

MATTER 4/1147875

MATTERS STATEMENT

**Borough of Broxbourne
Local Plan Examination**

**On behalf of:
Countryside Properties PLC
(Representor ID 1147875)**

17 July 2018

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**Our Reference:
17086**

Matter 4: Green Belt

Issue 4.1A: Green Belt Purposes

How would the alterations to the Green Belt affect the purposes of including land in the Green Belt in the following locations: c) Around Goffs Oak village (4 sites)

Issue 4.1C: Proposed Green Belt boundaries

Would the boundaries around the land that the Plan proposes to remove from the Green Belt be clearly defined using physical features that are readily recognisable and likely to be permanent?

Is it likely that the Green Belt boundaries would not need to be altered again at the end of the plan period?

Introduction

This statement has been prepared on behalf of Countryside Properties PLC in relation to the forthcoming Hearing Sessions for the Broxbourne Local Plan 2018-2033 Independent Examination.

Countryside Properties PLC have an interest in several sites within the Borough of Broxbourne and are keen to promote and deliver high quality residential developments within the area.

Site specific information will follow in subsequent Matters Statements.

Matter 4: Response.

We support the Local Planning Authority in the identification of their housing need and their pragmatic approach to the allocation of sites and the release of Green Belt sites where it is deemed appropriate.

We consider the Green Belt Review to be sound and the release of Green Belt sites necessary to meet the Authority's demonstrable housing need.

In particular we are considering sites in and around Goff's Oak, within which the proposed allocation sites are in locations that naturally expand the core of the existing settlement, as opposed to continuing the historic linear sprawl. This allows good connectivity with the village facilities and in the case of sites to the west, ready access to Cuffley Hill and in turn Cuffley Station, located less than a mile away.

Similarly, the nature of the sites ensure that the wider purposes of the Green Belt are not impinged

upon and that the allocations follow naturally defined boundaries.

There is a concern regarding the density of development proposed within the site allocation policies. These are considered to be low for the size of many of the sites and it is considered that they do not result in the most efficient use of land.

Broxbourne have had a persistent under delivery of housing for 7 of the last 10 years and without the Local Plan allocations were only able to demonstrate a 3.19 years supply of housing in the 2016/17 Annual Monitoring Report. That same report advised that when the Local Plan allocations are factored in, the Authority will only be able to show 5.04 years supply of housing.

Whilst it is acknowledged that this would demonstrate a 5 year land supply, it is only marginal and it would only require the delayed delivery of a few sites to result in a further under delivery of housing and therefore a lack of a 5 year land supply.

If a persistent under delivery of housing continues, even following the adoption of the Local Plan, then it is highly likely that further Green Belt release will be required in subsequent Local Plan's.

If the Local Planning Authority were to follow the approach suggested by the Draft National Planning Policy Framework and apply minimum densities to the proposed housing sites, as opposed to listing an estimated dwelling number, there would be scope for the delivery of developments that are more dense and make the best use of land, thus avoiding unnecessarily low density developments, delivered as a result of overly prescriptive planning policies and maximising the housing delivery across the Plan period.

Such an approach would ensure maximum housing delivery within this plan period and minimise the risk of needing to release further land in subsequent years.

Main Modification

We would respectfully request that the Inspector seeks to amend the housing land allocations to reference minimum housing densities.

Conclusions

There is general support for the Broxbourne Local Plan 2018 – 2033, however, it is considered that the housing land allocations are overly prescriptive in housing density terms that will result in low density developments across the Borough, contrary to the Draft National Planning Policy Framework.

More importantly, the approach taken to site capacity will in turn increase the risk to the Borough in achieving their 5 year land supply in future years, thus increasing the risk of additional Green Belt land needing to be released meet the under delivery.

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