

**Standing up for Hertfordshire's countryside**

Mrs. Elizabeth Aston  
Planning and Development Control  
Welwyn Hatfield Council  
Campus East  
Welwyn Garden City  
Herts AL8 6AE

Our Ref:

Your Ref:

5<sup>th</sup> June 2019 (by email)

Dear Mrs. Aston,

**Application No. 6/2019/0882/Outline**

**Outline permission for residential development of site of up to 38 dwellings following demolition of the existing buildings and structures with all matters reserved apart from access at Colesdale Farm, Northaw Road West, Northaw**

CPRE Hertfordshire object to this proposal for residential development within the Green Belt. Such a development would, in effect, alter the Green Belt Boundary. Paragraph 136 of the National Planning Policy Framework is clear that amendments to Green Belt boundaries must be made through the Local Plan process, not by decisions made on individual planning applications.

The Council, following instruction from the Inspector at the Examination in Public of the Submission Local Plan, is currently undertaking a search for further housing sites. In our view, premature approval of substantial residential development of this nature would prejudice balanced decisions on the scale and locations of housing in the Borough and specifically between Northaw and Cuffley, contrary to the proposed Settlement Strategy being determined through the Local Plan process.

These proposals must be considered against the provisions of saved policy GBSP1 (Green Belt) of the Welwyn Hatfield District Plan and draft policy CS4 (Green Belt Boundaries and Safeguarded Land) of the Submission Local Plan.

This site is former agricultural land, now with established use for various commercial purposes. Consequently the applicant bases the application on NPPF para 145(g) which considers redevelopment of previously developed land as appropriate provided that such development does not harm the purposes of the Green Belt. As a result, no very special circumstances sufficient to outweigh harm to the Green Belt are presented.

However, this proposal would harm the purposes of the Green Belt. This site is within Parcel GB52 of the SKM report on Green Belt sites, commissioned by the Council. The commentary states clearly that GB52 makes a significant contribution towards checking sprawl from London and maintaining the existing local settlement pattern by providing gaps between those settlements. Levels of visual openness are generally high with long views over the

parcel evident, especially from Cuffley. From more agricultural locations and elevated areas such as the western edge of Cuffley, views are panoramic and open. *“Overall the parcel contributes significantly towards 3 of the 5 Green Belt Purposes.”* Consequently the development of this site for residential purposes would harm purposes 3 and 5.

The applicant also refers to the inability of the Council to maintain a 5-year housing land supply. On the matter of 5-year housing supply, case law has made it clear that *“the absence of a five year housing supply will not always be conclusive in favour of the grant of planning permission; the absence of such a supply is merely one consideration required to be taken into account.”* (Tewkesbury BC v. SSCLG) and the Government’s position is that: *“the single issue of unmet demand ... for housing, is unlikely to outweigh harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt.”* (written ministerial statement of 1 July 2013, re-emphasised on 17 January 2014) Recent decisions by the Secretary of State have overturned appeal decisions on the basis that inadequate land supply does not outweigh the presumption against inappropriate development in the Green Belt.

A residential development on this site would result in an incongruous and isolated enclave of housing, surrounded by countryside, almost half way between Northaw and Cuffley. It is noticeable that, as a result of the Council’s recent call for sites, proposals have come forth for land adjacent to both villages, potentially reducing the Green Belt gap between them and resulting in the merger of the two. This is contrary to the NPPF Green Belt provisions. The proposed internal road layout of the Colesdale Farm development, results in access to the adjoining fields on three sides, facilitating further development on those fields.

NPPF para. 78 states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities and NPPF para. 138 outlines the need to promote sustainable patterns of development. This site is not in a sustainable location. Little reference is made in the application to the lack of utilities in proximity to the site, or the ability to adequately drain both surface and foul water. In terms of social amenities, para 3.3 of the Transport Assessment states that *“on average, people are willing to travel 16 minutes per walking trip”*. Table 1 (accessibility assessment) shows that 7 out of the 12 destinations identified are beyond that threshold. These include the train station, retail outlets and pre-school facilities.

By its location the proposal is contrary to NPPF para 103 “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes”

There are currently bus stops serving both directions immediately outside the site, but it is not true to say (Transport Assessment para. 7.2) that *“the stops are served by the frequent 242 bus service.”* Current bus timetables show no morning buses at these stops between 07:53 and 12:12 then a three hour frequency until 17:05 with a last bus at 19:27 in one direction and 21:34 in the other. This is hardly a frequent service or conducive to using the bus to access local services, or to commute.

There are no dedicated cycle tracks between Northaw and Cuffley. The Transport Assessment says (para. 3.10) “... *any cycling is likely to be taken on-road. It is considered that cycling provision in the form of on-carriageway cycling in close proximity to the site is deemed suitable due to the rural, low-traffic nature of some of the immediate highway network, which can be regarded as conducive to cycling.*” Clearly the author has never attempted to cycle along the B156, which is not a low-traffic rural road.

Over the years the B156 has become a link route between the A10 and the A1(M) and as a result is heavily used by more than local traffic. Cuffley is notorious for traffic jams at peak periods. The Transport Assessment acknowledges that there are over-capacity problems at both the Northaw Road/Cattlegate Road and at Station Road/Plough Hill junctions and that proposals for the latter would, at best, mitigate, but not resolve problems caused by increased flow. Cattlegate Road frequently backs-up from the B156 Northaw Road junction. It is proposed that the access to the new residential development will be 85 metres from that junction. It will be for the Highway Authority to determine the suitability of this arrangement. The cumulative effect of development on other potential sites in the area must also be taken into account.

For the above reasons we urge the Council to reject this application.

Yours sincerely,

David Irving