

Appendix 3

Land between Camlet Way and Crescent Way, Hadley Wood

London Borough of Enfield Local Plan 2039
Regulation 18 Consultation Stage

Draft Policy SA45

LANDSCAPE AND GREEN BELT APPRAISAL


on behalf of the Hadley Wood Association and Hadley Wood Neighbourhood
Planning Forum

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1.0 INTRODUCTION

Background

- 1.1 This Landscape and Visual Appraisal is a ‘high-level’ assessment of a potential strategic development site identified in the London Borough of Enfield Local Plan (the Council), which has reached the Regulation 18 Consultation stage¹. This stage is a public consultation into the Council’s draft Local Plan policies and proposed strategic and other site allocations that have been identified to deliver the housing need for the Local Plan period up to 2039.
- 1.2 The Council is seeking to provide for circa 25,000 new dwellings in the plan period up to 2039, equating to the delivery of some 1,246 homes per annum. The Council’s strategy pursues intensive use of its urban land, particularly in the defined “*place making areas*”, while protecting the built and natural environment. The proposed allocations include only two sites outside of the place making areas that are also outside of the urban areas. One such potential allocation is land between Camlet Way and Crescent Way at Hadley Wood, as defined by draft Policy SA54, for some 160 new dwellings (refer to Figure 1). Enplan (landscape, planning and environmental consultants) has been instructed by the Hadley Wood Association and Hadley Wood Neighbourhood Planning Forum to undertake a landscape and visual impact assessment of this draft allocation and to review the allocation in the context of the land’s status as Green Belt and as part of a designated Area of Special Character.
- 1.3 In developing the Regulation 18 plan, the Council has considered high-level planning constraints, including the Green Belt boundary. Development at the land between Camlet Way and Crescent Way is currently Green Belt land but the Council will review the Green Belt boundary at the Regulation 19 stage of the Local Plan. Should the Council propose to put forward the land for allocation at the Regulation 19 stage, then it follows that it will propose to amend the Green Belt boundary, on the grant of planning consent, to exclude the development area from the Green Belt.
- 1.4 The main aims of this appraisal are to define the principal landscape and visual effects of the potential development, including on the Green Belt, based on a number of assumptions about the nature of the potential development, as set out below. The appraisal sets out an assessment of the landscape character, value, susceptibility and

¹ Enfield Local Plan: Main issues and preferred approaches: June 2021

sensitivity of the landscape context of the site. It defines in broad terms the existing landscape conditions, assesses the character and quality of the landscape and analyses the potential landscape effects of the proposal and their significance, against the existing landscape baseline. The appraisal also considers the potential visual effects of the development at the site, using key viewpoints, and assesses the overall significance of these potential effects.

- 1.5 This appraisal also briefly reviews Green Belt policy and the Council's Green Belt and Metropolitan Open Land Study (prepared by LUC) June 2021 and considers the implications of allocating this land for development and for the release of this from the Green Belt.
- 1.6 Assessments undertaken within this appraisal have been undertaken in accordance with '*Guidelines for Landscape and Visual Impact Assessment*', 3rd Edition (GLVIA3), published jointly by the Landscape Institute and Institute of Environmental Management & Assessment. This assessment has been led by a Chartered Landscape Architect, with over 35 years of experience, who is highly familiar with the local landscape context.

2.0 LANDSCAPE AND GREEN BELT RELATED PLANNING POLICY CONTEXT

2.1 This section describes the background of relevant national planning policy guidance, in so far as this relates to landscape and Green Belt matters.

National Planning Policy Framework and Planning Policy Guidance

- 2.2 The NPPF (revised July 2021) defines three overarching objectives for the planning system to contribute to achieving sustainable development; these are economic, social and environmental. For the environmental objective, at Paragraph 8(c), the planning system should contribute to protecting and enhancing the natural, built and historic environment.
- 2.3 Paragraph 11 of the NPPF requires that plan-making should apply a presumption in favour of sustainable development and should positively seek opportunities to meet the development needs. This includes, as a minimum, providing for objectively assessed housing and other needs, unless policies that protect areas of particular importance “*provides a strong reason for restricting the overall scale, type or distribution of development in the plan area*”. Such restrictive policies include land designated as Green Belt (Footnote 6).
- 2.4 The NPPF states that the fundamental aim of Green Belt is to prevent urban sprawl and openness by keeping land free from development. Paragraph 138 sets out the five purposes of Green Belt, as follows:
- a) To check the unrestricted sprawl of large built-up areas;
 - b) To prevent neighbouring towns margining into one another;
 - c) To assist in safeguarding the countryside from encroachment;
 - d) To preserve the setting and special character of historic towns; and
 - e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 2.5 Paragraph 139 states that, once established, Green Belt boundaries should only be altered where “*exceptional circumstances*” are fully evidenced and justified, through the

preparation or updating of plans. The strategic policies of the plan should establish the need for any changes to Green Belt boundaries “*having regard to their intended permanence in the long term, so they can endure beyond the plan period*”.

2.6 Paragraph 141 requires that, before concluding that exceptional circumstances exist, it is necessary for the policy-making authority to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. These include making as much use of suitable brownfield sites and under-utilised land as possible, optimising density of development and informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development. Paragraph 142 requires that authorities should also set out ways to compensate for the impact of removing land from the Green Belt through improvements to the environmental quality and accessibility of land remaining in the Green Belt.

2.7 Paragraph 143 sets out the requirements of authorities when defining Green Belt boundaries (which can include new boundaries related to the release of land from the Green Belt), which can be summarised as follows:

- a) Consistent with the plan’s strategy in meeting identified requirements for sustainable development;
- b) Not to include land unnecessary to keep open;
- c) Where necessary, safeguard between the boundary and urban area, for future development beyond the plan period;
- d) Make clear that any safeguarded land is not allocated for development;
- e) Demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
- f) Clearly define boundaries using physical features that are likely to be permanent.

2.8 Accordingly, the NPPF envisages that plan-making authorities may release land from the Green Belt and, in so doing, define new Green Belt boundaries in order to deliver sustainable and objectively assessed development needs, where there are fully justified exceptional circumstances. Authorities must have regard to the likely permanence of any revised Green Belt boundaries which should reflect the strategy for meeting identified requirements and for safeguarding land outside the revised Green Belt that may be required for future development needs beyond the plan period, i.e. ensuring the revised boundaries can work into the long term. Where land is removed from the Green Belt,

authorities should seek compensatory improvements to the environmental quality and accessibility of land remaining within the Green Belt.

- 2.9 Within Section 15 “*Conserving and enhancing the natural environment*”, paragraph 174 requires that the planning policies and decisions contribute to and enhance the natural and local environment by, inter alia, “*protecting and enhancing valued landscapes....*” and by “*recognising the intrinsic character and beauty of the countryside*”. The Framework distinguishes landscapes that are “*valued*”, from those that are not, and attaches greater weight to those that are designated.

Relevant London Borough of Enfield Planning Policies and Evidence Base

- 2.10 Core Strategy 2010 Core Policy 33 states that the Council will continue to protect and enhance Enfield’s Green Belt. The supporting text also sets out that Areas of Special Character (designated through the 1994 Unitary Development Plan) will be reviewed as part of the Characterisation Study. The policy states that the Development Management Document will set out criteria for assessing proposals in Areas of Special Character (AOSC).
- 2.11 As part of the evidence base for the Development Management Document, the Enfield Characterisation Study, February 2011, identified twelve landscape character areas for the Borough’s rural Green Belt, including Area 1F: Hornbeam Hills South, an area including the potential allocated site and Local Open Space in Hadley Wood. Also, as part of the same evidence base, the Area of Special Character Review, March 2013, recommended that subject to the draft Development Management Document consultation, the AOSCs first designated in 1994 be separated into 9 distinct areas and be refined to exclude some areas but also to include new areas, such as the Hornbeam Hills South landscape character area. In so doing, the review identified that “*This area is similar to the wider area to the west and is an attractive landscape of agricultural land with long distance views to the woods of Wrotham Park to the west*”².
- 2.12 Policy DMD 84 of the Adopted Development Management Document, November 2014, states that “*New development within the Areas of Special Character will only be permitted if features or characteristics which are key to maintaining the quality of the area are preserved and enhanced*”. The justification and guidance include that the borough

² Paragraph 4.26 Area of Special Character Review 2013

has a rich and diverse range of landscape types, and its unique character is strongly influenced by its topography.

- 2.13 The Enfield Local Plan: Main issues and preferred approaches, June 2021, is at the Regulation 18 Consultation stage. This is identified as an 'Issues and Options' version of the Local Plan to 2039 which provides for a preferred approach for where growth can be delivered. The Regulation 18 Consultation is stage one in a process towards adoption of a new Local Plan that will replace the Core Strategy and Development Management Document. The NPPF requires that Council's found their policies on an up to date evidence base. The published evidence base includes a review of the Green Belt boundaries but no similar review of the AOSC.
- 2.14 Relevant draft policies at the Regulation 18 Consultation stage include Strategic Policy BG4: Green Belt and Metropolitan Open Land, BG5: Green Belt and edges of countryside/urban area, Policy DM DE5: Strategic and local views and DM DE6: Tall buildings and DM RE1: Character of the Green Belt and open countryside, as well as under Strategic Policy SS1: Spatial Strategy, the specific site allocation of the land between Camlet Way and Crescent Way as Site Allocation SA 45. There is no draft policy concerning the AOSC. The Proposals Map, which accompanies the plan, identifies Site Allocation SA 45 and shows that at present it lies both within the Green Belt and within an AOSC (although in the case of the AOSC the policy reference on the map is incorrect, referring to Policy DM DE9 which relates to shopfronts). Refer also to Figure 3 for how the potential allocation lies in relation to the existing Green Belt boundary.
- 2.15 Strategic Policy BG4 of the draft Local Plan seeks to continue the protection afforded to Green Belt and MOL from inappropriate development, whilst Strategic Policy BG5 defines criteria for whereby development that is not inappropriate, as set out in the NPPF, will be permitted. As defined in Paragraph 143 of the NPPF, plan-making authorities may release land from the Green Belt where there are fully justified circumstances and must have regard for the likely permanence of amended boundaries. Policy DM RE1 defines the criteria to be met for the permitting of development adjoining or within close proximity to Green Belt. These include, but are limited to:
- not having a detrimental impact on visual amenity of the Green Belt;
 - having a clear distinction between the Green Belt and urban area;
 - views and vistas from the Green Belt into urban areas and vice versa, especially at important access points, are maintained; and

- conserve and not detract from the open character of the Green Belt and surrounding landscape.

- 2.16 The Council commissioned LUC to undertake an independent assessment of the Green Belt within the Borough, as an “*important piece*” of evidence for the borough’s new Local Plan and subsequent Local Plans³. LUC reported in June 2021 to inform the emerging Local Plan. The study assesses the potential harm to the designation if any land were to be re-designated from the Green Belt through the Local Plan process including the Council’s identified 36 Green Belt and MOL in the Regulation 18 Consultation Plan. The study concludes that the harm of releasing all of the allocated land would be ‘Very High’⁴ (subject to mitigation), although the harm of release is considered to be ‘High’ in Appendix D Site Assessment Proforma (refer to site LP465). Further detailed review of this study is set out below.
- 2.17 Policy DM DE5 of the draft Local Plan identifies a number of strategic and local views and requires that development should contribute to the setting and integrity of important views. Such views include south-westerly views from The Ridgeway and describes these as “*spectacular and extensive*”. The explanation includes that these attractive views of skyline ridges and landmarks make a significant contribution to the borough’s townscape and landscape.
- 2.18 Policy DM DE6 of the draft Local Plan relates to the principle and potentially suitable locations for tall buildings (as defined by the London Plan at 21m or 7 x 3m high storeys). One such potentially suitable location identified is as a marker building for Hadley Wood Station, within the existing urban area⁵. No other locations within Hadley Wood have been identified as suitable although the Council may yet give consideration to tall buildings as being potentially appropriate for future allocated sites.

Conservation Areas

- 2.19 Figure 3 illustrates the boundaries of three Conservation Areas. The Hadley Wood Conservation Area forms part of and adjoins the potential allocation along part of the allocation’s eastern boundary. The Monken Wood Conservation Area partly adjoins the

³ Paragraph 1.1 of Green Belt and Metropolitan Open Land Study, Final Report, June 2021

⁴ Table 8.1 of Green Belt and Metropolitan Open Land Study, June 2021, LUC

⁵ Figure 7.4 of Regulation 18 stage: Main issues and preferred approaches

allocation's western boundary. The Trent Park Conservation Area lies to the east of Hadley Wood and is not directly relevant.

2.20 Conservation Areas are a heritage designation but there can be heritage matters that overlap with some landscape and visual issues, such as views into or out from a Conservation Area. The issue of the setting of a Conservation Area is also a matter which may overlap but the definition of such settings is a matter for heritage specialists.

2.21 The Hadley Wood Conservation Area Character Appraisal (as amended 2016), as part of its Appraisal of Special Interest, identifies "*More attractive breaks occur in the street frontage on the north side of Crescent West, where houses give way to open country, with views out to the northwest of hills and woods.....*"⁶ and "*.....patches of open land punctuating the housing, with occasional views to the open countryside.....*"⁷ The Monken Hadley Conservation Area Character Appraisal Statement (2007) recognises the undeveloped nature of the agricultural land to the north of Camlet Way and the "*considerable historical significance*" of the field boundaries, likely to reflect early enclosure, of the former Rectory Farm area, within the Conservation Area, to the north of properties along Camlet Way⁸. These are all matters of relevance to a landscape and visual appraisal, such as this, although any assessment of effects on this element is a matter for a heritage specialist.

⁶ Paragraph 2.5.2 of Hadley Wood Conservation Area Character Appraisal (as amended 2016)

⁷ Paragraph 2.6.1

⁸ Section 7.6 of the Monken Wood Conservation Area Character Appraisal Statement (2007)

3.0 APPRAISAL METHODOLOGY AND APPROACH

- 3.1 The approach to the landscape and visual appraisal is in accordance with the 3rd Edition 'Guidelines for Landscape and Visual Impact Assessment' (GLVIA3). For the assessment of landscape effects, professional judgements have been made regarding landscape value, landscape susceptibility and landscape sensitivity. The process of landscape assessment, as advocated by the GLVIA3, involves the individual assessments and combining of these for value and for susceptibility, specifically to the type of development envisaged, to evaluate the landscape's overall sensitivity. This is not a full landscape impact assessment, in that it is limited to assessments of landscape value, susceptibility and sensitivity with the assessment of effects predicted as a potential effect, given that, at this time, there are no specific development details formalised at this stage. The nature of the magnitude of effects is described in the narrative of the report.
- 3.2 For the visual assessment the overall extent of the visibility of the potential development was established; this represents the Zone of Theoretical Visibility (ZTV) for the development. These were determined through a combination of computer-based assessment using 3-D digital terrain modelling (LiDAR) and an assumed development boundary within the site, set at 7.5m above ground level, i.e. ridge height for a typical two storey house, 11m or the approximate height of a four storey block of apartments and 21m, the London Plan's defined tall building height.
- 3.3 A relatively high-level visual impact assessment has been undertaken of the potential development areas and building heights from a number of selected viewpoints. The viewpoints have been selected because they are notable views and represent a typical direction or type of view from locations where receptors are most likely to be of higher sensitivity. The process of assessing visual effects includes defining visual receptor value, susceptibility and sensitivity, as well as the assessment of magnitude of the effects. As with the assessment of landscape effects, the nature of these has been set out in the narrative of the report.
- 3.4 The viewpoint photographs (Figures 9 to 13) illustrate a range of representative publicly accessible views of the potential allocation. In each case the photographs have been marked up with estimated extents, in the view, of the higher southern field (in red) and the lower central field (in blue). The solid lines indicate where the surface of the field is visible in the view, whilst the dashed line indicates the estimated extent of those

parts of the surface of the two fields that are screened and not in the view. The former indicates where buildings would be visible whilst the latter indicates where, subject to the heights of the vegetation in relation to buildings heights, development may still be visible above that vegetation.

3.5 As there is no formal proposal for the allocation as yet, the approach for the assessment has been to assume that the southern and central fields would be developed for up to 160 dwellings, as per the site allocation quantity, and that the edge of the built development would be set back from the boundaries and the middle hedgerow by around 15m (refer to Figure 5). It has been assumed that the field to the north of the Monken Mead Brook, would be excluded from the development due to its Flood Zone 3 status. The main access to the site is assumed to be located at the lay-by on Crescent Way.

4.0 BASELINE LANDSCAPE CHARACTER AND VALUE

Published Landscape Character Assessments

4.1 The relevant published national and borough landscape character data and assessments include the following:

- National Character Area Profiles: Northern Thames Basin (NCA 111)⁹; and
- London Borough of Enfield Characterisation Study 2011.

National Landscape Character Area

4.2 The potential allocation lies within the Northern Thames Basin NCA111. This character area consists of four sub-character areas including the *Hertfordshire Plateaux and River Valleys*. The key characteristics of the *Hertfordshire Plateaux and River Valleys* relevant to this assessment are displayed as:

- *“A diverse landscape with a series of broad valleys containing major rivers Ver, Colne, Lea and extensive areas of broadleaved woodlands being the principal features of the area. The landform is varied with a wide plateau divided by the valleys.....”*
- *Smaller, intimate tree-lined valleys supporting red brick villages provide a contrast to the more heavily developed major river valley floodplains. Within these river valleys, organic field shapes are common, defined by water courses and the legacy of woodland clearances rather than formal enclosure patterns.....”*

4.3 The landscape character of the Hertfordshire-London fringe “.....comprises much transitional countryside as rural Hertfordshire merges into northern London suburbs. It is often despoiled by urban activity, particularly the motorways and associated services, power lines and so on. However, there is much local landscape diversity and interest characterised by a patchwork pattern of fields and woodlands”.

Borough Landscape Character Areas

4.4 The London Borough of Enfield published the Enfield Characterisation Study: Final Report in February 2011 as part of the evidence base for the preparation of the

⁹ <http://publications.naturalengland.org.uk/publication/4721112340496384?category=587130>

Development Management Document 2014. This identifies two character areas relevant to this application (refer to Figure 3). As detailed below, the potential allocation lies outside the urban area and within Character Area 1F: Hornbeam Hills South. This incorporates the allocation in the south-east corner of the character area with the remainder stretching to the borough boundary along Barnet Road to the west and up to and over the M25 to the north. To the east is Character Area 1A: South Salmon's Brook Valley. This runs north to The Ridgeway.

4.5 The key characteristics and distinctive features of the Hornbeam Hill South character area are as follows:

- *“Sloping valley landforms*
- *Geometric field pattern*
- *Mainline railway in cutting/tunnel*
- *Potters Bar and M25 to the north-west*
- *Limited Rights of Way”*

4.6 The character description highlights that this character area is the south-eastern corner of a larger landscape character area defined in the Landscape Character Area for South Hertfordshire (2000). Also, specifically refers to a *“small corner of this character area comprising four fields and an adjacent track (Bartram’s Lane).....”* as being visible from the public layby on Crescent Way as being an *“attractive landscape of agricultural land with long distance views to the woods of Wrotham Park to the west.”* This would appear to be a reference to the fields occupied by the potential allocation and the Local Open Space. Key issues include, that although only a small area, this character area is part of an important wider area of Green Belt and is in good condition; that the Green Belt boundary is clearly defined by Bartram’s Lane and the rear boundaries of properties on Camlet Way and Crescent Way; and, also, highlights the importance of the local open space. Under the heading ‘Implications’ it is noted that the existing character and pattern of uses, and hedgerows should be retained and managed.

4.7 The key characteristics and distinctive features of the Salmon’s Brook Valley character area are described as:

- *“Frequent small woodland blocks;*
- *Valley drained by Salmon’s Brook with undulating valley sides;*
- *Geometric fields of mainly pastoral farmland with some arable fields;*

- *Mature hedgerows with frequent large mature hedgerow trees (mainly oak);*
- *Secluded with few roads;*
- *Views across the valley from Ferny Road/Hadley Road and the Ridgeway;*
- *Views south towards Enfield Chase and Hadley Wood;*
- *Wrest Lodge Park and Beale Arboretum;*
- *Electricity pylons in the north east corner of the area;*
- *Scattered farms.”*

4.8 Under ‘Key Issues’ the study identifies the long views across the area as being valued and worthy of protection, identifying that *“In some areas, recent development is prominent, for example, the northern edge of Hadley Wood and detracts from the quality of these views”*. The areas protection by Green Belt policy is noted and that the south-west boundary of the area at Hadley Wood is *“well-defined”* by Cockfosters Road and Waggon Road and that *“Proposals for development on the north side of Waggon Road and east side of Cockfosters Road should be strongly resisted to ensure that the Green Belt remains a clear and enduring boundary.”*

Site Location and Appraisal

4.9 The potential allocated site is located adjacent to the settlement boundary of Hadley Wood (refer to Figure 1). Hadley Wood stands just separate to the wider urban area of Enfield and Barnet to the south; Monken Hadley Common and the golf course of Hadley Wood Golf Club providing a relatively narrow countryside break. The eastern edge of Hadley Wood is bounded by the A111 with Trent Park and open countryside beyond. To the west there is countryside although within this there is development along Camlet Way leading to the village of Monken Hadley. To the north of Hadley Wood is open countryside, including the potential allocation, although within this there is scattered settlement and several significant roads, including the A1000 Barnet Road, Wagon Road and the M25 about 1.5km away from the urban edge.

4.10 Hadley Wood began as a Victorian suburb built up from 1885 around the then new Hadley Wood Station by Charles Jack. Beginning with the construction of large villas along the curved Crescent East and Crescent West, Hadley Wood had expanded along Lancaster Avenue by 1914 and in the inter-war and post war period along Camlet Way. The original central part of Hadley Wood is a Conservation Area. The area between Lancaster Road and Waggon Road was not part of the planned suburb but rather it developed more sporadically post 1945. In more recent times it has been further

developed and its density gradually increased through infill. Its character, therefore, is of a mixed style and more informal appearance than the original core of the settlement but generally remains an attractive low-density residential area of large, detached dwellings set in generous mature gardens.

- 4.11 The topography of the area is complex and rolling, lying in the transition between the Hertfordshire plateaux landscape and the broad floodplain of the River Lea. Monken Hadley is sited on a domed hill at around 130m AOD, the highest level in the local area. Hadley Wood occupies a minor west to east ridgeline which slopes away from Monken Hadley along the crest of which is aligned Camlet Way (refer to Figure 2). To the north of this minor ridge is a shallow valley with a further, lower, minor west to east ridgeline, along which runs Waggon Road. A major part of Hadley Wood lies between the two ridgelines. North of Waggon Road the land falls away down to Salmon's Brook at 75m AOD before rising again to around 130m AOD towards the M25 and Potters Bar. The valley of Salmon's Brook runs east towards the River Lea; its undulating sides are bordered to the north by a major ridgeline along which runs the A1005 The Ridgeway and by Hadley Road to the south at the edge of Enfield Chase.
- 4.12 Within the countryside area to the north-west and north of Hadley Wood medium-sized predominantly arable agricultural fields are divided by hedgerows with occasional groups or lines of trees and several copses and a few more substantial woodland blocks (e.g. Spoilbank Wood). Other 'open' land uses include, to the north-west of Hadley Wood, Wrotham Park, with Trent Park to the south-east; both are Registered Historic Parks & Gardens with the latter a Conservation Area and both contribute to the landscape character of the area (refer to Figure 3). By the railway cutting at Hadley Wood Station is an area of Local Open Space off Bartram's Lane (as designated through the borough's Core Strategy), with a playing field and more informal recreational uses, including walks and some woodland around the top of the cutting, and a primary school with playing field to the east of the railway line.
- 4.13 The more immediate landscape context of the potential allocated site and of the site itself comprises the mixed-farmed valley of arable and pasture, of the Monken Mead Brook, rising up an undulating valley side to the north and north-west to a wooded skyline. Settlement and roads to the north of the watercourse are sparse, with only the buildings of Ganwick Farm and a few scattered houses noticeable. The landscape is actively farmed, largely consistently throughout, and well-tended, with very little evidence of urban fringe uses, which otherwise affect the condition and appearance of countryside.

- 4.14 The existing urban edge formed by the houses and gardens of Camlet Way and Crescent Way, lies on the southern horizon line of this valley. This is a leafy, low density and high quality residential edge, generally two or two and half storey maximum and whilst some are large properties, the well-vegetated character of the gardens and street scene softens the built appearance considerably. The rear boundaries of these properties are also generally formed of vegetation or are more open with low level fencing and there is little presence of solid, higher fencing, or garden buildings and other paraphernalia at the interface of the gardens with the countryside. This soft edge is comparatively attractive, in its own right, and does not detract from the character and attractive appearance of the countryside beyond.
- 4.15 The potential allocation comprises three areas; a sloping, southern field of pasture/hay meadow onto which the rear gardens of a number of houses along Camlet Way and Crescent Way adjoin and overlook; a second, central and flatter field of pasture on lower lying ground than that to the south which adjoins a layby on Crescent Way, but otherwise is physically separate from the urban edge of Hadley Wood by a narrow drive or track known as Bartram's Lane and a wedge of mature woodland; and a third, much smaller, overgrown and wooded area, separated from the central field by the Monken Mead Brook. The southern and central fields are divided from each other by a tall mature hedgerow and the western boundaries of both fields, with the countryside beyond, are also formed of hedgerows with occasional hedgerow trees. Consistent with the landscape context, the condition of these fields is good, with the land well-tended and managed. The land uses of the two fields, the character of the vegetation across the potential allocation and the overall character of the site, their condition, is also consistent with the countryside to the west and north and, in visual terms, the land is clearly read as part of this countryside, as opposed to some other compromised urban fringe use.
- 4.16 Views out from the southern edge of the southern field are broad and relatively long range. Figure 7 identifies three photograph locations (S1-3) with the panoramic photos displayed at Figures 8 and 9. In these views the attractive qualities of the rolling countryside is evident, of which the potential allocation forms part as the immediate foreground. From location S1, in the south easternmost corner, the view is orientated to the west and north-west, with the wooded edge of Wrotham Park, amongst other woodlands, forming the horizon. From location S2, more centrally located, views are broader, including the edge of Wrotham Park, but also part of The Ridgeway horizon to the north-east. From location S3, in the south westernmost corner, the westerly views

are contained by the local vegetation and are more focussed on the longer range views to the Ridgeway horizon.

- 4.17 The character and appearance of the countryside is strongly rural, which is unexpected given its close proximity to a large urban area. Whilst not especially accessible, due to the relative absence of rights of way, where access can be obtained, such as across the Local Open Space and even along some roadsides, a moderate sense of tranquillity and remoteness can be obtained even at a short distance from the urban area.
- 4.18 Overall, the key landscape characteristics of the area can be summarised as follows:
- Attractive, rural valley comprising mixed farming across rolling topography with a mature vegetated character;
 - Scattered and inconspicuous settlement and development;
 - The good condition of the landscape, especially the almost complete absence of typical urban fringe uses;
 - The leafy, low density, high quality residential townscape edge;
 - The clear distinction between the urban area and the adjoining countryside; and
 - A moderate sense of tranquillity and remoteness.

Landscape Value

- 4.19 In evaluating landscape value, it is appropriate to consider a range of factors (as defined GLVIA3¹⁰) to understand the specific attributes of value which a landscape may have to a greater or lesser degree. Such aspects include, in turn, whether the landscape is afforded any national, regional or local designation and/or any management policies which recognise particular values, its landscape condition, scenic quality, rarity, representativeness, conservation interests, recreation value, perceptual aspects and, also, its associations, typically in art or literature. It is also important to define the area being considered. In this case, the appropriate area is the immediate landscape context of the potential allocation plus the site itself (as described in paragraphs 4.13 to 4.15 above); this is a triangular area bounded by the urban edge of Hadley Wood, Barnet Road to the west, and the railway line and tunnel to the north-east. The table below sets out the assessment of landscape value against the criteria above.

¹⁰ Box 5.1 page 84 Guidelines for Landscape and Visual Impact Assessment

Landscape unit	Landscape Designation	Landscape Value Aspects	Assessment (overall evaluation highlighted)
Immediate Landscape Context including the potential allocation (as identified above)	Designated as an Area of Special Character in Development Management Document 2014	Landscape Condition	Good-Very Good , active mixed farming uses and well-tended
		Scenic Quality	Moderate-High , attractive rolling and mature countryside, with sparse, inconspicuous development
		Rarity	Not rare but largely consistent with both landscapes to the west (outwith the borough) and east (within the borough)
		Representativeness	Strongly characteristic of wider landscape context both within and outwith the borough
		Conservation Interests	Moderate and related predominantly to the pasture, hedges and woodland
		Recreation Value	Moderate-High , not especially accessible but it includes the designated Local Open Space with playing field and informal recreational area of grassland and woodland
		Perceptual Aspects	Moderate sense of tranquillity and

			remoteness, which is unexpected given the proximity to the urban area
		Associations	Understood to be relatively limited

4.20 These assessments are broadly consistent with the findings of the Enfield Characterisation Study, 2011, description for the Hornbeam Hills South landscape character area, which recognises the attractiveness of this area of countryside. It is considered that the landscape context of the potential allocation and the site itself, is of a moderate to high level overall and of clear borough and countywide importance. Its current designation as an Area of Special Character, through the Development Management Document 2014, recognises this value. Paragraph 174 of the NPPF requires that planning policies and decisions should protect and enhance “*valued landscapes*”. This assessment concludes that this landscape is a valued landscape for the purposes of Paragraph 174.

5.0 LANDSCAPE AND VISUAL APPRAISAL

5.1 This section sets out a high-level landscape and visual appraisal of the potential development on the proposed allocation, based on the methodology and approach outlined in Section 3.0.

Visual Effects

5.2 The ZTV (Figure 6) indicates that a combination of the topography, vegetation and built urban edge define the potential extent of visibility of development at the potential allocation to the horizon lines of Barnet Road and Wrotham Park, to the west, the wooded horizon to the north and north-east, up to the M25 and along The Ridgeway, and the leafy, urban edge of Hadley Wood to the south and south-east. The ground level photographs from the site (at Figures 8 and 9) broadly support the findings of the ZTV in this respect.

5.3 The extent of the visibility of the potential development across the landscape context of the site, as defined in the section on landscape value above, is relatively significant, perhaps around 50% of the area. To the east, the areas with views of the potential development would be more sporadic, broken by the Waggon Road ridgeline along the northern edge of Hadley Wood and woodland around the railway tunnel, and related to the higher ground in this area.

5.4 The ZTV shows the extent of visibility of the development with building heights at 7.5m (in pink), 11m (in yellow where this is in addition to the pink areas) and 21m (in purple where this is in addition to both the pink and yellow areas). These indicate little difference between the three alternatives, in terms of extent, but the issue of the magnitude of the visual effect may differ, of course, as considered below.

5.5 The key publicly accessible views are as follows (refer to Figure 7 for the selected viewpoint locations):

- Close range views from the Local Open Space to the north-east (Viewpoints 1-3, Figures 9 and 10);
- Mid distance views from Wagon Road from in the vicinity of Ganwick Farm (Viewpoints 4 and 5, Figure 11);

-
- Mid and slightly longer distance range views from Barnet Road to the west and north-west (Viewpoints 6-8, Figure 12 and 13);
 - Broad, long range views from the elevated location of The Ridgeway (Viewpoint 9, Figure 13); and
 - a small area of close range views from within the urban area at the lay-by on Crescent Way.

5.6 Visual receptors, i.e. people, using the Local Open Space, in this location, can be considered to be highly susceptible to visual change to the type of development envisaged. The value of the location and its amenity is high as well and, therefore the overall sensitivity of visual receptors to visual change is high. Despite the proximity of the Local Open Space to the urban area, the character of the area is predominantly rural, with only occasional glimpsed views of buildings possible. The elevated nature of the northern part of the space provides open views of much of the southern field and parts of the central field, depending on exactly the location chosen. In all instances, the potential development would be conspicuous and, although partially screened by intervening vegetation, much less well screened than the existing urban area. Its presence would strongly contrast with the existing urban edge and would appear out of context in the rural setting. It would adversely alter the current balance in favour of the rurality of the scene, to one where a new urban edge would be highly noticeable and detrimental to the otherwise attractive countryside. The magnitude of the adverse change would be substantial on visual receptors of the valued and popular Local Open Space. Buildings above two-storeys would be particularly conspicuous, even if restricted to the lower lying central field.

5.7 Visual receptors, with views from in the vicinity of Ganwick Farm, on Wagon Road, and from Barnet Road, are located on public highways at less than 1km from the site. Whilst their susceptibility to change may also be relatively high, the location by the road reduces their overall sensitivity. From Wagon Road at Ganwick Farm, the surface of part of the southern field is largely, openly visible; the surface of the central field only partially so. Development on the central field would though be visible above some of the intervening vegetation and would contribute the adverse visual change created by open views of development on the higher, southern field. The magnitude of these visual changes would be less than from the nearer and even more open views from the Local Open Space. The degree of effect would be a noticeable adverse visual effect, with again, the new development standing in strong contrast to the rural character of the scene and with the leafy and largely inconspicuous existing urban edge. As with the views from the Local

Open Space, buildings above two-storeys would be particularly conspicuous, even if restricted to the lower lying central field.

- 5.8 From Barnet Road, due to the height and density of the roadside hedgerow at the time of the assessment, the views towards the allocation were more restricted than the more open nature of the section of Wagon Road near Ganwick Farm. With the hedgerow trimmed, more frequent views would be possible. Where the views are available the extent of the surface of the two fields in the view is less than seen from Ganwick Farm, with Viewpoint 7 offering the greatest extent of view of the development, the new development would be seen in an attractive rural context and against the well vegetated existing urban, edge within which the existing built form is inconspicuous. The magnitude of the visual effect of the views of the new development, from Barnet Road, would be somewhat less than from Ganwick Farm, due to the slightly greater distance (over 1km from the site) and the greater screening afforded in these views, but would still be noticeable in this context. Again, taller buildings would be more conspicuous.
- 5.9 The views from The Ridgeway would be from around 2.5km from the site. Whilst the context is rural and attractive, more of the urban area is visible from this location than from the others to the west. The magnitude of the visual effect on these views would be limited given the distance and context.
- 5.10 The final group of publicly accessible views is the small area of the urban area in the vicinity of the lay-by on Crescent Way. These are urban views which whilst the tree removal by the lay-by and presence of new buildings would be noticeable, and potentially substantial depending how the scheme would be executed, the sensitivity of people in this vicinity would be less than in locations within the rural area where expectations and sense of enjoyment of the landscape is likely to be less. The adverse effects of these changes on the character and appearance of the Conservation Area are a matter for a heritage specialist and may be more significant than the visual effects.
- 5.11 Overall, this assessment of the potential visual effects highlights that from the publicly accessible locations within the countryside that the development of the potential allocation would have an adverse visual effect on visual receptors enjoying the Local Open Space and countryside to the west, north and north-east. A substantial magnitude of effect would be experienced by users of the Local Open Space, in which the development's presence would detract from the attractive countryside and strongly contrast with the existing urban edge.

Landscape Effects

- 5.12 The assessment of landscape susceptibility for the landscape context of the potential allocation and the site (as defined in section 4), is based on judgements of the degree of susceptibility of the landscape to the specific form of development envisaged. Those key characteristics of this landscape that are considered to be more susceptible (to effects) are the attractive, rural and relatively undeveloped character of the landscape, the long views across to the wooded edge of Wrotham Park and The Ridgeway, the leafy, low density of the existing urban edge and the clear distinction this promotes with the countryside and the moderate but unexpected sense of tranquillity and remoteness that this landscape area provides, despite its near proximity to a large urban area. Those key characteristics that are less susceptible and provide some degree of potential to limit effects are the robust hedgerows and woodland, in that these features can help to visually screen development into the landscape; there are few characteristics of this landscape, therefore, that would assist in absorbing the development. The susceptibility of the landscape to new development of the type broadly envisaged is considered to be high.
- 5.13 Combining the high susceptibility of the landscape to this form of development with its moderate to high value, means this is a landscape with a high sensitivity to change. The potential magnitude of the landscape effect would be a substantial adverse one, in which the development would become a prominent new characteristic feature of the landscape, would be seen to contrast with the existing attractive rurality and would stand out starkly against the existing leafy, low density urban edge.

Effect on the Green Belt

- 5.14 LUC's Green Belt and Metropolitan Open Land Study, Final Report, June 2021, considers the potential allocation as Site LP465 in the Site Assessment Proforma at Appendix D of the report. The LUC assessment method considers each parcel's contribution to the relevance of each of the five purposes of the Green Belt (as defined at Paragraph 138 of the NPPF) and openness. For the first of the three purposes the parcel's distinction from the urban area is assessed, i.e. the extent to which the land is associated with the urban area or with the wider countryside. The fifth purpose, which is to do with assisting in urban regeneration, is considered to be equally strong for all land parcels considered. This method is well-established, and LUC are highly experienced at

such assessments, having undertaken many similar Green Belt assessments for local planning authorities.

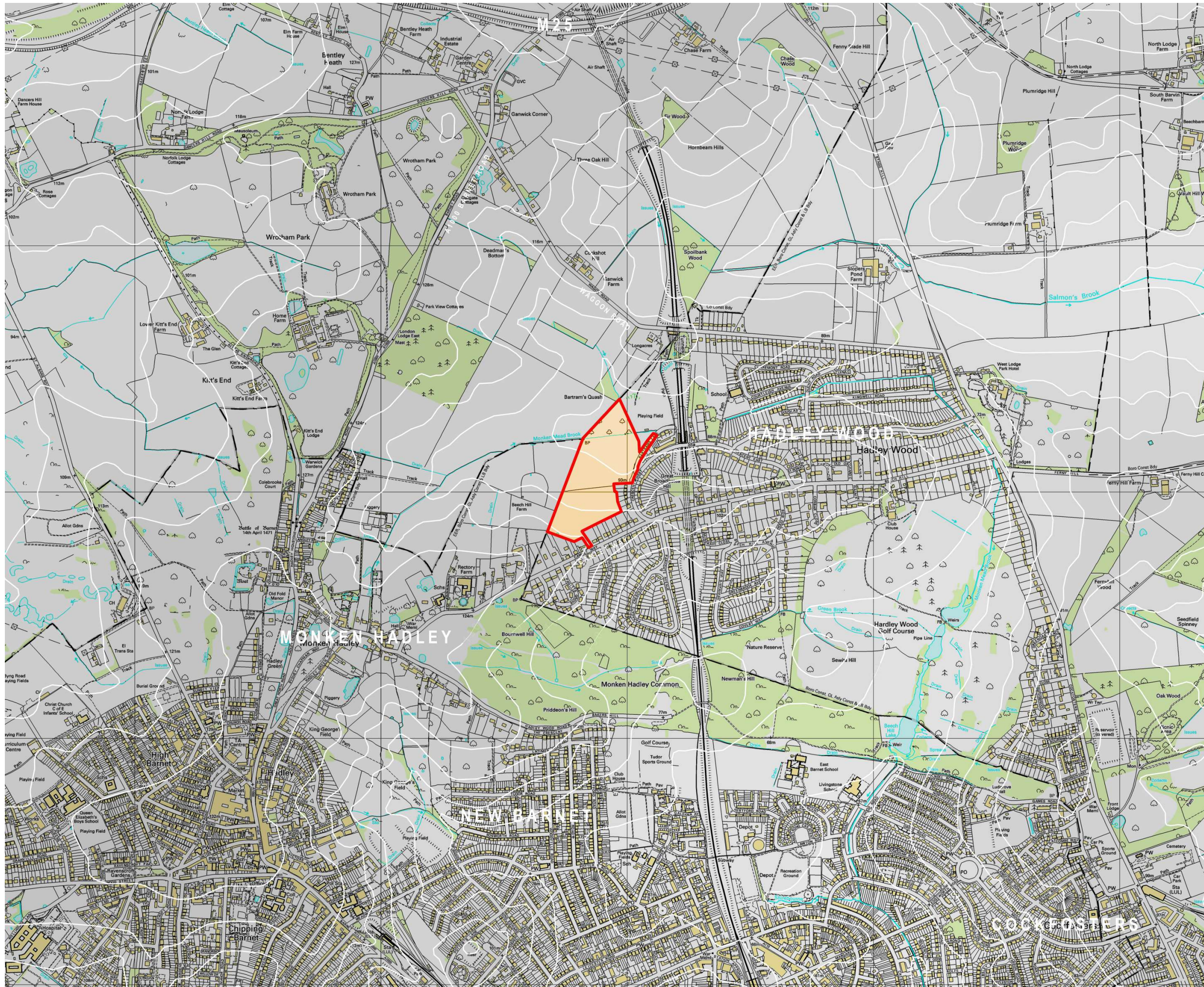
- 5.15 LUC found that for Purpose 1, checking the unrestricted sprawl of large built-up urban areas, that the potential allocation has a strong distinction from the urban area and performed a *Strong* role (as defined in the report). For Purpose 2, preventing neighbouring towns merging not one another, the site is peripheral to a gap between Greater London and Potters Bar and would perform a *Moderate* role. For Purposes 3 and 4, respectively safeguarding the countryside from encroachment and preserving the setting and special character of historic towns, LUC found the contribution of the site to be *Strong* in both cases; they identify the openness and strong distinction between the site and the urban area, as well as noting the Conservation Area Appraisal's reference to the attractive breaks in the street frontage and views out to the northwest of hills and woods.
- 5.16 In Appendix B LUC conclude the harm of releasing the land would be *High*, although LUC states this to be *Very High* in the body of the report. They note that the release would result in a minor impact on the distinction of adjacent Green Belt land to the west due to the availability of a regular and consistent boundary. However, this appears to be predicated on the basis that the land to the north-east (the Local Open Space) be included in the release to allow for the continuation of the consistent and well-defined boundary. Evidently, the Local Open Space is likely to be an absolute constraint to development and such a release would be inappropriate. LUC also consider releasing the southern field (and Local Open Space too) separately to the central field. Whilst this would to the advantage of the Conservation Area and Purpose 4, it is likely to be impracticable, as there would be no point of access.
- 5.17 It is considered that the Council should ask LUC to reconsider the assessment of harms in the context that the Local Open Space cannot come forward for development and is inappropriate for release and that the southern field cannot also come forward for release without the central field. Notwithstanding the need for some corrections, the LUC assessment demonstrates that the contribution of the potential allocation to the Green Belt is strong and that harm of releasing it to Green Belt land would be at least high, possibly very high.

6.0 CONCLUSIONS

- 6.1 This Landscape and Visual Appraisal is a 'high-level' assessment of a potential strategic development site identified in the London Borough of Enfield Local Plan, which has reached the Regulation 18 Consultation stage. The main aims of this appraisal are to define the principal landscape and visual effects of the potential development, including on the Green Belt.
- 6.2 The Enfield Local Plan Regulation 18 Consultation stage is identified as an 'Issues and Options' version of the Local Plan which provides for a preferred approach for where growth can be delivered. This is stage one in a process towards adoption of a new Local Plan that will replace the Core Strategy and Development Management Document. The NPPF requires that Council's found their policies on an up to date evidence base. The published evidence base includes a review of the Green Belt boundaries but no similar review of the AOSC and there is no AOSC policy in the pre-draft plan.
- 6.3 The AOSCs were first designated in the 1994 Unitary Plan, although the Hornbeam Hills South area was not included at that time. Through the Enfield Characterisation Study of 2011 and the Development Management Document 2014, the AOSCs were refined and expanded to include the Hornbeam Hills South area, including the potential allocation. The Council can, of course, decide not to bring forward AOSCs in the emerging plan, although the plan as drafted does make passing references to AOSCs, but such an approach would require justification and would not accord with the findings of the characterisation work. This assessment has found that the landscape to the north-west of Hadley Wood is of moderate to high value, of clear borough and countywide importance, and should be considered a valued landscape for the purposes of Paragraph 174 of the NPPF. It would, therefore, be appropriate to be included as or as part of landscape designation and accordingly afforded a higher level of protection, as envisaged by the NPPF.
- 6.4 LUC's Green Belt study for the Council finds that the contribution of the potential allocation to the Green Belt is strong and that harm of releasing it to Green Belt land would be at least high, possibly very high, if corrected as this assessment proposes. Nevertheless, the Regulation 18 Consultation plan proposes allocation of the land.
- 6.5 This assessment concludes that the potential visual effects on the publicly accessible locations within the countryside demonstrate that the development of the potential allocation would have an adverse visual effect on visual receptors enjoying the Local Open Space and countryside to the west, north and north-east. A substantial magnitude

of effect would be experienced by users of the Local Open Space, in which the development's presence would detract from the attractive countryside and strongly contrast with the existing urban edge. The potential magnitude of the landscape effect would be a substantial adverse one, in which the development would become a prominent new characteristic feature of the landscape, would be seen to contrast with the existing attractive rurality and would stand out starkly against the existing leafy, low density urban edge.

- 6.6 Release of this land for development would have significant landscape and visual harms and that the harm to the Green Belt would be high, possibly very high.



KEY



Site location

revision	date	description	dwn	chkd

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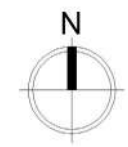
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Site Location	JT

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drawing number	revision
04-1031 - FIGURE 1	*

04-1031 - FIGURE 1

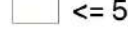
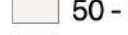

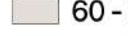




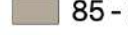










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KEY

-  Site location
-  Areas of significant vegetation

**Camlet Way ZTV
Elevation shading
(metres AOD)**

-  <= 50
-  50 - 55
-  55 - 60
-  60 - 65
-  65 - 70
-  70 - 75
-  75 - 80
-  80 - 85
-  85 - 90
-  90 - 95
-  95 - 100
-  100 - 105
-  105 - 110
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-  115 - 120
-  120 - 125
-  125 - 130
-  130 - 135
-  > 135

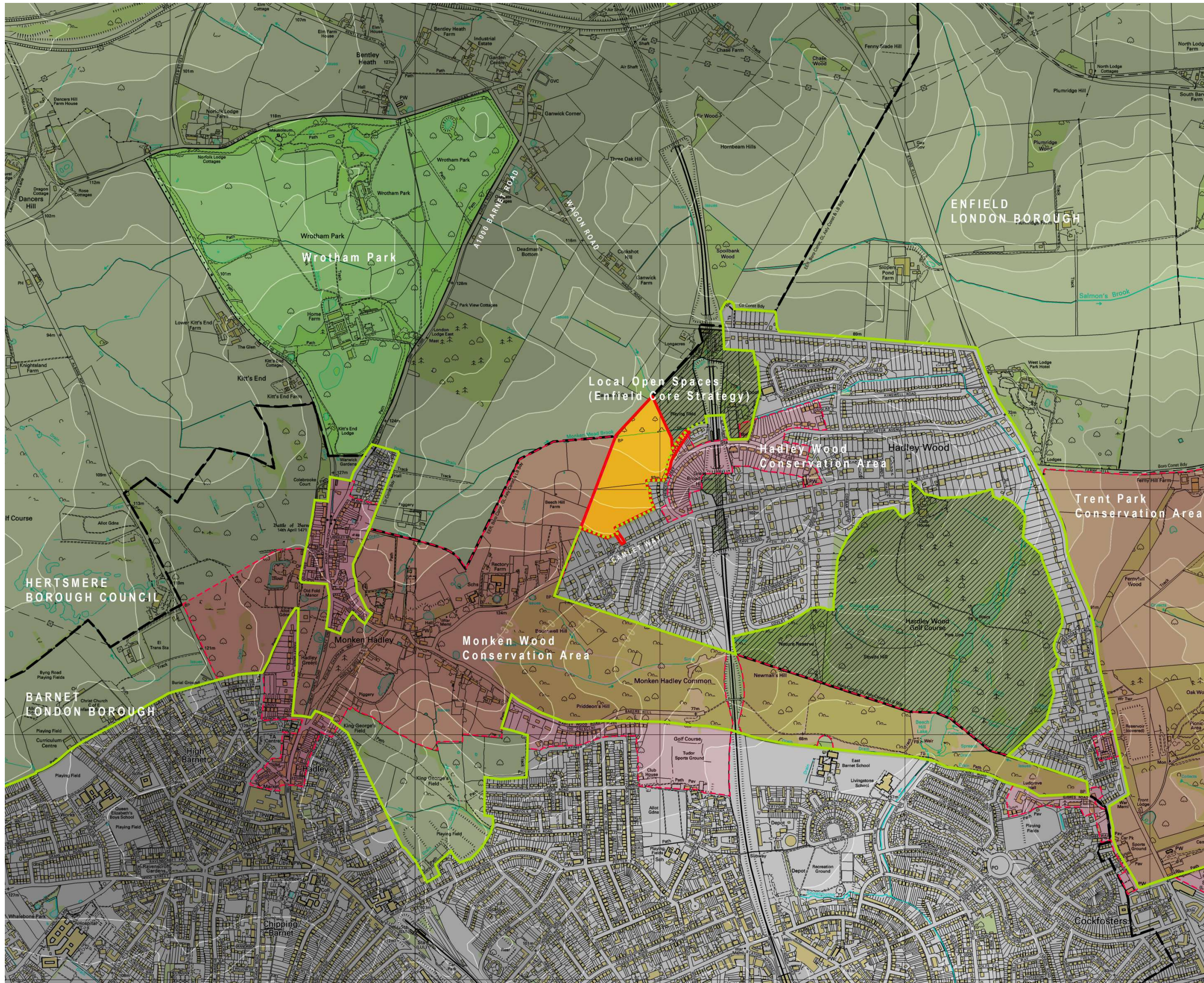
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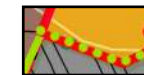




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Surface Buffers higher than 1m	JT
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drawing number	revision
04-1031 - FIGURE 2	*



KEY

-  Site location
-  Green Belt
-  Registered Parks and Gardens
-  Open Space
-  Conservation Areas

revision	date	description	dwn	chkd
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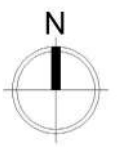
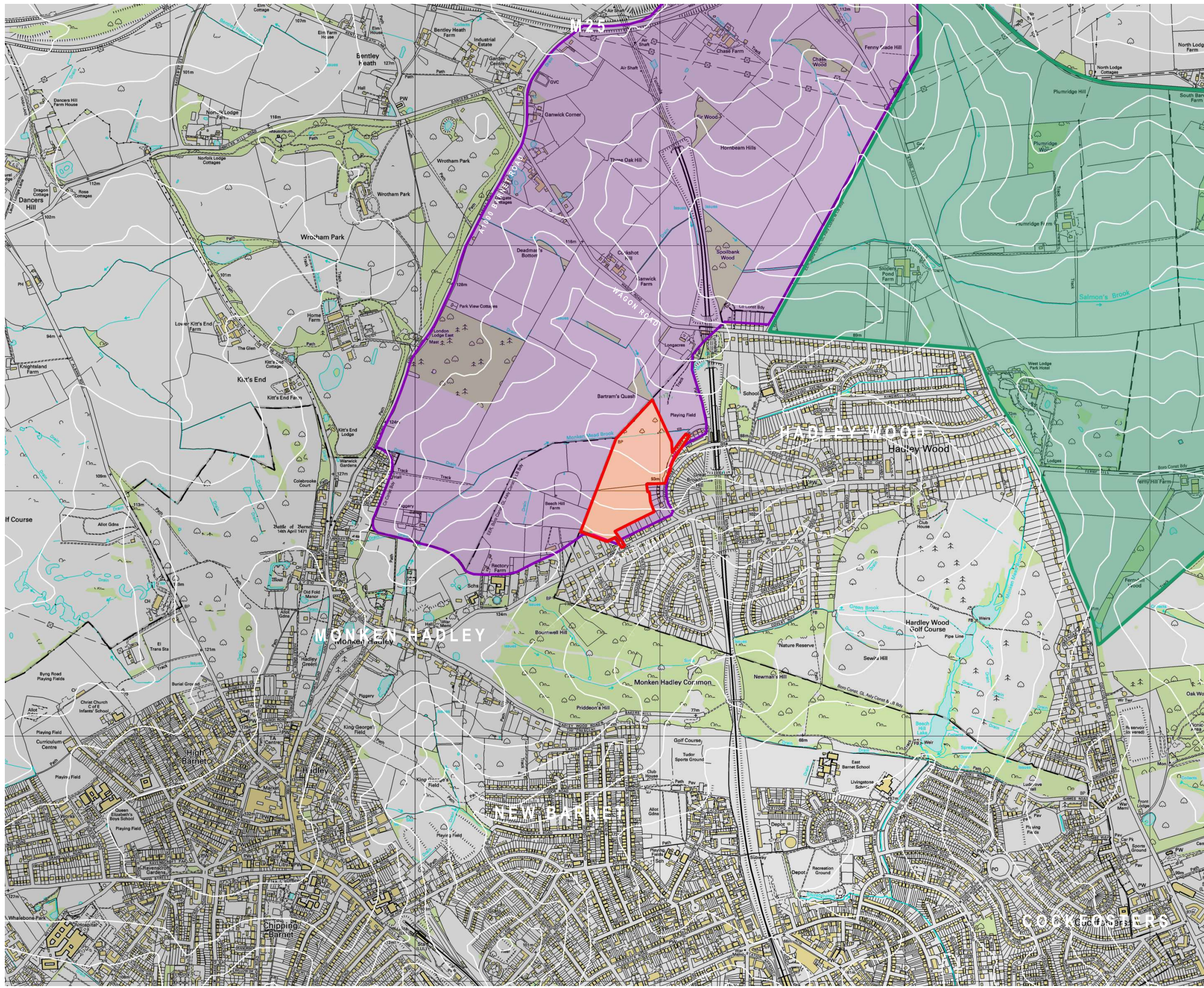
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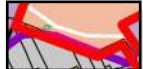


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title	drawn by
Landscape Planning Designations	JT
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	PRV
drawing number	revision

04-1031 - FIGURE 3 *



KEY

-  Site location
-  Character Area
(1F Hornbeam Hills South)
-  Character Area
(1A Salmon's Brook Valley)

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Landscape Character Areas	JT

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04-1031 - FIGURE 4	*

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04-1031 - FIGURE 4 *



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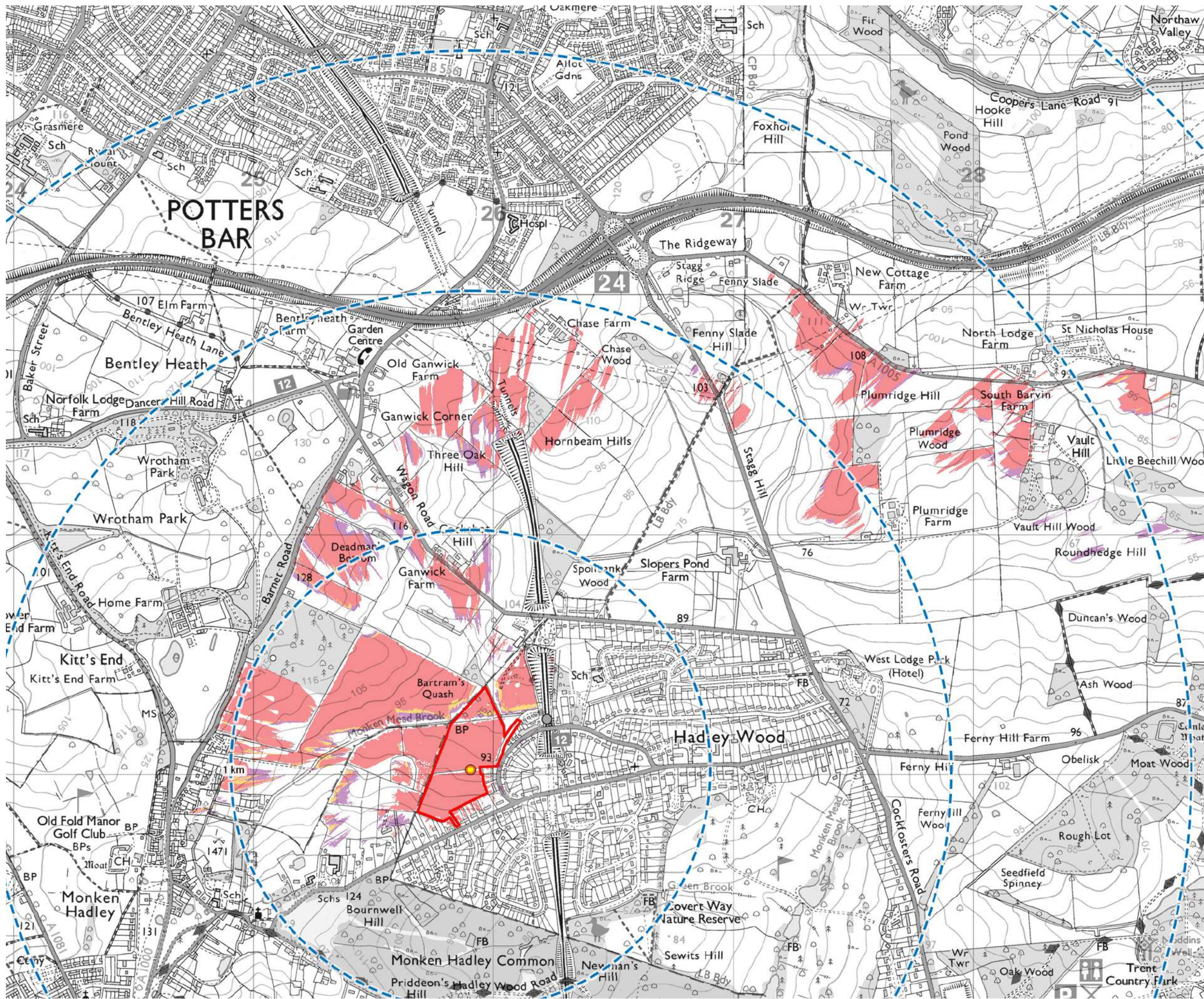
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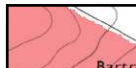


Marker Boundary	JT
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drawing number	revision
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04-1031 - FIGURE 5	*
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KEY

-  Site location
-  Red unobstructed, views at 7.5m.
-  Orange unobstructed, views at 11m.
-  Purple unobstructed, views at 21m.

revision	date	description	dwn	chkd

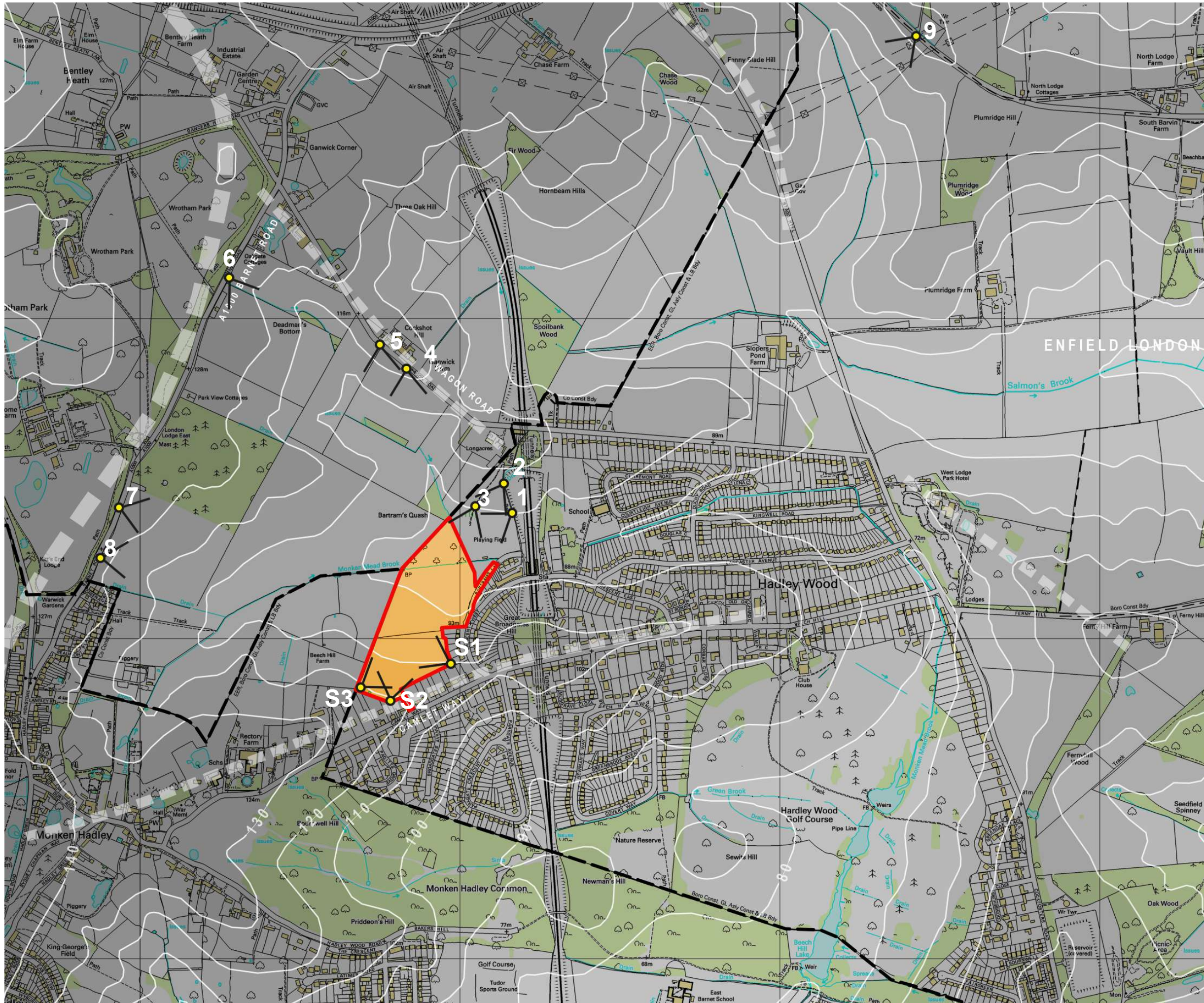
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04-1031 - FIGURE 6 *



KEY

-  Site location
-  Ridge lines
-  Photograph Viewpoint Location

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photograph viewpoint
locations

drawing number	revision
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04-1031 - FIGURE 7 *



Site View S1: View across the site from the south east corner



Site View S2: View across the site from the southern boundary

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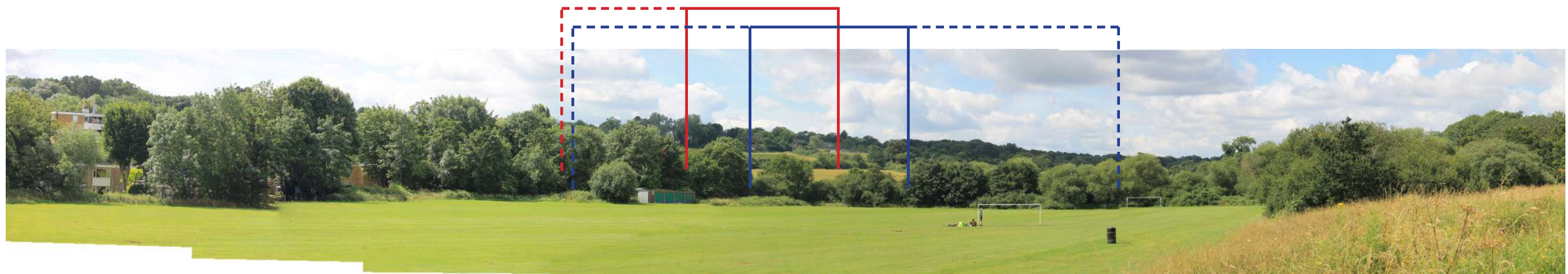
Photograph Viewpoints Site 1 and Site 2	JT
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04-1031 - FIGURE 8 *



Site View S3: View across the site from the south west corner



Viewpoint 1: View south west towards site from local open space

- Land within the southern field in the view
- - Estimated extent of southern field where screened
- Land within the northern field within the view
- - Estimated extent of northern field where screened

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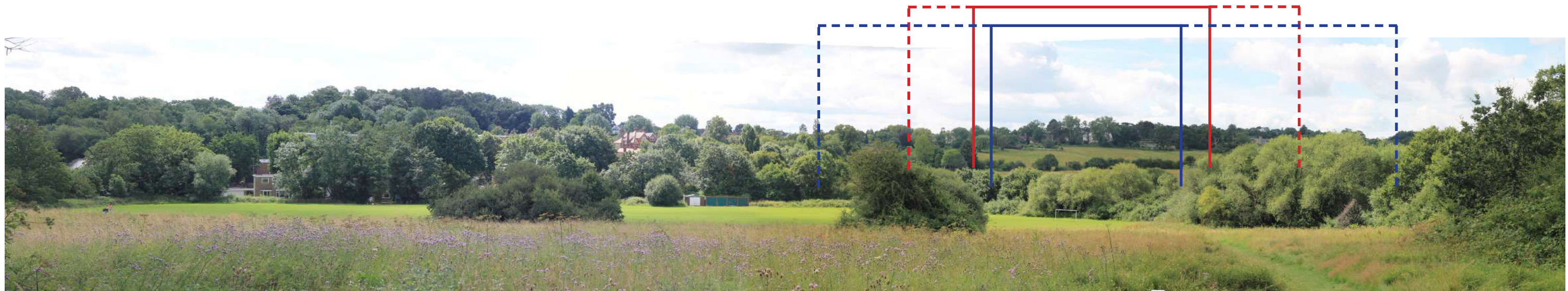
Photograph Viewpoints Site 3 and 1	JT
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04-1031 - FIGURE 9	*
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Viewpoint 2: View south west towards site from local open space



Viewpoint 3: View south west towards site from local open space

- Land within the southern field in the view
- - - Estimated extent of southern field where screened
- Land within the northern field within the view
- - - Estimated extent of northern field where screened

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Photograph Viewpoints 2 and 3	JT
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drawing number	revision
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04-1031 - FIGURE 10 *



Viewpoint 4: View south towards site from Waggon Road



Viewpoint 5: View south towards site from Waggon Road, opposite Garnwick Farm

- Land within the southern field in the view
- - Estimated extent of southern field where screened
- Land within the northern field within the view
- - Estimated extent of northern field where screened

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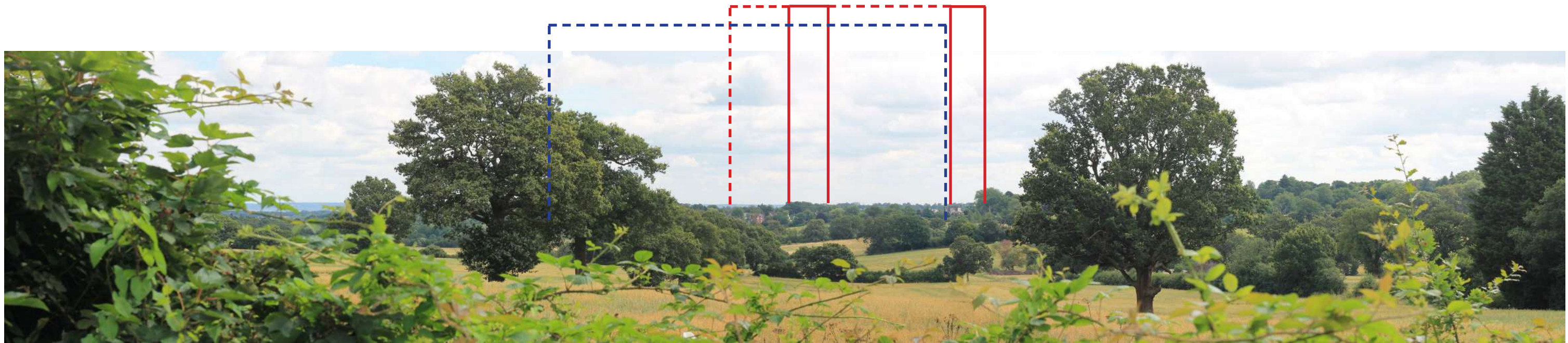
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Photograph Viewpoints 4 and 5	JT
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drawing number	revision
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04-1031 - FIGURE 11 *



Viewpoint 6: View south towards site from Barnet Road, south of Wrotham Park



Viewpoint 7: View south east towards site from Barnet Road

- Land within the southern field in the view
- - - Estimated extent of southern field where screened
- Land within the northern field within the view
- - - Estimated extent of northern field where screened

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title	drawn by
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Photograph Viewpoints
6 and 7

JT

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PRV

drawing number	revision
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04-1031 - FIGURE 12 *



Viewpoint 8: View south east towards site from Barnet Road



Viewpoint 9: View south west towards site from The Ridgeway

- Land within the southern field in the view
- - Estimated extent of southern field where screened
- Land within the northern field within the view
- - Estimated extent of northern field where screened

revision	date	description	dwn	chkd
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project	scale
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Land between Camlet Way and Crescent West, Hadley Wood	date
	09.08.2021

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Photograph Viewpoints 8 and 9	JT
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drawing number	revision
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04-1031 - FIGURE 13 *

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