

The Manager
Strategic Planning & Design,
Enfield Council
FREEPOST NW5036
EN1 3BR

10 September 2021

Dear Madam or Sir,

Re: Draft Enfield Local Plan 2021: Site SA45 Land Between Camlet Way and Crescent Way, p. xx (364); Response from Interested persons; Cover Letter and Site SA45 Study;

Revision 02

We are writing with a revised edition of our comments and observation, issued by email and issued on our behalf, to supplement any correspondence already issued. We would like this to be taken into account in the items issued to Strategic Planning & Design as *Interested Persons* in response to the above Consultation. This in relation to the principles, set out in London Borough of Enfield's, 2015 *Statement of Community Involvement in Planning*.

We object because any development is likely to have a severe and detrimental impact on the environment and visual experience, particularly at the 'Key view' of the site above ('SA45'), as set out in Figures 1, 2, 7, 8 and 9 in the attached document, *Site SA45 Study* and planning supporting documents, for example paragraph 3.4.2 and 'Figure 9- View north at Crescent West', in:

- London Borough of Enfield, *Hadley Wood Conservation Area Character (HWCA) Appraisal*, Approved Feb 2015 Amended Sept. 2016.

Local Plan Policy

- 'Core Policy 33, 'Green Belt and Countryside', Core Strategy (CS), Adopted Nov. 2010, and

(Development Management Document DMD, Adopted November 2014), 'DMD 82 Protecting the Green Belt' and 'DMD 83 Development Adjacent to the Green Belt';

- CS 'Core Policy 30 'Maintaining and improving the Built and Open Environment' Conservation Area Appraisal' documents and 'DMD 80 Trees on Development Sites' (in relation to Conservation

Areas); Saved Unitary Development Plan (1994) UDP Policies, '(II) C23-C25 Safeguarding the Environment in Conservation Areas'. and more broadly from other viewpoints.

This is a special area of Green Belt identified in the Local Plan, as set out and any development may fail to meet the standards set out in the Listed Buildings and Conservation Areas Act 1990, Sections 69 and 71. This may be important in relation to the setting for HWCA and relevant Local plan Core Strategy Core Policies, Development Management Policies and any Saved UDP policies, which requires assessment and maintenance of such key elements of Conservation Area, respecting the unique character and the Green Belt.

The attached *Site SA45 study*, sets these views out in context, provides a landscape and visual area character analysis and demonstrates that there is LOW landscape capacity for development at the site, see Table 1, section 4,7, page 38 in the attached document.

We would prefer this site (Site 'SA45') is withdrawn altogether from sites being considered as draft Site Allocations. As *Interested Persons*, we request to be kept expressly informed of progress in the matter and reserve our right to reply in more detail and under the principles of the above SCI in relation to engagement and inclusion in planning. No liability will be accepted and independent legal advice should be taken on any matter of law. We reserve the right to reply in more detail and we look forward to your reply.

Yours faithfully,



[Signed]



FAO. The Manager, Strategic Planning & Design, Enfield Council

13/9/2021

Dear Madam or Sir,

**Re: London Borough of Enfield, Draft Local Plan 2021 (Regulation 18) Consultation
response from Interested Persons: 57 Crescent West, Hadley Wood, Enfield EN4 0EQ**

To clarify this note and the emails issued today are supplementary to details issued from the Residents, also by email, apologies for any inconvenience. The edition issued today forms a revised edition of correspondence, to be taken into account in the consultation, on behalf of Interested persons below and in relation to the above Consultation.

Regards,

Ac

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ENCS. Letter from Interested Persons Revision02: *Site45 Study*

‘SITE SA45’ LANDSCAPE AND VISUAL CHARACTER STUDY



PHOTO- ADAM COOK 2021

11/09/2021

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Final Draft 12/9/2021

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1. Introduction:

The work is prepared in relation to *Draft Enfield Local Plan 2021 (Regulation 18) edition: Site SA45 Land Between Camlet Way and Crescent Way*, p. xx (364). As a preamble considering possible ethics for sustainable development this works ask:

- Who is affected by planning policy led development/ proposals?
- How they are affected? and
- How engaged in the decision- making?, (Blewitt, 2018).

The work is based in the principles of plan assessment, held to cover questions about:

- Objectives;
- Resources and
- Environment in which a plan is to operate, (Lichfield, 1996?)

On the first point the work is produced as part of a Consultation response to, London Borough of Enfield (LB Enfield), *draft Local Plan, 2021 (Regulation 18)* consultation, required under

Town and Country (Local Planning) Regulations 2021 and relevant to LB Enfield, *Statement of Community Involvement in Planning, 2015*. This is at the request of Interested Persons, to undertake work in outline. This study looks at draft site allocation 'SA45' capacity, to accommodate change, principally from the perspective of landscape character and visual effects, whilst also providing insights into, natural capital, biodiversity considerations and importantly historic and urban development context and previous development proposals for the site, from around 1899. On the second point a form of outline landscape and visual assessment is presented in a hybridised form. This studies the draft estimated visual envelope for the proposed site allocation and considers the principles on objectives, resources and environment which the draft Local Plan, site allocation may affect. The study focus is a 'Key View' detailed in paragraph 3.4.2 and shown in 'Figures 4 and 9', *Hadley*

Wood Conservation Area Character Appraisal, Adopted Feb. 2015. Amended Sept. 2016 excerpted in this document, *Figures 1 and 9*. This has developed into a distinctive cultural English landscape view from the suburban edge. This may be as a result of an urban development proposal by the 19th century Jack Trustees, 1899 which apart from the housing of the period which has been built, has remained unbuilt.

Study area

The draft estimated visual envelope of the draft Site Allocation 'SA45' is illustrated, *Figure 3*. This means the areas which can be seen from the site and the areas from which the site can be seen from. This includes a record of these views, termed as 'visual receptors' in the study and which may be annotated, for the purposes of clarification.

Also considered in brief summary are other statutory designations for example, a statutory Conservation Area (CA) Hadley Wood CA and Wrotham Park, Herts landscaped park, which 'Plantation Wood' of the Wrotham Estate, forms part of the draft estimated visual envelope, This Park is included in Historic England's, Register of Parks and Gardens of Special Historic Interest and included in Hertsmere District Council Local Plan, Heritage Assets Historic Parks and Gardens, (SADM30). How the draft estimated visual envelope relates to the 'CA 'Key View' and critical visual sensitivity, is presented in Figures 1 and 2.

Potentials for mitigation may be considered whilst specific guidance on mitigation, is beyond scope of this study. Attempt to assess either *landscape effects* and or *magnitude of change*, may also be subject of further study and on this basis, no liability will be accepted.

2. Assessment methodology

The assessment methodology is based upon principles :

- Regulation 18, Town and Country Planning (Local Planning) Regulations 2012

- *Guidelines for Landscape and Visual Impact Assessment* (The Landscape Institute [LI] and Institute of Environmental Assessment, 1st Edition, 1995 & 2nd Edition, 2002; 3rd ed. 2013), often referred to as “GLVIA”.
- *Landscape Character Assessment: Guidance for England and Scotland* (Scottish Natural Heritage and The Countryside Agency 2002);
- Countryside Agency Topic Paper 6 *Techniques and Criteria for Judging Capacity and Sensitivity*; 2004
- LI Advice Note 01/11 *Photography and photomontage in landscape and Visual Impact Assessment*, 2011
- *An Approach to Landscape Character Assessment*, (Natural England, 2014)

The ‘Regulation 18’, above Consultation requires a local planning authority (LPA) to undertake notification of various bodies (and the general public) that the Council is preparing a plan and invites comment about what the plan ought to contain. This is also relevant to the principles set out in LB Enfield's, *Statement of Community Involvement in Planning*, 2015.

The guidelines cited above set out principles, for reaching consistent, credible and effective results, in landscape and visual assessment. These are not a prescriptive set of rules or exhaustive manuals, relevant, to the task. Recognition is needed that landscape and visual assessment is based upon judgement and experience, supported by robust evidence, informed opinion and clarity of reasoning.

The work in this document was undertaken by a Landscape Architect and Planner, a professional holding Chartered Membership of the Landscape Institute (CMLI) and Planner, holding ‘Licentiate and Associate Membership of the Royal Town Planning Institute’, (AssocRTPI). The work is based on opinion of the author and no liability will be accepted.

2.1 Site and development planning history

This section is intended to provide an overview of the site history and planning history.

Ancient routes and conquest

The site lies about 9 kilometres lying approximately equidistant between two closest ancient Roman roads. In the east, the axe of 'Ermine Street' running north south from London *Londinium* via Lincoln *Lindum* to York *Eboracum*. In the west an axe of the ancient Roman road 'Watling Street', running from London, via St. Alban's *Verulamium*, to Chester *Deva*. This may form a measure and shaping influence on land parcels of the road axes, when viewed on plan, revealed in the shape of unbuilt parcels of land between the road and the site, particularly in the west. This possibly originates from land enclosures dating from the Romano- British period, (Natural England, 1996). These characteristic shapes may be erased in design for neighbouring Golf courses, returning loosely near the settlement of Hadley Wood, where land shapes tend to be possibly more defined by topographical influences and the axe of the old Great North Road, loosely measured in orientation, with ancient 'Ermine Street' in the East.

In terms of Norman- Medieval history the study area contains the site/s of the dynastic 1471, Battle of Barnet. The Battle was characteristic victory on Easter Day 14 April 1471, for Yorkist Edward IV over the Lancastrian Henry VI, which with after his wife Mary of Anjou's defeat later that year at the Battle of Tewkesbury, secured the English throne for Edward IV, until his death in 1483, (Britannica.com, 2021). Two locations in the study area, 'Deadman's Bottom' and 'Bartram's Quash' are held to be sites relevant to archaeological study connected with the Battle and which lies beyond the scope of this work. The area is included in the Historic England's, Archaeological Priority Area, [undated], for LB Enfield, (Historic England, 2021). The area principally lies at the Western end of Enfield Chase an ancient common which was enclosed under a 1777 Act of Parliament and from which an estate was created by Francis Russell, Secretary to Duchy of Lancaster. In the late 18th century Charles Jack responsible for the building of Beach Hill Park, later Hadley Wood 1880 negotiated a Building Estate Lease for 99 years, from the Duchy of Lancaster in 20/3/1884, (Clark, 1968; Pam, 1992). There were terms in which

unbuilt land after 53 years should be handed back to the Duchy. Jack is held to be influential in the Great Northern Railway (GNR) siting a station on this land, which eventually took place after September 1847 objections by Thos. Paris, tenant at Greenwood Farm, to routing the railway through Enfield Chase. The work started later that year and was completed in August 1850, Kings Cross station opened in October 1852. Negotiations with Jack on the building of Hadley Wood station ensued in 1880 and £6,279 was paid towards the station and £5,120, to build the bridge, which in today's terms may be worth around three quarters or over half a million pounds, respectively. The station opened in April 1885 with 12 trains a day in each direction, until 8pm. 40 well appointed houses were built until 1896 and the view is that building continued slowly, (Pam, 1992). Jack died on 22/4/1896- had been held to be mentally incapacitated, since 21/3/1892. His son Arthur Jack handled his affairs and in due course Jack's estate was administered by Trustees, where after Court of Chancery supervision, beneficiaries were identified. This included two unmarried daughters, an unmarried son and a married son, whom produced a layout plan, to develop vacant land of the estate in 1899. An affidavit of the daughters stated that development was opportune and that without a tenant the outgoings are heavy, (Clark, 1968). This building has not yet taken place and is likely site 'SA45', forms part of the original Jack estate and 1899 plan.

Open space

Relevant to the provision of open space in the area, a newspaper report from a 1936 Public Inquiry mentions attempting to acquire open space/ common land, for public benefit amid prolific building on former green space during the period. There was representation from the National Playing Fields Association, at the Inquiry and it is held there were noted 335 acres (135.57 Ha) of open space, comprising Hadley Woods and [Monken Hadley] Common, 186 acres (75.27 Ha). Hadley Green 26 acres (10.52 Ha) and Oak Hill Park 74 acres (26.95 Ha) and 58 acres (23.47 Ha) set aside for games, (Southgate Gazette, 1936). When the Inspector mentioned open spaces at Trent Park and Oak Hill Park, a response mentioned that these were not [then] publicly accessible, as they are today and the registration of remining commons becoming possible, under the Commons Registration Act, 1965. Under the Enclosure, Commoners rights were given to people of Hadley Wood, like a legal privilege of grazing cattle in the Woods, which was only ended on Monken Hadley Common in the 1950's, (Southgate Gazette, 1936). Whist Site 'SA45' may not be publicly accessible at present, as

far as is known. There is also an area of publicly accessible open space east of the station, where the Hadley Wood Association has a Meeting Room/ Clubhouse and Tennis Court, next to the school. There is a Recreation Ground and Football pitch on the western side of the railway off Bartram's Lane. This completes a landscape buffer on the northern edge of the settlement, next to arable/ pasture farmland and forms unbuilt portion, almost by accident, of the 1899 Jack plan and acts as defining feature of the suburban settlement and on this point, could be critical to the identity of Hadley Wood.

Development since 1890's

There was a Hotel built next to the Station? but never used. This may have been replaced with a 4-storey parade of shops, with higher residential density flats, than the neighbouring houses. The parade has vehicular back access servicing from the late 1950's, early 1960's. Other houses have been built along the North side of the Crescent West, up to the junction with Bartram's Lane, formerly Windsor Road, included on the 1899 Jack plan and 1914 map. This includes one house, 34 Crescent West, which could easily be a house in a row, as described in E.M. Forester's, *Howard's End*. This was used as a Temporary Hospital, for casualties returning from the Great War, (World War One WWI), possibly evacuated from the Western Front by Hospital/ Ambulance Trains, viewed as a herald of modernity, (Millard, 1993). This is commemorated publicly in a bronze plaque, on the entrance to the premises. This is fittingly paralleled with the nearby of the Battle of Barnet see above, in WWI having possible origins in political and dynastic affairs. Whilst the successor WWII may be more total war, in which science, technology. Ideology and rhetoric were a focus. This has also led to the awakening of ethical principles, like the 1947 *Nuremburg Code*.

Settlement pattern.

When viewed from a figure ground an analytical approach, in which the built is dark/ black and the unbuilt areas are light/ white, the settlement of Hadley Wood with a population of around 4,000 is distinct and in particular dispersed from the older centres around Enfield Town, (HWA, 2019; Urban Practitioners, 2011). These may have grown possibly by increment and accretion and held to 'classic suburbs', (Urban Practitioners, 2011). Thus, it may be that the growth of Hadley Wood, termed as a 'large scale suburb', arose from growth around the Station and remains distinct from the rest of LB Enfield, (Urban Practitioners, 2011). Whilst in most of the outer areas of LB Enfield there are landscape which may act as buffers for urban settlement at the outer western and northern edges,

including in the area where draft Site 'SA45', is situated. For example, the usual pattern is that where the borough boundary runs through the MGB, this remains unbuilt on both sides and if built up would extend the urban boundary of the borough with the green belt, in effect urbanising the green belt. By contrast the neighbouring urban areas are co-joined in many cases to neighbouring urban areas at the urban boundaries east, west and south, with small pockets of open space and building, following the pattern identified above, like Monken Hadley Common and Hadley Wood Golf Course, part of the ancient common land of Enfield Chase, mentioned above. These may be excepted, from a pattern of market led urbanisation in the 1930's and around the time of enactment of the Green Belt Act 1933. This may have led to a restraining a pattern of urbanisation and including the coalescence of Hadley Wood with settlements to the south and thus retaining a nucleated settlement pattern. There is also a gradual creeping pattern of urbanisation of the Green Belt, next to Rectory Farm which appears to be in disuse off Camlet Way, west of Hadley Wood Neighbourhood Area, where recent house building on the Green Belt may be found.

2.2 Landscape Assessment

The landscape assessment considers the potential effects of the proposed development on the landscape as an environmental resource. Physical change to the landscape may also result in changes to the distinctive character of that landscape and other surrounding landscapes and how they are perceived.

The landscape baseline for the assessment is established by both desk-based and field-based surveys in order to identify, describe and classify the physical and perceived aspects of the landscape within the defined study area. An understanding can then be gained of the individual elements, features and characteristics of the landscape and the way that these interact and combine to form distinct character areas.

The landscape fabric can be described as the physical elements and combinations of these elements that make up the landscape and which may be affected by development.

The relative sensitivity of the landscape fabric within each landscape character area depends upon the scarcity of its constituent elements and the ease with which these can be

replaced. A five-level system of High, Medium to High, Medium, Low to Medium and Low sensitivity is employed. The following definitions have been applied:

- High - *Examples of landscape fabric that could be described as unique; or are nationally scarce features or elements having particularly distinctive characteristics; or mature vegetation with provenance. For example, ancient woodland or feature parkland trees, national trails or cycle routes.*
- Medium to High
- Medium
- Low to Medium
- Low - *Examples of landscape fabric that might be considered to detract from landscape character such as obtrusive man-made artefacts (e.g., power lines, large areas of hard-standing etc).*

Landscape Character

2.2.1 Landscape character classification is a process of subdividing the landscape into distinct character areas with similar or shared characteristics, distinguishing them from other character areas that have different shared characteristics. Key characteristics can then be identified, which can help to provide understanding of the sensitivity to change of a particular landscape character area.

The sensitivity of each character area potentially affected by the proposed development has been determined based on the degree to which the landscape is able to accommodate change without unacceptable effects on its character. *Guidelines for Landscape and Visual Impact Assessment* (2002) (paragraph 7.16) indicates that the degree to which a particular landscape can accommodate change arising from a particular development will vary with:

- Existing land use;
- The pattern and scale of the landscape;
- Visual enclosure/openness of view and distribution of draft visual receptors; and

- The value placed on the landscape.

Topic Paper 6: Techniques and Criteria for Judging Capacity and Sensitivity (2004) defines the sensitivity of a landscape to change as being determined by:

- The exact form and nature of the change that is proposed to take place; and
- The particular aspects of the landscape likely to be affected by the change, including aspects of both landscape character sensitivity and visual sensitivity.

To understand the sensitivity of a landscape to change, the various characteristics/factors that make up a particular landscape character area must be identified and consideration given as to how these will be affected by the proposed development. Consideration is given to factors including:

- Physical components of landscape character, both natural and man-made. For example: landform, land cover, enclosure, settlement pattern, condition/quality;
- Aesthetic components of landscape character such as: scale, pattern, movement, complexity, nature of connections with adjacent landscapes; skyline;
- Visual sensitivity of landscape character to the proposed change; and
- Perceptual components of landscape character (the value of the landscape) including: presence/absence of statutory and non-statutory landscape designations; other designated elements/features; rarity; conservation interest; cultural associations; scenic quality; amenity/recreational function; tranquillity; remoteness; wildness.

The sensitivity to change of the landscape is expressed on a five-point scale as indicated below. Again, a five-level system of High, Medium to High, Medium, Low to Medium and Low is used:

- High – *Key characteristic(s) of landscape very vulnerable and could be adversely affected by development;*
- Medium to High;
- Medium;

- Low to Medium;
- Low – *Key characteristic(s) of landscape very robust and would not be adversely affected by development.*

National Landscape Character

- 2.2.2 At an England-wide level, 159 National Character Areas (NCA) have been identified by the former Countryside Commission (now Natural England). These are described in *National Character Area Profiles*, (Natural England, 2021), which is published in 158 parts, each covering one region of England.
- These NCAs provide background and context to more detailed landscape character assessments produced at county and district level. Their broad geographic reach means that the key characteristics identified as typical of a particular character area may not necessarily apply to a specific location within that character area.

The site of the proposed development lies at the edge of NCA 111 North Thames Basin

Key characteristics

- ■ The landform is varied with a wide plateau divided by river valleys. The prominent hills and ridges of the 'Bagshot Hills' are notable to the northwest and extensive tracts of flat land are found in the south.
- ■ Characteristic of the area is a layer of thick clay producing heavy, acidic soils, resulting in retention of considerable areas of ancient woodland.
- ■ Areas capped by glacial sands and gravels have resulted in nutrient-poor, free-draining soils which support remnant lowland heathlands, although these are now small. Areas that have alluvial deposits present are well drained and fertile.
- ■ The water bearing underlying Chalk beds are a main source of recharge for the principal London Basin Chalk aquifer.
- ■ A diverse landscape with a series of broad valleys containing the major

rivers Ver, Colne and Lea. Numerous springs rise at the base of the Bagshot Beds and several reservoirs are dotted throughout the area

■ ■ The pattern of woodlands is varied across the area and includes considerable ancient semi-natural woodland. Hertfordshire is heavily wooded in some areas. Significant areas of wood pasture and pillared veteran trees are also present.

■ ■ The field pattern is very varied across the basin reflecting historical activity. Informal patterns of 18th-century or earlier enclosure reflect medieval colonisation of the heaths. Regular planned enclosures dating from the Romano-British period are a subtle but nationally important feature on the flat land to the south-east of the area.

■ ■ Mixed farming, with arable land predominating in the Hertfordshire plateaux, parts of the London Clay lowlands and Essex heathlands.

■ ■ The diverse range of semi-natural habitats include ancient woodland, lowland heath (...).

■ ■ Rich archaeology including sites related to Roman occupation, with the Roman capital at Colchester and City of St Albans (Verulamium) and links to London. Landscape parklands surrounding 16th- and 17th-century rural estates and country houses built for London merchants are a particular feature in Hertfordshire.

■ ■ The medieval pattern of small villages and dispersed farming settlement, remains central to the character of parts of Hertfordshire and Essex. Market towns have expanded over time as have the London suburbs and commuter settlements, with the creation of new settlements such as the pioneering garden city at Welwyn and the planned town at Basildon.

■ ■ Brick-built dwellings are characteristic from the late 17th century onwards. Prior to this dwellings and farm buildings tended to be timber built with weatherboarding, now mainly painted white but traditionally black or tarred, and whitewashed plaster walls.

Some of the NCA characteristics are present in the landscape of Site 'SA45', including bedrock geology of Claygate member, comprising sand, silt and gravel and Stanmore Gravel formation on the ridge of the Old Great North Road, Barnet Road within the draft estimated visual envelope and extension of Wrotham Park Estate, to include 'Plantation Wood', (BGS, 2021). This may be an equivalent of London Merchants' rural estates and country houses, which by the mid 16th century it is viewed London had become a global city, (Natural England, 1996; Pain and Hall, 2006).

The NCA produced by Natural England includes management opportunities and guidelines for the above Character area with aims of strengthening and conserving the natural landscape and aligned with the principles of environmental stewardship. This may present a conservation method and interpretation, which planning designations may adhere and contrasted to an ecosystems and natural capital assessment perspective, in which balance sheet and Western accounting may be relevant, (Christopher, 2013; Mace et al, 2012). For example, in the current Environment Bill 2020 'biodiversity net gain' principles, are proposed in regulating natural environment and planning decision making. Though it is possible that environmental stewardship may encompass principles of biodiversity, benefits in development. From the view of the proposals and published NPPF 2021, it is likely to be trade-off between the conservation perspective and emerging natural capital and biodiversity agenda. This may mean need to factor in both existing and proposed NCA and biodiversity indicators, aimed at realising benefits in development, running alongside affordable housing and infrastructure benefits, through assessment and planning mitigation, in a context and scenario where NPPF 2021 presumption in favour of sustainable development is feasible.

2.2.3 Regional/ Sub- regional Landscape Character

Natural England's Natural Signatures regional level landscape character assessment covering the Greater London Administrative regions, identifies the area with Character Area '(3) Barnet Plateau', (Natural England, 2011). Summary: Underlining the natural signature of the

Barnet Plateau

Key influences

- Remnant heathlands – heather, bracken, transitional, secondary birch woodland.

- Coppice woodland – on wet and dry land.
- Common land – traditional cultural links.
- Floodplain meadows alongside narrow streams.
- Lines of willow marking meandering alignment of streams.
- Veteran trees and ancient hedgerows.
- Traditional 'patchwork' of pastures and meadows
– farmed countryside.

The document details the characteristics of the area as former Enfield Chase Hunting grounds and nearby Monken Hadley Common. For example, the document identifies features relevant to the area like Oak- Hornbeam- Beech woodland. Also included possibly acid grassland and surviving remnants of the formerly managed wood pasture, in areas of former ancient woodland. Predecessor possibly to the modern idea woodland- farmland mosaic.

2.2.4 Regional/ County Landscape Character

The South Hertfordshire Landscape Character Assessment details the area within:
'Hornbeam Hills Landscape Character Area (26), (Hertfordshire County Council, 2004;
2021)

KEY CHARACTERISTICS

- geometric field pattern
- steeply sloping valley landforms
- straight roads of Roman or earlier origin, with wide verges
- sparsely settled
- discrete woodlands to north
- Enfield Chase to south
- limited rights of way
- sweeping views over landforms
- mainline railway in cutting
- Potters Bar and M25 to north west

STRATEGY AND GUIDELINES FOR MANAGING CHANGE: IMPROVE AND CONSERVE

For example, the work details activities relevant to the landscape around Site 'SA45' like:

- promote hedgerow restoration through locally

appropriate measures, including coppicing, laying and replanting/gapping-up

- promote the creation of buffer zones between intensive arable production and important semi-natural habitats and the creation of links between semi-natural habitats

Local/ Site Landscape Character

- promote crop diversification and the restoration of mixed livestock/arable farming where possible.

The work above indicates the potential for alternatives to use of the land for the restoration of mixed livestock/arable farming by contrast to use of land for non- agricultural horse grazing at Site 'SA45' and may be beneficial to the Character area. The Rectory Farm site maybe relevant to this possibility and in any case where there maybe a role for social enterprise, (Cook, 2020).

2.2.5 Local urban and landscape character assessment

A draft landscape character study, undertaken by the author in August 2021, is included, see *Figure 4*. This covers the area of the site and the estimated visual envelope at a scale of approximately 1:10,000- 1:25,000. Overall, the land bears a Grade 3 Good or Moderate Agricultural Land Value, (Natural England, 2010) . With areas South the West of the site lies predominantly suburban development. This details five draft landscape character areas (LCAs):

1. Hornbeam Hills woodland farmland mosaic local LCA

The principal characteristics of this area are rolling valley slopes with a small-scale combe like structure, the broader open rolling slopes of post- enclosure English arable and pasture landscape, including that grazed by sheep, on fertile Claygate Member, Clay, silt and sand and by contrast to landscape further east of Stag Hill, (BGS, 2021). There is a mosaic of woodland parcels 'Plantation Wood', Wrotham Estate, on well- drained Stanmore Gravel Formation, and 'Bartram's Quash', possible area habitats for Grey Partridge and Lapwing, covered in wildlife Watch list/s, (DEFRA, 202; BGS, 2021). This is interspersed with linear woodland along Monken

Mead Brook, with hedges, hedgerow trees and shelter belt, comprising deciduous and mixed forest species woodland. The area is part of the Metropolitan Green Belt recorded in Hertsmere District Council's Local Plan 2012- 2027 and LB Enfield Local Plan and may be a Statutory local plan designation of regional planning importance.

2. Monken Mead Combe heath and recreational landscape, with non- agricultural horse grazing pasture local LCA

This landscape is small scale associated with the valley of the Monken Mead Brook on Claygate Member, Clay, silt and sand. Bedrock geology, with colonising trees and vegetation along watercourses and hedge boundaries with mature forest species, like a Hornbeam *Carpinus betulus*, (BGS, 2021). In the upper part there are heath like areas of scrubby pasture of non- agricultural horse grazing and herbaceous wild plant species, occurring in well drained slopes of unmown terrain. On the sloping flood plain of the Brook in use for Horse training and show jumping at Site 'SA45', and with a close mown playing field of the recreation ground in proximity. The area is part of the Metropolitan Green Belt recorded in Hertsmere District Council's Local Plan 2012- 2027, (ref xxx) and LB Enfield Local Plan and may be a Statutory local plan designation of regional planning importance.

3. Great Northern Railway corridor landforms and colonising recreational woodland and vegetation local LCA

The landscape consists of landforms, railway cuttings and tunnelling of the 1850 railway, driving through the landscape with tunnelling and bridges to accommodate roads routes across the railway and maintain a possibly acceptable incline for rail traffic. This has colonised vegetation and trees to provide a naturalistic landscape with recreational value and woodland, particularly above the tunnel heads, with trees like stunted English 'Sessile' Oak *Quercus petraea*, in the less nutrified soil substrate and network of footpaths with long views, along the rail engineered corridors.

The area is part of the Metropolitan Green Belt recorded in Hertsmere District Council's Local Plan 2012- 2027 and LB Enfield Local Plan and may be a Statutory local plan designation of regional planning importance.

4. Hadley Wood and Mount House Schools in landscape surroundings local LCA

These schools with campus like arrangements are situated with grounds orientated towards the Monken Mead Brook, with modern mid- 20th century Hadley Wood School in the east, with land oriented towards the canalised Brook in a linear pattern at the lower end of the grounds with trees and vegetation on the periphery and lying east of the Great Northern Railway corridor. In the west a neo- Classical school building lies on a site and landscaped and paved grounds situated on the plateau tending towards the line of the Brook to the north lying outside the school boundary with hedges in the periphery.

The area is part of the Metropolitan Green Belt recorded in LB Barnet Council's Local Plan 2006, (ref xxx) and LB Enfield Local Plan, and may be a Statutory local plan designation of regional planning importance.

5. Hadley Wood and extended residential area local LCA

The area includes area in the draft estimated visual envelope beyond the Hadley Wood Neighbourhood Area and the Hadley Wood Conservation Area for the areas lying in the west, at Monken Hadley. This may also show a pattern of possible new house building off Camlet Way immediately west of LB Enfield boundary in LB Barnet, in land either in or recently in the Metropolitan Green Belt, possibly as a Statutory local plan designation of regional planning importance, (LB Barnet, 2006; 2021).

2.3 Visual Assessment

In formal Environment Assessment for planning purposes the local planning authority will normally agree which of the draft visual are significant for the purposes of policy and planning decision making. At this stage of consideration draft visual receptors are included as evidence for the purposes of information in the response to the *draft Local Plan Regulation 18* consultation, as detailed above.

A visual assessment is concerned with the potential effects that may occur resulting from a proposed development upon the population likely to be affected. It assesses the change in visual amenity undergone by specific draft receptors that would arise from any change in the nature of views experienced. through the *Viewpoint location plan, Figure 3* and *draft Visual Receptors, Figures. 5 to 8*.

The method of determining visual effects is ostensibly the same as landscape impacts. The sensitivity of the draft visual receptor is identified, as is the magnitude of the impact experienced. These are then correlated to produce *Visual sensitivity*– see 'Table 1' below.

Unless otherwise stated in the main body of the assessment report, the eye height of the viewer is assumed to be 1.8m. These photos are taken in accordance with LI guidance on LVIA in attempt to replicate as accurately as possible what the human eye perceives. This involves use of a 50-55mm lens and careful setting of the camera, to avoid distortion of an image.

The relative sensitivity of each draft visual receptor is determined and classified by both the type of draft receptor and the nature of the view experienced from that draft receptor, as follows, with Medium to High and Low to Medium categories also available as appropriate to the proposals being assessed:

- High - *Strategic recreational footpaths, areas or rights of way; important landscape features with physical, cultural or historic attributes; principal views from residential buildings; views from beauty spots and picnic areas;*
- Medium to High;
- Medium;
- Low to Medium;
- Low - *Land accessible to the public away from well-trodden footpaths; views from industrial or commercial buildings or areas; drivers and passengers of vehicles engaged in commercial travel or commuting; views from primarily functional main roads; and views from trains.*

2.3.1 Viewpoints- seasonal variation

Visual evidence in the document is based on views taken in summer (August 2021) and the usual practice is to present both winter and summer views and due to the Consultation taking place in Summer 2021. Thus, it is not possible to obtain current Autumn and Winter views. On this point a Winter view has been presented for 'draft Visual receptor 2', *Figures 6* and using evidence excerpted from the CA Appraisal 'Figure 9', and a Spring view, for 'draft Visual receptor 3', *Figure 7*.

2.3.2 Zone of visual influence

This document also examines estimated Zone of Visual Influence/ Estimated Visual Envelope. This is achieved by a survey of significant views to and from the site the site and use of topographic mapping.

2.3.4 Landscape Value

This is derived from guidance in Countryside Agency Topic Paper 6 on Value attached to each landscape, which will reflect:

- national designations based on landscape value;
- other judgements about value based either on a 'Quality of Life Assessment', or on consideration of a range of appropriate criteria relating to landscape value, E.G., likely to be met in a *Green Infrastructure Baseline* assessment

2.4 Landscape capacity

As detailed in *ibid.*, Landscape Capacity should be used to describe the ability of a landscape to accommodate different amounts of change or development, of a specific type. This should reflect:

- the inherent sensitivity of the landscape itself, but more specifically its sensitivity to the particular type of development in question. This means that capacity will reflect both the sensitivity of the landscape resource and its visual sensitivity;
- the value attached to the landscape or to specific elements in it.

2.5 Overall profile

Introduction

Site 'SA45' has an estimated visual envelope of around 100 hectares of which the site forms 11.03ha. The majority of this area is an arable- pasture- grazing and woodland mosaic, sloping down to the south east, from approximately 120/125 metres, to the 90-metre contour, around Crescent West, Hadley Wood. At the lower altitude, a small-scale landscape may be encountered by contrast to broad plateau and valley slopes over the ridge of Camlet Way, further South. Views from footway and the public realm at Crescent West, *Figures 8 and 9*, at gap in the lay-by off the Crescent, with the view mentioned above and the current gateway to the site (SA45) and Bartram's Lane, *Figure 7*, to the east may be the most significant open near views of the site. There are also likely to be views experienced across the site from the upper floors of residential properties on the Crescents' East and West and Camlet Way, not exclusively. Thus, borrowing from the landscape principles may

represent an important feature of the visual composition, incorporating both architecture and landscape in what is viewed to be a 'lived – in' experience of residents, (Rolnik, 2014).

The sparse mosaic of woodland blocks and shelter belts in the landscape, act as visual feature, buffer and visual stop, with both picturesque and screening properties. This may be seen in views across the land, bearing some open water features, like Monken Mead Brook. This includes 'Plantation Wood', woodland of Wrotham Park Estate, *Figure. 10*, the mansion itself lying well out of view north west of the draft estimated visual envelope, over the ridge bisected by Barnet Road (Old Great North Road), where there are views to the east, *Figures 1 and 2*. This landscape surrounds Burlingtonian- Palladian mansion begun by Ware in 1754, for Admiral John Bing and illustrated in the fifth edition of *Vitruvius Britannicus*, 1771. Ware was author of what is viewed to be an influential textbook, *The Complete Body of Architecture*, (Pevsner and Cherry, 1977; Fleming et al, 1998). Wrotham Park is a major film/ TV location for features films, 'Gosford Park', (2001); 'Bridget Jones Diary', (2001); 'Kingsman', (2014) and 'The Crown', (2016 on), a Netflix's series.

From the viewpoint of relevance to Site 'SA45', the Estate was originally landscaped, from 1765 by Samuel Lapidge, in consultation with Lancelot 'Capability' Brown, for whom Lapidge worked as draughtsman, (Pevsner and Cherry, 1977). There a views of site 'SA45' from publicly accessible highway, Barnet Road (A1000- old Great North Road), on the perimeter of the estate which 'Plantation Wood', also possible area habitats for Grey Partridge and Lapwing, covered in wildlife Watch list/s, (DEFRA, 2021) and extends across the road into the draft estimated visual envelope, with open views of Site 'SA45'.

The site uses for non-agricultural horse grazing and horse training, dressage and show jumping, were evident on visits on 25 and 29 August 2021. This could be a

case of Green Belt recreation for sports in which the UK recently excelled receiving Olympic Gold medal at Tokyo Olympics 2021 for Eventing, after decades in second place, (Nasralla, 2021).

This baseline profile is based on a table derived from hypothetical Fig. 2 *ibid.* above and results are contained within s.5 **Baseline Conditions** below.

The values for Landscape Sensitivity and Capacity are further derived from Fig 3(a) and Fig 3(b) *ibid.*, and shown below. This methodology supports the determining of a Cumulative assessment of sensitivity, discussed below.

Landscape Character Sensitivity	High	HIGH	HIGH	HIGH
	Medium	MEDIUM	MEDIUM	HIGH
	Low	LOW	MEDIUM	HIGH
		Low	Medium	High
Visual sensitivity				

Fig 4. Combining Landscape Character Sensitivity and Visual Sensitivity, to give overall **Landscape Sensitivity**

Landscape Sensitivity	High	MEDIUM	LOW	LOW
	Medium	MEDIUM	MEDIUM	LOW
	Low	HIGH	MEDIUM	MEDIUM
		Low	Medium	High
Landscape Value				

Fig 5. Combining Landscape Sensitivity and Landscape Value, to give **Landscape Capacity**

2.6 Cumulative assessment of *sensitivity*

Based upon guidance in Countryside Agency Topic Paper 6, cumulative assessment may be of worthwhile where reliance on policy designation could simply be an oversimplification of a complex issue. The purpose is to reach common ground in assessment of value. The *Overall Profile Capacity and Sensitivity matrix*, Table 1 is response using baseline study, to support this approach. That is attempted through definition of *Landscape Sensitivity*, derived through methodology in 3.6 above.

3.1 Policy Context

The purpose of this section is to provide a brief summary of some relevant policy and guidance, at various scales.

3.1.1 International

Paris Agreement and the Nationally Determined Contributions (2016)

The Paris Agreement sets out a global framework to limit global temperature rise below 2°C, with a target of 1.5°C in accordance with the recommendations of the IPCC. Signed by 175 countries, including the UK, it is the first legally binding global climate change agreement and came into force

in November 2016. All parties have agreed to reduce emissions and the majority have submitted National Climate Action Plans (NDCs). Countries must review their contributions and update their NDCs every 5 years.

Intergovernmental Panel on Climate Change (IPCC) Fifth Assessment Report AR5 (2018)

Since the Paris Agreement the IPCC have called for increased action to achieve net zero carbon by 2030, including placing a higher price on emissions, shifting investment patterns, accelerating the transition to renewable energy and enabling demand-side mitigation and behavioural change.

United Nations Sustainable Development Goals (2015)

The UN set 17 goals for sustainable development that were adopted by UN Member states in 2015. The goals are interdependent and recognize that development must balance environmental, social and economic sustainability. The SDGs are intended to be achieved by 2030.

3.1.2 National

Climate Change Act, HM Government (2008)

In 2008, the UK pledged to reduce greenhouse gas emissions by 80% against 1990 levels, by 2050. To achieve this, they set carbon budgets and established the Committee on Climate Change. In 2019, the UK became the first nation to make net zero by 2050 a legally binding commitment. Legislation which obliges Local authority's to have a plan for carbon adaptation, mitigation and adaptation

European Landscape Convention (ELC), Florence, 20 October 2000;

Treaty Series No. 36 (2012); [The Convention entered into force for the United Kingdom on 1 March 2007], Cm8413.

The Treaty lies outside the scope of the 'Brexit' referendum, as a Council of Europe Treaty. Art5(d) of above Convention ELC, may state importantly an obligation on the part of States ratifying the document to:

(d) 'to integrate landscape into its regional and town planning policies and in its cultural, environmental, agricultural, social and economic policies, as well as in any other policies with possible direct or indirect impact on landscape'.

On the basis set out above the Treaty may support the maintenance of landscapes of particular cultural and environmental importance. This is in the setting for HWCA and the

sensitive landscape identified in this study, notwithstanding the principles of the Green Belt designation.

3.1.3 National Planning Policy and Guidance

National Planning Policy Statement 2021/ Planning Practice Guidance [NPPF 2021(a), / PPG]

paragraph 10 *Delivering Sustainable Development*. This guidance sets the task of:

‘protecting and enhancing the natural and historic environment, the quality and character of the countryside, and existing communities.

From the above viewpoint the need to take into account an assessment of *landscape* and *landscape character* sensitivity, may be raised. On the other hand, the position set out in paragraph 10 at the heart of the Framework as positive approach to sustainable development in the *NPPF, 2021* is:

‘the presumption in favour of sustainable development’, paragraph 11 (d)(i)(ii), where the Framework suggests in policy making that it may be important to consider that:

- ‘b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas⁶, unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area⁷; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole’.

These points from the NPPF 2021 may illustrate the need to consider both the context, landscape and its sensitivity in considering whether there may be any capacity to accommodate change and contribute to objectively assessed local housing needs.

Under heading Chapter ‘15. Conserving and enhancing the natural environment’, at paragraph 174(b) the NPPF 2021, in considering contributing and enhancing the natural and local environment by recognising the intrinsic character and beauty of the countryside. This Chapter places emphasis on

not, may appear that this should remain unbuilt local green space, as in principles set out below.

This site lies in contemporary London's Metropolitan Green Belt (MGB) and for summary purposes, the MGB may have effect on restraining the outward growth London and safeguarding landscape. In particular, maintaining separate character of village scale neighbourhood settlements, like Hadley Wood, Enfield. This may have been achieved to maintain a landscape buffer area north of the settlement, apart from linear settlement, west of Hadley Wood Station. In the west from Camlet Way a portion of Crescent West is built with residential buildings on both sides of the Crescent, most recently carefully design bespoke detached town houses, in the mid- late 20th century, for example number 74 Crescent West, north side. Whilst in the west of Hadley Wood Neighbourhood in LB Barnet some recent relatively low- key development has taken place. This is likely to be on former non-agricultural horse grazing pasture, whilst as a recreational use in the Green Belt may be in accordance with paragraph 145, (NPPF, 2021(a)) in effect urbanising the Green Belt may be inappropriate.

3.1.5 National Model Design Code 2021

Reference to the *National, Model Design Code*, (MHCLG, 2021(b)) is provided based upon the Code's purpose to guide to design policy, in this case as it relates to consultation on LB Enfield's *draft Local Plan 2021 (Regulation 18)* consultation, on proposed site allocation: Site 'SA45'. In addition, objectives for code holds that it:

'sets out clear design parameters to help local authorities and communities decide what good quality design looks like in their area, based on local aspirations for how their area will develop, following appropriate local consultation'.

On this basis the terms of ethics for sustainable development and plan assessment for this study, may be expressed as a communicative approach. Whilst the way of working for the code works starting with:

the importance of both 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 site may represent Grade 3 Agricultural Land Classification and be classified as some of the best and most versatile agricultural land and by definition, (*NPPF 2021(a)*, Annex 2: Glossary, page 65), detailing the: Best and most versatile agricultural land: Land in grades 1, 2 and 3a of the, (Natural England, 2010).

3.1.4 NPPF 2021 Green Belts The 'Metropolitan Green belt' [MGB] is sourced in the *Green Belt Act 1938* and *Town and Country Planning Act 1947*, Circular 42/55 *Green Belts* specific national policy on Green Belts is set out in Planning Policy Guidance NPPF 2021(a) *Green Belts*

Summary of purposes of this landscape planning policy is intended to:

There are five purposes of including land in Green Belts:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns from merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The history of London's Green Belts' may relate to a 1580 (Royal) Proclamation, under Queen Elizabeth I, which forbade any new house being built in a radius of three miles of any (City of) London gate, where no house was earlier known to have existed, (Tyndall, 2016). It is noted that Enfield Chase, historically held by the Duchy of Lancaster, itself has an association with the 16th century Queen, when as Princess was granted the estate of West Lodge Park (now a hotel), west of Hadley Wood by her brother, King Edward VI in 1547, (Trustees of Monken Hadley Common, 2021). Thus, it could be questioned why if where the 1580 Proclamation is considered, why the suggestion of building of open areas of lands of Enfield Chase held by the Duchy of Lancaster, of which Site 'SA45' forms part is being considered at all. Thus, in particular where the *draft Neighbourhood Plan for Hadley Wood 2019*, as material consideration records the area as Green Belt and whether designated or

- Analysis: through Scoping and Baseline assessment;
- Vision, through Design Coding Masterplan/s and the
- Code: Guidance for Area types and General Guidance

An enabling developer may be expected to produce a Code. The Code then may then go on to become a requirement for the developer or successor as implementing developer to meet, the terms of the Code, for example required under a form of Development Order/ Neighbourhood Development Order under which the principles of prior consent for development in an area, subject to local planning authority and building control approvals.

This study is principally concerned with Analysis and Baseline assessment criteria within the *Model Design Code and Guidance Notes*, (MHCLG, 2021(b)(c)), for example:

- Heritage assets
- Masterplans and open space and
- Nature

As set out in Code Guidance Notes:

C.2 Cultural Heritage

'11. Well-designed development adds a new layer to the history of a site while enhancing and respecting its past, with the expectation that new development will be valued for its heritage in the future as heritage assets are today.

'C2.ii (15) The presence of such historic character, either directly on the site, or nearby, should always be seen as an opportunity to add value to any development by helping to provide inspiration', (MHCLG, 2021(c)).

Summary notes

3.1.6 Local Spatial Planning

Consider NPPF 2021 guidance sets itself up to ensure that local plans and proposals maps take into account landscape protection, designations and well considered definitions of the Green Belt.

3.1.7 Local Green Space designation

The following statutory criteria are relevant to the making of new Local Green Space in Neighbourhoods and is a discretionary designation by a Local Authority under:

National Planning Policy Framework (Ministry of Housing, Communities & Local Government updated July 2021, paragraphs 101-10, (MHCLG, 2021(a)

Principles applicable to the LGS designation are, (OSS, 2021):

1. Reasonably close proximity to the community it serves;
2. Demonstrably special to the local community, bearing the following characteristics:
 - (a) *Beauty*
 - (b) *Historic significance*
 - (c) *Recreational value*
 - (d) *Tranquillity*
 - (e) *Richness of wildlife*
3. Local in character, not an extensive tract of land
4. Land already designated

3.2 Regional/ County/ Planning Policy

Consider scope for GLA London Plan/ Hertfordshire County Council

London Plan 2021

Policy 7.16 Green Belt

Policy

Strategic

A The Mayor strongly supports the current extent of London's Green Belt, its extension in appropriate circumstances and its protection from inappropriate development.

Planning decisions

B The strongest protection should be given to London's Green Belt, in accordance with national guidance. Inappropriate development should be refused, except in very special circumstances. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt as set out in national guidance.

Supporting text

7.55 Paragraphs 79-92 of the NPPF give clear policy guidance on the functions the Green Belt performs, its key characteristics, acceptable uses and how its boundaries should be altered, if necessary. Green Belt has an important role to play as part of London's multifunctional green infrastructure and the Mayor is keen to see improvements in its overall quality and accessibility. Such improvements are likely to help human health, biodiversity and improve overall quality of life. Positive management of the Green Belt is a key to improving its quality and hence its positive benefits for Londoners. Boroughs with landscape designations (such as AONBs) should follow the advice of NPPF paragraph 113.

Policy 7.18 Protecting open space and addressing deficiency

- Policy
- Supporting text

Policy

Strategic

A The Mayor supports the creation of new open space in London to ensure satisfactory levels of local provision to address areas of deficiency.

Planning decisions

B The loss of protected open spaces must be resisted unless equivalent or better quality provision is made within the local catchment area. Replacement of one type of open space with another is unacceptable unless an up to date needs assessment shows that this would be appropriate.

LDF preparation

C When assessing local open space needs LDFs should:

- a include appropriate designations and policies for the protection open space to address deficiencies
- b identify areas of open space deficiency, using the open space categorisation set out in Table 7.2 as a benchmark for all the different types of open space identified therein
- c ensure that future publically accessible open space needs are planned for in areas with the potential for substantial change such as opportunity areas, regeneration areas, intensification areas and other local areas.
- d ensure that open space needs are planned in accordance with green infrastructure strategies to deliver multiple benefits.

D Boroughs should undertake audits of all forms of open space and assessments of need^[1]. These should be both qualitative and quantitative, and have regard to the cross-borough nature and use of many of these open spaces.

^[1] National Planning Policy Framework DCLG March 2012 paras 73 and 74

Supporting text

7.57 As part of London's multifunctional green infrastructure, local open spaces are key to many issues, such as health and biodiversity. Needs assessments can be part of existing borough strategies on issues such as allotments, play, trees and playing pitches and the preparation of a green infrastructure strategy will need to bring together the outputs of these borough strategies. The categorisation of open space in Table 7.2 provides a benchmark for boroughs to assess their own provision for the different categories of open space found throughout London. These standards can be used to highlight areas of open space deficiency and to facilitate cross-borough planning and management of open space. The London Parks and Green Spaces Forum can provide a useful mechanism to support this co-ordination. Cross-borough boundary planning is particularly relevant for the larger metropolitan and regional parks and for facilities such as playing pitches, where a sub-regional approach to planning is recommended.

7.58A Neighbourhoods may identify Local Green Spaces that are important to them, local in character and small-scale. The policy for controlling development on them is Green Belt policy^[1], as such Local Green Spaces are not included in Table 7.2 above.

^[1] National Planning Policy Framework DCLG March 2012 paras 76-78

The London Plan enables the identification by a neighbourhood of Local Green Space and links this to the weight in terms of policy designation to the Green Belt. Thus, where an attempt to review the Green Belt to remove the site, its identification as Green Belt in a draft Neighbourhood Plan as material consideration may be read as Local Green Space and the equivalent level of protection afforded to Green Belt may remain. On the other hand, the approach taken by the London Plan may be pragmatic to treat both previously developed land (brownfield) and Green Belt possibly to be included in a flexible development framework for a 'National Park City' and perhaps to provide a contribution to objectively assessed housing needs. This may be in appropriate locations within the Greater London area, where concerns in planning terms may be met, including natural capital, ecosystems and biodiversity concerns being addressed.

Whilst in terms of the study the critical nature of a landscape of distinctiveness at the 'Key View', in terms of cultural heritage and landscape indicate the site may be less feasible for comprehensive close-grained urbanisation and removal from the Metropolitan Green Belt, possibly in planning terms and in its distinctive contribution to the 'National Park City', with visual links to the historic cultural landscape of the Wrotham Park Estate landscape and its relationship to CA 'Key View'.

3.2.1 Local Planning Policy

LB Enfield's *Core Strategy*, Adopted Nov. 2010, 'Core Policy 30'

'Maintaining and improving the Built and Open Environment'

For example, placing emphasis on

'Maximising restoration of, access to and visibility of the blue-ribbon network and the Borough's green assets'

'Addressing issues at the urban edge' and

Promoting the principles of Character Appraisals for Conservation Areas.

Local Plan- LB Enfield/ Hertsmere DC

Draft Local Plan 2021, (Regulation 18)

Site 'SA45' is earmarked for Housing Development under Strategic Policy SPH1, 'Housing Development Sites', page 187, for 'Housing'. This is under the Strategic Policy SPSS1 (11), page 27.

'11. Small sites on the edge of the urban area near Hadley Wood, Forty Hall and Junction 21 of the M25 will provide for additional housing and employment development'.

3.2.2 Statement titled 'New Enfield Plan – Comments by the Duchy of Lancaster', dated 27/2/2019, (Hadley Wood Associations, 2021(a)).

A Statement is summarised as relevant to the draft Local Plan 2021 (Regulation 18) edition consultation in support of Green Belt review for Site 'SA45'.

The statement suggests the site is especially suited to being included in the Green Belt review. This is on a number of grounds, including it being more suited than sites around Crews Hill and the ability to provide sustainable development, with affordable housing. This may polarise the matter by a contrast to other sites at Crews Hill where local concerns are raised, in which the Council suggest in the draft Policy above, that these sites are small and yet actually may amount to 330 hectares in 28 locations. This may exceed the 20% of borough's new homes, traditionally being found in smaller

sites, (Enfield Society, 2021). Whilst at the last General Election there was possibly a cross-party pledge, to boost house building rates to levels, possibly not seen since the late 1970's. This may mean doubling the amount of house-building.

The other point in this may be LB Enfield support for the 'National Park City', whilst simultaneously proposing to potentially adversely impact on the natural environment of some of the most sensitive landscape and historically important parts of Enfield Chase and including the Hadley Wood Open Green Belt site, Site 'S45'. (Enfield RoadWatch, 2021).

3.2.3 Green Belt Development Criteria

LB Enfield's Core Strategy, Adopted Nov. 2010]

'Core Policy 33, Green Belt and Countryside'

LB Enfield, December 2020 *Statement of Community Involvement in Planning*

www.enfield.gov.uk/SCi

3.3 Draft Neighbourhood Plan

Add text analysis refereeing to Draft HWNP 2018, (Hadley Wood Association, 2021(b)).

The following excerpts from the plan are included as material consideration

'Policy HW-C1: Setting

Proposals for development in the Neighbourhood Plan area, including new build, extension or replacement buildings, will be required to maintain the characteristic views and setting of Hadley Wood.

Proposals will not block nor significantly infill gaps between buildings, avoiding the creation of a 'terracing' effect where buildings are extended to the edge of the plot boundary'.

'Policy HW-HD2: High-Quality Built Environment

Proposals for all development, including new build and extensions, will be expected to respond positively to the character of Hadley Wood.

1. Proposals for new development should use materials and architectural details which reference the character and appearance of the immediate area and period of development as identified in the Hadley Wood Heritage and Character Assessment, including the rhythm of existing buildings, and they should respond positively to the overall street scene and neighbouring buildings in terms of prevailing height, scale and massing.

2. Proposals for new development, including extensions, should align with existing street frontages and established buildings lines.

3. Proposed extensions should reflect the proportions of the existing building and not dominate this nor cause overbearing to neighbouring

properties. The footprint and positioning of buildings, and extensions, should be consistent with other buildings on the street.

4. Additions to houses, such as security systems, outdoor lighting and air conditioning units should be visually inconspicuous.

5. The use of alternative materials to uPVC and other synthetic materials is encouraged.

The use of innovative architecture that responds to local character is encouraged. Proposals for new development that mimic traditional styles and features, but do not respond to the proportion or massing of these, or which use different, modern materials, are considered inappropriate for Hadley Wood.

Applicants will be expected to reflect best practice guidance in proposals for new development and extensions, including that established in Building for Life 12 (or any subsequent updates of that). All applicants for development are required to complete and submit the Hadley Wood design considerations checklist with their application material, either as part of a Design and Access Statement (where required) or as a free-standing and clearly marked document'.

'Policy HW-C9: Local Green Space Designations

The following are designated as Local Green Spaces:

1. List here – to be provided by HWNPF

Planning applications for development on the Locally Designated Green Spaces will not be permitted unless, and in exceptional circumstances, it can be demonstrated that the proposed use performs a supplementary and supporting function to the Green Space'.

Where proposal to review the inner boundary of the Metropolitan Green Belt (MGB) and to remove parcel/s of land from the MGB. This area appears in the draft NPHW and it could be reasonable to suggest that the Local Green Space (LGS) may be intended by a draft NPHW, to supplement a removal of land from the MGB and thus the land should be treated as LGS, as a material consideration. This when without the protection afforded in the MGB, in plan making and development management decision making terms, instead the purposes of LGS may be applicable in treatment of Site 'SA45', providing an equivalent level of protection as set out in the London Plan 2021, paragraph 7.58A

On the other hand, it may be important to grasp that a Neighbourhood plan cannot not be used to restrict development below the locally identified housing need for LB Enfield, (NPPF 2021). What may be significant is to what extent

the designated neighbourhood area has any capacity to accommodate housing growth and contribute to objectively identified housing need. Where Green Belt/ Local Green Space is intended in the draft Neighbourhood Plan, the capacity to accommodate housing need on Site 'SA45' may represent inappropriate development. Development that is restricted on the grounds it should be treated as Green Belt and or Local Green Space that may not meet the special circumstances, which enable development in the Green Belt/ Local Green Space. This is unless the draft Neighbourhood Plan identifies the site for housing development and or local green space as in other contexts, whilst maintaining openness of Green Belt/ LGS may be feasible in context for proposals able to meet the exceptional circumstances allowing for development in the Green Belt

4.1 Baseline conditions

Baseline conditions are assessed, in accordance with methodology above.

4.2 Landscape sensitivity

The sensitivity of this landscape may be due to its being largely in tact historical development, from a wood pasture of the common lands of Enfield Chase. This is on the basis that it appears at first glance to be in relatively good condition and established as a developed community, in the late 19th century and since overseen by the residents of the area. The landscape has possibly developed with buffer between the agricultural landscape, to the North of the settlement.. Here the boundary is harmonious and there is little by way of detracting elements and it may be this which makes for more sensitivity, over a generic condition. For example, deterioration of the landscape in the suburban-rural fringe and or rural- suburban condition, in a what could be described as an urban fringe, in which physical and psychological shock may be characteristic, (Osmet, 2003).

4.3 Landscape Character/ sensitivity

The landscape character sensitivity at the larger scale National and Regional/ District scale, may be benign and difficult to predict in this study, whilst it may be that the traditional mosaic of woodland and

farmland is a cultural artifact and product of a history of land enclosure. Thus, in the terms of leaving a legacy in hedgerow trees, resembling the planted landscape parkland, which is of relatively high landscape character sensitivity. At closer grain the views out of the settlement borrow landscape sensitivity from the cultural landscape and despite being scrubby and heath-like in places are enriched by the borrowed landscape, to present a fine and balanced visual composition.

4.4 Visual sensitivity

In supporting evidence to consider visual sensitivity of the site, the issue of seasonal variation in the views. The draft Visual receptors of the site are predominantly summer views, unless stated.

Winter views are presented for views from Barnet Road, *Figure 6 (Winter)* and Bartram's Lane, *Figure 7 (Spring)*. These views are based photos taken in 2013 and 2014 and presented, owing the seasonal practicalities of obtaining current Winter images. In addition to excerpt from the *CA Appraisal*, possibly a Winter view, *Figure 9*. Thus, the images supplied are included as evidence, given timing of the current *draft Local Plan (Regulation 18)* Consultation, running until mid-September 2021.

4.5 Estimated visual envelope

The estimated visual envelope covers about a square kilometre and may be smaller, by comparison to the extents of potential views and scale of the surrounding landscape, to the site east and north. This is largely due to small scale topography of the combe like landscape in which Monken Mead Brook is characteristic and the topographic and landscaped surrounding with woodland blocks and shelter belts.

4.6 Landscape Value

The landscape value present in open farmland and in particular in the small-scale landscape in the Combe like structure of the valley of Monken Mead Brook. This may be witnessed particularly in the visual experience when looking towards the ridge of Barnet Road, Old Great North Road and 'Plantation Wood', (draft Visual receptors 3 and 4). The woodland colonising the rail engineering and in the woodland farmland mosaic offers a parallel to the historic legacy of ancient wood pasture and may indicate an interplay of human land management activity and for this reason reflects cultural heritage of landscape. On the other hand, views in return from Barnet Road, draft Visual receptors 1

and 2. This shows the settlement well screened by trees and vegetation and relatively unobtrusive to the visual experience and also makes both aspects of high landscape value in the Metropolitan Green Belt.

View no.	Name/ description	Landscape assessment	Landscape Character sensitivity	Visual sensitivity	LANDSCAPE SENSITIVITY	Landscape Value	LANDSCAPE CAPACITY
1	Winter view east from Barnet Road to Site SA45.	High	Medium to High	High	High	High	Low
2	Summer view east from Barnet Road to Site SA45.	High	Medium to High	Medium to High	Medium to High	High	Low
3	View east to site from Crescent West 'Key View' to Site SA45.	Medium to High	Medium to High	Medium to High	Medium to High	High	Low
4	View west from Bartram's Lane, Hadley Wood to Site 'SA45'	Medium to High	Medium to High	High	High	High	Low

4.7 Overall profile, Capacity and Sensitivity matrix, Table 1

The table is completed on the basis of *Viewpoint Locations*, Fig. 5 and 8

Note: Rights of ways information is based upon use of Ordnance Survey mapping and site visits.

Evidence of a public right of way is available from LB Enfield and Hertfordshire County Council *Rights of Way Definitive Maps*, but was not used in compiling this study.

4.8 Potentials for mitigation

Based on the findings of the above table, in most exceptional circumstances there may be some scope for mitigation by design, to significantly reduce potential effects of change and to accommodate this and to in particular maintenance of the Hadley Wood CA 'Key View' at Crescent West. The provision of publicly accessible open space in landscape buffer areas and retaining open areas of the site, could also be applicable to achieve appropriate mitigation.

At draft local policy level SP SS1 (11), in the *draft Local Plan 2021 (Regulation 18)* edition mentions both housing and employment and may be applicable to the proposed Site allocation Site ;'SA45'. This may suggest mixed used development is preferable, considering schools, shops and 25% new publicly accessible open space, in of any development and in accordance with the *Model Design Code 2021* in the preparation of any Development Order for Site 'SA45'. If the circumstances to allow development exceptionally in the Green Belt is considered in the event of any development the issue of openness is likely to feature and in particular to maintain openness, at Figures 5 and 6. The other issue of local green space may substitute the purposes of *draft Hadley Wood Neighbourhood Plan 2019*, in earmarking Green Belt and were removed in policy.

Further information concerning the nature of proposed changes as exception are required, before any specific guidance on mitigation, can be provided, whilst it is important to consider the *NPPF 2021*, paragraph 174(b) natural capital and ecosystem service are recognised and the emerging statutory principles for 'biodiversity net gain' in development, may be criteria under which any ongoing proposals need to be robustly assessed.

4.9 Summary additional recommendations

(a) A biodiversity study maybe preferable to be conducted at Phase 1 and or Phase 2 Habitat studies and a form of Natural Capital assessment and or valuation to ascertain baseline for biodiversity in evidence may benefit Interested Persons.

(b) An arboriculture study may be conducted and or application to the Planning Tree Protection service for LB Enfield. This could consider the statutory protection of important trees, groups and areas of trees and woodland in the neighbourhood. A particular focus may be Bartram's Lane and Crescent West, but also the landscape of Site 'SA45', hedgerows and vegetation around Monken Mead Brook and Bartram' Quash, woodland block recorded on plan.

5.0 Conclusion

In some places the proposed site allocation Site 'SA45' is in part well concealed by vegetation and hedges, whilst the draft capacity assessment may reveal a 'Low' capacity to accommodate change, in all four cases. This may vary in accordance with the extents of landscape change and disturbance, detracting from intrinsic character and by introduction and dominance of made-made elements. This is into scenes that in some cases bare detractor elements and suburban edges and the high- rise skyline of London and signature tower styling. On the other hand, in other areas an unspoilt example of post- enclosure landscaped farmland and wildlife are experienced and in close proximity to the metropolis of London, makes this landscape potentially highly sensitive to change. The maintenance of the openness of the site of critical visual and landscape character sensitivity, as illustrated in *Figures 1 to 4* an it may be preferable to maintain the area as Green Belt or with the provision of Local Green Space or equivalent open space, to retain this openness and avoiding adverse impacts of changes and urbanisation. On this basis the sites inclusion as a draft Site Allocation, may be in question.

Further study is needed, to gauge appropriately *landscape effects* and *magnitude*, of any proposed changes and guide appropriate mitigation in detail.

Disclaimer: The work represents the authors view, writing on the behalf of Interested Persons and no liability will be accepted. Independent legal advice should be obtained in any points of law.

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Figures 7.0

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'SITE SA45' LANDSCAPE AND VISUAL CHARACTER STUDY REV03A 11/9/2021

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See also 'Draft Visual Receptor 5, View northwest to site from Crescent West, Hadley Wood'



'Key View' highlighted at Crescent West, excerpted from 'Figure 4, Townscape Analysis', London Borough of Enfield, Hadley Wood Conservation Area Character Appraisal, Approved Feb. 2015, Amended Sept. 2016

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'Licentiate Member of the Royal Town Planning Institute', 2021 Elected as 'Associate of the Royal Town Planning Institute (AssocRTPI)', 2008



Panorama at possible location of 'Key View' from the public realm footway (59) Crescent West, Hadley Wood- Figure 1

Hadley Wood 'Key view' September 2021 Rev01
Artwork and photos by Adam Cook MSc CML

Key



Approximate direction of visual elements in draft visual receptor 'x', Crescent West.

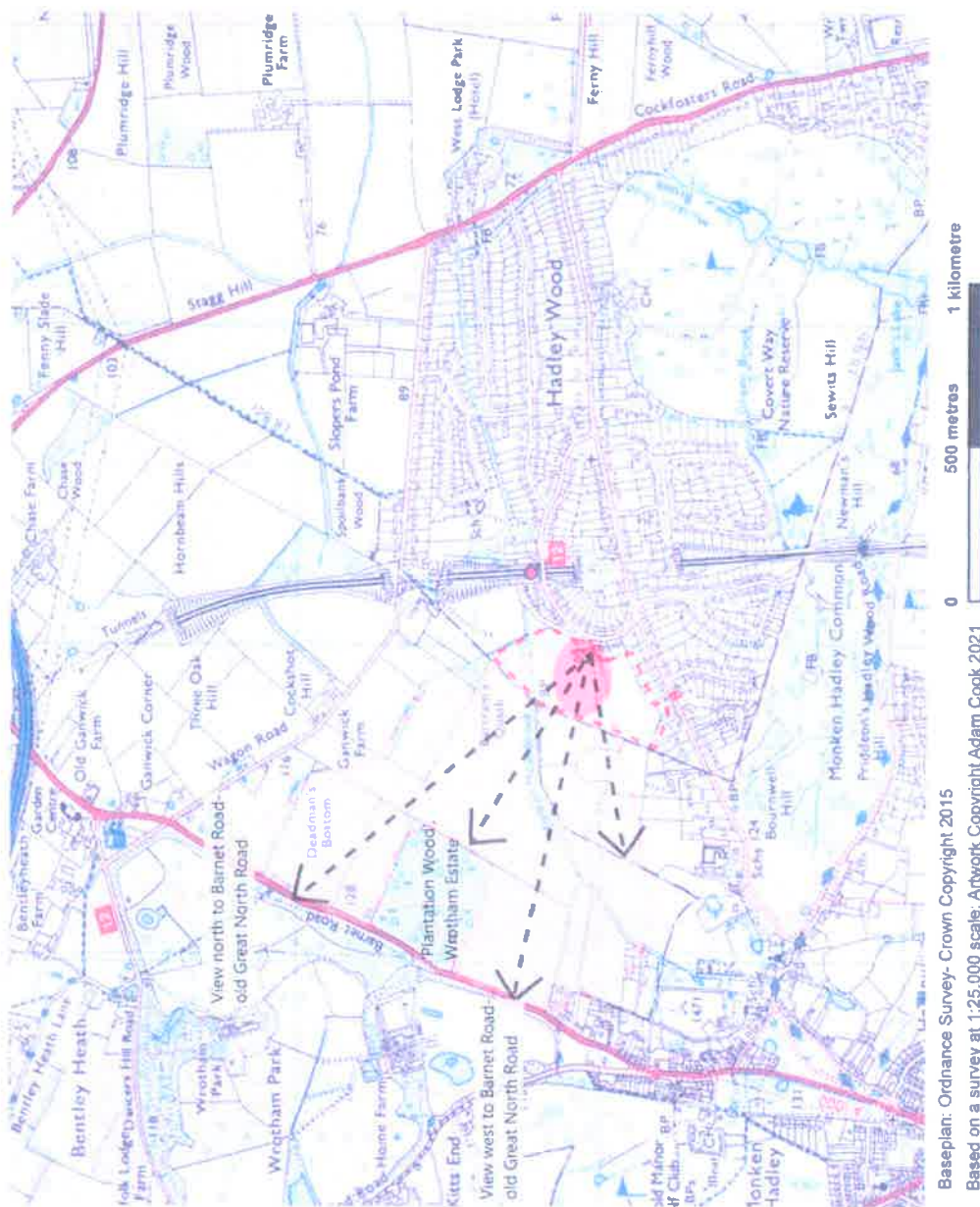
Area of approximate visual sensitivity-



Site 'SA45' estimated area of 'Key View' critical visual sensitivity



Area of draft Site Allocation, 'SA45'.



Baseplan: Ordnance Survey- Crown Copyright 2021
Based on a survey at 1:25,000 scale, Ordnance Survey- Crown Copyright 2021

Draft figure 2, Hadley Wood Conservation Area Appraisal. 'Key View' wider extents , paragraph 2.5.2, Figure 4, Adopted Feb. 2015; Amended Sept. 2016

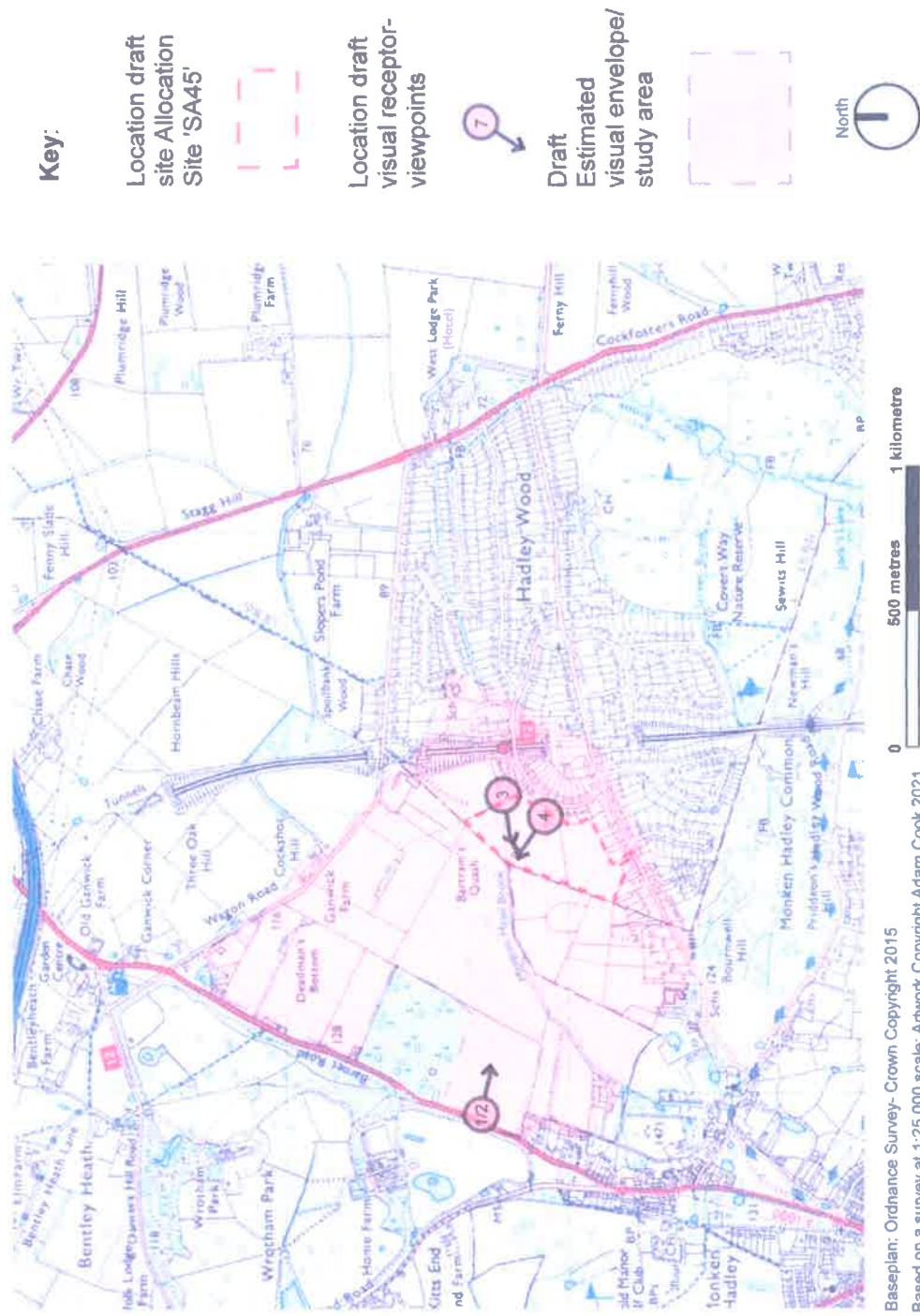


Figure 3, Draft Estimated Visual Receptors

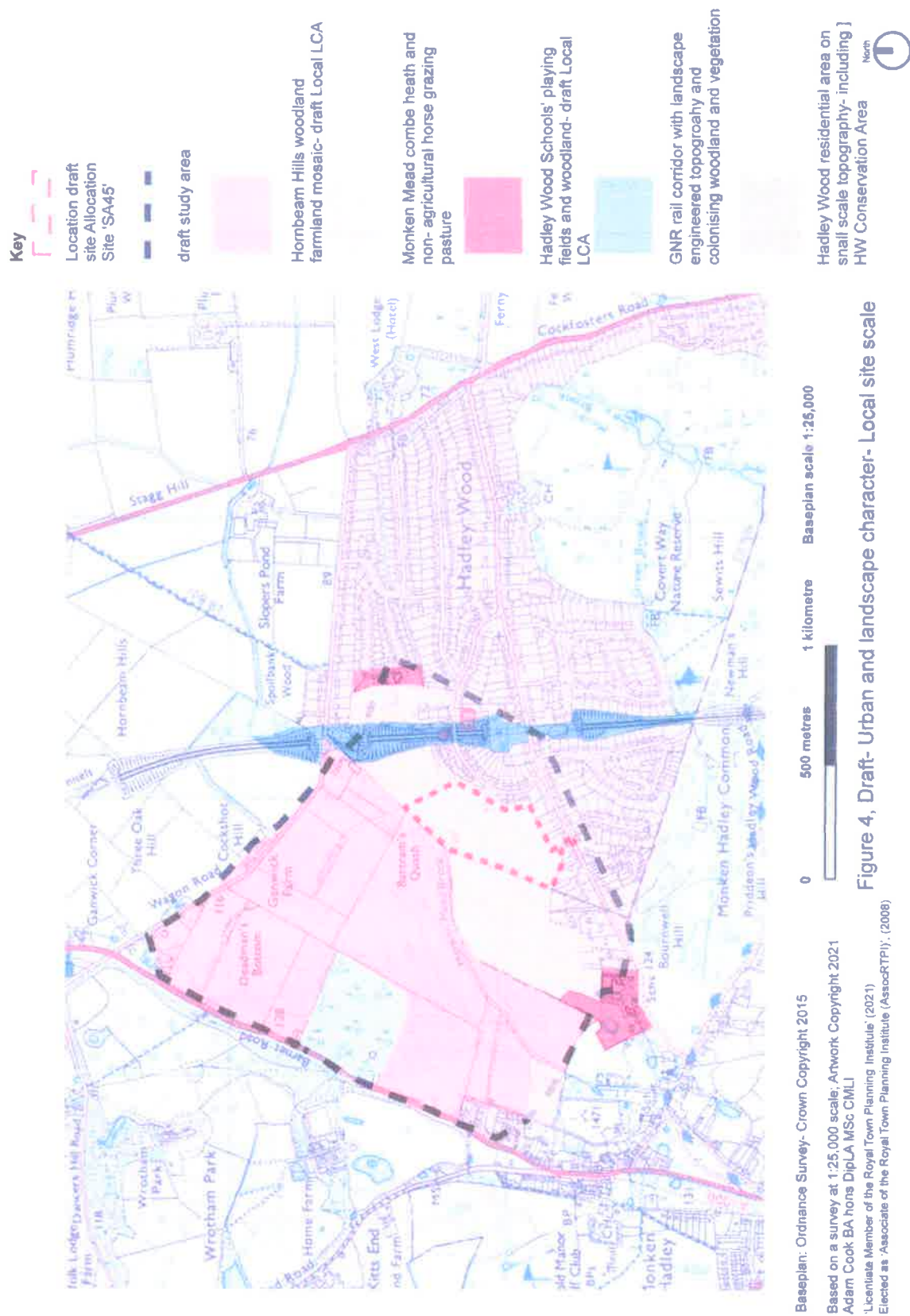


Figure 5



Draft visual receptor 1 location - View east from Barnet Road (A1000)
Date: 25 May 2021; Photo and artwork Copyright Adam Cook



Figure 6

Draft visual receptor 2 location - Winter view east from Barnet Road (A1000), to proposed Site
Date: 25 May 2021; Photo date 4/2/2013; Photo and artwork Copyright Adam Cook

Figure 7



Draft visual receptor- 3 location - View west to site from Bartram's Lane, Hadley Wood to Site 'SA45'
 Date: 3/9/2021 Photo date 22/4/2014; Photo and artwork Copyright Adam Cook

Figure 8



Draft visual receptor 4 location - View west to site from Crescent West, Hadley Wood
 Date: 25 May 2021 Photo and artwork Copyright Adam Cook



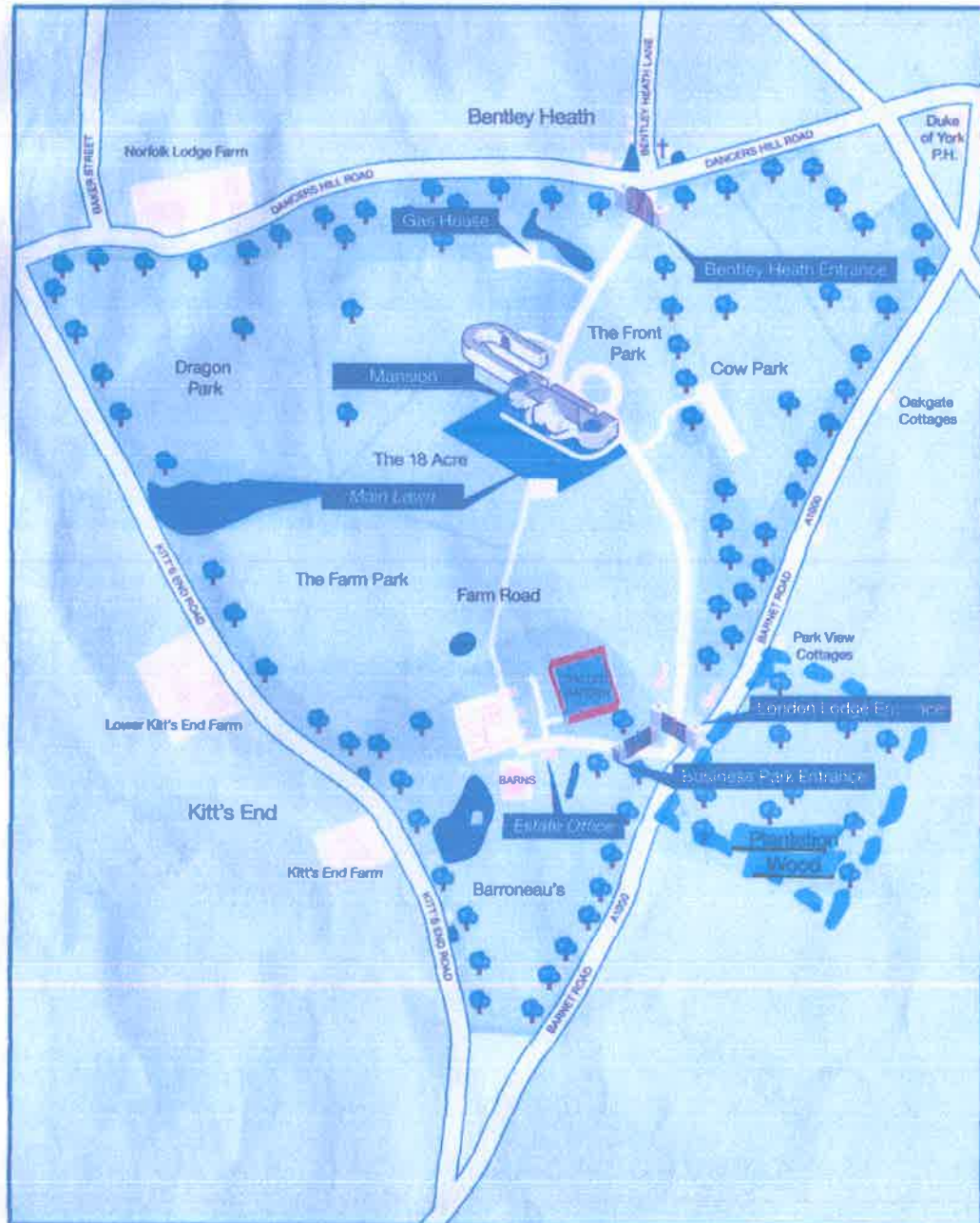
Figure 9

Figure 9: View to north from Crescent West

Source: London Borough of Enfield 2016; Hadley Wood Conservation Area Appraisal Adopted Feb. 2015, Amended Sept. 2016

Fig 10.

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Figure 10

