered to achieve that 12,775 number. It would be useful to remind members that a ‘windfall’ site is one that has not been identified through the Local Plan process and is simply not anticipated by that process. This requires suitable sites coming forward that will contribute to the housing requirement. These sites are often infill sites or the redevelopment of previously developed land, just like this application.

It is also important to remember that the Welwyn Hatfield Local Plan is the longest running Plan in the country and there is a critical under-delivery of housing with only 2.63 years of land supply available. Therefore, sites such as this which are deliverable in the short term should be welcomed.

Some mention was made about the potential for this development to be a precursor to other inappropriate development and should therefore be refused. This application should be considered solely on its merits as a windfall scheme for housing on a brownfield site. Its approval does not prejudice any future decisions and any other site would need to be scrutinised through the planning process although there are no current live applications.

Affordable Housing

Cllr Cragg suggested that we were trying to avoid providing affordable housing by paying a commuted sum. On the contrary, the commuted sum will ensure the delivery of affordable housing and more housing overall than can be accommodated on this site. Its delivery will be secured through the s106 agreement.

We are only proposing 14 homes and a low number of affordable homes would be difficult for the council or Registered Providers to manage economically. Housing officers have requested a sum of £914,000 which can be used to cross-fund the completion of affordable homes and will in

reality deliver more homes in total, and with certainty that they are constructed quickly and where the council want them. Whilst Cllr Cragg says this will cause problems somewhere else in the borough, we believe the provision of affordable housing in the midst of a housing and cost of living crisis is only a positive benefit of these proposals.

We hope that, if these points are addressed at the next committee meeting, we might be able to allay members' fears and demonstrate that these proposals are suitable and positive for both Cuffley and the borough as a whole. In doing so we seek to avoid a costly appeal process for all parties.

Kind regards

Jon

Jonathan Collins

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