

18<sup>th</sup> February 2021

Mr William Myers  
Planning Department  
Welwyn Hatfield Borough Council  
The Campus  
Welwyn Garden City  
AL8 6AE  
Electronic copy sent by email

**Re: 6/2021/0072/MAJ – Northaw House, Coopers Lane, Northaw, Potters Bar, EN6 4NG.  
Representation on behalf of Northaw and Cuffley Parish Council.**

Dear Mr Myers,

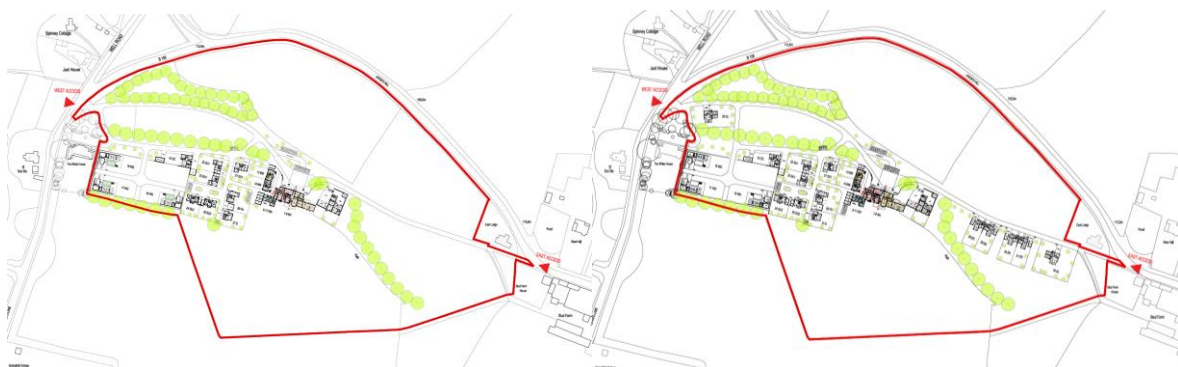
This objection has been prepared by AECOM and is submitted on behalf of Northaw and Cuffley Parish Council ('the Parish Council') in response to the proposals for the repair, refurbishment and conversion of Northaw House and its surroundings. Specifically, the proposed construction of 2 new Gate Lodge dwellings and 4 new dwellings on the East Drive (6/2021/0072/MAJ). These elements are in addition to the extant permission (6/2019/0217/MAJ) consented on 07/01/2020 and the focus of these representations.

In preparing this representation we have reviewed all materials submitted by the applicant and considered all relevant documentation submitted for the purposes of the ongoing Welwyn Hatfield Borough Council (WHBC) Local Plan examination.

We would also highlight that the Parish Council is in the process of preparing a Neighbourhood Plan and has undertaken an extensive programme of community engagement to date. The outputs of which are pertinent to the application in question. In particular, residents have highlighted the importance of the surrounding landscape and green gaps between Northaw, Little Heath/Potters Bar, Goff's Oak and Cuffley.

The Parish Council are not commenting on the elements of the proposals that have been consented previously. The principle of development to enable restoration of Northaw House has been established. The Parish Council are objecting to the proposal of 6 new dwellings in highly sensitive locations within the application site. The proposed developments on East Drive and two new Gate Lodges would result in Northaw becoming contiguous with developments on Coopers Lane (see Figure 1). The eastern area of the site, and the gap that it provides between Northaw House (including the associated buildings) and Northaw, is a key component of the local landscape.

**Figure 1 Comparison between 2019 (left) and 2021 proposals (right)**



The Parish Council have three principal grounds of objection and comments which are set out in greater detail below, concerning:

1. Green Belt harm
2. Landscape impact
3. Viability

### 1. Green Belt harm and failure to demonstrate very special circumstances

The National Planning Policy Framework (NPPF) is clear that very special circumstances will not exist unless the harm is clearly outweighed by other considerations.

*144. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.*

It is clear that this application would be harmful to the Green Belt. WHBC has previously concluded that the harm to Green Belt (and other factors) was outweighed by the potential to restore and secure the long term management of Northaw House. However, that was in respect to the 25 dwelling scheme and not the 31 dwelling proposal in the current application.

The applicant has not sufficiently demonstrated a very special circumstances case reflecting the additional 6 dwellings. The *'Planning, Design and Access Statement'* (Waller Planning, January 2021) does not explicitly address or consider the specific Green Belt harm of these new additions and instead relies upon the previous arguments that supported the consented scheme submitted in 2019. In this respect, the application fails to provide any evidence on the harm that these additional dwellings would cause and therefore it does not demonstrate how the harm can be outweighed by any benefits.

This application cannot be determined purely on the basis of viability and the arguments put forward for the 'optimal viable use'. This represents only one planning consideration. The NPPF at paragraph 57 emphasises that decisions at the development management stage should reflect *all* the latest evidence and *all* material considerations (e.g. new Green Belt harm and landscape impacts):

*" 57. ...The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case..."*

The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence (NPPF paragraph 133). The 6 additional dwellings would have a significant harmful impact on openness of the site and would erode the essential characteristics of the Green Belt in this location. The proposed developments on East Drive would result in Northaw becoming contiguous with developments along Coopers Lane.

Historical mapping from 1811 confirming partial development in these locations is immaterial. The London Metropolitan Green Belt was established in the middle of the 20<sup>th</sup> Century and washed over Northaw and its environs. The East Drive and locations for the two Gate Lodge dwellings are not on previously developed land (as defined by the NPPF), they would be located on highly visible and open parkland within the Green Belt. The application site sits between the inset Green Belt settlements of Cuffley, Potters Bar/Little Heath and Brookmans Park. The 6 new dwellings are an entirely different and more harmful proposition to the new dwellings in the consented scheme which utilise existing buildings and structures to contain the development in close proximity to Northaw House and western portion of the application site.

The Parish Council accept the principle that some sensitively planned and designed enabling development is acceptable in order to save an important local heritage asset. But this should not include development of land beyond the current footprint of Northaw House and associated buildings and structures. The location of the proposed dwellings on East Drive and the Gate Lodges is highly sensitive and would erode the function and characteristics of the Green Belt to an unacceptable level in these locations

The openness of the Green Belt has both spatial and visual dimensions. The proposed dwellings on East Drive and the two Gate Lodges would be located within the open Green Belt. These locations are highly visible from local roads and footpaths with unobstructed views into site and would be overlooked by occupiers of neighbouring dwellings. The eastern portion of the site is in a highly visible position where development would be overt within the surrounding landscape.

The increased mass of development on the East Drive and two prominent gateway locations of the site would represent a substantial visual and spatial intrusion into the openness of the site and the surrounding Green Belt. The scale and footprint of the proposed additional 6 dwellings (and associated garages) will result in a substantial visual and spatial impact on the openness of the Green Belt that would be significantly greater than the consented development.

The proposal would result in development that would urbanise these currently open parcels of parkland within the Green Belt. Consequently, the proposal would encroach into the Green Belt in conflict with a key purpose of Green Belt policy. The Green Belt serves five purposes (NPPF paragraph 134), this application is misaligned with national policy insofar as the East Drive and Gate Lodge components would represent: creeping sprawl; erode an important green gap between neighbouring settlements by increasing the urban built form in an open parkland; significantly reduce openness; and encroach into the countryside that encircles Northaw.

## 2. Landscape impacts and erosion of an important green gap

The 6 additional dwellings fail to have regard to the following local landscape policy (our emphasis):

### **Policy RA10 - Landscape Regions and Character Areas**

*Proposals for development in the rural areas will be expected to contribute, as appropriate, to the conservation, maintenance and enhancement of the local landscape character of the area in which they are located, as defined in the Welwyn Hatfield Landscape Character Assessment.*

The NPPF places great importance on conserving local character and landscapes (our emphasis):

*127. Planning policies and decisions should ensure that developments:*

*c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*

*141. Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.*

*170. Planning policies and decisions should contribute to and enhance the natural and local environment by:*

*a) protecting and enhancing valued landscape, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*

*b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*

The proposals for East Drive and the Gate Lodges depicted on the proposed site plans, elevations and visualisations included within the Planning Statement, demonstrate how the East Drive and Gate Lodge elements of the application are misaligned with the above national and local policy aims and

represent insensitive overdevelopment of the site that would be incongruous within an open parkland setting.

The accompanying 'Northaw House Landscape + Visual Impact Assessment (LVIA)' (Landscape Collective, December 2018) was prepared over two years ago and does not include wireline verifiable photomontages showing the impact of the East Drive and Gate Lodge proposals. As such, neither consultees nor the case officer are able to fully consider the impacts of these 6 additional dwellings on the basis of the submitted materials. Further, the LVIA was prepared prior to the publication of two key Local Plan evidence studies published in July and August 2019:

1. 'Development of Evidence for Welwyn Hatfield Local Plan: Landscape Sensitivity Assessment' (LUC, July 2019); and
2. 'Development of Evidence for Welwyn Hatfield Local Plan: Green Gap Assessment' (LUC, August 2019). Both studies explicitly address the sensitivities on the landscape and green gap in this location.

The urbanising impact of the 6 additional dwellings has not been fully considered in light of the latest landscape evidence and is not sufficiently captured and assessed in the LVIA. Generally, there is a bias in the submitted LVIA toward short roadside views and views from within the application site. There is a notable absence of long or panoramic views from local viewpoints. Even without verifiable roof line or volumetric depictions of the proposed development in long, short and panoramic views, the LVIA and 3D visualisations provided in the Planning Statement provide enough evidence to demonstrate how prominent the 6 new dwellings will be in the landscape. They will erode the openness of the site and reduce the green gap between Northaw and Little Heath/Potters Bar.

The 'Development of Evidence for Welwyn Hatfield Local Plan: Landscape Sensitivity Assessment' (LUC, July 2019) summarises the sensitivity of the landscape in this location (our emphasis):

*The distinctive landform...parkland character within the north east are all valued features within the area [53b]...The landform and land cover to the east of Potters Bar forms a distinctive settlement setting...development along Coopers Lane retains a historic character and pattern. The level of sensitivity to residential development is therefore moderate-high across this sub-area.*

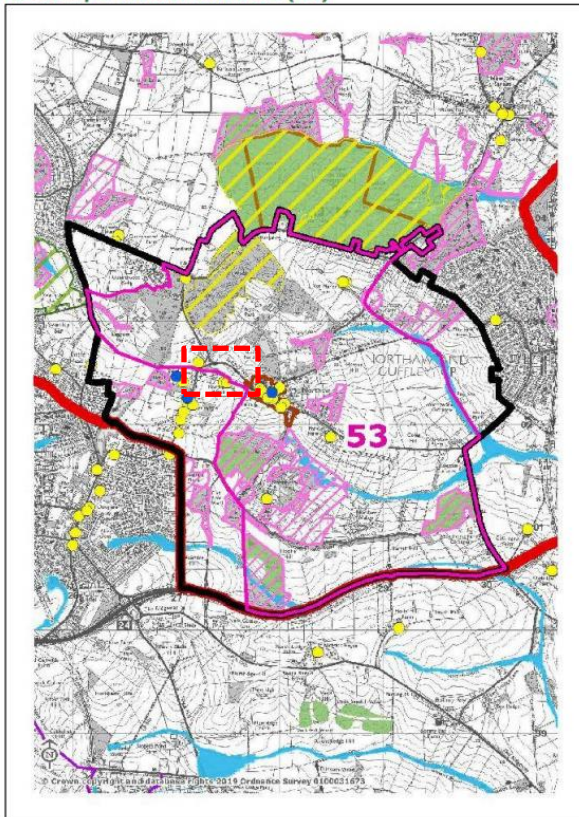
*There are some urbanising influences within the area [53] from the c. 20<sup>th</sup> century housing within Northaw village and the small detached settlement of Northaw Valley, along with the disturbance from large individual houses within estates; albeit these are visually enclosed by woodland. However, the historic parklands and their associated woodlands, the historic and organic field patterns, the distinctive landform pattern, and the historic buildings within the area, results overall in a moderate-high sensitivity to residential development.*

*To minimise adverse impact on landscape and visual character, development proposals should:*

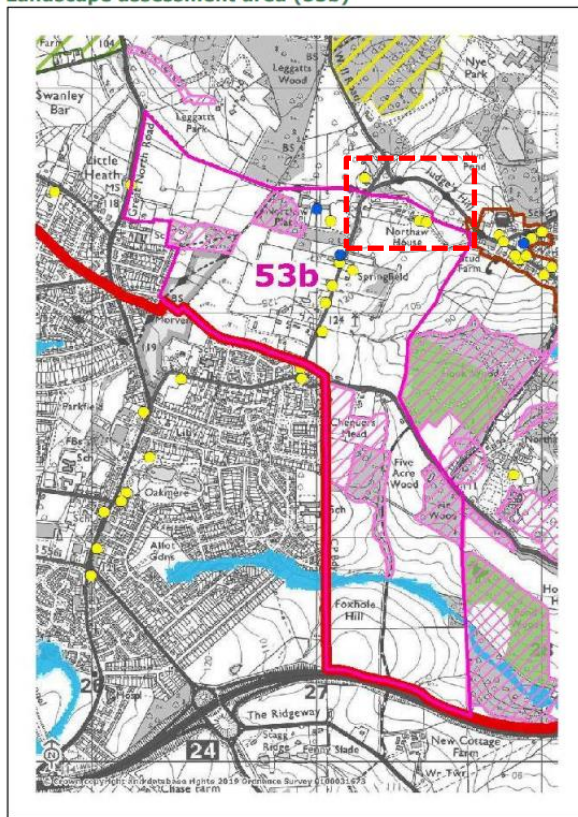
- Maintain the relationship between listed buildings clustered within Northaw village and their surrounding rural landscapes.
- *Minimise impact on public rights of way including the Hertfordshire Long Distance Footpath.*

Figure 2 Landscape Assessment Extracts (site highlighted with red dashed line)

Landscape Character Area 53: Northaw Common Parkland  
Landscape assessment area (53)



Landscape Character Area 53: Northaw Common Parkland  
Landscape assessment area (53b)



For the area between Northaw and Little Heath (Figure 3 - overleaf) the 'Development of Evidence for Welwyn Hatfield Local Plan: Green Gap Assessment' (LUC, August 2019) states (at pages 106-109) that (our emphasis):

*"The distance from the eastern edge of Little Heath and the western edge of Northaw is approximately 1.3km. In between is a rural landscape of fields and woodlands, interspersed by Northaw Place, Northaw House and the hamlet of Springfield. The area has a parkland character with a strong presence of vegetation including frequent blocks of deciduous woodland and well established hedgerows along field boundaries that are organic and irregular in pattern...*

*The only vehicular access connecting the two settlements includes travelling along Coopers Lane and, despite the presence of some ribbon development, the rural character of the gap can be appreciated when travelling on this road. The Hertfordshire Way Long Distance footpath also connects the two settlements and the rural character of the gap can also be appreciated from this route.*

*There are only a few sites with planning permission within the area and typically comprise a change of use within existing buildings. The gap is likely to be most vulnerable from scattered buildings in the countryside, or roadside ribbon development...*

*The case for keeping this land open is strengthened by the role the area plays in providing a rural and parkland setting to Little Heath, Northaw, Springfield, Northaw Place and Northaw House, and its relatively high landscape sensitivity.*

*...within it the aims should be to:*

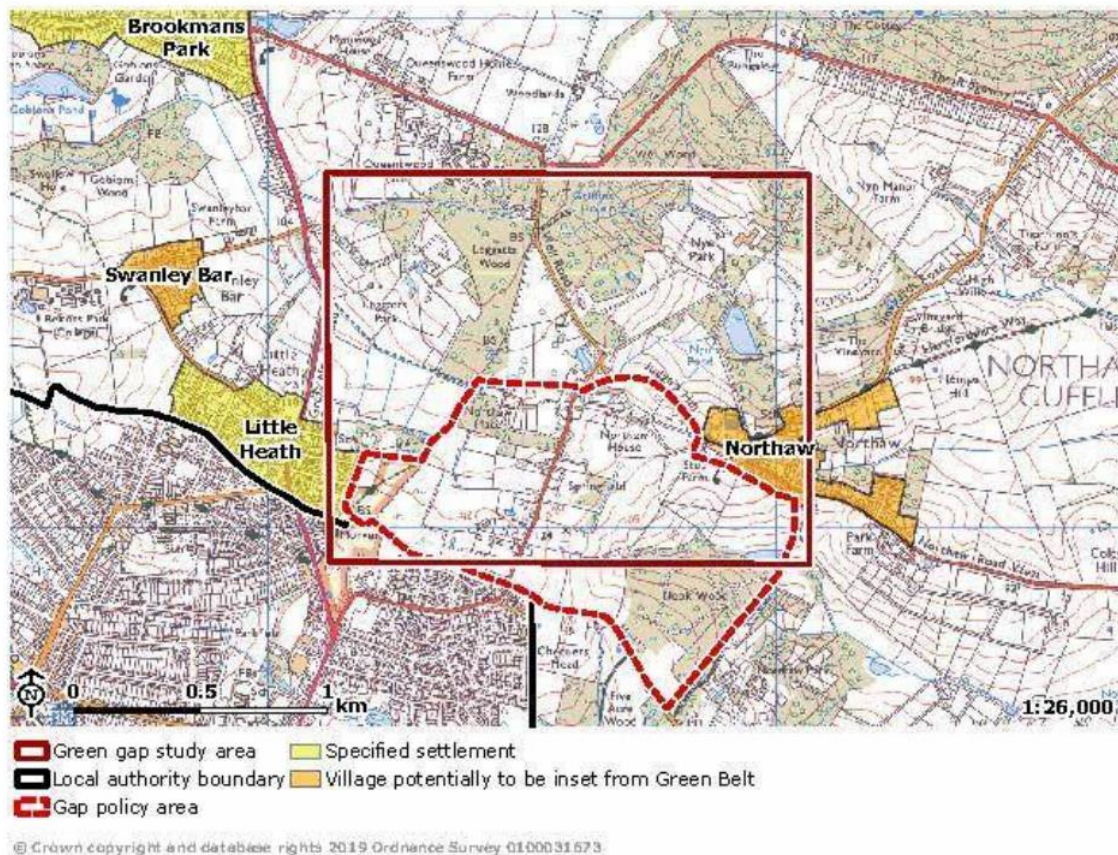
- *Maintain a physical and visual separation between Little Heath/ Potters Bar (which are already joined), Springfield and Northaw, high density development that could erode the gap;*
- *Retain the rural and parkland character that defines the gap, comprising agricultural fields, blocks of woodland, well established hedgerows and scattered low density buildings in the countryside;*

- Ensure that there is an experience of travelling through rural countryside after leaving one settlement and before entering the next, when travelling along the B156 and when walking the Hertfordshire Way Long Distance Footpath.
- Protect existing features of ecological interest including the priority habitat deciduous woodland, good quality semi-improved grassland and the traditional orchard at Northaw House, and seek opportunities for improving habitat provision of acid grassland, neutral grassland and broadleaved woodland.

The penultimate bullet points (above) are material to this application. The 6 additional dwellings will be highly visible from Coopers Lane and Judges Hill and would result in the loss of a key component of the landscape (open parkland) and lessen the experience of ‘travelling through rural countryside’.

### Figure 3 Green Gap Assessment Extract

Map 2: Area in which impact of development on settlement separation should be a consideration



Development here would result in the erosion of this important green gap. The site’s location in the gap means it would result in an increase of ribbon development to the eastern portion of the site and two gateways introducing new urbanising elements and features. The applicant’s landscape appraisal does not include a comprehensive assessment of long views and vistas of the site nor verifiable wireline photomontages showing the scheme in the wider landscape and as such it should not be relied upon for considering these aspects.

### 3. Viability

The applicant has highlighted ‘a number of errors and omissions in the BNP Paribas reports’. As at the time of writing, there is no open book appraisal provided by an independent third party. The Parish Council reserve the right to make further comments once WHBC’s appointed viability consultants have responded to the matters discussed in the applicant’s viability appraisal report prepared by James R Brown & Company Ltd (October, 2020). Namely, paragraphs 3.5-3.9; Sections 6-7; and updated assumptions, including: uplift from 20% to 22% of GDV for the developer’s profit; alternative Existing

Use Values (EUV) and higher Benchmark Land Value (BLV) assumption (see below) and updated build costs.

The applicant's viability report states that (paragraph 7.1): *'Generally, we do not consider the assumptions used by BNPP as at July 2019 to arrive at a BLV of £1.6m to be unreasonable (as per their appraisal in Appendix 2 of the July 2019 report)'*. With the exception being three main areas:

1. Profit assumption applied in consideration of the heritage asset's EUV;
2. GIA and NIA discrepancies applied by BNP Paribas; and
3. Approach to EUV 'Plus' i.e. the premium above EUV representing a BLV or point at which a 'reasonable' landowner would be incentivised to release their land for development.

The applicant's consultant adjudges that a more appropriate BLV would be circa £2.64m. This is a significant difference (>£1m) based upon the previously agreed inputs. The Parish Council would request that any further viability materials are made available at the earliest opportunity to allow full and open scrutiny in accordance with the Planning Practice Guidance.

Northaw is a desirable location north of London with strong market values, Welwyn Hatfield's affordability ratio has seen sharp increases in recent years reflecting rising house prices compared to workplace-based earnings. The global pandemic and letter from the local estate agent do not justify the uplift in developer's profit. We note that the approach to establishing sales values does not include any new primary data collection (such as land registry prices paid data). The Parish Council would like to see further evidence and new data specific to the site circumstances and local market.

The 6 additional dwellings would be located on generally flat greenfield plots and would represent a very low risk profile for any future developer. The approach to site preparation and construction is far less complex on the 6 additional plots, as compared to the elements covered in the extant permission, and this could also be reflected in the appraisals for any schemes over 25 dwellings. The viability report talks about a development programme over several years and recognises that the property market is cyclical. It would be inappropriate to alter the developer's profit assumption without more compelling evidence. Further, the Parish Council would request a review mechanism is inserted into any future planning obligations agreement reflecting the potential for development on this site to achieve sales values beyond the conservative assumptions inputted into the modelling to date. The executive housing envisaged is likely to attract a premium over other new build schemes locally.

## Conclusion

The Parish Council object to this proposal on the grounds that:

- The proposal for 6 new dwellings on East Drive and at the Gate Lodges will result in an unacceptable harm to the Green Belt;
- Failure to demonstrate very special circumstances for the new parcels of land envisaged for the 6 new dwellings; and
- Unsuitable location, overdevelopment of the site, landscape impacts in a sensitive location and erosion of an important green gap.

The 6 additional dwellings would result in significant harm to the openness of the Green Belt and would result in encroachment into the Green Belt. These elements would harm the landscape character and appearance of the area and would be located in an unsuitable location for local services and public transportation.

Paragraph 144 of the Framework requires substantial weight to be given to any harm to the Green Belt. The harm to the Green Belt is not clearly outweighed by other considerations identified in the applicants materials. Therefore the very special circumstances necessary to justify the development of 6 additional dwellings in these highly sensitive locations do not exist. Accordingly, the proposal fails to adhere to the local and national Green Belt policies outlined in these representations.

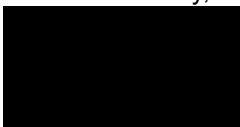
The Parish Council do not dispute that WHBC cannot demonstrate a 5-year housing land nor the principle that some enabling development will be required to ensure Northaw House's long term survival. However, the harm associated with the additional 6 dwellings proposed in these locations makes them unsuitable locations for any residential development. All new residents of the scheme, including those elements of the consented scheme, shall be reliant on car borne transportation. This is misaligned within national and local policies which encourage new housing in locations with high public transport accessibility levels and access to services.

Paragraph 11(d)(i) of the Framework states that where the policies most important for determining the application are out-of-date, including where a local planning authority cannot demonstrate a 5-year supply of deliverable housing sites, development should be granted. This is unless policies within the NPPF that protect areas of particular importance, including Green Belts, provide a clear reason for refusing development. The harm caused to the Green Belt would be significant and so the Parish Council contend that this is a clear reason for refusing this application. When considering the 'tilted balance', the Parish Council contend that the latest proposals would not be capable of satisfying the presumption in favour of sustainable development as the 6 additional dwellings are by definition inappropriate and would cause irreversible harm to the Green Belt and this important green gap. The homes would be located in an unsuitable location divorced from public transport and services. The proposal would not therefore accord with the Framework when taken as a whole or in considering the extant saved policies in the Development Plan.

In this instance the decision maker should place minimal weight on the extant permission when considering the harmful impacts of development on East Drive and the Gate Lodges. The Parish Council request that the case officer considers the new WHBC landscape and green gap evidence published after the production of the applicant's LVIA. In addition, the Parish Council would like to be kept up to date on those matters and issues relating to the viability of this scheme.

Should WHBC be minded to grant permission, the Parish Council request that any permission is conditioned to ensure the long term survival of Northaw House. For example, prior to the commencement of development, a Scheme of Implementation shall be submitted to and approved in writing by the Local Planning Authority. The Scheme of Implementation shall include, for the avoidance of any doubt, a timetable for the restoration and repair works to the Listed heritage assets. The development shall be completed in accordance with the Scheme of Implementation, unless otherwise agreed in writing with the Local Planning Authority. This will help to ensure the works for the restoration / repair/ refurbishment of the Listed heritage assets are carried out prior to the completion of the new development to comply with the justification for the development and in order secure the heritage and public benefits of the development scheme.

Yours sincerely,



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