

Examination of the Welwyn Hatfield Local Plan 2013 – 2032

Regulation 19 (Submitted Sites)

Cuffley

Policy SADM 33, Sites HS28, HS29 and HS30

Statement on behalf of CPRE Hertfordshire by

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Introduction

1. This statement has been prepared by Jed Griffiths MA DipTP FRTPI on behalf of the Campaign to Protect Rural England Hertfordshire (CPREH). It has been compiled in response to an invitation by the Examination Inspector to submit further material to be considered at the Stage 8 hearing sessions. This statement addresses matters, issues, and questions with regards to areas of land allocated for housing at Cuffley, under Policy SADM 33. The three sites are as follows:
 - HS28 (Cuf6) Land south of Northaw Road East
 - HS29 (Cuf12) Land north of Northaw Road East
 - HS30 (Cuf7) Wells Farm, Northaw Road East
2. At the Regulation 19 stage, CPREH made representations objecting to the allocation of the sites. Where appropriate, reference will be made to these submissions, and to points made in respect of previous hearing sessions. The main purpose of this statement, however, is to respond to the issues and questions set out by the Inspector in the schedule published on 17th March 2020.

Matter 1 – Environmental Considerations (Questions 168 – 181)

3. CPREH notes that the Draft Local Plan, at Table 17 refers to the need for a flood risk assessment to be carried out for these sites at the planning application stage. The text also states that SUDs design would need to take account of local topography to manage overland flows. In the view of CPREH a flood risk assessment should be carried out for the whole of the area to the east of Cuffley. Although the three sites are in Flood Zone 1, the area does slope markedly from north to south, along the Northaw Road. The wider risk from surface water flooding needs to be fully assessed.
4. In response to Questions 176 – 179, CPREH believes that the three sites are far enough from the Sites of Special Scientific Interest (SSSIs) not to have a harmful impact on the habitats and species. There is an issue, however, with regards to the impact of the proposals on the wider countryside landscape. All three sites are located on the south side of Cuffley beyond the settlement boundary. This area slopes markedly towards the south.
5. In the Landscape Sensitivity Assessment (EX156), site HS28 is within Landscape Character 55 Theobalds Estate, which is to the south-west of Cuffley. The whole of this area was assessed as “moderate”, although the site itself was assessed as a sub-area (55a) which was rated as “low-moderate”

6. By contrast, sites HS29 and HS30 were located within Landscape Character Area 53 Northaw Common Parkland, with a rating of “moderate/high”. The sites themselves were assessed as sub-area 53c, with a similar rating.
7. CPREH was critical of the differing ratings for the areas and sites to the east and west of the Northaw Road East. The methodology fails to acknowledge the strategic importance of the wide sweep of open countryside to the south and south west of Cuffley, which defines its setting. This can be appreciated in the long-distance views and vistas towards the village from areas to the south. Any development beyond the settlement boundary would detract from this aspect of Cuffley, set in a rural landscape. This point is only partially recognised in the Green Gap Assessment (EX160) which included a study of the gap between Cuffley and Crews Hill. The report concluded that a “gap policy area” was not required because of the distance between the two settlements.
8. The Green Gap Assessment also included an analysis of the gap between Northaw and Cuffley, which seemed to contradict the conclusions on the gap between Cuffley and Crews Hill. The study recognised the qualities and sensitivities of the landscape between Northaw and Cuffley and recommended that there should be a “gap policy area.”

Matter 2 – Infrastructure (Questions 182 – 192)

9. With regards to infrastructure, CPREH has a particular concern about the potential impact of the proposed developments on highway capacity and safety. The main access points for the developments would be on Northaw Road East (B156), a busy road leading from Cuffley to Northaw, as well as to Crews Hill and Enfield. Traffic leaving the village tends to accelerate sharply downhill, passing the entrance to the King George V recreation grounds. This stretch of highway is particularly busy at peak travel times and is a popular diversionary route between the A10, Potters Bar, and Barnet, avoiding the M25. Should the three sites be developed, with up to 257 dwellings, improvements would undoubtedly be necessary on Northaw Road East, and in the centre of Cuffley.

Matter 3 – Sustainability (Questions 193 – 197)

10. The sites range up to 1.5 KM from Cuffley Station, a significant distance to walk. As noted above, Northaw Road East (B156) is a particularly busy road with narrow pavements and fast-moving traffic. The speed limit beyond the built-up area is 40 mph, which is often exceeded. This does not provide an attractive option for walking and cycling trips into the centre of Cuffley, or to wait for the limited bus services from the proposed development sites. To illustrate this point, a photograph of Newgate Street Road East, adjacent to the sites is attached to this statement.

11. In these circumstances, CPREH fundamentally disagrees with the sustainability appraisal which has assessed the sites as having significant positive ratings for transport and air quality. Owing to the distance and the unattractive nature of journey routes, residents would be extremely car-dependent – the sites should therefore have minor negative or significant negative impacts. Clearly, they are not a sustainable location.

Matter 4 - Green Belt (Questions 198 – 217)

12. In the introduction to this Matter, the Inspector has referred to the conclusions of the Stage 3 Green Belt Review (EX99A – E). CPREH has noted the differing assessments relating to sites HS28 (“moderate/high”) and HS29/30 (“high”). Site HS28 was included in assessment parcel P88, which had an overall harm rating of “moderate/high”. The site itself, however, was included in the assessments of sub-parcels P88c and P88d, with a rating of “moderate”.

13. By contrast, sites HS29 and HS30 were include in assessment parcel P87, which rightly had an overall rating of “very high”. The boundary between this parcel and P88 was defined as Northaw Road East, which in the view of CPREH was somewhat arbitrary.

14. Despite the above results, the two assessment parcels were not identified as areas of “most essential” Green Belt. CPREH contests this view. In its critical comments on the draft review (December 2018), CPREH pointed out that national policy requires that all Green Belt identified in the Borough should remain as such. Thus, all three sites should remain in the Green Belt, as they contribute to its purposes, and its sense of openness.

15. With regards to site HS28, the proposed new boundary is defined mainly by a hedge, separating the site from the King George V playing fields. The existing boundary, however, clearly defines the built-up edge of the village, and is more robust. The Green Belt includes the buildings and open grounds of the local junior school. It should also be noted that the site itself is good quality agricultural land, used for the growing of high yield crops. There should be no change to the existing boundary line.

16. In summary, the assessment of “moderate/high” harm is a sound reflection of the contribution that site HS28 makes to the purposes and openness of the Green Belt on the southern edge of Cuffley. Thus, the allocation of the site is neither justified, nor affective, nor consistent with national policy as set out in the National Planning Policy Framework (NPPF) 2012. As CPREH has expressed in its representations at earlier hearings, there are no exceptional circumstances to release the site from the Green Belt.
17. In response to the Inspector’s questions on sites HS29 and HS30, CPREH consider that they do impinge meaningfully on the gap between Cuffley and Potters Bar. Moreover, the development of these sites would also encroach on the open countryside, in a wider gap between Cuffley and Enfield, on the northern edge of Greater London. As explained above, the sloping topography to the south of Cuffley means that the sites are part of a wider vista. In this sense, they are checking the outward sprawl of Greater London, as well as containing the outward expansion of Cuffley.
18. As outlined above, the southern boundary of Cuffley very clearly marks the definition of the built-up area. There a clear division between the village and the countryside beyond. As such, the existing boundary is exceedingly robust – the proposed new boundary would therefore be weak and is most inappropriate.
19. Bearing in mind the characteristics of the sites, CPREH agrees that the assessment of “high harm” is a sound interpretation that they make to the purposes and openness of the Green Belt. It is the firm view of CPREH the allocation of the sites for development is neither justified, nor effective, nor consistent with national policy in the NPPF 2012. There are no exceptional circumstances which would justify the release of the sites from the Green Belt.

Matter 5 – Implementation (Question 218)

20. CPREH has no comments to make in response to this question.

Policy SADM 33 Site HS28 (Cuf6) Land south of Northaw Road East (Questions 222 - 2250)

21. A total of 108 dwellings are proposed on the site, which seems to imply a higher density. This is not appropriate on the edge of the village in such a prominent position.

Policy SADM 33 Site HS29 (Cuf12) Land North of Northaw Road East

Policy SADM 33 Site HS30 (Cuf7) Wells Farm, Northaw Road East

Questions 226 and 227

22. CPREH has expressed some concerns about odour from the anaerobic digestion plant between Cuffley and Crews Hill. This is clearly a factor, but insufficient to weigh against the development of these sites.

Summary

23. In summary, CPREH has structured this statement so as to follow the sequence of the questions as set out in the schedule. In its original Regulation 19 submission, however, CPREH made the point that, taken together, development of the three sites would amount to a major linear projection of Cuffley south-westwards into the sensitive area of Green Belt between the village and the edge of London.

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Hertford

21st April 2020