

Standing up for Hertfordshire's countryside

Chenge Taruvinga  
Planning and Development  
Broxbourne Borough Council  
Bishop's College  
Churchgate  
Cheshunt  
EN8 9XQ

Our Ref:

Your Ref:

29<sup>th</sup> March 2019 (by email)

Dear Chenge Taruvinga,

**Ref: 07/19/0160/O - Former Inex Nursery, 612 Goffs Lane, Goffs Oak, Hertfordshire**  
**Outline planning for assisted living residential village (76no. 1 bed, 49no. 2 bed, 84 rooms in care home totaling 209 units (c2 use)) across 3 blocks of 2.5/3 storey builds including landscaping, amenity space with incorporated seating, car parking, cycle store, mobility buggy store, electric car charging points and allotments and including ground floor level cafe/restaurant/retail (a1 & a3 use) (site a & b)**

**AND**

**Ref: 07/19/0154/F - Former Inex Nursery, 612 Goffs Lane, Goffs Oak, Hertfordshire**  
**Erection of 21no. sheltered apartments (15no. 2 bed and 6no. 1 bed) with amenity space and car parking (17 spaces), electric car points, shuttle bus service, refuse and recycling, landscaping and cycle storage (site c)**

CPRE Herts write with respect to these two applications. Objection has already been made to a third related application, the Tina Nursery site, (81 dwgs) Ref 07/18/1097/O by our letter of 12<sup>th</sup> December 2018.

**Green Belt / Principle**

There is no argument that these two sites, and the site at Tina Nursery, remain within the Green Belt and that very special circumstances are therefore required to warrant residential proposals, which constitute inappropriate development. CPRE Herts objected that exceptional circumstances had not been demonstrated to warrant the proposed release of the sites G02 and G03 from the Green Belt as part of the Local Plan. The objections to the Local Plan were also due to the loss of open break between Goffs Oak and St James and the coalescence of existing built up areas. This impact is all the greater due to the amount of development now being proposed.

In principle, we would further query the provision of such a large care home in a relatively remote location with limited facilities and poor public transport. Visitors would be highly dependent on the use of the private car. Care home provision is better located nearer to public transport and services close to main centres of population. This is the sustainable approach and is advocated by emerging Local Plan policy H5 II (a) which states that

proposals will be expected to be “In a suitable location where access to local services and a choice of sustainable travel options is available”.

While the need for elderly person housing within the borough is evident, the site is remote from town centre and other services and out of scale with the village of Goffs Oak. As the release of Green Belt is an exceptional case, the application is further lacking in justification.

### **Lack of masterplan approach**

Broxbourne planning policies in the emerging Local Plan GO2 require a comprehensive masterplan approach to development of the site subject of these applications. A concept for this is illustrated on the Figure 10 plan within the emerging Local Plan. It is surprising and a concern that the application has paid no regard to this requirement and given the status of the site as Green Belt land the justification for permission is further weakened.

The Design Statement submitted with the Tina Nursery site appeared to suggest an overall framework (see opportunities page 9), but the approach is neither followed by the neighbouring applications nor is it one agreed as a basis for the overall design vision.

The outline application (sites A and B), leaves all detailed matters reserved, but there are extensive details in supporting document for the application which will inevitably be used to justify the applicants thinking behind the numbers chosen and any subsequent reserved matters application. This is both confusing and unsatisfactory.

We object to the indicative implications of the numbers proposed. The lack of layout and appearance details as a full consideration of the application is incorrect given the large quantum of development (209 units plus café /retail) being proposed, well in excess of that envisaged for the site. This compounds the absence of a Strategic Design approach and an agreed masterplan.

The details, such as they are, do not demonstrate that a high-quality scheme at the site can be satisfactorily designed for such a large amount of development.

### **Design details**

Neither of these schemes has been presented for Design Review even though the option is there within the Herts County Design Review Panel. This lack of scrutiny compounds the lack of a required masterplan approach for a site that is exceptionally to be released from the Green Belt.

Although appearance is a reserved matter, the Design and Access Statement (Sites A and B) shows precedent drawings for pitched roof designs in the area. The submitted plans show a mansard type roof form (needed to accommodate the additional top floor). The outline application seeks a commitment to a quantum of development but it is not demonstrated that this can be successfully designed within the context of the site.

A more contextual design would move away from the indicated monolith institutional block like forms which bear little relation to the rural setting of the site and Goffs Oak village. Neither is it an approach derived from a collaborative design exercise with local groups, stakeholders and residents.

### **Site connections**

At the number proposed (Sites A and B) it is far from evident that development can be delivered and satisfactorily accommodated in a well-designed manner facilitating enhanced connections to the village centre. A masterplan approach would enhance linkages from this new area to those surrounding and to the village core. A footway and cycle way link, well overlooked in landscaped situation for instance should be provided but is lost in indicative plans. Any residents wishing to walk to the village centre or to meet other residents would have to walk along the noisy B156 road Goffs Lane. East to west linkages across the site and beyond it are far from guaranteed, especially if the quantum of development proposed becomes a given and a constraint to be worked around in the final details.

### **Flooding**

A Flood Risk Assessment is submitted with respect to the Area C site for 21 units. Very limited SuDs are proposed and surface water is discounted “for safety reasons”. As Herts CC Guidance, *Sustainable Drainage in Hertfordshire* March 2015 states, SuDs should be designed in from the beginning at the masterplan stage. With respect to Sites A and B, commitment is sought to agree a large amount of development by outline permission when this is unlikely to be compatible with a SuDs approach given the extensive built footprint. A SudS approach should inform the layout and masterplan across the wider area so that low maintenance, more ecologically beneficial SuDs solutions are incorporated from the outset. This would set the context to determine the appropriate amount of development for the sites of Tina Nursery as well as Inex Nursery. Lack of provisions for SuDs is a further objection reflecting the lack of a masterplan and reinforcing objections due to the Green Belt status of the site.

### **Amenity areas**

Site C includes a very modest courtyard area on the main road frontage which will be exposed to traffic noise and pollution. The site as indicated is too small to provide properly sheltered amenity areas away from traffic noise. A lower rise scheme with courtyard for instance could have provided a landscaped amenity to be enjoyed by residents both in views from within the accommodation and outside as a sheltered tranquil space. As proposed, it is unsatisfactory.

### **Summary**

The sites of all the applications are within the Green Belt. No final decision has been made on the Local Plan Green Belt allocation. In planning law, therefore very special circumstances must be demonstrated to justify inappropriate development in the Green Belt. CPRE Herts object they are not present for these proposals.

The lack of masterplanning, a strategic approach to design, the lack of Design Review and the excessive quantum of development within a confused outline application (including detailed submissions not to be determined) are all matters of objection that result in additional harm.

The applications are not in accordance with emerging Local Plan policies GO2 and H5 and best design practice DSC1 and the NPPF. A strategic design approach with agreement to a common vision and objectives is needed to then inform detailed schemes subject to Design Review.

All of the above compound the harm to the Green Belt in releasing the site for development. The predetermined parcelling up of the land ahead of any agreed masterplan approach to sites A, B, C and the Tina Nursery site reduces the quality of the final design; limits the provision of SuDs ; frustrates a coordinated provision for cross site connectivity, walking and cycling links and the provision of adequate amenity space.

Any future application should only be made in the event of a formalised release of land from the Green Belt and should this occur a much higher quality development should be demanded. CPRE Herts conclude that the very special circumstances are not demonstrated and urge the Council to refuse the applications.

Yours sincerely,

Tim Hagyard