

**MATTER 6/1147875**

**MATTERS STATEMENT**

**Borough of Broxbourne  
Local Plan Examination**

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

**13 August 2018**

**Prepared by:**  
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Associate Director

**Our Reference:  
17086**

**Matter 6: Are the policies and proposals in the different parts of the Borough justified, consistent with national policy, and likely to be effective?**

*Issue 6.2: Goffs Oak*

*If there are exceptional circumstances to justify altering the Green Belt, would the assumption that a total of around 181 dwellings will be built at the four extensions at Goffs Oak during the plan period as proposed in policies GO2, GO3, GO4 and GO5 be justified? How many are likely to be constructed by 31 March 2022?*

*How would the four extensions to Goffs Oak village proposed in policies GO2, GO3, GO4 and GO5 affect the character and appearance of the area?*

*Does the Plan contain effective policies to ensure that social, economic and environmental infrastructure will be adequate having regard to the development proposed in policies GO2, GO3, GO4 and GO5?*

**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 delivery high quality residential developments within the area.

This representation is made in respect of site GO5, for which Countryside have an option over the Fairmead and Rosemead Nurseries and intend to submit a planning application for in advance of the Hearing Sessions.

**Matter 6: 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 GO5, ready access to Cuffley Hill and in turn Cuffley Station, which is 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.

GO5, is well screened with dense tree belts to north and west, obscuring the site from the wider Green Belt. The site also benefits from abutting residential development to the east and south. It is considered that this site is a natural location for the expansion of Goffs Oak, with the land failing to truly serve any of the five purposes of the Green Belt.

The site is not permanently open and is not available for use by the public, it is not therefore considered to fulfil the functions of the Green Belt, the allocation of this site is therefore considered to have a minimal, if not negligible, impact on the wider retained Green Belt.

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. This matter is dealt with in detail in our Matter 4 response.

The intention is to submit a planning application comprising circa 55 dwellings, which whilst resulting in a denser form of development, it is considered that it will not be detrimental to the character and appearance of the area, it will not be visible from the wider countryside/Green Belt and will reflect the general form and character of the adjacent settlement. In addition, it will ensure smaller more affordable properties are also provided enabling younger local residents to afford properties within the village.

The village of Goffs Oak is well served socially and economically, with policy GO2 providing further commercial opportunities for the settlement.

Environmentally, in respect of GO5, the allocation proposes the re-development of a semi derelict site and as such will ensure the site is appropriately remediated and brought back into a meaningful use. In addition, the National Planning Policy Framework 2018 requires developments to incorporate sustainable urban drainage where appropriate and to protect and enhance biodiversity on site. It is considered that the allocation of GO5 will facilitate the delivery of sustainable urban drainage solutions and provide opportunities to enhance the ecological value of the site generally. It therefore offers an environmental benefit to the area.

It is acknowledged that Fairmead and Rosemead Nurseries are covered by a Tree Protection Order and as part of the re-development of the site, it is intended to retain as many protected trees as possible. We are however conscious that a number of the protected trees have been surveyed and are considered to be of poor quality. In discussions with the Council's tree officer, it is considered that the loss of lesser quality protected trees is agreeable, subject to an appropriate replacement planting scheme being provided. It is considered that this pragmatic approach to the development of the site should be reflected in the proposed policy.

Subject to a timely decision on the soon to be submitted planning application, it is considered that circa 55 dwellings can be delivered by the 31 March 2022.

### **Main Modification**

With respect, we request that a main modification to policy GO5 be considered, having regard to deliverable increased dwelling density, whilst the retention of protected trees clause be amended to reflect the pragmatic approach to lesser quality specimens.

## **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.

GO5 is considered to be sustainable and a natural housing allocation having regard to the boundary treatments and sites location in proximity to existing residential development. It is considered that the site will not have any detrimental impact on the character and appearance of the area and will have limited to negligible impact on the wider retained Green Belt.

Countryside are committed to delivering timely, high quality housing, to meet the needs of the local community and assist in the Council's five year housing land supply.

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