

Broxbourne LDF Core Strategy Pre-Submission Consultation
Response by CPRE Hertfordshire

Policy CS2 – Housing Development
Is this part of the Core Strategy Sound? No

Why do you think it is not sound?

Paragraph 50 indicates that the Council considers an indicative target of 240 dwellings per year for the 16-year period 2010-2026 to be appropriate, giving a total of 3,840 for the plan period. This is directly comparable to the annual rate set in the East of England Plan (Policy H1) for the 15-year period 2006-2021. Table 2: Housing Trajectory to 2026 shows that 2,515 dwellings can be provided on urban sites, in accordance with the Strategic Housing Land Availability Assessment (SHLAA). However, Tables 3, 4 and 5 of the SHLAA (August 2010 Update) list a total of 2,559 urban sites considered to be deliverable and developable during the Core Strategy planning period. There is some discrepancy between this figure and the 2,515 dwellings shown in Table 2, and it is not clear from the Core Strategy which sites from the SHLAA make up the figure of 2,515.

If we accept that there is a supply of 2,515 housing units in the urban areas to 2026, this leaves 1,325 dwellings to be provided in the Green Belt during the plan period, according to Table 2. This accords with the figure given in the first part of Policy CS2, which indicates that 1,025 dwellings are to be provided on Green Belt sites during the period 2016-2026, together with 300 dwellings in the Green Belt at Greater Brookfield.

However, paragraphs 30 – 31 of the SHLAA apply non-implementation rates to commitments and urban sites, and conclude that the Council should plan for between 802 and 1,354 dwellings in the Green Belt during the plan period, averaging out at 1,078 without any implementation assumptions. This is the figure for dwellings required in the Green Belt 2010-2026 given in SHLAA Table 7. There is no discussion or explanation in the Core Strategy of the discrepancy of 247 dwellings between the figure of 1,325 in Table 2 and the 1,078 in the SHLAA.

Table 2 shows 65 dwellings required in the Green Belt up to 2016 and 580 in the period 2016-2021. We assume that this total of 645 dwellings in the Green Belt includes the 300 proposed at Greater Brookfield. Paragraph 54 states that the full justification for this is set out in Policy CS7 Greater Brookfield. We can find no such justification in the section on Greater Brookfield. The only justification given is in paragraph 111, which states that “About 300 new homes will add an extra element of vibrancy so that the area [Greater Brookfield] has a genuine sense of place throughout the day and into the evening”. This in itself does not justify residential development in the Green Belt. There has to be overriding need to justify releasing land from the Green Belt for development, particularly in the short to medium term.

Policy CS2 refers to the allocation of small edge-of-urban sites (in the Green Belt) and large Green Belt sites (in Areas of Search) in the third and fourth sub-sections under housing development. The only definition of small edge-of-urban sites is given in paragraph 55, which states that such sites are close to existing services and facilities, unlikely to require major infrastructure investment and capable of being brought forward as discrete schemes. This appears to be based on the concept outlined in Option 1 of the Scott Wilson report (referred to below) and carried forward in the SHLAA, but it is not clear from the Core Strategy. The number of such sites and the total dwelling capacity that might be provided by them is not quantified anywhere in the Core Strategy, so far as we can see. It is not acceptable for a Core

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Strategy document to contain a policy for allocating Green Belt sites for development without providing adequate justification and quantification (in broad terms) in the document.

When we turn to the SHLAA to try to identify which sites the Council might consider to be acceptable as small edge-of-urban sites, we find that SHLAA Table 6 lists 35 Green Belt sites considered suitable for development. These sites are shown individually in Appendices 4a, 4b and 4c Part 2 of the SHLAA. A quick analysis of the information given for each of the individual sites shows that only a few of the 35 (possibly six of them) can truly be regarded as edge-of-urban. The remainder are large Green Belt sites or smaller Green Belt sites which when aggregated make up the proposed Areas of Search.

Paragraph 25 of the SHLAA refers to Edge-of-Urban sites as though this is a special category of the Green Belt that can be given less protection than the 'real' Green Belt. This is not so, and to do so is contrary to national policy in PPG2. The SHLAA says that the differentiation between Green Belt and Edge-of-Urban sites will be further clarified in the Core Strategy. This has not been done.

It is clear from the statement in paragraph 24 of the SHLAA that Table 6 shows a list of Green Belt sites promoted to the Council during the "call for sites" consultation, and that this is little more than a 'wish' list based on bids made by developers and landowners. There is nothing in the Core Strategy to indicate that the Council has attempted to make any detailed assessment of these sites, as should have been done before promoting the sites collectively as 'edge-of-urban sites' or 'areas of search'. The assessment of the suitability of each site given in the Comments column for each site in the SHLLA appendices falls far short of what is required according to PPS3 and the Government's Strategic Housing Land Availability Assessments: Practice Guidance. July 2007. PPS3 paragraph 56 states that sites should be in a suitable location for housing development to be considered developable. Green Belt designation is a major policy constraint, but hardly any of the individual site assessments specifically addresses this.

Core Strategy paragraph 56 et seq refers to four Areas of Search where the Council considers that there is scope for Green Belt sites to come forward to meet future housing and other development needs. These areas are roughly, but not precisely, defined and delineated in paragraphs 57 – 60. The combined area of these four Areas of Search is about 380 hectares, and the Council envisages that at least 2,030 – 2,680 dwellings could be provided in these AoS's. This is far in excess of the number of dwellings required in the Green Belt over the plan period. The proposed Areas of Search are therefore far too large, and should be reduced in size or deleted altogether from the Core Strategy, taking into account the criteria for including land in Green Belts given in PPG2.

The Scott Wilson report Review of the Green Belt (March 2008) commissioned by the Council set out a detailed assessment of the Green Belt in Broxbourne and made a series of recommendations, notably two main policy options for making adjustments to the Green Belt boundary and proposing three large areas (Hoddesdon, Goff's Oak and Wormley) where land might be removed from the Green Belt in the longer term. These areas are shown on Map 8 of the report. However, the Scott Wilson report was geared to the RSS period to 2031 which no longer applies to this Core Strategy. Indeed, Scott Wilson states (paragraph 1.2.7) that this "would lead to the loss of significant amounts of Green Belt land which may not be seen as necessary even in the long term" and "these areas of search provide more substantial

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opportunities to remove areas from the Green Belt to safeguard land for future protection and development needs post 2031”.

Notwithstanding this, the Council has chosen to identify two Housing Areas of Search roughly equating to two of those proposed by Scott Wilson plus two others (Bury Green and Albury Farm East). The Core Strategy does not explain how the Council arrived at this conclusion or provide any credible justification for it. It is not possible to distil from the Core Strategy presented what recommendations and conclusions from the Scott Wilson report or the Prospect Planning report (referred to in our comments on the Green Belt section) were accepted or rejected by the Council and for what reasons. The Council itself acknowledges (CS paragraph 56) that the AoS’s “are more than sufficient to accommodate housing targets during and potentially beyond the plan period”. In the absence of any other justification for the Areas of Search identified in the Core Strategy, the document is clearly UNSOUND.

CS paragraph 56 and Policy CS2 state that the merits of each large Green Belt site (Area of Search) will be considered and consulted on, and the most appropriate sites will be allocated, through the Site Allocation DPD. In light of our comments above, it would not be appropriate for consideration and consultation on these sites/areas to be left to the Site Allocations DPD. In the absence of any proper justification of need for these sites/areas in this Core Strategy, the principle of releasing any of this land from the Green Belt has not been established. The document is therefore UNSOUND with regard to these references to the Site Allocation DPD.

What should be changed?

Policy CS2 and the whole of the Housing Development section should be withdrawn and re-written to take into account the points we make above. Fully justified evidence for allocating sites in the Green Belt, whether they are to be released from the Green Belt during the plan period or safeguarded for future use, should be given in the Core Strategy. The proposed Areas of Search should be reconsidered, and either deleted as not being required during the plan period, or significantly reduced in scale to show only those areas on the edge of existing settlements where some limited encroachment into the Green Belt might be needed to meet the justified requirement.

Policy CS5 – Employment

Is this part of the Core Strategy Sound? No

Why do you think it is not sound?

Policy CS5 – Employment states that the Council will appraise new employment land opportunities in the Southern A10 Corridor Area of Search, and Park Plaza West and Maxwells Farm West are identified as locations in the Green Belt which might be suitable for employment development at some time in the future. The introduction to the policy goes further by saying that the Council will promote high-value jobs in new employment sites in Areas of Search.

It is not clear from the Core Strategy what the justification is for promoting these areas of Search in the Green Belt. Paragraph 83 admits that, in terms of planning for the future, there are no specific [employment] targets for the borough. Paragraph 92 states that the general approach for the longer term (beyond what date?) is to consider bringing forward new employment sites in the green belt where they are capable of attracting office-based companies and cluster activities such as biotechnology, pharmaceuticals and environmental industries.

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The underlying evidence studies on Employment do not appear to provide justification for identifying Areas of Search for employment in this Core Strategy for the period up to 2026. The Derrick Wade Waters report (January 2010) recommends that the Council should enter into a dialogue with the owners of land at Theobalds Park and Maxwells Farm to establish the potential of those sites to be brought forward for development as a national business park in the future, but that in itself does not justify allocating these sites in the Core Strategy. The Broxbourne Employment Land Study (Roger Tym & Partners, March 2008) was prepared in the context of the East of England Plan which no longer applies, as was the Hertfordshire London Arc Jobs Growth and Employment Land report (March 2009).

Paragraph 96 acknowledges that promotion of the Employment Areas of Search should be done as part of any strategic employment site work that may be undertaken at the county or sub-regional level in the future. That would be the correct approach, and until such work is done, it would be premature for the Council to be identifying AOS's for employment in this Core Strategy.

Given that no adequate justification for the proposed Areas of Search has been given in the Core Strategy, it would not be appropriate for the Site Allocation DPD to identify defensible new green belt boundaries, as proposed in CS paragraph 94.

What changes do you think should be made?

Changes: Delete the seventh arrowed point from Policy CS5, delete Map 5: Employment Areas of Search, and delete the references in paragraphs 92 – 96 to the areas of search in the Green Belt.

Policy CS7 – Greater Brookfield
Is this part of the Core Strategy Sound? No

Why do you think it is not sound?

The Council claims that the principle of comprehensive mixed use development for new shopping and leisure facilities and housing at Greater Brookfield was established in the Broxbourne Local Plan (adopted December 2005). That Plan included a policy of developing land at Canada Fields for housing in association with the Greater Brookfield proposal. Canada Fields has since been developed with about 600 dwellings. That part of the Greater Brookfield scheme has therefore been completed.

The Greater Brookfield Scheme now promoted in the Core Strategy includes an area of Green Belt on the opposite side of the A10 from Canada Fields, proposed for the development of about 300 new homes (CS paragraph 111). No real justification for this residential development in the Green Belt is given. It appears to us that the Council wishes to include this residential element in the Greater Brookfield scheme in order to help finance the new shopping and leisure facilities and associated proposed new link road. This does not provide the necessary very special circumstances for permitting inappropriate development in the Green Belt.

It is stated in paragraph 114 that a new link road will be required as part of the Greater Brookfield scheme, and this is repeated in paragraph 141 about highway infrastructure. The proposed link road is shown schematically on Map 6. However, no justification for this link road

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on highway grounds is given in the Core Strategy. Its purpose appears to be to create a new, artificial boundary to the Green Belt rather than to meet actual road transport needs.

What changes do you think should be made?

The Council should either provide proper justification for the proposed residential area and new link road in the Green Belt, or delete these provisions from the Core Strategy.

Policy CS8 – Environment

Is this part of the Core Strategy Sound? No

Why do you think it is not sound?

Green Belt

The Core Strategy devotes only three paragraphs in the Environment section and the first bullet point of Policy CS8 (Environment) to the issue of Green Belt, although there are references to the Green Belt elsewhere in the document, principally in the Housing and Employment sections. Indeed, most of the discussion concerning the Green Belt appears in the Housing section (paragraph 55 onwards), where the four Areas of Search for housing development are identified. In our view, the question of green belt review should be dealt with in its own, separate section of the Core Strategy, as a strategic issue.

It seems to us that the Core Strategy is wholly UNSOUND on the question of Green Belt, basically because the Council has not explained in the document precisely how it has arrived at the conclusions it has reached on the Green Belt, it has not provided sufficient justification (evidence) for those conclusions, and the evidence that is available does not necessarily lead to the conclusions presented in the document.

The first part of Policy CS8 states that “To help meet medium and long term development needs a detailed review of Green Belt boundaries within areas of search will be undertaken as part of a Site Allocations DPD”. Paragraph 122, on the other hand, states that “To help meet medium and long term development needs, the Council has undertaken a review of Green Belt land which may be most appropriate for release”. This appears to be contradictory: either a review has been carried out or it has not.

We assume from the documents referred to in paragraph 122 that the Council has conducted some kind of strategic review of the Green Belt, based on the Scott Wilson Review of the Green Belt for the Preparation of the Local Development Framework (March 2008) and the Prospect Planning Review of the Inner Boundary of The Metropolitan Green Belt within the Borough of Broxbourne (2008). However, it is not clear from the Pre-Submission Core Strategy which conclusions/recommendations from these reports the Council has accepted or, more importantly, why the Council has chosen the strategy selected.

The first major stumbling block is that the Scott Wilson and Prospect Planning reports were prepared in response to the requirement in the Regional Spatial Strategy (East of England Plan) for a local review of green belt boundaries in Broxbourne (Policy SS7). However, with the revocation of RSSs in July 2010, this requirement was removed and there is no imperative for a green belt boundary review to be carried out. If the Council wishes, or perceives a need, to review green belt boundaries, it must provide the evidence to justify doing this. We maintain

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that the evidence in the underlying reports and in this Core Strategy document does not justify the extent of green belt release being signalled in the document.

It is not clear from the Introduction to the Core Strategy what period it is intended to cover, but we assume from the Housing section that it is 2010–2026 (ie, 15 years). The Prospect Planning report, however, is based on the period up to 2031 (presumably to accord with the proposed revision of the RSS which no longer applies). This means that the specific area conclusions in the Prospect Planning report are geared to the period up to 2031 and should not be applied directly to the period up to 2026 without some explanation and justification on the part of the Council.

Further confusion is caused by what is meant by “medium and long term” (referred to in Policy CS8 and paragraph 122, above). In the Prospect Planning report, “long term” appears to mean post-2021 (in accordance with the RSS perspective). In the Core Strategy section on Housing, the period 2016-2021 is defined as medium term and the period 2021-2026 is the long term. The Prospect Planning recommendations for Green Belt releases (last paragraph on page 7 of that report) are based on the period to 2031. The Council needs to be clear in its Core Strategy what recommendations it is adopting for the period to 2026, which relate to the period beyond 2026, and why.

The next major issue concerning the Green Belt is the extent of the areas (principally the Areas of Search) identified by the Council as being potentially suitable for some release of land from the Green Belt. We deal with this in more detail in our response to the sections on housing, employment and Greater Brookfield. Basically, we consider that the areas are far too large compared with the identified need, and that they are not defined in precise enough detail to enable meaningful assessments to be made.

The key point about the Green Belt is that any proposed changes will have to satisfy national criteria (principally PPG2) and should only be made if exceptional circumstances can be demonstrated. We do not believe that the Council has demonstrated the necessary exceptional circumstances in this Core Strategy for anything more than minor changes to the Green Belt boundary for the period of this plan. We justify our views on this in our response to other sections of the Strategy.

What changes do you think should be made?

Delete the first bullet point, about the Green Belt, from Policy CS8. Create a new section on the Green Belt, taking into account the points we make above, and include within a new policy on Green Belt the first sentence of Policy CS8 that Green Belt land will be protected from inappropriate development in accordance with national guidance.

Key Diagram

Is this part of the Core Strategy Sound? No

Why do you think it is not sound?

The Key Diagram is schematic to the extent that it is extremely difficult to ascertain which precise areas are being identified for development or protection from development. Compared

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with the 2005 Local Plan Proposals Map, it is impossible to identify precisely the inner boundary of the existing Green Belt on the Core Strategy Key Diagram.

The Areas of Search are indicated on the Key Diagram as four yellow stars (even though there are six Areas of Search (1, 2, 3, 4a, 4b and 4c) taking into account both the Housing and Employment proposals. These yellow stars in no way indicate the size of the Areas of Search being proposed, and there is no indication on the Key Diagram of the extent of Green Belt that is being identified either for release or safeguarded for future needs.

What should be changed?

If the Core Strategy submitted to the Secretary of State includes proposals to change Green Belt boundaries or identify Areas of Search in the Green Belt, The Key Diagram should clearly show the existing boundaries of the Green Belt and the full extent of the proposed Areas of Search.