

Standing up for Hertfordshire's countryside

Secretary of State for Housing, Communities
and Local Government
Ministry for Housing, Communities and Local
Government
(Call-In Request)
c/o Planning Casework Unit
5 St Philip's Place
Colmore Row
Birmingham, B3 2PW

Our Ref:

Your Ref:

23rd May 2018

Dear Sir,

Outline applications:

07/17/0352/O - 380 dwellings, Andrews Lane, Cheshunt
07/17/0864/O - 360 dwellings, Burton Lane, Goffs Oak and
07/17/1267/O - 63 dwellings, Andrews Lane, Goffs Oak

We refer to the above applications which have been made to Broxbourne Borough Council, Hertfordshire. CPRE Hertfordshire invites you to use your general power under Section 77 of the Town and Country Planning Act 1990 to direct the Council that these applications should be referred to you for determination rather than remaining with the Council. Our reasons for proposing this are as follows:

1. All three of these applications are for substantial development in the Green Belt, contrary to the National Planning Policy Framework and the current Broxbourne Local Plan Second Review. The emerging Broxbourne Local Plan has yet to be subjected to Examination in Public which is not scheduled to commence until September 2018.
2. The developments which form the subject of these applications are part of a wider proposal in the emerging Local Plan known as 'Rosedale', all of which is in the Green Belt, outside of existing settlement boundaries and which would result in the coalescence of the settlements of Goffs Oak, St. James and Cheshunt. With regard to the weight which can be accorded the emerging Local Plan under paragraph 216 of the NPPF, there are substantial unresolved objections from local community groups and others to these specific proposals.
3. Individually and collectively the applications will have a major adverse effect on four of the five stated purposes of the Green Belt as identified in paragraph 80 of the NPPF. They would extend urban sprawl; result in a consolidation of development between neighbouring towns such that the settlements would merge; result in a major encroachment into the countryside and adversely effect the pressure for urban regeneration through recycling of derelict and other urban land.

4. In determining these applications at the meeting of the Planning Committee on 22 May 2018, the Council has in effect gone against both the NPPF and its own current Local Plan and pre-empted any future Examination in Public of its emerging Local Plan without demonstrating any very special circumstances for doing so. The granting of planning permission has implications of significance beyond the area of Broxbourne Borough because of the importance of the application sites to the purpose of the Metropolitan Green Belt in preventing further urban sprawl of the continuous built-up area from London northwards along the Lea Valley and the precedent that it would set for proposals on other Green Belt land.
5. The NPPF is clear that once established, Green Belt boundaries should only be altered in exceptional circumstances, and only then through the preparation or review of the Local Plan. That policy has not been followed in this instance. We would also point out that the Secretary of State has stated that even where there is unmet demand for housing this is unlikely to outweigh harm to the Green Belt to constitute very special circumstances justifying inappropriate development of this nature

Given the extent of the departures from both National and Local Green Belt Policies, CPRE Hertfordshire wishes the Secretary of State to carry out his own assessment of whether the circumstances exist to outweigh the harm that would be caused.

We would be pleased to provide further information on all or any of the above reasons if this would be helpful in reaching your decision.

Yours faithfully,



Kevin FitzGerald,
Honorary Director, CPRE Hertfordshire

cc Broxbourne Borough Council - Head of Planning
Goffs Oak Community Association