

**Council Responses to Actions Required following Hearing Sessions for  
Matter 6 (Week Three)**

**General**

**AP16.** Council to propose a main modification to ensure that the Plan is effective in explaining the purpose of the indicative dwelling numbers for each of the sites proposed for development, including in terms of achieving efficient use of land through a design-led approach.

POLICY/ PARAGRAPH	PROPOSED MODIFICATION	REASON
New paragraph 3.19	<u>3.19 For each of the Local Plan sites shown on the Policies Map an indicative dwelling figure is provided within the relevant policy in Part 3 of the Plan and in the list of sites in Table 2 below. The dwelling numbers provide a starting-point for consideration of site-specific issues through the planning application process. In considering the merits of planning applications at the Local Plan sites, the Council will apply the dwelling numbers in the context of sustainable place-making, to achieve efficient use of land through a design-led approach. Proposals at Local Plan sites which differ from the indicative dwelling numbers provided within this Plan should be fully justified with regard to site-specific factors.</u>	To ensure that the Plan is effective in explaining the purpose of the indicative dwelling numbers for each of the sites proposed for development. See Inspector’s Action Point 16.

**AP17.** Council to clarify the relationship between proposed main modification policy H1 “making effective use of urban land” and policies ED2 and ED3 relating to designated employment areas and other employment uses. In particular, consideration should be given to whether collectively those policies strike an appropriate balance between ensuring an adequate supply of land and premises to meet the needs of the local economy and encouraging the provision of additional homes in urban areas and enhancing the local environment. Proposed policy H1, and the response to this action point, will be discussed under Matter 3 (resumed) on Thursday 8 November 2018.

For ease of reference the text of all three policies is reproduced below. A couple of inconsistencies in the references to Employment Areas in H1 and ED3 are shown amended highlighted in yellow.

Bullet 3 of paragraph 21 of the NPPF states that Local Plan policies should “support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances”.

As worded policy ED2 contains sufficient flexibility to respond to changes in economic circumstances so long as such changes are limited to employment or other complementary uses. The policy supports effective use of urban land for employment uses but not for residential uses. This is important because these designated Employment Areas provide a vital role in the continued supply of suitable land for small businesses such as workshops in particular, many of which would disappear from the borough if left to compete with housing or mixed-use redevelopment proposals. Workshops and other B2 uses are often not attractive but nevertheless play an important role in the local economy.

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Weakening of this policy position could cause landowners to fail to invest in the upkeep of their sites in the hope of generating higher returns from conversion and redevelopment opportunities. The wording in Part III of Policy H1 reflects the position in ED2.

Policy ED3 provides a criteria-based framework for consideration of redevelopment for non-employment uses (which could include residential uses envisaged in policy H1) outside Employment Areas. This policy wording is considered sufficiently flexible to comply with national policy.

As above, the NPPF is clear that policies should avoid the long term protection of employment land where there is no reasonable prospect of a site being used for that purpose. The Council’s Employment Land Study identifies the need to retain all remaining designated Employment Areas for current and future requirements. Nevertheless, the policy approach is sufficiently flexible to respond to individual business needs within the remit of protecting and retaining land for employment purposes. Cross-referencing between ED3 and H1 could articulate the balance more clearly.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON
<p><b>New Policy H1</b></p>	<p><b><u>Policy H1: Making Effective Use of Urban Land</u></b></p> <p><u>I. The Council will optimise the potential for housing delivery on all suitable and available brownfield sites, especially:</u></p> <p><u>a. redevelopment/conversion and re-use of vacant or redundant sites;</u></p> <p><u>b. estate renewal and regeneration opportunities;</u></p> <p><u>c. suitable opportunities within defined town centre boundaries as shown on the Policies map that are in accordance with policy RTC2;</u></p> <p><u>d. Sites within the boundaries of the Waltham Cross Area Action Plan (Policy WC3), provided that these will not impede the delivery of a strategic approach to development, in particular around transport hubs.</u></p> <p><u>II. The Council will proactively use its brownfield register to identify appropriate sites for residential development and increase planning certainty for those wishing to build new homes.</u></p> <p><u>III. The Council will continue to protect designated eEmployment sites Areas as shown on the policies map, in accordance with policy ED2</u></p>	<p>To ensure that the proposed allowance represents a reliable source of supply and that effective use is made of urban land. See inspector’s action point 4.</p>
<p><b>Policy ED2: Employment Areas</b></p>	<p><b>Policy ED2: Employment Areas</b></p> <p>I. Designated Employment Areas (as defined on the Policies Map) are reserved for employment use and other uses which support, or are wholly compatible with, the designation.</p> <p>II. Within these areas, the Council welcomes proposals for redevelopment and intensification of sites for uses within the B1 and B2 use classes.</p> <p>III. Wherever possible, new employment floorspace should be of a flexible design, able to adapt to the changing needs of occupiers, and be of energy efficient construction.</p>	<p>n/a</p>

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	<p>IV. Development must not prejudice the continued operation and viability of the Employment Area and neighbouring employment uses.</p> <p>V. Within the Employment Areas identified on the Policies Map, the Council will permit development, re-development or change of use for an alternative employment use subject to the following criteria:</p> <p>a) the proposal would not significantly affect the amenities enjoyed by occupiers of properties adjoining the employment area;</p> <p>b) the proposal would not create an unacceptable impact on the local and/or strategic transport network;</p> <p>c) the proposed use provides a complementary benefit to the Employment Area and serves the needs of local workers;</p> <p>d) any retail element must be ancillary to the main business use;</p> <p>e) the use maximises the employment potential of the area.</p>	
<p><b>Policy ED3: Loss of Employment Uses - Rest of the Borough</b></p>	<p><b>Policy ED3: Loss of Employment Uses - Rest of the Borough</b></p> <p>Development which would cause the loss of an existing employment use, will only be permitted where all the following criteria are met:</p> <p>(a) The retention of the site or premises for employment use has been fully explored without success, and that there is no reasonable prospect of the site/premises being suitable and viable for reuse or any alternative employment use in the medium term; or</p> <p>(b) Continued use of the site for employment generating purposes is incompatible with surrounding land uses; and</p> <p>(c) The proposal does not prejudice the continued viability of existing <b>Strategic</b> Employment Areas and neighbouring uses.</p>	<p>n/a</p>

**Issues 6.4: Bury Green**

**AP18.** *The justification for policy CH11 restricting the development of the former eastern playing field site to a "residential care scheme comprising 75 units" will be discussed further under Matter 8 on Wednesday 7 November in the context of identified needs for specialist accommodation for the elderly and opportunities to meet those needs. **Council to prepare a short note setting out relevant evidence to inform that discussion.***

Paragraph 159 of the NPPF identifies that local planning authorities should address the need for all types of housing including.....older people... and to cater for housing demand and the scale of housing supply necessary to meet this demand.

Part 6 of Document H5 within the evidence library – Housing Needs of Particular Groups – addresses needs for older persons housing. Within the context of an

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aging population within Broxbourne, paragraph 6.18 concludes a need for around 700 units of elderly persons housing from population growth. That does not, however, include for pent up demand which given the relative absence of market supply within Broxbourne, is considered to be significant.

The Council is seeking to provide housing for elderly persons housing in the following locations:

### Private Sector

High Leigh Garden Village – 80 bed care home with planning permission  
Brookfield Riverside – unspecified type and quantum  
Brookfield Garden Village – unspecified type and quantum  
Rosedale Park North – 64 bed care home  
Rosedale Park South – retirement “village” – unspecified type and quantum  
Cheshunt Lakeside – unspecified type and quantum

A development of mixed elderly persons accommodation is also being promoted as part of the Policy GO2 development north of Goffs Lane.

### Public Sector

Wormley Care Home  
Former Eastern Playing Fields Site

The attached minute of the recently formed Broxbourne Adults Strategic Supported Accommodation Board (BASSAB) explains the positions of Hertfordshire County Council and Broxbourne Council in relation to both of these developments.

In general terms, paragraph 6.19 of Document H5 concludes that the level of proposed delivery is consistent with the need and that is the Council’s position. The Council also considers that it is taking a pragmatic and flexible approach to ensuring that the mix and geographical location of sites provides flexibility of choice of type and location in relation to current and future needs across the market and social sectors.

The former Eastern Playing Fields site plays an important role in providing for the social provision of elderly housing. It is currently anticipated that this will be through a sheltered/extra care model rather than through provision of a nursing home and that this will be entirely complementary to the Wormley Care Home which will enable elderly people to progress through the cycle of care. This position is clearly supported by BASSAB though not by HCC Property which is seeking a general allocation on the site.

The other factors that have informed the Council’s restriction of this site to elderly care are:

1. the history of the site as a school playing field within a wider area of parkland that has through the passage of time virtually assumed the status of public open space. Indeed, the Regulation 18 Local Plan had designated this land as community open space, prior to the Council’s

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agreement that part of the site would be suited to elderly persons housing whilst retaining significant openness within the wider locale; and

2. that the wider parkland setting is considered to be ideally suited to elderly care provision. The care scheme would be adjacent to St. Mary's Church and a proposed community centre and early discussions have been held on a joint model of community provision.
3. The site is within the ownership of the County Council which is responsible for providing elderly social care

The 75 unit scale within the policy was based on a single building and that number may be challenged should a care scheme be sought in disaggregated fashion. However, the Council considers that when all of the above factors are taken into consideration and subject to detailed planning considerations that Policy CH11 should continue to restrict the eastern playing field site to a residential care scheme.

**AP19.** Council to propose a further or different main modification to policy CH12 relating to land north of Bonney Grove to ensure that it is effective in terms of the future development, redevelopment or relocation of the sports club and the potential for residential development taking account of access considerations and the compatibility of outdoor sport activities with new residential uses.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON
Paragraph 7.21	West of Goffs School lies the V&E sports club, including football pitches, and further to the west is an area of undeveloped land known as Bonneygrove Field. <del>Although not forming part of the Council's planned housing land supply, it is considered that this area has the potential to be developed in part for housing as a means to improve the facilities at the club and</del> improve the frontage onto Goffs Lane <u>as part of a comprehensive development and contribute to the requirements of Policy H1: Making Effective Use of Urban Land. A development brief will be prepared for this site.</u>	To ensure that the policy is effective. See inspector's Action Point 19.
Policy CH12: Land North of Bonney Grove	<b>Policy CH12: Land North of Bonney Grove</b> <del>Land north of Bonney Grove is allocated in part for housing to enable improvements to club facilities.</del> <u>allocated for comprehensive residential redevelopment, subject to the following requirements:</u>  a) <u>relocation of the V&amp;E sports Club to a suitable alternative location;</u> b) <u>approximately 100 homes, 40% of which should be affordable;</u> c) <u>development in accordance with a comprehensive masterplan; and</u> d) <u>suitable access arrangements from Goffs</u>	To ensure that the policy is effective. See inspector's Action Point 19.

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	<p align="center"><u>Lane.</u></p> <p><u>II. Should a suitable relocation site for the V&amp;E Club not be agreed by all relevant parties within two years of the date of adoption of this Plan, the Council will consider favourably proposals for a stand-alone residential development at Bonneygrove Field subject to the following requirements:</u></p> <ul style="list-style-type: none"> <li>a) <u>approximately 40 homes, 40% of which should be affordable;</u></li> <li>b) <u>appropriate mitigations to ensure compatibility of new residential uses with adjacent outdoor sports activities; and</u></li> <li>c) <u>suitable access arrangements from Lieutenant Ellis Way.</u></li> </ul> <p><del>A development brief will be prepared for this site.</del></p>	
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**Issue 6.5: Cheshunt Lakeside**

**AP20.** Council to propose a main modification to policy CH1 to ensure that it is effective in facilitating the provision of suitable replacement accommodation for existing businesses that could be satisfactorily located within the proposed mixed use urban village at Cheshunt Lakeside.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON
<p><b>Policy CH1: Cheshunt Lakeside</b></p>	<p><b>Policy CH1: Cheshunt Lakeside</b> Cheshunt Lakeside will be developed as a new mixed use urban village to accommodate:</p> <ol style="list-style-type: none"> <li>1. c. 1,750 new homes;</li> <li>2. 40% affordable homes;</li> <li>3. Buildings limited to a maximum of 8 storeys in height;</li> <li>4. Elderly persons' accommodation;</li> <li>5. <u>Approximately 20,000 square metres of business space to accommodate existing businesses within the allocated land area that could be satisfactorily located within the proposed mixed use urban village.</u> <del>Businesses and business floorspace for</del> new business start-ups <u>and additional business space;</u></li> </ol>	

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**AP21.** Council’s proposed modification to policy CH1 and paragraphs 7.7 and 7.8 relating to mitigation of the impact on the Lee Valley SPA arising from the Cheshunt Lakeside development [EXAM14A] to be discussed under Matter 9 on Wednesday 7 November 2018.

For ease of reference the proposed modifications referred to in document EXAM14A are reproduced below:

<p><b>CH1: Cheshunt Lakeside</b></p>	<p><b>Policy CH1: Cheshunt Lakeside</b></p> <p>Cheshunt Lakeside will be developed as a new mixed use urban village to accommodate:</p> <ol style="list-style-type: none"> <li>1.c. 1,750 new homes;</li> <li>2.40% affordable homes;</li> <li>3.Buildings limited to a maximum of 8 storeys in height;</li> <li>4.Elderly persons' accommodation;</li> <li>5.Businesses and business floorspace for new business start-ups;</li> <li>6.A local centre, situated along Windmill Lane, connecting Cheshunt Lakeside to Cheshunt Railway Station;</li> <li>7.A two form of entry primary school;</li> <li>8.Landscaped open space; and</li> <li>9.Relocation of Network Rail depot.</li> </ol> <p>A section 106 agreement will accompany a future planning permission and proportionate contributions will be allocated to priorities within the Infrastructure Delivery Plan.</p> <p>Cheshunt Lakeside is to be developed in accordance with a comprehensive master plan. Incremental development of the area will be resisted.</p> <p>The Council will work in partnership with Natural England, the Lee Valley Regional Park Authority and the developers of Cheshunt Lakeside to agree <a href="#">a mitigation strategy containing a range of on-site and off-site measures aimed at mitigating to mitigate</a> the effect of the development on the qualifying interests of the Lee Valley Special Protection Area. <a href="#">The mitigation strategy will be in place by the time of grant of planning permission.</a></p> <p>If necessary, compulsory purchase will be pursued by the Council.</p>	
<p><b>Paragraph 7.7</b></p>	<p><b>Cheshunt Lakeside and the Lee Valley Special Protection Area</b></p> <p><b>7.7</b> Under the Conservation of Habitats and Species Regulations 2010, the Council is required to consider the impacts of a plan or project on any European site. The Habitats Regulations Assessment (HRA) process requires detailed consideration of the potential effects of the plan or project, by itself or in-combination with other similar plans or projects, on the conservation objectives of a site, commonly called an ‘appropriate assessment’. Any adverse effect on the qualifying features of the site must be avoided or mitigated, if the further stages in the Habitat Regulations Assessment process – onerous tests that most proposals are unable to satisfy - are to be avoided. <a href="#">Proposals must also satisfy the requirements set out in Policy NEB2: Wildlife Sites (see Chapter 27).</a></p>	<p>In order to ensure that mitigation relating to the Lee Valley SPA is implemented in a timely and effective manner. See inspector’s Action Point no.1</p>
<p><b>Paragraph 7.8</b></p>	<p><b>7.8</b> The Council has carried out an appropriate assessment of this plan. That assessment found that the</p>	<p>In order to ensure that mitigation</p>

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	<p>proximity of the proposed Cheshunt Lakeside development less than 400 metres from the Special Protection Area (SPA) was likely to have an adverse effect on the qualifying interests of the SPA (Bittern, Gadwall and Shoveler), unless mitigation measures were put in place. In considering any application, the Council will need to be satisfied that the development provides sufficient mitigation, in accordance with the mitigation hierarchy in Policy NEB1 <a href="#">and the provisions of Policy NEB2</a>, to ensure that no adverse effect on the Lee Valley SPA arises. This is likely to require the provision of access to sufficient on-site recreational open space and amenity space to meet the day to day needs of residents, as well as off-site mitigation measures such as the provision of habitat for qualifying species, and improved visitor management infrastructure such as information signs and paths which encourage activity away from the qualifying interests. <a href="#">Further details of potential measures for inclusion within the mitigation strategy are set out in the Council's Habitats Regulations Assessment.</a> The project level appropriate assessment will enable the collection of more detailed information on the qualifying interests and inform the detail of mitigation measures to be provided.</p>	<p>relating to the Lee Valley SPA is implemented in a timely and effective manner. See inspector's Action Point no.1</p>
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**Issue 6.8: Council Offices, Churchgate**

**AP22.** Question 119 to be discussed under Matter 9 on Wednesday 7 November 2018: (a) Would the "development of new homes at Bishops' College as a mixture of conversion and redevelopment" preserve or enhance heritage assets including the listed college buildings and the Churchgate conservation area? (b) Is the Council's proposed modification to policy CH13 necessary and adequate to ensure that this would be the case?

For ease of reference, the Council's proposed modification is reproduced below:

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON
<p><b>Policy CH13: Council Offices, Churchgate</b></p>	<p><b>Policy CH13: Council Offices, Churchgate</b> A development of <a href="#">approximately 75</a> new homes is proposed at Bishops' College as a mixture of conversion and redevelopment. A development brief will be prepared <del>for this site</del> <a href="#">to address a range of issues including the setting, character and appearance of the listed buildings and conservation area and associated green spaces including the New River.</a></p>	<p>Modification in response to inspector's Further Preliminary Questions no. 1 (part a). The number of houses derives from the Housing Trajectory, which combines 28 at Whit Hearn SLAA site and 45 at the Council Offices site. Additional sentence proposed to reflect the fundamental importance of the setting to any development proposals in this area.</p>



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**Issue 6.9: Cheshunt Football Club and Albury Farm**

**AP23.** Council to propose a main modification to policy CH7 so that it is effective and consistent with national policy in terms of delivering comprehensive development comprising a football stadium, associated community and commercial floorspace of an appropriate scale, and around 165 new homes.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON
Policy CH7: Cheshunt Football Club	<p><b>Policy CH7: Cheshunt Football Club</b></p> <p><del>A development of c.165 new homes, community and commercial floorspace is proposed at Cheshunt FC to enable the development of the Cheshunt FC Stadium.</del></p> <p><u>Cheshunt Football Club will be developed as a mixed sporting, community, commercial and residential development comprising:</u></p> <ol style="list-style-type: none"> <li>1. <u>Enhanced facilities and football stadium;</u></li> <li>2. <u>A development of approximately 4,000 square metres net floorspace for community, business, leisure and ancillary retail uses;</u></li> <li>3. <u>Approximately 165 new homes.</u></li> </ol> <p><u>The site will be developed in accordance with a comprehensive masterplan. Incremental development of the area will be resisted.</u></p>	To ensure that the policy is effective and consistent with national policy. See inspector's Action Point 23.

**AP24.** Council to propose a main modification to policy CH8 so that it is effective in achieving the objective of "retaining openness along the A10" referred to in paragraph 7.19 of the Plan.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON
Policy CH8: Albury Farm Landscape Protection Zone	<p><b>Policy CH8: Albury Farm Landscape Protection Zone</b></p> <p><u>I. The area indicated on the Policies Map will be protected from development <del>other than ancillary buildings or structures which</del></u></p> <ol style="list-style-type: none"> <li>a) <u>are demonstrated to be necessary to the effective implementation of any of the uses contained in Part II of this policy; and</u></li> <li>b) <u>are designed and sited to ensure consistency with the objective of retaining openness along the A10.</u></li> </ol> <p><u>II. Acceptable land uses within this zone could include any of the following:</u></p> <ol style="list-style-type: none"> <li>a) <u>agriculture;</u></li> <li>b) <u>sport and recreation facilities, including playing pitches, sports fields, parks and other open spaces;</u></li> <li>c) <u>allotments;</u></li> </ol>	To ensure that the policy is effective. See inspector's Action Point 24.

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	<p>d) <u>cemeteries;</u>  e) <u>wildlife habitat creation;</u>  f) <u>any other land uses which do not compromise the openness of the landscape.</u></p>	
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**Issue 6.10: Maxwells Farm West and Rush Meadow**

**AP25.** Council to propose a main modification so that the Plan includes a policy that provides a clear indication of how a decision maker should react to any development proposals that may be made during the plan period on land at Maxwells Farm West and Rush Meadow.

Further changes to previous modifications are highlighted in **yellow**.

<b>POLICY/PARAGRAPH</b>	<b>PROPOSED MODIFICATION</b>	<b>REASON</b>
<b>Paragraph 3.12</b>	In the event that there are difficulties in implementation of the development strategy, contingency planning will focus on bringing forward the <u>reserve site undesignated land</u> at Maxwells Farm West <u>and Rush Meadow</u> <del>(Policy CH8, Section 7)</del> <u>(Paragraph 7.23 and see Policy CH13, Section 7)</u> or the Waltham Cross Area Action Plan (see Policy WC3, Section 11).	Modification for consistency with new Policy regarding Maxwells Farm West and Rush Meadow.
<b>Paragraph 7.23</b>	This site is proposed for removal from the Green Belt as part of wider Green Belt changes in the vicinity. It is not being specifically allocated for development within this Local Plan but it is recognised that its development <u>for a variety of uses</u> could contribute to the strategic economic objectives of the Plan within the Plan period. <del>Any proposals that emerge for its development will be assessed against their ability to contribute to the vision, objectives, and strategy of the Local Plan</del> <u>That contribution could include the accommodation of employment uses displaced from the proposed Brookfield and Cheshunt Lakeside developments that would be compatible with the character and appearance of a high quality business park environment. There are infrastructure challenges to accommodating the development of this site alongside the wider Park Plaza proposals and the infrastructure impacts of developing this land will need to be fully tested within planning applications.</u>	To provide a clear indication of how a decision maker should react to any development proposal that may be made during the plan period on land at Maxwells Farm West and Rush Meadow. See inspector's Action Point 25.
<b>New Policy CH13</b>	<u><b>Policy CH13: Maxwells Farm West and Rush Meadow</b></u>  <u>Planning applications for Maxwells Farm West and Rush Meadow will be assessed against their contribution to the employment, environment, transport, infrastructure, and health and wellbeing objectives set out within paragraph 2.2 of this Plan.</u>	As above.

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**Issue 6.11: Cheshunt Country Club**

**AP26.** Council to consider further how policy CS1 should be modified so that the Plan is effective and consistent with national policy relating to the Green Belt with regard to any development proposals that may be brought forward at Cheshunt Country Club.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON
<p><b>Paragraph 14.3</b></p>	<p>This area provides strategic separation between metropolitan London and the southerly settlements of Hertfordshire. It is mainly characterised by attractive rolling farmland and woodlands. It is also interspersed by a number of public paths. The only significant development issue is the future of the Cheshunt Country Club at Theobalds Park which is owned by Tesco and contains a number of sports facilities including a pavilion and sports pitches. The company has proposed that this area be allocated for a range of uses and has specifically identified its potential for development as a business park. That is not proposed within this Plan and the site remains in the Green Belt. Nevertheless, it is clear that there needs to be a solution for the building and the site.</p> <p><u>A potential option for the site could be to accommodate a sports club but the Council will consider other uses subject to compatibility with Green Belt policy.</u></p>	<p>As below.</p>
<p><b>Policy CS1: Cheshunt Country Club</b></p>	<p><b>Policy CS1: Cheshunt Country Club</b></p> <p><u>I. The Council will work with the land owner to secure a sustainable future for the Cheshunt Country Club that is compatible with its countryside Green Belt location.</u></p> <p><u>II. To ensure consistency with Policy GB1 and national policy in relation to Green Belt, proposals for built development should not have a greater impact on the openness of the Green Belt than the existing structures on the site;</u></p>	<p>To ensure that the policy is effective and consistent with national policy relating to Green Belt. See inspector's Action Point 26.</p>

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**Issue 6.12: Park Plaza West**

**AP27.** Council to propose a main modification to policy PP1 to ensure that it is effective in terms of setting out requirements relating to the provision of transport infrastructure; the management of car parking; and the provision of pedestrian and cycle links on the site.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON
<p><b>Policy PP1: Park Plaza West</b></p>	<p><b>Policy PP1: Park Plaza West</b> Land at Park Plaza West is allocated for the development of a business campus. This campus will be developed in strict accordance with a Master Plan and design codes based on the following principles:</p> <ol style="list-style-type: none"> <li>1. Up to 100,000 square metres gross floorspace;</li> <li>2. Gateway development sensitive to Green Belt setting;</li> <li>3. Restricted to use classes B1a (offices) or B1b (research and development) or other uses that support the campus or clearly demonstrate that they meet the employment objective of the Local Plan;</li> <li>4. Generous and well landscaped setting including <u>the southern area of the site (forming the southern part of Theobald’s Park Farm as shown on the Policies Map and Concept Diagram)</u> to be laid out as <u>public open green space (minimum 12.5 hectares) in accordance with Policy ORC1;</u></li> <li>5. Landmark development at corner of A10 and Lieutenant Ellis Way;</li> <li>6. Bus service to be provided;</li> <li>7. <u>Parking in accordance with Local Plan Guidelines; A parking strategy that balances the provision of car parking spaces with the objective of securing modal shift to other forms of transport for trips to and from the site;</u></li> <li>8. <u>Contributions to meeting the transport mitigations set out within Policies INF3, INF5, INF7 and INF8 of this Local Plan;</u></li> <li><del>8.</del> 9. <u>Pedestrian and cycle connections to be made to the urban area and pedestrian and cycle linkages within the site and the area of open green space to facilitate and encourage cycling and walking;</u></li> <li><del>9.</del> <del>10.</del> <u>New River and environs to be developed as a Green Corridor; and</u></li> <li><del>10.</del> <u>11.</u> <u>Cecil's Pond to be restored;</u></li> <li><del>11.</del> <u>12.</u> <u>Historic assets (including the listed barn) and their setting should be respected.</u></li> </ol> <p>This site will be developed in strict accordance with</p>	

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	a master plan and design codes for buildings and the public realm which will be incorporated within an outline planning application for the development.	
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**AP28.** Council to clarify whether the concept plan for Park Plaza West (Figure 12) and the Policies Map are justified and consistent with policy PP1(4) relating to the "southern area of the site being laid out as public open space (minimum 12.5 hectares)", and whether the open space should be referred to as "public".

The minimum 12.5 hectares open space specific in policy PP1(4) was originally based on the illustrative masterplan for Park Plaza West (EXAM20A). However this was not accurately transcribed onto either the Policies Map or the concept diagram. The Council therefore proposes to modify both the map and the diagram as shown below on the next page. Justification of the overall concept is provided in paragraph 10.4 of the supporting text, "to enhance rather than detract from the entrances into Broxbourne and London."

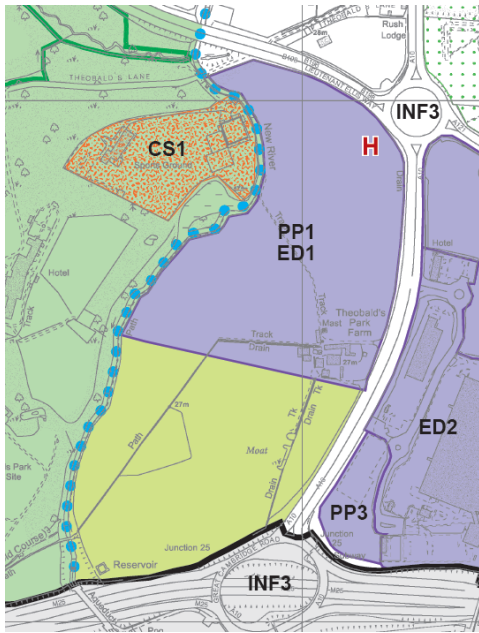
In relation to whether the open space should be referred to as 'public', there is an existing public right of way which crosses the western part of this area, as shown on the Concept Diagram as a red dotted line. Reflecting the masterplan at EXAM20A, the Council's expectation is that there will be paths crossing the open space connecting the site with the New River and a new crossing over the A10, as well as providing public access to Cecil's Pond and other features of interest. The policy wording as submitted is clear that this space is to be located in the "southern area of the site", although this could be made more explicit by reference to the Policies Map and concept diagram.

However, the Council acknowledges that the open space will be privately managed and maintained as part of the overall Park Plaza West development, and that the open space will therefore not be a public park as such. The Council has proposed a main modification to replace the Local Green Space designation with ORC2: Loss of Open Space, Leisure, Sport and Recreational Facilities on the Policies Map. For consistency with ORC2 it is considered appropriate to delete the word 'public' from policy PP1(4). However, the 'greenness' of the open space is considered to be essential to achieving the objectives of this part of the policy and therefore the Council proposes to include the wording 'open green space' within the policy and on the Concept Diagram.

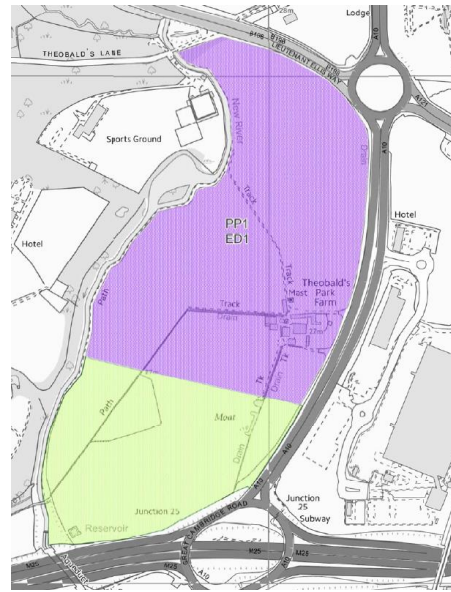
Reflecting the proposed approach set out above, Policy PP1(4) would therefore be amended as set out in the table of modifications relating to AP27 above.

**Council Responses to Actions Required following Hearing Sessions for Matter 6 (Week Three)**

*Submission Local Plan Policies Map*



*Proposed amendment to show 12.5 hectares of open space*



*Submission Concept Plan*



*Proposed amendment to show 12.5 hectares of open space*



**Council Responses to Actions Required following Hearing Sessions for  
Matter 6 (Week Three)**

As a consequence of this modification, a further modification to policy ORC1 is required as highlighted in yellow below:

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON
<p><b>Policy ORC1: New Open Space, Leisure, Sport and Recreational Facilities</b></p>	<p><b>Policy ORC1: New Open Space, Leisure, Sport and Recreational Facilities</b></p> <p><i>[delete Turnford Brook at Brookfield from the list of 4 areas designated under new part VI of this policy – designation of this area as the Hell Wood Local Wildlife Site. Public access to be considered through detailed masterplanning]</i></p> <p><i>[Add a new part VI as follows:] <u>The areas shown on the Policies Map at Rosedale Park, Theobalds Park Farm south of Park Plaza West and at Newgatestreet Road in Goffs Oak, are all designated as new <b>Public Open Green</b> Space. These areas will be kept permanently free from built development, and should include a mix of formal and informal recreational space, parks and gardens, planting schemes, or landscaping.</u></i></p>	<p>To ensure effectiveness and consistency with national policy.</p> <p>Point VI added to redesignate Local Green Spaces as Open Green Spaces, taking account of the Inspector’s Preliminary Question no. 25 which draws attention to the requirements of NPPF paragraphs 76 and 77, which suggest that Local Green Space is not an appropriate designation for new open spaces.</p> <p>See Council response to Question no. 132 and Action Point 28.</p>

**Council Responses to Actions Required following Hearing Sessions for  
Matter 6 (Week Three)**

**Issue 6.12: Park Plaza North.**

**AP29.** Council to propose a main modification to policy PP2 so that it is effective and justified with regard to accommodating uses that need to be relocated as a result of other policies in the Plan on Park Plaza North as well as helping to meet identified needs for other B1, B2 and B8 employment uses.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON
<p><b>Policy PP2: Park Plaza North</b></p>	<p><b>Policy PP2: Park Plaza North</b>            Park Plaza North is allocated for a <del>variety of small and medium sized enterprises</del> <u>mix of employment uses</u> as follows:</p> <ol style="list-style-type: none"> <li>1. <del>Bulky goods retailers that need to be relocated Restricted to use classes B1, B2 or businesses requiring to relocate</del> as a result of regeneration developments proposed within <del>this Local Plan</del> Waltham Cross Town Centre; and</li> <li><del>2. Landmark development at the corner of the A10 and Winston Churchill Way.</del></li> <li>2. <u>A mix of B1, B2 and B8 uses on the remainder of the site.</u></li> </ol> <p>The site will be developed in general accordance with a master plan and design code which will be incorporated within an outline planning application for the development. <u>The masterplan should include a visual landmark development at the corner of the A10 and Winston Churchill Way.</u></p>	



**Council Responses to Actions Required following Hearing Sessions for  
Matter 6 (Week Three)**

**Issues 6.13: Waltham Cross and Hoddesdon**

**AP30.** Council to propose a main modification to policy WC2, paragraph 11.4 and Figure 13 to ensure that the Plan provides an effective and justified approach to the redevelopment of Waltham Cross northern High Street and the relocation of any existing uses that may be required.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON
11.4	<p>The northern end of High Street the High Street presently sees relatively low levels of footfall and has a level of vacancy significantly higher than the southern end. Whilst the ‘big box’ Wickes (<u>east of Sturlas Way</u>) and Homebase DIY stores (<u>west of Sturlas Way</u>) <del>at this end of the High Street</del> play a recognised role in the broad retail offer of the town, they turn their back on this end of the street and create closure to the pedestrianised core, consequently limiting footfall and the viability of the retail units. Previous endeavours to redevelop the northern end of the High Street for a retail led development have not attracted investors. The Town Centre Strategy therefore now promotes this site for a mixed use, high density development of apartments, shops and community uses. <del>The estimated capacity for the site is for 300 new homes. This would entail the relocation of Wickes, and Homebase to Park Plaza and negotiations are on-going with both companies towards this end.</del></p>	
New paragraph 11.5	<p><u>The estimated capacity of the eastern part of the site is for 150 new homes. This would entail the relocation of Wickes, potentially to Park Plaza North (see Policy PP2). The western part of the allocation comprises the Homebase store and negotiations will take place with both the landowner and Homebase to establish the most sustainable future for this site. That may result in the status quo, a redevelopment incorporating a re-modelled Homebase store or the closure of the Homebase store and its potential relocation.</u></p>	
<p><b>Policy WC2: Waltham Cross Northern High Street</b></p>	<p><b>Policy WC2: Waltham Cross Northern High Street</b> Waltham Cross Northern High Street will be developed as a mixed use quarter <del>as follows</del> <u>comprising the following:</u></p> <ul style="list-style-type: none"> <li><del>1. c. 300+ new homes;</del></li> <li><del>2. 40% affordable housing;</del></li> <li><del>3. Shops/commercial/community ground floor uses.</del></li> </ul> <p style="margin-left: 40px;">a) <u>On the land east of Sturlas Way, approximately 150 homes;</u></p>	

**Council Responses to Actions Required following Hearing Sessions for Matter 6 (Week Three)**

	<p>b) <u>On the land west of Sturlas Way, the potential for significant housing development, possibly as part of a mixed use development incorporating the existing store;</u></p> <p>c) <u>40% affordable housing;</u></p> <p>d) <u>Shops/commercial/community ground floor uses.</u></p> <p>The site is to be developed in accordance with a comprehensive master plan. Incremental development of the area will be resisted.</p> <p><u>Masterplanning is to consider reasonable options for the relocation of the Wickes and Homebase stores.</u></p> <p>A section 106 agreement will accompany a future planning permission and proportionate contributions will be allocated to priorities within the Infrastructure Delivery Plan.</p> <p>If necessary, compulsory purchase will be pursued by the Council.</p>	
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Representations from the agents for the freeholders of the Homebase site are attached as an appendix. These state that *"They [LCP Investments Ltd] remain unconvinced that Homebase represents a viable option on this site. They support in principle the proposal in the Local Plan to redevelop the site and would work with the Council to consider a mixed use redevelopment of the site."* The Council considers that it is appropriate to retain the Homebase site within the site allocation, but reduce the number of dwellings proposed to 150 to reflect development of the land east of Sturlas Way only, in order to provide flexibility around the future of the Homebase site.

In relation to Figure 13, this means that the only modification required is to delete the reference to 'c. 300 dwellings' and instead label "c.150 dwellings" on the eastern part of the site only. No modifications to the Policies Map are required.