

Standing up for Hertfordshire's countryside

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

Our Ref:

Your Ref:

27th September 2019 (by email)

Dear Ms. Taruvinga,

Application No. 07/19/0753/F
Construction of 42 dwellings, creation of public open space, formation of access, hard and soft landscaping, car parking and associated works
On land at the junction of Newgatestreet Road and St. James Road, Goffs Oak.

In the view of CPRE Hertfordshire, this application is premature. Paragraph 49b of the National Planning Policy Framework is clear that an application is premature if “*the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.*” The Broxbourne Submission Local Plan 2018-2033 is currently subject to Examination In Public and that examination is at an advanced stage.

This site is included in the Submission Local Plan as a potential residential development site, with consequential removal from the Green Belt (Policy GO4). The issues arising from this proposal were discussed at length at the Examination In Public and we will not rehearse them again here. The decision on the arguments made is one for the Inspector to make and not for us to presume.

However, the applicant does presume. Paras. 4.9 - 4.12 of the Planning Statement makes the case for officers to pre-empt the outcome of the Examination In Public by making assumptions on what the Inspector's views will be, based on what the Inspector has not said, rather than what he has said in his various statements. The argument is that because the Inspector has not so far made comment on GO4 “*It is evident that the inspector is supportive of the principle of the allocation and that in turn addresses most of the issues raised in respect of the allocation.*” In our view this is an inappropriate interpretation of NPPF para.48.

On the specific development proposal included in this application, we consider this to be gross over-development of the site. Policy GO4 requires approximately 25 units on this site. The application is for 42 units, an increase of 68%. That is a rather loose interpretation of ‘approximately’. The Council's pre-application advice stated that the council would be unlikely to support much more than 25 dwellings. That advice has been ignored.

As stated above it would be inappropriate for the Council to consider this application until the Inspector has issued his findings on the emerging Local Plan and that Plan has been adopted. We urge the Council to request the applicant to withdraw the application, or to suspend consideration of it until the findings of the EIP are known.

Yours sincerely,

David Irving