



The countryside charity  
Hertfordshire

31a Church Street  
Welwyn  
HERTS AL6 9LW  
[www.cpreherts.org.uk](http://www.cpreherts.org.uk)  
[office@cpreherts.org.uk](mailto:office@cpreherts.org.uk)  
01438 717587

**Standing up for Hertfordshire's countryside**

Ms Marie Laidler  
Planning and Development  
Broxbourne Borough Council  
Bishop's College  
Churchgate  
Cheshunt  
EN8 9XQ

Our Ref:

Your Ref:

29<sup>th</sup> January 2021 (by email)

Dear Ms Laidler,

**Application: 07/21/0029**  
**Ashfield Nursery, Newgatestreet Road, Goffs Oak, EN7 5RY**  
**Outline application with all matters reserved for custom-build development**  
**consisting of 8 house plots.**

I write with reference to the above application and several previous responses by CPRE Hertfordshire to proposals for residential development of this site. There appears to be some confusion as to the number of plots proposed in that the application states eight plots but the accompanying Design and Access Statement indicates five plots. In the event, our fundamental objections remain as previously and we object to this proposal for the following reasons:

1. Residential development on this horticultural site in the Green Belt is contrary to the relevant policies in the National Planning Policy Framework (NPPF) and the adopted Broxbourne Local Plan. At present this portion of the Green Belt acts as a buffer between the northern development of Goff's Oak which ends at Chiltern Close and the southern edge of development along Hammondstreet Road. Development on this site would create a visual intrusion and lead to pressure for further development of the fields and substantial gardens on each side and the merging of settlements.
2. The site is not included as a potential residential site in the adopted Broxbourne Local Plan. Policy GB2 policy envisages self-build and custom build housing for derelict glass house sites in the Green Belt and where permitted, the Council would seek to 'prevent urban sprawl', and low densities in sustainable locations while maintaining the openness of the Green Belt.
3. Among the criteria for Policy GB2 are the extent of dereliction of the glass houses and the viability of the businesses on the site. The photographs included in the Design and Access Statement do not demonstrate significant dereliction and the fact of closing the business does not demonstrate unviability. There is reason to consider whether

CPRE is working nationally and locally for a beautiful and living countryside

CPRE Hertfordshire is a Charitable Incorporated Organisation

President: Sir Simon Bowes Lyon, KCVO  
Chairman: Richard Bullen

Registered Charity 1162419



the present economic circumstances surrounding home grown produce may not change in the future, and this should be encouraged.

4. In any case, as noted previously (CPREH Letter 7th May 2020), in the Lee Valley Park Authority v Broxbourne Borough Council judgement in 2015, the judge dismissed concerns about dereliction of the existing buildings as very special circumstances and restated that “the concept of openness here means the state of being free from built development, the absence of buildings as distinct from the absence of visual impact”.
5. The applicant cites the Custom Build and Custom Housebuilding Act 2015 and that the provisions of the Act that have been incorporated into Policy GB2. However, approval of this application would in effect alter the Green Belt boundary which has been confirmed in the recently adopted Broxbourne Local Plan and the NPPF is clear that alterations to Green Belt boundaries should not be made by decisions on individual planning applications.
6. The proposed form of the development, with a single spine road and up to eight units constitutes a significant intrusion into the Green Belt. At most, a continuation of the adjacent development character should be maintained which would reduce considerably the number of units which may be acceptable.
7. The Council should satisfy itself on the extent of contamination and the need for remediation. Remediation is a requirement for any contaminated site and is not, in itself, a ‘very special circumstance’ as required by legislation.

Yours sincerely,

Chris Berry  
Planning Manager