

**Examination of the Welwyn Hatfield Local Plan 2013-32  
Regulation 19 (submitted) sites in or adjacent to villages  
INSPECTORS' MATTER AND ISSUES  
Southern Settlements**

**Cuffley**

**Policy SADM 33 Sites HS26-31 (Cuf 1, 6,7 & 10 and No 02 & 10)**

At paragraph 100 the National Planning Policy Framework (NPPF) says that Local Plans should develop policies to manage flood risk from all sources. It also points out at para. 109 that the planning system should prevent new and existing developments from contributing to or being put at unacceptable risk from or being adversely affected by unacceptable levels of water or noise pollution. At paragraph 123 it further points out that planning policies should avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development. There is significant representation against these sites in the context of the possible contribution their development could make to off-site flooding.

Flooding is an issue specifically on the B156 adjacent to HS29

168) How would the surface water from these sites be managed comprehensively and individually?

169) Has a flood risk assessment been carried out? **The Strategic Flood Risk Assessment (SFRA) notes that the area is subject to potential overland flow. Flood zones 2 and 3 (Environment Agency) extend into the area on its western boundary that runs adjacent to Hempshill Brook. The Strategic Flood Risk Assessment notes that flood zones 2 and 3a extend into the north western part of the area and that flood zones 2, 3a and 3b are present on the south western boundary of the area.**

170) Are there any on or off-site ramifications for flood risk that would result from the implementation of some or all of the proposed developments?

**Currently, whenever there is high rainfall, regular and persistent flooding occurs on the B156 adjacent to the HS29 site. This is sufficient to reduce the traffic to a single lane only. The HS29 site is steeply sloping and flooding is caused by runoff from the land. This would be exacerbated further by development on this site as currently it is agricultural land which has at least some absorptive capacity compared with housing and the hard surfaces which would result. The adjacent HS30 site is also steeply sloping and drainage would be an issue here too.**

**The increasing frequency of extreme weather events due to climate change is likely to increase the frequency of flooding here in the future.**

**It should be noted that the area is well known for springs which run in times of high rainfall.**

HS27 has Cuffley Brook on its boundary which could also potentially cause flooding

171) If so how are they to be mitigated?

172) Would the sites' development require (a) balancing pond(s)? **This would be difficult on such a sloping site (HS29 and 30)**

173) If so, how extensive would this/they be and where would it/they be located?

174) How would foul drainage be dealt with?

175) Are there any foul drainage constraints that would impede the implementation of any of the developments?

**Development at HS27 would have to connect to the existing drainage system along The Meadway which is already overloaded. There have been issues with blockages in properties on The Meadway which Thames Water are aware of. The existing foul water drainage was installed when the houses were built in the 1930's and area seen as inadequate for moderns usage.**

176) What impact would the proposals have on the wider countryside landscape? In particular on, Broxbourne Wood, Hoddesden Park Wood and Northaw Great Wood SSSIs.

**The increase in households would potentially lead to increased footfall in Northaw Great Wood SSSI. Currently the Country Park which is within the SSSI is heavily used almost exclusively by dog walkers, which has a detrimental effect on wildlife in the woodland due to disturbance. Northaw Great Wood can be accessed directly by footpaths from HS29 and HS30.**

177) Is any harm likely to be adverse and if so to what extent can the harm be overcome through mitigation? **No mitigation possible.**

178) Would there be any long-term impact on the wildlife at these sites from the development of any of the Cuffley sites? **Potentially yes**

179) If so would there be any potential unacceptable impact that could not be satisfactorily mitigated? **No**

180) Is atmospheric pollution a potential issue at any of these sites.

**Current levels of NO2 which are monitored by WHBC along Station Road, Cuffley and do not exceed acceptable standards. Increase in development at the sites in Cuffley would probably not be sufficient to raise levels above the limits of itself but it would be necessary to assess the contribution of proposed developments in Broxbourne and Enfield Boroughs, and the proposed A10 CAZ which could add to the traffic on the B156 and therefore raise levels above allowable limits. Policy SADM18 of the 2018 SA recommended that air quality appraisal should be carried out for any development within 50m of this route.**

181) If so, how would it be mitigated?

## Matter 2 – Infrastructure

Significant concern has been raised by representors concerning the provision of the infrastructure necessary to develop these sites, particularly in the context of that required to provide for the needs of future residents but also because of the need for off-site mitigation, in particular but not exclusively in relation to the highway network in Cuffley.

182) Has the impact of the proposal on local infrastructure been effectively considered?

183) If so what are the outcomes?

184) Have the considerations included the impact of the significant development proposed at Goff's Oak in adjacent Broxbourne? **Not to my knowledge**

185) Is there sufficient capacity within the local schools to provide places for the children likely to be generated by these developments? **Secondary schools are likely to be more of an issue than primary schools**

186) If not, what extra capacity is required and where would it be located?

187) Is there sufficient capacity within local health services to meet the primary health care needs of the persons who would reside in the developments?

188) If not, what extra capacity is required and where would it be located?

189) What are the off-site highway ramifications of these proposals?

**The B156 is already heavily congested especially at peak times. It was described in the 2016 SA as a 'heavily trafficked route' and HCC confirm that there were around 18,000 vehicle movements per day on Station Rd Cuffley in 2019.**

**Traffic is stationary down Cattlegate Road, Northaw Road East and Station Road Cuffley in peak hours, often extending to Crews Hill and Goffs Oak. This is especially significant when the M25 is congested and the route is used to bypass the motorway between Junctions 24 and 25.**

**The junctions at with Cattlegate Road/Northaw Road East and Northaw Road East/Plough Hill/Station Road are dangerous. Further development which would increase the volume of traffic both with the parish and outside it will add to the congestion and increase the problems at the junctions. These junctions have been highlighted as a particular concern in the Welwyn Hatfield Local Plan Housing Sites Selection Background Paper 2016.**

**The junction of The Meadway and the B156 has not been considered. This is hazardous because of the rise in the road on the approach to Cuffley which reduces the sightline up to the junction.**

190) Without improvements, would there be unacceptable harm to highway safety and/or the free flow of traffic within Cuffley? **Yes**

191) Are the sites' overall viabilities sufficient to be able to support any required highway improvements as well as any other required contributions to additional infrastructure and facilities? **The B156 is essentially a country lane. Improvements would be difficult due to the narrowness of the road and the topography of the area**

which is very hilly especially along Northaw Road East and the junction with th The Meadway.

192) If not what other options have been considered to try to achieve viable development sites?

### **Matter 3 – Sustainability**

193) Are the sites in a sustainable location for development? **It depends how you define sustainability**

194) How far is it to Cuffley railway station and its village centre from a median location on each site?

195) Are these acceptable walking distances for commuters travelling by train?

196) Are these acceptable walking distances to local shops and other facilities?

**Because of the volume and speed of traffic on the B156 many parents will not walk their children along the footway on Northaw Road East**

197) Have these sites been appropriately assessed in the sustainability appraisal? **Not that I am aware of.**

### **Matter 4 Green Belt**

The National Planning Policy Framework stresses that the government attaches great importance to Green Belts and says that Green Belt boundaries should only be altered in exceptional circumstances.

The Council carried out a stage 3 Green Belt Review in 2018/19 in order to ascertain the contribution that a finer grain of sites, than were previously examined, around the urban fringes within the district, made to the different purposes of the Green Belt. In this assessment the overall harm at these sites was considered to be moderate/high (HS28) and high (HS29/30) but the parcels are not identified as areas of most essential Green Belt. In these circumstances:

198) Is the proposed new boundary to urban development at site **HS28** as robust as the existing one, in the context of visually preventing urban sprawl and maintaining openness? **Acceptable**

199) If the boundary is to be moved, is the current proposal the most appropriate location for a new Green Belt boundary.

200) If not are there other more defensible boundaries that could be chosen?

201) Is there scope to improve the permanence of any new boundary through the introduction of woodland planting to create enhanced physical features?

202) Is there scope to extend this site into other parts of the Green Belt parcel? **No**

203) If so what, if any, remedial measures would be required to mitigate any resulting harm?

204) Is the overall assessment of moderate/high harm a sound interpretation of the contribution that site HS28 makes to the purposes and openness of the Green Belt? **Yes**

205) In that context, is the allocation of this site justified, effective and consistent

with national planning policy?

206) Do exceptional circumstances exist to release this site from the Green Belt and if so, (other than Welwyn/Hatfield's housing need), what are they?

207) Do sites **HS29/30** impinge in a meaningful way upon the existing gap in built development between Cuffley and Potter Bar? **The LUC Green Gap analysis indicates that there is sufficient significance for the gap between Northaw and Cuffley to be designated a Green Gap Policy Area.**

208) Do they contribute to the checking of the unrestricted sprawl of large built up areas? **No because there is no defensible boundary on the northern edge of these developments**

209) Is there mitigation that could be implemented to reduce any harm to openness? **Northward spread of these developments could be restricted by introduction of significant boundaries as a condition of planning permissions.**

210) Would the proposed new boundary to urban development be as robust as the existing one, in the context of visually preventing urban sprawl and maintaining openness? **No**

211) If the boundary is to be moved, is the current proposal the most appropriate location for a new Green Belt boundary. **Yes but no further**

212) If not are there other more defensible boundaries that could be chosen? **Not at present**

213) Is there scope to improve the permanence of any new boundary through the introduction of woodland planting to create enhanced physical features? **Yes**

214) Is the overall assessment of high harm a sound interpretation of the contribution that sites HS29/30 makes to the purposes and openness of the Green Belt? **Yes**

215) Can this level of harm be appropriately applied to the entirety of the sites? **No**

216) In these contexts, is the allocation of these site justified, effective and consistent with national planning policy?

217) Do exceptional circumstances exist to release these sites from the Green Belt and if so, (other than Welwyn/Hatfield's housing need), what are they?

### **Matter 5 – Implementation**

218) When would these sites realistically be likely to be able to deliver dwellings within the plan period?

### **Policy SADM 33 Site HS27 (Cuf1) Land at the Meadway**

219) Have the ramifications of any noise pollution from the adjacent railway on the potential living conditions at this site been fully considered? **Not that I am aware of.**

220) If so what mitigation (if any) would be required? Mitigation would be required as trains arriving and pulling out of the station increase noise levels. As well as stopping services there are regular intercity services and freight movements.

221) Is the proposed dwelling capacity appropriate?

There is no defensible boundary at this site as the proposed boundary just bisects a field. There should be a proposal to limit further development of the site and provide defensible boundaries as a condition of planning permission.

The dwelling capacity would be limited by the power line which runs across the site, problems with traffic access at the junction of the B156 and The Meadway which is extremely hazardous. As well as traffic from houses on The Meadway, the junction is within a few metres of Sopers Road Industrial Area, Cuffley Station car park and several blocks of flats which add to the already heavy traffic movements on the B156 and the difficulty of negotiating entry into and exit from The Meadway by car.

**Policy SADM 33 Site HS28 (Cuf6) Land south of Northaw Road East**

222) Have the ramifications of any noise pollution from the adjacent railway on the potential living conditions at this site been fully considered? Not that I am aware of

223) If so what mitigation (if any) would be required?

224) Is the proposed dwelling capacity appropriate?

225) Are there archaeological considerations that could affect the delivery of this site? The area is adjacent to Area of Archaeological Significance (Ref: 37), which is noted for Cropmarks at Cattlegate Farm, indicating the presence of, as yet undated archaeological remains (WHBC Landscape Sensitivity and Capacity Study 2011)

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

**Policy SADM 33 Sites HS30 (Cuf7) Wells Farm Northaw Road East**

226) Does the outdoor pollution from the nearby anaerobic digestion plant weigh against the suitability of these sites for residential development? No, it is the other side of the railway embankment

227) Are there archaeological considerations that could affect the delivery of this site? There is an Area of Archaeological Significance (Mesolithic and Neolithic Occupation, Thorntons Farm) adjacent to the North West boundary of the area (WHBC Landscape Sensitivity and Capacity Study 2011)