

**Borough of Broxbourne Local Development Framework**  
**Core Strategy Consultation November 2008**

**Comments by CPRE – The Hertfordshire Society**

Note: The references in this document relate to the printed version of the consultation document, which varies in some respects from the online version.

Regional development context

1. Green Belt is listed in Table 4 and paragraph 3.3 as a land use. Green Belt is not a land use – it is a planning designation, or constraint on land use and development.
2. It would be more appropriate in this section to list Green Belt under a heading *Constraints on development* – together with other constraints identified in the Regional Spatial Strategy (RSS), such as green infrastructure, landscape conservation, biodiversity and earth heritage, agriculture land and soils, woodlands, the historic environment, flood risk, etc.

Housing

3. We welcome the Council's view, expressed in section 3.3.1.2, that the most sustainable approach is to make the best use of redevelopment opportunities within the built-up area of the Borough, particularly those close to town centres and public transport routes. We agree that, in this context, there are a number of general options that should be discounted – redevelopment of recreational and open space, allotments, schools and back gardens in particular.
4. In accordance with the requirements of Policy H1 of the RSS, the Council calculates that 310 additional dwellings will be needed in the Green Belt by 2021, a further 435 in the Green Belt by 2025, and at least a further 1,180 by 2031 for which land in the Green Belt needs to be safeguarded. Given the current economic downturn, it is futile to be planning now for so many dwellings to be built in the Green Belt. The annual rate of housebuilding in Broxbourne has already fallen from the very high rate of 390 per annum between 2001 and 2006 and seems set to decline dramatically over the next couple of years or so. The rate of new building would then have to increase markedly beyond the proposed rate of 280 dwellings p.a. in order to achieve the planned total of 5,600 new dwellings by 2021. In the current climate, it seems unlikely that it will be possible to achieve this.
5. In these circumstances, it is impossible to predict with any accuracy the need for (or even market demand for) additional housing beyond 2021, or the capacity of the development industry to provide it. This brings into question the justification for releasing large tracts of Green Belt land now, which will only encourage developers to develop greenfield land first rather than focus on previously developed land which may be more difficult to develop. If the Council's declared preference of making the best use of development opportunities within existing built-up areas is to be met, the amount and timing of release of Green Belt land needs to be tightly controlled.
6. Draft Policy CP13 *Housing provision* states that over the period 2008 to 2025 the Council will make provision for the delivery of 4,578 net dwellings. According to Table 5, however,

4,578 is the number of residential units for which sites have yet to be identified between 2008 and 2031.

### Affordable housing

7. Paragraph 3.3.1.4 of the consultation document indicates a possible range of delivery targets for affordable housing of between 35% and 50% of new development. It makes the point that little more than half the affordable housing target is ever actually achieved. This suggests that a target of 50% is needed in order to ensure delivery of 25% affordable housing. We consider that a high target needs to be set, together with a significant lowering of the site size threshold, if the necessary level of affordable housing is to be provided. We recommend that a headline target of at least 40% should be set and that the current threshold (in the adopted Local Plan) should be reduced from 15 dwellings or 0.5 hectares to all sites of 5 dwellings or 0.2 ha or more.

8. Draft Policy CP14 defers decisions on site size thresholds and the proportion of affordable housing to be sought to subsequent supplementary planning documents. These issues should be addressed and resolved in the Core Strategy. It is not appropriate for policy to be set in supplementary planning documents.

### The Green Belt

9. RSS Policy SS7 calls for a “local” (ie, not strategic) review of green belt boundaries in Broxbourne. Paragraph 3.30 goes on to say that this local review should “support the regeneration of towns in the Lee valley” (whatever that means) while avoiding further coalescence between them.

10. The draft Core Strategy concludes (paragraph 3.3.5) that at least 20 years of development should be capable of being accommodated within the revised Green Belt boundary, but does not specify what precisely is meant by “20 years of development”. By reference to Table 5 in paragraph 3.3.1.2, it appears to mean the 1,925 additional dwellings estimated to be required in the Green Belt by 2031. The veracity of this figure is highly suspect, since the majority of it (1,180 dwellings) is based on an extrapolated residential requirement and ‘guesstimate’ of urban capacity for the period 2025 to 2031. No attempt appears to have been made to translate the number of dwellings to be accommodated in the Green Belt into an area of land expressed in terms of hectares (or any other appropriate measurement).

11. Plan 2 (the Key Diagram) shows “areas of search for future (2021+)” in light green. This does not take account of the 310 additional dwellings shown in Table 5 as being required in the Green Belt by 2021.

12. Plan 1 *Strategic options in the Green Belt* (why “strategic”?) indicates six “potential growth locations” in the Green Belt. These are referred to in more detail in section 3.4.1 of the draft Core Strategy.

13. There are discrepancies between Plan 1 and Plan 2 and the supporting text for each location in section 3.4.1. For example, the Land East of A10 indicated as a potential growth location on Plan 1 is shown as Countryside Protection Policy land on Plan 2. But there is no Countryside Protection Policy as such in the rest of the document. Paragraph 3.4.1.5, proposing that the Land east of A10 should be released for major development, recognises

that the area has a value for recreation, including local wildlife site, golf course and playing fields, but does not conclude that this should be a restraint on development.

14. Another example concerns the potential growth location North of Goffs Lane indicated on Plan 1. Paragraph 3.4.1.4 describes this area as Land west of Cheshunt and north of Goffs Lane, and concludes that “there may be scope for limited infilling on the edges of existing settlements”. This is hardly a ringing endorsement of a potential growth location. Paragraph 3.4.5 *Development options for the period 2025 to 2031* identifies Land west of Cheshunt and north of Goffs Oak as one of two options for development in the Green Belt, but states that it is an unsustainable location and that further investigations of the area and associated constraints are needed.

15. Draft Policy CP7 *Developments outside the urban area* is effectively a green belt policy, since in Broxbourne the existing non-urban area is already designated as Green Belt. The wording of this policy needs to be strengthened to make it clear that inappropriate development that conflicts with the openness and functions of the Green Belt will not be permitted (“seek to protect” is weak).

16. Policy CP2 *location of new development* refers to “extensions to urban areas”, which by definition must mean land currently in the Green Belt. While we welcome the intention in Policy CP2 to regard these areas as last in the sequential allocation of land for new development, these areas must be specifically identified and justified. As matters stand, the reference to extensions to urban areas in Policy CP2 conflicts with Policy CP7.

#### Proposed growth locations

17. We have the following comments on the specific areas/locations identified for possible development in the draft Core Strategy:

#### Greater Brookfield

18. Plans 2 and 3 of the draft Core Strategy show the proposed strategic development site of Greater Brookfield. This proposes development of a new retail centre and approximately 600 dwellings in the Green Belt to the north of the existing Brookfield retail centre. This would extend development beyond the New River and west of the A10, both of which provide an eminently defensible green belt boundary in this area. The proposed development would entail a new link road being built through the Green Belt from the Brookfield centre to the A10 interchange at Turnford. This would create an entirely artificial boundary to the Green Belt which would not follow any existing naturally defensible boundary.

19. The Greater Brookfield project was first conceived nearly ten years ago and was included in the Local Plan Second Review on the basis of retail studies dating from 1999 and 2004. Since then, the economic climate has changed markedly, particularly in recent months, and there needs to be up-to-date retail and leisure studies carried out in order to justify the kind of sub-regional retail, leisure and service centre that the Council seems to envisage. Such a centre would be more appropriate for an area which has been designated as a Key Centre for Development and Change in the RSS, which Broxbourne has not.

20. Draft Policy CP3 *Retail centre development* promotes Greater Brookfield as a mixed-use development including retail, employment, housing and leisure. No justification for the

residential element of approximately 600 units in the Green Belt has been provided. This is twice the number of new dwellings that the Council calculates will be needed in the Green Belt by 2021 (Table 5). Yet, according to section 3.4.3, the Council proposes to bring forward the Greater Brookfield development, including the proposed housing provision, in the period up to 2021.

Land east and/or west of the A10 south of Cheshunt School/Albury Farm

21. This is a substantial area of Green Belt, straddling both sides of the A10. The New River would not provide a defensible boundary to the west, as claimed, because development up to the New River and approved development at Bury Green Farm to the west would fragment the narrow wedge of Green Belt between the existing built-up area and Lieutenant Ellis Way to such an extent as to make it unviable as Green Belt. The only defensible boundary in this area is the A10 itself.

Land west of Hoddesdon and east of the A10

22. Given that there has to be some release of Green Belt land in order to accommodate required development, we would not oppose the release of this land between the A10, the A10 link road and the existing built-up area.

Land west of Cheshunt and north of Goffs Lane

23. We do not see any justification for releasing land from the Green Belt in this area. Development would not meet the criteria set by the Council in paragraph 3.4.1, and by the Council's own admission it would have detrimental impacts on landscape value (paragraph 3.4.1.4).

Land east of A10 and north of Turnford

24. As we observe in paragraph 13 above, this area of Green Belt is proposed as a potential growth location but is also designated as a Countryside Protection Policy area. These two designations conflict with each other. The area currently comprises a Local Nature Reserve, a Local Wildlife Site and community open space and recreational facilities. These assets could not easily be reprovided if the area were to be released for development.

Southern A10 corridor

25. The A10, rather than the New River, forms a clear defensible boundary to the Green Belt in this area. Release of land for development west of the A10 and south of Lieutenant Ellis Way would consolidate coalescence between the boroughs of Enfield and Broxbourne, and make Broxbourne even more of an extension of Greater London. There is no justification at this stage for releasing or safeguarding the area for strategic employment use of national importance. The RSS does not call for such provision to be made at Broxbourne, and the borough is not designated as one of the Key Centres for Development and Change.

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