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16<sup>th</sup> September 2016

BY EMAIL

Dear Sir / Madam,

## **BROXBOURNE LOCAL PLAN CONSULTATION**

### **REPRESENTATIONS ON BEHALF OF COUNTRYSIDE PROPERTIES IN RESPECT OF LAND NORTH OF CUFFLEY HILL (FORMER ROSEMEAD & FAIRMEAD NURSERIES)**

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Iceni Projects Ltd, on behalf of our client Countryside Properties (UK) Ltd (Countryside), welcomes the opportunity to submit representations on the Broxbourne Draft Local Plan. Our client supports the preparation of the Local Plan and welcomes the residential allocation (Policy GO5) on Land North of Cuffley Hill. This response relates specifically to Policy GO5, Land North of Cuffley Hill and Policy GB2, Residential Development on Derelict Glass House Sites.

These representations should be read in conjunction with the attached Development Design Framework document (Appendix 1) which details Countryside's vision for the subject site. Countryside has an option on the subject land at Cuffley Hill and is keen to work with the Council to bring forward high quality residential development on the site. These representations demonstrate that the site is available, suitable and deliverable in the short term.

The proposed framework adopts a design led approach to the site which is fully cognisant of the constraints and opportunities of the site as well as being in keeping the surrounding Goffs Oak village. The Design Framework seeks to convey the quality of development Countryside is proposing for the site and our credentials as a placemaker of repute. In addition to this Countryside has prepared a number of technical assessments to inform the development, including a detailed arboricultural assessment, transportation appraisal and a Green Belt Assessment and Landscape Impact Assessment. These assessments help to demonstrate that through a design led approach the scale of residential development on this site can be increased whilst still delivering an appropriate density of high quality detached and semi-detached homes nestled within a mature wooded environment. It is considered that the number of homes can be increased on site to around 65 dwellings whilst still being sympathetically integrated into the site with limited tree loss and retention of the existing sense of wooded character.

### **About Countryside**

Founded more than 55 years ago by Alan Cherry, Countryside has an established reputation for delivering high quality developments. At Countryside, we believe that where we live matters. We are passionate about creating places where people aspire to live, that deliver enduring value and where people feel a true sense of belonging. All of our developments and homes carry a signature style and character, designed to work for the way people live today with materials that reflect our commitment to quality. Our exacting standards and sustainable credentials combine to create places that will stand the test of time.

## **a. Key Characteristics of the Subject Site**

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The Countryside Properties site, located to the north of Cuffley Hill Road, approx. 7.6 acres (3 ha) in area. The site is located on the north-western edge of Goff's Oak, on the site of two former redundant nurseries. The site comprises of two rectangular areas which both have access off the same entrance at Cuffley Hill. The site benefits from access onto Cuffley Hill / B156 between 92 and 94 Cuffley Hill.

The site comprises of two plots of land. To the east is the former Fairmead Nursery which is a relatively narrow linear plot of unmanaged land characterised by an area of hardstanding, sheds, portacabins, storage containers, abandoned cars and overgrown grassland with bramble and scrub. The remaining larger portion of the site, lies to the west comprising the former Rosemead Nursery, with the majority of the operations and former buildings located within the southern half of the land. The footprint of the previous nursery can be seen with significant areas of concrete hardstanding present on the site.

The site has been left unmanaged and shows evidence of neglect in the form of an overgrown storage area, containers and abandoned cars. The site benefits from a number of well-established trees that form a strong characteristic within the site. A well treed and wooded character, and mainly better quality trees, lies within the northern part of the site.

The site is bounded by residential development to the east and south and a commercial builders yard to the west.

The general slope of the land is east to west with a fairly steep fall towards the north west and south west corners. The site is classed as grade 3 agricultural land i.e. good to moderate quality. The site benefits from defensible boundaries on all edges due to the presence of mature hedgerows and trees on the site boundaries.

The site is in a highly sustainable location on the western edge of Goffs Oak, within a short distance of the local amenities and services including Cuffley station (0.6m from the site) and provides excellent rail connections to London. The proximity of the site to Goffs Oak provides access to local facilities including education, retail and recreational amenities.

## **b. National Policy Context**

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We fully support the decision of the Council to bring forward a new Local Plan to ensure the right type of development is delivered within the borough. We understand the requirement for a new Local Plan has arisen as a result of the condition of current adopted policy being out-of-date and not in accordance with the NPPF.

This has been further exacerbated by the Government's requirement for Councils to keep Local Plans up-to-date, strengthened by the recent Housing and Planning Bill which allows Central Government to intervene where councils have failed to put in place plans by early 2017. We support the Council's efforts to bring the current proposed plan to submission as soon as possible, save for some observations contained within these representations.

In light of this, we stress the importance in bringing forward a plan which is positively prepared, justified, effective and consistent with national policy in accordance with section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and the National Planning Policy Framework (NPPF).

Paragraph 182 confirms that, to be sound, a plan must be:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and where it is consistent with achieving sustainable development;

- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

In order for the Local Plan to be found sound, it must comply with relevant paragraphs of the NPPF when assessing and planning for its housing needs. Relevant NPPF paragraphs include:

- Widen the choice of high quality homes [9];
- Positively seek opportunities to meet the development needs of the area [14];
- Contain sufficient flexibility to adapt to rapid change [14];
- Respond positively to wider opportunities for growth [17];
- Set out a clear strategy for allocating sufficient land which is suitable for development in the area [17];
- Boost significantly the supply of housing [47];
- Meet the full objectively assessed housing needs of the housing market area and identify key sites that are critical to delivery of the housing strategy over the plan period [47];
- Plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups [50];
- Set out the strategic policies for the area, including policies to deliver the homes and jobs needed in the area [156 & 178];
- Ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals. [158];
- Prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries; [159] and
- Be deliverable and viable [173].

Additionally, Planning Practice Guidance (PPG) (paragraph 2a-019-201-40306) recognises that various factors may require some adjustment to be made to demographically-modelled household projections (e.g. affordable housing needs, employment issues and market signals). The Council should be mindful of recent Local Plan examinations where Inspectors have sought to upwardly adjust demographic housing figures to take into account other factors, such as affordability.

### **c. Draft Broxbourne Local Plan**

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#### **Objectively Assessed Housing Needs**

The Draft Plan states that the Borough has an objectively assessed need (OAN) for 419 dwellings per year for the period 2014-2031, amounting to 7,123 dwellings over 17 years. The Draft Plan states that it is anticipated that the Borough will meet its housing needs in full.

Policy DS2: Housing Provision of the Draft Plan states that in order to meet its assessed need for 419 dwellings per annum, the Council will provide for at least 7,123 new homes across the plan period in accordance with the housing trajectory set out within Table 2 of the Draft Plan.

The Review of Objectively Assessed Housing Need Final Report (May 2016) considers the issue of affordable housing in the analysis of the OAN. Nonetheless the report concludes that it is not proposed to factor in additional provision for affordable housing as this is addressed in the demographic projections. The report further states that any uplift for affordable need would be a policy-on decision, however this is inconsistent with recent case law on this issue. In the *Oadby and Wigston Borough Council v Secretary of State* (2015) judgement, Justice Hickinbottom concluded that to keep the true affordable housing requirement out of the OAN was a policy on decision. He states at Paragraph 34 (ii) *“...it becomes policy on as soon as the Council takes a course of not providing sufficient affordable housing to satisfy the FOAN for that type of housing and allowing the private sector market to take up the shortfall”*.

This issue was also considered in the *Satnam Millennium Ltd v Warrington Borough Council* case where Justice Stewart considered at Paragraph 43 of the judgment that :

*“(a) having identified the OAN for affordable housing, that should then be considered in the context of its likely delivery as a proportion of mixed market/affordable housing development; an increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes; (b) the Local Plan should then meet the OAN for affordable housing, subject only to the constraints referred to in NPPF, paragraphs 14 and 47”*.

In view of the above it is considered that the Planning Authority should review the OAN to ensure that full account of the affordable housing needs have been accounted for.

### **Green Belt Review & Long Term Strategy for Broxbourne**

The Draft Local Plan sets out a development strategy for the next 15 years for homes, jobs, shops, leisure, transport, and infrastructure which are all set alongside the long term protection and improvement of a redefined Green Belt. In fact the draft Local Plan considers that the revised Green Belt boundaries may function post-2031 stating that:

*“The Local Plan continues to protect the countryside through retention of Green Belt and the new boundaries proposed are considered able to endure beyond 2031”*.

This highlights the importance of ensuring that the emerging Plan maximises the developable land within the settlement boundaries to ensure that it protects the Green Belt which provides the greatest contribution to the borough.

The Draft Plan identifies that in order to meet the OAN this inevitably means that some carefully selected Green Belt sites should be released for development to help create a more balanced, sustainable, desirable and prosperous community for all.

In preparing this Local Plan the Council paid close regard to selecting Green Belt areas for development where those developments have the greatest potential to deliver the most sustainable outcomes for Broxbourne.

The draft plan states that the 2008 Broxbourne Green Belt study and the overall aim and purposes of the Green Belt have also been important considerations in re-defining boundaries.

The Council has consequently identified scope to provide for at least 3,733 new homes and in excess of 6,500 new jobs within the Green Belt.

## **Efficient use of Green Belt Land Released**

The Draft Plan states that the key to creating an appropriate design is not about achieving a certain density, but much more about block design, massing, heights, housing mix, and use of open space. The Draft Plan further states that changes in density across a large scheme or in urban settings can often be appropriate and add variety and mix providing that they are well-designed. Countryside supports this statement and considers that this is particularly relevant for the subject site which abuts existing residential development on the southern and eastern boundaries and it is bound by land to the east, which is also allocated for residential development in the emerging Local Plan. Furthermore, Countryside is keen to ensure that proposals are design led and provided that the overall development creates high quality places, and in this instance a well thought out landscape and open space strategy is delivered, then there should be flexibility on density and overall housing numbers.

The Draft Plan promotes a mix of house types stating that a minimum of 50% of new dwellings should be family sized dwellings of 3 bedrooms. Furthermore with our aging population, the Plan acknowledges that the type of housing needed will continue to alter over the plan period. The Draft Plan emphasises the importance of offering a range of alternative housing choices for older people and vulnerable groups at relatively affordable levels frees up family sized homes that are currently under-occupied.

### **d. Policy G05: North of Cuffley Hill**

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The subject site, along with the adjoining CG Edwards site, are allocated for residential development in the draft Local Plan. North of Cuffley Hill is identified within the draft Local Plan as an area of semi derelict land on the north side of Cuffley that was formerly occupied by Fairmead Nursery and Rosemead Nursery. The Council considers this site to be well suited to new homes, and likely to be developed independently.

This section considers this allocation in further detail including the work undertaken by the Planning Authority to date on the site and the technical environmental reports prepared by Countryside, which provides the context to the Development Design Framework Document also detailed below.

### **Evidence Base relating to the Subject Site**

The subject site has been earmarked for release from the Green Belt and for residential development in the Planning Authority's various evidence base studies which support the current draft Local Plan from as early as 2008. This section of the representation summarises the key evidence base documents as they relate to the subject site.

### **Review of the Green Belt for the Preparation of Local Development Framework (LDF) Final**

#### **Report March 2008 prepared by Scott Wilson**

This review of the Green Belt which was prepared by Scott Wilson on behalf of the Planning Authority assessed the subject site. In the assessment of the site the report considers that the site provides little contribution towards the Green Belt stating that:

*“Performs poorly against the Green Belt purposes, its location meaning that it does little in terms of preventing sprawl. In reality, also does little to separate existing settlements and thus, if anything, it could score lower than that attributed here. Of medium countryside value. Consider possible release from Green Belt”.*

The review considers two options regarding changes to the inner Green Belt Boundary. Option 1 involves small scale adjustments to improve robustness and defensibility of the Green Belt in the short term and enable release of poorly performing sub areas. This Option would include Sub Area C33 (eastern part of the subject site) which is also identified as having 'low constraints and strong performance against sustainability opportunities'. Option 2 provides a slightly more bold change, involving additional release of larger areas of land in order to achieve a strengthened boundary that would survive over the long term. It is considered that Option 2 provides a sensible and appropriate

solution to cover the length of the Local Plan. Option 2 involves the removal of part of Sub Area C31 (western part of the Site), C33 and C34 (C G Edwards land) and repositioning the Green Belt boundary to the northern edge of the woodland and field boundary. In terms of Green Belt purposes the report advises *'the removal of these sub areas would enable a more robust and defensible long term boundary that would more effectively prevent encroachment westwards from Goffs Oak'*. Countryside fully agrees with this statement.

### **Strategic Housing Land Availability Assessment (August 2010)**

The subject site referred to as 'Land between 90a and 102 Cuffley Hill' (Site Reference CG-GB-02) was considered by the Planning Authority in the Strategic Housing Land Availability Assessment (SHLAA) in 2010. The SLAA acknowledged the suitability of the site stating that the site benefits from access to a major road and is within walking distance of services and facilities in Goffs Oak. The SHLAA states that:

*"It is also within walking distance of Cuffley Station. The site lies in between the residential units and is therefore considered an urban extension. There are some TPO trees on the site that would have to be taken into account when delivering the site. However the site is considered developable".*

### **Strategic Land Availability Assessment (April 2016)**

The 2016 SHLAA assessed the subject site and identified that there were no significant constraints preventing this development of the subject lands for residential development.

### **Goffs Oak Development Options Report**

The report assesses various development options for the Goffs Oak area, Development Approach 2 – Goffs Oak Village expansion, identifies the site as a location for development with the possibility to provide approximately 50 homes. This option is considered to be the most sustainable for further development due to the existing range of shops and services already on offer in the village. The sites makes up one of the largest possible development areas in development approach 2. The Options Report states that a number of protected trees are on site which restricts the number of deliverable dwellings to 50.

Development Approach 2 would involve concentrating a moderate amount of housing around Goffs Oak village, with dwellings dispersed over a number of sites which minimising the impact. The increase in residents could also strengthen the provision of services in the village and also future public transport provision.

### **Exceptional Circumstances and Sustainable Places**

This Statement prepared by the Planning Authority in Summer 2016 sets out the draft criteria to assist the LPA in determining whether exceptional circumstances exist from each site to be released from the Green Belt in accordance with the NPPF.

The Draft Criteria fall within a number of headings which are considered against the subject site and the release of the site from the Green Belt.

### **Local Plan Strategy**

1. *Consistency with the Local Plan strategy and objectives*
2. *Meeting identified requirements for sustainable development*
3. *Housing provision to meet objectively assessed needs*
4. *Inclusion of jobs and access to employment opportunities*
5. *Supporting town centres and the retail hierarchy*
6. *Restoration of derelict or underused land/buildings*
7. *Minimising the impact on roads*
8. *Sustainable transport solutions*

In terms of the Local Plan Strategy and the criteria listed above, the subject site is viewed very positively as it accords with the Local Plan strategy which provides for a limited release of Green Belt

land on the edge of an existing settlement to make the best use of land and to help regenerate the neighbourhood. The development of the subject site, particularly for the additional housing as set out in the design framework which accompanies this representation, will make a positive contribution towards the Borough's objectively assessed housing needs.

### **The Green Belt**

9. *Minimising the impact on and maintaining the aim and purposes of the Green Belt*
10. *Establishing the permanence of the Green Belt*
11. *Improving the Green Belt and the countryside Sustainable Place Making*
12. *Place creation – unique, beautiful and safe with a sense of place, community and belonging*
13. *Strong connection to existing place and/or creation of new place*
14. *Strong mix of uses and facilities*
15. *Inclusion of and/or accessibility to shops*
16. *Inclusion of and/or accessibility to school(s)*
17. *Inclusion of and accessibility to sports, recreation, open space and countryside*
18. *Inclusion of other services and/or accessibility to other services*
19. *removal of these sub areas would enable a more robust and defensible long-term boundary that would more effectively prevent encroachment westwards from Goffs Oak.*

The LPA's evidence base carried out to support the preparation of the Local Plan confirms that the subject site performs poorly when assessed against the functions of the Green Belt. The subject site does not currently meet the purposes of the Green Belt. Based on the sites location and Countryside's future design aspirations, the site would provide a positive contribution in terms of place creation. The sites location on the edge of Goffs Oak benefits from access to a range of schools, shops and recreational facilities. The allocation of this site will also ensure the creation of a more robust and defensible long term boundary.

### **Design, landscape and biodiversity**

20. *Respecting heritage and landscape assets*
21. *Exceptional design*
22. *Sustainable design and construction*
23. *Exceptional landscaping and biodiversity*

Countryside have prepared a Design Framework which demonstrates that the design rationale for this site is a landscape led approach to provide a mature woodland setting which involves retaining trees around the boundary and open space areas, particularly in the northern portion of the site. The intention is to create a development with secluded intimate clusters of houses with appropriate design and landscape treatment. A design led approach would be adopted with leafy lanes that are meandering with variable width and shared surfaces. The design of buildings would take a reference from the traditional local vernacular, with complementing hard and soft landscape treatment. Existing landscaped boundaries would be reinforced.

### **Transport**

24. *Minimising the need to travel by car*
25. *Inclusion of and/or accessibility to a public transport to a variety of destinations*
26. *Walking and cycling connections*
27. *Accessibility to countryside*

This is a sustainable site which benefits from access to local buses and a mainline railway station with frequent services to key employment locations including central London, which will ensure that future occupiers of the housing will not be solely reliant on private car. The site is immediately adjacent to a bus stop which provides access to nearby settlements and there is a footpath which connects the site to Cuffley train station and the amenities within Goffs Oak village.

### **Goffs Oak Development Options Report**

The report assesses various development options for the Goffs Oak area, Development Approach 2 – Goffs Oak Village expansion, identifies the site as a location for development with the possibility to provide approximately 50 homes. This option is considered to be the most sustainable for further

development due to the existing range of shops and services already on offer in the village. The sites makes up one of the largest possible development areas in development approach 2. The fact that a number of protected trees are on site restricts the number of deliverable dwellings to 50.

Development Approach 2 would involve concentrating a moderate amount of housing around Goffs Oak village, with dwellings dispersed over a number of sites which minimising the impact. The increase in residents could also strengthen the provision of services in the village and also future public transport provision.

## **Technical Environmental Reports**

Countryside has instructed their environmental consultant teams to undertake a host of assessments in order to analyse the site in detail. The key reports are summarised below.

### **Trees Assessment**

Countryside acknowledges the presence of a number of trees on site and is keen to bring forward a development which protects and enhances key trees as well as incorporating new planting. A key feature of the proposed design framework is for the enhancement of the wooded area in the north west of the site. We are keen to work with the Council to develop a landscape strategy which delivers this.

A tree survey has been undertaken for the site by James Blake Associates Ltd, attached at Appendix 2, and a commentary provided setting out the higher value trees that should be retained and protected. The report also identifies a select number of trees that need to be removed in the southern portion of the site in order to facilitate the development. These trees are all C category (low quality or value) or U category (tree in irreversible decline or dead). Countryside recently met with the Council's Tree Officer on site and agreed on those trees which could be removed. We also agreed the principles of a wider landscape improvement strategy for the protection and enhancement of the wooded area to the north. Clearly, further discussion will be needed as proposals evolve but Countryside will look to ensure these principles are adhered to.

The trees have been viewed as an opportunity in the design and the preliminary concept framework indicates the retention of a considerable number of existing trees. The trees that are to be retained will become features within the development, aiding the landscape-led design and enabling the creation of a woodland open space in the northern part of the site.

We also believe that it is important to retain as much vegetation on the boundaries of the site as possible as this will reinforce the sense of containment. It is proposed to enhance the landscaping along the site boundaries in order to protect the amenity of the adjoining residential properties.

### **Landscape and Green Belt Appraisal**

The Landscape Partnership has prepared a Landscape and Green Belt Appraisal on behalf of Countryside Properties (Appendix 3) to assess the impact of the development of the subject site on landscape, views and the Green Belt. The report identifies that due to the nature and character of the site, the views of the site are relatively limited and restricted to the adjoining houses along the eastern and southern boundaries.

The Conclusions of the report state:

*"The eastern part of the Site performs poorly in terms of the Green Belt functions, whilst the Site as a whole has weak inner boundaries. Release of the Site from the Green Belt would provide much stronger long-term defensible boundaries for the Green Belt.*

*It is considered that the proposed development of the Site for housing would provide an appropriate new land use with long term beneficial influences, subject to the: proposed landscape and design led approach; the retention of many of the trees; development sympathetically integrated into the existing treed and wooded*



*character of the Site; the provision of further planting and biodiversity enhancements; the creation of new public open space, access and links; and the long term management of the existing and new planting. TLP consider that these objectives can still be met with the allocation of a greater number of dwellings (approximately 50-70) than the currently drafted proposal for 26 dwellings.”*

In this regard, this is no rationale in terms of the impact on the wider landscape to limit the development capacity of the site to 26 dwellings.

### **Access**

Through input from a transport consultant and engineer, a suitable access has been proposed that offers a landscape gateway and sense of arrival to the development. The access abuts public highway and the required visibility splays are achievable. Discussions have been held with HCC and an access solution has been agreed in principle.

Odyssey Markides has been instructed by Countryside Properties to prepare a Transport Appraisal in support of proposed residential allocation, attached at Appendix 4. The report confirms that adequate access can be achieved and that there are no material transport issues which prevent this site coming forward for residential development.

### **e. Initial Development Design Framework for the Subject Site**

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Policy GO5 allocates all three sites for residential development, and states that Fairmead Nursery and Rosemead Nursery are suitable for 12 and 14 dwellings respectively. Countryside fully supports the allocation of this site but is able to demonstrate through the supporting development framework and supporting information that the site is able to accommodate more development on the site, whilst still delivering a high quality scheme which maintains and enhances a large number of the existing trees on the site. Countryside welcomes the opportunity to present further information to the Council to address any outstanding concerns that the Council may have.

Countryside has prepared an initial Development Design Framework to demonstrate the quality of development which is proposed for the site. As explained above, Countryside takes a design led approach to all of our developments and seeks to create places of quality and distinction.

Countryside provide a clear appreciation for a landscape led approach to any future development on the site. There is a recognition of the contribution and role of trees within the site and the value they would bring to the housing development, the need for a sympathetic layout that relates well to the landscape of the site and its boundary, and the intention to create a high quality built development that reflects good design and traditional local vernacular.

### **New Homes**

Countryside have taken full account of the sites opportunities and constraints as identified through the evidence base collated for the subject site detailed above. The indicative proposals provide for a low density of housing scheme particularly in view of the site area of 3ha which ensures that the development is compatible with the local context and the character of the area. The development would be c. 20 units to the hectare and would provide for 0.8 ha of open space, which equates to more than 25% of the overall site.

As demonstrated by the attached Green Belt and Landscape Assessment at Appendix 3, the site performs poorly against Green Belt objectives and offers limited contribution to the role and function of the Green Belt. Given this, Countryside considers that the site should be used efficiently and therefore the overall number of dwellings to be provided increased; this can be done without jeopardising the character of the area.

Following discussions with the LPA's tree officer in regards to which trees the LPA consider are worthy of protection, which relates primarily to the woodland area in the northern portion of the site and a small number of trees dispersed throughout the site Countryside are satisfied that in the order of 65 dwellings can be accommodated on the site whilst protecting all of these trees.

The subject site comprises an edge of urban site which offers an ideal location to accommodate new homes, at an increased density than set out in the Draft Local Plan, to make the best use of land and to help regenerate Goff's Oak.

Policy GO5 stipulates that development of these areas will incorporate 20% starter/shared homes, 20% affordable rented homes, public open space and the retention of public trees. Countryside fully supports this requirement, understanding the evident need for a mix of properties, in addition to open space and protected trees in this location. Indeed increasing the quantum of housing on the site will enhance the contribution to Starter Homes and affordable rented dwellings. The Draft Plan identifies that an onsite contribution may be appropriate in respect of the affordable housing. Whilst Countryside welcomes the flexibility afforded by the draft policy, it is considered that if the site meets its full development potential there may be capacity to accommodate affordable housing onsite, subject to viability.

### **New Public Open Space**

The existing woodland area in the northern portion of the site is currently unmanaged and is in need of maintenance. The larger group of trees in the northern portion of the site created a woodland character and it is intended that area will provide quality public open space. Countryside intends to enhance this asset through the management of these trees and additional tree planting. This will form publically accessible open space, with an area of 0.8ha which is a major asset and will form a focal point for the development as identified on in the Development Framework plans.

### **f. Policy GB2: Residential Development on Derelict Glass House Sites**

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Countryside welcomes the policy in the Local Plan to protect and enhance the Green Belt and provide a framework for the long-term redevelopment of derelict sites with sympathetic residential development compatible with a countryside setting. The Borough accommodates a number of derelict glasshouses which are vacant. The principle of bringing these sites forward for residential development will assist in meeting the Council's housing requirements on brownfield land, which will reduce the amount of undeveloped land that needs to be released from the Green Belt.

Policy GB2 highlights the ability to redevelop derelict glass house sites for self-build housing in accordance with the stated criteria. Countryside supports this policy in principle, particularly with regard to utilising derelict sites, however it is considered that the policy should not be restricted to self-build housing. On this note, it is considered that this policy should be in accordance with the emerging National Policy Planning Framework, which seeks to utilise brownfield land in the Green Belt for housing where it facilitates the delivery of starter homes.

It is noted that that one of the options considered in the preparation of the draft Local Plan is the allocation of the nursery sites and the Planning Authority decided that this strategy was inappropriate as *"development at conventional densities would result in isolated blocks of development incompatible with countryside and unrelated to existing settlements"*. It is considered that there is a balance between negating the harm caused by *'conventional densities'* and self-build housing, the important factor in this regard is not the type of housing but rather the scale and density of the housing proposed. In this regard, low density housing, which could also contribute towards Starter Homes and affordable rent, would achieve the same objective in terms of protecting the countryside as self-build housing.

The concept of self-build housing is supported by Countryside, nonetheless this is a Plan for a 15 year period where the demand for house types and delivery models will evolve. The restriction of this policy to self-build housing only may render this policy meaningless in the future. A policy which allows for housing that minimises the impact on the countryside setting would be preferable and in fact, unlike the self –build requirement, will ensure this policy is deliverable across the plan period.

In order to utilise an untapped source of housing supply, a full spectrum of housing types should be provided on derelict glass house sites, not restricted to self-build. It is considered that with sensitive design low density housing would have the same impact on the countryside as the proposed self-build housing.

**g. Summary and conclusions**

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On behalf of Countryside Properties, we thank you for the opportunity to comment on the Broxbourne Local Plan consultation. As detailed above the subject site provides an excellent opportunity to help realise Broxbourne Council's aspiration for this area.

Countryside wholly supports the preparation of the Local Plan and views both Policy GB2 and GO5 positively. It is considered that these specific policies can be developed further in order to maximise the use of land within the borough. By doing so, the borough can seek to utilise green belt land in the most efficient way, and best meet the identified housing targets.

The Countryside Properties site has the capacity to accommodate development, whilst maintaining the overall purpose of the Borough's Green Belt. There are no impediments constraining the development of this landholding. Countryside welcomes the opportunity for further dialogue with officers about the proposals and is keen to work alongside the Council to bring the site forward.

I trust that these comments are of assistance and that these representations will be taken into account in consideration of the current consultation. We also confirm that we would like to be involved in future stages of the plan-making process. However, should you require any further information, please do not hesitate to contact me on [REDACTED]

Yours sincerely,

[REDACTED]

Leona Hannify  
DIRECTOR