

Mr D Cooper
Planning Department
Broxbourne Borough Council
Bishop's College
Churchgate
Cheshunt
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Our ref: LF/17086

21 December 2017

by Email Only:
planningpolicy@broxbourne.gov.uk

Dear Mr Cooper,

Pre-Submission Local Plan (Regulation 19 Stage)
Public Consultation November/December 2017

We write further to the ongoing Regulation 19 public consultation, in respect of the Pre-Submission Local Plan, on behalf of Countryside Properties Ltd.

We are seeking to specifically respond to the proposed policy GO5, North of Cuffley Hill. This proposed site allocation is comprised of two former nurseries, Fairmead and Rosemead, and the adjacent CG Edwards site. Countryside Properties have an interest in the Fairmead and Rosemead sites.

The inclusion of the sites and rationalisation of the policy since the earlier Regulation 18 consultation is welcomed. On the basis of this policy wording and proposed allocation, Countryside have sought to undertake further site assessments and constraint mapping to enable the quantum of development to be fully understood and to enable the proposed policy to more accurately reflect a deliverable housing figure.

In the first instance an Arboricultural Appraisal has been undertaken, whilst the site is currently subject to two TPO's', discussions have occurred between Countryside Properties and the Council's Tree Officer with regard to the most appropriate trees for long term retention. The outcome of those discussions are contained within the Appraisal and the findings of the tree survey are shown in Appendix 1.

A Transport Appraisal has also been undertaken to ascertain the accessibility of the site and the most

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suitable access arrangements for a development of up to 65 residential units. Discussions have been ongoing with Hertfordshire County Council Highway Authority regarding the acceptability of the proposed access strategy contained within the Transport Appraisal, they have confirmed that such a strategy is acceptable in principle.

Lastly, a Landscape and Green Belt Appraisal has been undertaken. This concludes that the site is well tree'd and has a wooded character, with the better quality trees being located within the northern part of the site. The woodland to the north and west of the site provide a strong enclosure for the site when viewed from the Green Belt beyond.

In addition, the residential development to the east and south of the site results in public views into the site being limited and therefore the impact of the development of this site on the wider area would be exceptionally limited.

The above assessment of site constraints has informed the proposed indicative layout enclosed. The open space is sited to the north of the site, within which SUDs can be included and ecological enhancements provided.

This has been submitted to the Council's Development Management Team for pre-application discussion and whilst a formal response is awaited, a positive meeting was held.

The scheme will need to be subject to some amendment, with the following being considered to be the fundamental points addressed:

- Affordable Housing need not be provided on site, but a commuted sum would be payable. The emerging policy allows for this approach to be taken.
- A more relaxed and organic layout is required.
- Given the location of the site, 3, 4 and 5 Bed units are considered appropriate.

The overall scheme was generally welcomed and there was no 'showstoppers' that would prevent an increased number of dwellings being delivered on this site.

There was however some concern regarding any significant uplift in numbers over and above the proposed policy, as the policy would only be recently adopted at the point at which an application could be determined.

There is some sympathy with this concern, however, the new site assessments, enclosed with this representation, do demonstrate that more housing can be readily accommodated on this site without prejudicing the setting, trees or undermining highway safety.

Given the significant housing growth required to be accommodated within the District and the likelihood of further growth being required as a result of the Crossrail 2 project, it is considered expedient to maximise the efficiency of new sites, subject of course to material planning considerations.

This site provides an opportunity to make the best use of land and it has been demonstrated that the policy, as currently worded, fails to achieve that aim.

The policy represents a significant underestimation on the number of dwellings that can be provided on this site. Accordingly, we would welcome the Local Planning Authority's support, at the Examination, in promoting an increased capacity figure of 'up to 59 dwellings' on this site.

Countryside would welcome further discussions on this possibility and would be willing to enter into a, suitably worded, Statement of Common Ground to support the matter at the Examination.

Yours sincerely,



LIZ FITZGERALD



Enc.