

**Examination of the Welwyn Hatfield Local Plan 2013-32**

**Regulation 19 (submitted) sites in or adjacent to villages**

**INSPECTORS' MATTER AND ISSUES**

**Southern Settlements**

**Consultation was undertaken about these sites at the Regulation 19 stage in 2017. All representations received at that time will be considered and it is not necessary for them to be repeated verbatim.**

**Any representors wishing to make further submissions on the matters and questions listed below, should do so before .**

Most of the following sites are within the Green Belt and the National Planning Policy Framework (NPPF) says at paragraph 136 that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation of plans. It is not appropriate to remove land from the Green Belt unless there are very sound reasons for doing so. In addition to the Borough's development needs, the justification should include considerations such as development constraints, as well as the removal's impact on the Green Belt's openness and purposes. As well as addressing the matters raised by representors and although not exclusively, the following questions are in part designed to establish what exceptional circumstances, beyond the Council's inability to identify sufficient land outside of the Green Belt in order to meet its Objectively Assessed Housing Need, exist to justify the release of these sites, in the context of the local and site circumstances.

**Welham Green**

**Policy SADM 26, Site HS 11 (Hat11), Land at South Way**

**Matter 1 – Sustainability**

Section 9 of the Framework promotes sustainable transport. It requires the promotion of opportunities to use walking, cycling and public transport through the planning system and for it to actively manage patterns of growth in support of this objective. At paragraph 103, it also says that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

- 1) Where are the schools that children living on the development would attend?
- 2) Where are the primary care medical facilities that would be used by the residents of this site?
- 3) Where are the local shops and community facilities that residents of this site would mainly use?

- 4) Would residents be able to easily access public transport?
- 5) Would this be an accessible neighbourhood?
- 6) Has this site been appropriately assessed in the sustainability appraisal?
- 7) Is South Way a sustainable location for development?

## **Matter 2 – Environmental Considerations**

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 pollution.

- 8) How would the surface water at this site be managed?
- 9) Has a flood risk assessment been carried out?
- 10) Are there any on or off-site ramifications for flood risk that would result from the implementation of the proposed development?
- 11) How would foul drainage be dealt with?
- 12) Are there any foul drainage constraints that would impede the implementation of any development?

## **Matter 2 – Infrastructure**

The Framework in Section 8 seeks to create healthy, inclusive communities through the planning system and to deliver the recreational and cultural facilities and services the community needs through a proactive and positive approach. In Section 9 it promotes sustainable transport and the provision of viable infrastructure, necessary to support sustainable development.

- 13) How extensive are the significant upgrades to the site's access?
- 14) Is there sufficient capacity within the local schools to provide places for the children likely to be generated by the development?
- 15) If not, what extra capacity is required and where would it be located?
- 16) Is there sufficient capacity within local health services to meet the primary health care needs of the persons who would reside in the development?
- 17) If not, what extra capacity is required and where would it be located?
- 18) Would it be viable to provide a local convenience shop on this site?
- 19) Are any community facilities likely to be proposed on the site?
- 20) Has the proposal's impact on local infrastructure been effectively

considered?

21) Is the site's overall viability sufficient to be able to support the required significant highway improvements as well as any other required improvements to infrastructure and facilities?

#### **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 borough, made to the different purposes of the Green Belt. In this assessment the overall harm at this site is considered to be Moderate/High but the parcel is not identified as an area of most essential Green Belt. In this context:

22) Is the overall assessment of Moderate/High harm a sound interpretation of the contribution that this site makes to the purposes of the Green Belt?

23) In that context, is the allocation of this site justified, effective and consistent with national planning policy? If not why not?

24) 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?

25) Does the site infringe upon the existing gap in built development between Hatfield and Welham Green?

26) If so what, if any, remedial measures are proposed to mitigate the resulting harm?

27) Is the proposed new boundary to urban development as robust as the existing one, in the context of visually preventing urban sprawl and maintaining openness?

28) Representations from Hertfordshire County Council against Policy SADM 34 request the removal of land at New Barnsfield from the Green Belt. How extensive is this area of land and how would it impinge upon the openness of this part of the Green Belt?

29) Would this development and that proposed at site HS 11 contribute to the furtherance of urban sprawl between Hatfield and Welham Green?

#### **Matter 5 – Implementation**

30) When would the site realistically be likely to be able to deliver dwellings within the plan period?

**Policy SADM 30, Site SDS 7 (WeG4b), Marshmoor****Matter 1 – Environmental Considerations**

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 paragraph 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, air 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.

- 31) How would the surface water at this site be managed?
- 32) Has a flood risk assessment been carried out?
- 33) Are there any on or off-site ramifications for flood risk that would result from the implementation of the proposed development?
- 34) Would the site's development require a balancing pond?
- 35) If so how extensive would this be and where would it be located?
- 36) How would foul drainage be dealt with?
- 37) Are there any foul drainage constraints that would impede the implementation of any development?
- 38) Have the ramifications of noise pollution from the adjacent railway and primary road on the potential living conditions and working environment at this site been fully considered?
- 39) Have the ramifications of air pollution, from the adjacent primary road, on the potential living conditions and working environment at this site been fully considered?

**Matter 2 – Infrastructure**

The Framework in Section 8 seeks to create healthy, inclusive communities through the planning system and to deliver the recreational and cultural facilities and services the community needs through a proactive and positive approach. In Section 9 it promotes sustainable transport and the provision of viable infrastructure, necessary to support sustainable development.

- 40) Has the impact of the proposal on local infrastructure been effectively considered?
- 41) If so what are the outcomes?
- 42) Where are the schools that children living on the development would attend?

- 43) Is there sufficient capacity within the local schools to provide places for the children likely to be generated by the residential development, together with other proposals in the area?
- 44) If not, what extra capacity is required and where would it be located?
- 45) Is there sufficient capacity within local health services to meet the primary health care needs of the persons who would reside in the development?
- 46) If not, what extra capacity is required and where would it be located?

### **Matter 3 – Sustainability**

The Framework at paragraph 5 says that the purpose of the planning system is to contribute to the achievement of sustainable development.

- 47) Is Marshmoor a sustainable location for development?
- 48) Has this site been appropriately assessed in the sustainability appraisal?
- 49) Where are the local shops and community facilities that residents of this site would mainly use?
- 50) How would residents get to them?

### **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 this site is considered to be Moderate/low and the parcel is not identified as an area of most essential Green Belt. In this context:

- 51) Is the overall assessment of Moderate/low harm a sound interpretation of the contribution that this site makes to the purposes of the Green Belt?
- 52) Can this level of harm be appropriately applied to the entire site?
- 53) In that context, is the allocation of this site justified, effective and consistent with national planning policy?
- 54) If the Council is unable to meet its Full Objectively Assessed Housing Need through other Green belt releases, and given its positive jobs v economically active population balance, what exceptional circumstances justify the removal of this site from the Green Belt to provide land for even more jobs?
- 55) Does the site impinge upon the existing gap in built development between Hatfield and Welham Green?

56) Would the development of this site further the urban sprawl between Hatfield and Welham Green?

57) If so what, if any, remedial measures are proposed to mitigate the resulting harm?

58) Does the site impinge upon the existing gap in built development between Brookman's Park and Welham Green?

59) If so what, if any, remedial measures are proposed to mitigate the resulting harm?

60) Is the proposed new boundary to urban development as robust as the existing one, in the context of visually preventing urban sprawl and maintaining openness?

## **Policy SADM 30, Site HS 35 (GTLAA01), Foxes Lane, Dixons Hill Road**

61) What are the planning irregularities referred to in representations?

62) Are they now resolved and if not do they have a bearing on the delivery of additional pitches at this site?

63) Has the site's capacity for pitch extension been objectively assessed?

64) Have the ramifications of noise pollution from the adjacent railway, on the potential living conditions at this site, been fully considered?

65) Is six additional pitches the optimum outcome for the proposed extension to this site?

66) Is the proposal positively prepared and fully justified?

**Brookmans Park****Policy SADM 31, Site HS22 (BrP4), Land west of Brookman's park Railway Station****Matter 1 – Environmental Considerations**

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 this site in the context of the possible contribution its development could make to off-site flooding.

- 67) How would the surface water at this site be managed?
- 68) Has a flood risk assessment been carried out?
- 69) Are there any on or off-site ramifications for flood risk that would result from the implementation of the proposed development?
- 70) If so how are they to be mitigated?
- 71) Would the site's development require a balancing pond?
- 72) If so, how extensive would this be and where would it be located?
- 73) How would foul drainage be dealt with?
- 74) Are there any foul drainage constraints that would impede the implementation of any development?
- 75) Have the ramifications of any noise pollution from the adjacent railway on the potential living conditions at this site been fully considered?
- 76) If so what mitigation (if any) would be required?
- 77) What impact would the proposal have on the wider landscape?
- 78) If this is likely to be adverse, to what extent can it be overcome through mitigation?
- 79) What is the potential impact on the Water End Site of Special Scientific Interest?
- 80) If there is any potential unacceptable impact? Can it be satisfactorily mitigated?
- 81) What is the potential impact on the nearby woodland?

82) If there is any potential unacceptable impact? Can it be satisfactorily mitigated?

83) Would the proposal have an impact on the setting of any listed buildings?

84) If so to what extent would there be harm? And could it be mitigated?

## **Matter 2 – Infrastructure**

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

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

86) If so what are the outcomes?

87) Where are the schools that children living on the development would attend?

Paragraph 21.4 says that the dwelling capacity has been limited to reflect the limited opportunity for expanding the existing primary school.

88) Why is an expansion of the existing school the only solution to a lack of primary school capacity?

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

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

91) Would it be viable to provide a local convenience shop on this site?

92) Are any community facilities likely to be proposed on the site?

93) What are the off-site highway ramifications of this proposal?

94) If they include unacceptable harm to Bradmore Lane and other roads to the west, how is this to be mitigated?

95) Is it practical to widen the roads in the vicinity of Water End?

96) If there would be unacceptable harm to highway safety and the free flow of traffic? Are there alternative solutions other than widening and/or straightening the existing network?

97) Is the proposal's overall viability sufficient to be able to support the required significant highway and drainage improvements as well as any other required improvements to infrastructure and facilities?

98) If not what other options have been considered?

### **Matter 3 – Sustainability**

The Framework at paragraph 5 says that the purpose of the planning system is to contribute to the achievement of sustainable development.

99) Is the site a sustainable location for development?

100) Has this site been appropriately assessed in the sustainability appraisal?

### **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 this site is considered to be high but the parcel is not identified as an area of most essential Green Belt. In this context:

101) Is the overall assessment of high harm a sound interpretation of the contribution that this site makes to the purposes of the Green Belt?

102) Can this level of harm be appropriately applied to the entire site?

103) In that context, is the allocation of this site justified, effective and consistent with national planning policy?

104) 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?

105) Does the site impinge upon the existing gap in built development between Brookman's Park and Welham Green?

106) If so what, if any, remedial measures are proposed to mitigate the resulting harm?

107) Does the site impinge upon the existing gap in built development between Brookman's Park and Potters Bar?

108) If so what, if any, remedial measures are proposed to mitigate the resulting harm?

109) Is the proposed new boundary to urban development as robust as the existing one, in the context of visually preventing urban sprawl and maintaining openness?

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

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

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

### **Matter 5 – Implementation**

113) When would the site realistically be likely to be able to deliver dwellings within the plan period?

114)

### **Policy SADM 31, Site HS21 (BrP13), Land west of Golf Club Road Policy SADM 31, Site HS23 (BrP14), Land east of Golf Club Road**

115) Would the development of either or both of these sites result in an unacceptable impact on highway safety?

116) If so could this be mitigated through achievable highway improvements?

117) Is the development of these sites compatible with the need to protect trees on the sites.

118) Is there any protected wildlife that could be affected by the proposals?

119) If so how would it be protected?

120) Is either site within the Green Belt?

121) Would the development of HS21 result in ribbon development/urban sprawl?

122) If so what exceptional circumstances exist to justify their removal from the Green Belt

**Little Heath****Policy SADM 32 Sites HS24 (BRP7) Land south of Hawkshead Road  
Policy SADM 32 Sites HS25 (LHe1) Land north of Hawkshead Road****Matter 1 – Environmental Considerations**

At paragraph 100 the National Planning Policy Framework (NPPF) says that Local Plans should develop policies to manage flood risk from all sources. There is significant representation against these sites in the context of the possible contribution their combined development could make to off-site flooding.

123) How would the surface water at these sites be managed?

124) Has a flood risk assessment been carried out?

125) Are there any on or off-site ramifications for flood risk that would result from the implementation of the proposed development?

126) If so how are they to be mitigated?

127) Would the sites' development require a balancing pond?

128) If so, how extensive would this be and where would it be located?

129) How would foul drainage be dealt with?

130) Are there any foul drainage constraints that would impede the implementation of either development?

131) What impact would the proposals have on the wider landscape? In particular on Gobions Historic Park and Garden?

132) If this is likely to be adverse, to what extent can it be overcome through mitigation?

133) Would there be any impact on the Gobbins Wood wildlife site from the development of either of these sites?

134) If so would there be any potential unacceptable impact? And could it be satisfactorily mitigated?

135) What potential impact could these sites have on Northaw Wood SSSI?

136) If there would be any, how could it be mitigated?

137) Would either of the proposals have an impact on the setting of the listed Folley or on Osbourne House?

138) If so to what extent would there be harm? and could it be mitigated?

## **Matter 2 – Infrastructure**

Significant concern has been raised by representors concerning the provision of the infrastructure necessary to develop this site particularly in the context of that required to provide for the needs of its residents but also because of the need for off-site mitigation in particular but not exclusively in relation to the highway network to the east of the sites and in Potters Bar more generally.

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

140) If so what are the outcomes?

141) Is there sufficient capacity within the local schools to provide places for the children likely to be generated by the developments?

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

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

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

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

146) Without improvements, would there be unacceptable harm to highway safety and/or the free flow of traffic?

147) Are the sites' overall viabilities sufficient to be able to support any required highway improvements as well as any other required improvements to infrastructure and facilities?

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

## **Matter 3 – Sustainability**

149) Are the sites in a sustainable location for development?

150) How far is it to Potters Bar railway station and its town centre from a median location on both sites?

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

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

153) How far is the nearest local convenience store from either site?

154) Are these acceptable walking distances for persons visiting local shops?

155) Have these sites been appropriately assessed in the sustainability appraisal?

**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 (HS24) and moderate (HS25) but the parcels are not identified as areas of most essential Green Belt. In these circumstances:

156) In the context of site HS25, to what extent is there a justification for land to be designated as Green Belt between Little Heath and Swanley Bar?

157) Is the overall assessment of moderate/high harm a sound interpretation of the contribution that site HS24 makes to the purposes of the Green Belt?

158) Can this level of harm be appropriately applied to the entire site?

159) In that context, is the allocation of this site justified, effective and consistent with national planning policy?

160) 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?

161) Does either site impinge upon the existing gap in built development between Brookman's Park and Potters Bar?

162) If so what, if any, remedial measures are proposed to mitigate the resulting harm?

163) Is the proposed new boundary to urban development at site HS24 as robust as the existing one, in the context of visually preventing urban sprawl and maintaining openness?

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

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

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

**Matter 5 – Implementation**

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

## Cuffley

### **Policy SADM 33 Sites HS26-31 (Cuf 1, 6,7 & 12 and No 02 and 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.

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

169) Has a flood risk assessment been carried out?

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?

171) If so how are they to be mitigated?

172) Would the sites' development require (a) balancing pond(s)?

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?

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.

177) Is any harm likely to be adverse and if so to what extent can the harm be overcome through mitigation?

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

179) If so would there be any potential unacceptable impact that could not be satisfactorily mitigated?

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

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?

185) Is there sufficient capacity within the local schools to provide places for the children likely to be generated by these developments?

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?

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

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?

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?

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?

197) Have these sites been appropriately assessed in the sustainability appraisal?

**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?

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?

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?

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?

208) Do they contribute to the checking of the unrestricted sprawl of large built up areas?

209) Is there mitigation that could be implemented to reduce any harm to openness?

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?

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

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

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

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?

215) Can this level of harm be appropriately applied to the entirety of the sites?

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?

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

221) Is the proposed dwelling capacity appropriate?

### **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?

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?

### **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 odour pollution from the nearby anaerobic digestion plant weigh against the suitability of these sites for residential development?

227) Are there archaeological considerations that could affect the delivery of this site?