

REPORT BY PROSPECT PLANNING

**Review of the Inner Boundary of The Metropolitan Green Belt within
The Borough of Broxbourne**

2008

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Introduction

A full review of the inner boundary of the Metropolitan Green Belt (MGB) within the Borough of Broxbourne has been undertaken in order to meet the requirement of Policy SS7 Green Belt of the East of England Plan.

Policy SS7 states:

“The broad extent of Green Belts in the East of England is appropriate, and should be maintained. However, strategic reviews of Green Belt boundaries are needed in the following areas to meet regional development needs at the most sustainable locations:

- *Stevenage, involving land in Stevenage and North Herts;*
- *Hemel Hempstead, involving land in Dacorum and probably St Albans District;*
- *Harlow, involving land in Harlow, East Herts and Epping Forest Districts; and*
- *Welwyn/Hatfield, involving land in Welwyn Hatfield District and potentially St Albans District*

A more local review will be required in Broxbourne which should support the regeneration of towns in the Lee Valley while avoiding further coalescence within them”.

The policy continues by stating that:

“These reviews will have to satisfy national criteria for Green Belt releases, accord with the spatial strategy, and ensure that sufficient land is identified to avoid the need for further review to meet development needs before 2031”.

Where Green Belt boundaries are reviewed the aim should be to release sufficient land to avoid further reviews before 2031 assuming the same rate of development from 2021 to 2031 as the average for 2001 to 2021. DPDs should test whether this scale of growth after 2021 will be achievable having regard to local circumstances and, if not, release the maximum area commensurate with sustainable development (paragraph 3.32). The further review of RSS will set the rate of growth at each key centre or district to 2031. An important criterion which will affect the ultimate quantity of land required to be released for development is the density at which housing land is to be developed. This will vary across the Borough depending upon a variety of factors. Hence, it is as yet too soon to state with any certainty the precise amount of land which will be required to be released from the Green Belt. It is for this reason that the Council must give itself breathing space by building in a sufficient degree of flexibility.

Having regard to the need to comply with the strategic policy framework created by the East of England Plan, a Borough-wide review of the existing inner boundary of the MGB has been undertaken in accordance with the approach specified.

National Criteria for Green Belt Releases

Advice in this regard is set out at paragraph 2.8 of PPG2:Green Belts. This states that when defining detailed Green Belt boundaries, it is necessary to establish boundaries that will endure.

They should be carefully drawn so as not to include land which it is unnecessary to keep permanently open. Otherwise there is a risk that encroachment on the Green Belt may have to be allowed in order to accommodate future development. If boundaries are drawn excessively tightly around existing built up areas it may not be possible to maintain the degree of permanence that Green Belts should have. This would devalue the concept of the Green Belt and reduce the value of local plans in making proper provision for necessary development in the future.

Paragraph 2.9 states that *Boundaries should be clearly defined, using readily recognisable features such as roads, streams, belts of trees or woodland edges where possible* whilst paragraph 2.10 advises that *When drawing Green Belt boundaries in development plans local planning authorities should take account of the need to promote sustainable patterns of development.*

In defining a new Green Belt boundary it is also necessary to have regard to the fundamental aim of Green Belt policy, which is to prevent urban sprawl by keeping land permanently open, the most important attribute of a Green Belt being its openness (paragraph 1.4) and to have regard to the five purposes of including land in a Green Belt, these being:

- To check the unrestricted sprawl of large built up areas;
- To prevent neighbouring towns from merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

Approach to The Assessment of a Revised Inner Green Belt Boundary within The Borough

Having regard to the above, the assessment has been approached in the following manner.

1. Land considered to fulfil a strategic Green Belt function in terms of maintaining separation of towns has been identified and recommended for safeguarding as Green Belt, thereby meeting the requirements of the first and second purposes identified above.
2. Land which displays strong countryside characteristics and is visually closely related to the wider open countryside has also been identified and recommended for safeguarding as Green Belt, thereby meeting the requirements of the third purpose identified above.
3. Finally, Green Belt land which abuts the Borough's six Conservation Areas has been assessed to see whether it makes an important contribution to the character and appearance of that Conservation Area, in which case it has also been recommended for safeguarding as Green Belt, thereby meeting the requirements of the fourth purpose identified above.

The fact that the Strategic Housing Land Availability Assessment (SHLAA) has established that there is a need to release Green Belt land for development to meet the Borough's development needs to 2031 means that the final purpose for including land within the Green Belt has also been addressed.

Advice in PPG2 is that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Paragraph 1.4 states that **the most important attribute of Green Belts is their openness**. Thus the approach to release of land from the Green Belt has been to consider what might be described as the more subjective aspect of “openness” whilst also carefully assessing all land against the five purposes for including it within the Green Belt. This is considered particularly necessary in the light of specific areas of the Borough where “openness” has already been seriously impaired, partially through dereliction, partially by the inappropriate nature of some existing development and partially by areas of large scale building associated with the horticultural industry which, whilst technically “appropriate” within the Green Belt, nevertheless impacts substantially upon its openness. The need for consideration of this aspect is further emphasised by comments made by the Inspector who conducted the inquiry into the Local Plan Second Review and who considered that addressing continuing problems in the glasshouse industry should be one of the key tasks for a future Green Belt review, which should include a revised sustainability analysis of all sites.

Having assessed the contribution of land to the five Green Belt purposes and to openness, the next step has been to assess the visual quality of the land and the likely impact in landscape terms of allowing it to be developed. This assessment has been undertaken having regard to the findings of Chris Blandford Associates’ Landscape Character Assessment of the Borough of Broxbourne October 2008. In particular, the question has been posed as to whether the quality of the landscape (as opposed to the physical condition of any particular site) warrants its permanent retention as open land. Additionally, attention has also been given to advice in the East of England Plan that all Green Belt reviews within the region should investigate the potential for more co-ordinated management of the countryside and consideration should be given to preparing joint strategies to enhance landscape character, recreational access and habitats (paragraph 3.29).

The Policy Approach To Land Proposed for Release from The Metropolitan Green Belt

Not all land released from the MGB will be available for development and certainly not within a short time frame. However, in order to create long term, defensible boundaries (as required by PPG2) it is necessary to take a broad view of Green Belt boundaries. This is particularly the case in the West Cheshunt/Goffs Oak area. The East of England Plan addresses the approach to be taken to land released from the Green Belt but not required immediately for development, stating that land released for housing and other development needs to meet long term requirements should be safeguarded for this purpose in accordance with advice in Annex B to PPG2. The Plan continues by stating that *“The further review of RSS will set the rate of growth at each key centre or district to 2031”* and emphasises that *“This may or may not require all the land excluded from the Green Belt and safeguarded on the basis outlined above to be developed in this period”* (paragraph 3.33). Thus, there is recognition that not all of the land safeguarded for development will be required for development during the plan period. This provides a very important protection, clearly stated at the highest level of the policy making process. It also embodies a long established and successful planning principle.

Safeguarded Land.

Annex B to PPG2 states that “Safeguarded Land” is land “which may be required to serve development needs in the longer term” and that LDFs should state clearly the policies to be applied to safeguarded land throughout the period covered by the plan. Specifically, it must be stated that the land is not allocated for development at the present time but rather that the policy aim is to keep it free to fulfil its purpose of meeting possible longer term development needs. Hence, no

development should be allowed in the short term which could prejudice later comprehensive development. Moreover, it will normally be necessary for a further review of a plan to bring forward safeguarded land. Annex B to PPG2 clearly states that “Making land available for permanent development in other circumstances otherwise represents a departure from the Plan”.

At this stage of the LDF research and preparation process, the precise future use of all land which it is proposed to release from the Green Belt and safeguard to meet needs through to 2031 cannot yet be known. For example, whilst housing is likely to be the predominant use on much of the land removed from the Green Belt, it may well be that some land will also be required for employment, education, retail or community purposes. Other areas will be required to fulfil open, recreational uses. Hence, the traditionally adopted policy approach within Hertfordshire toward long-term safeguarded land is to designate “**Areas of Special Restraint**”.

This was the approach taken in an earlier version of The Borough of Broxbourne Local Plan Review Adopted in December 1994 in respect of land north of Bass Lane east of the A10 before it was brought forward for residential development in the latter 1990s. It has been the approach taken since c1988 by Welwyn Hatfield District Council in respect of land at Panshanger on the edge of Welwyn Garden City which, although removed from the Green Belt over 20 years ago, has still not been released for development. “Area of Special Restraint” designation has also ensured that land within the A120 by-pass to the north of Bishop’s Stortford has remained open and undeveloped since it was initially released from the Rural Area as part of The East Herts Local Plan Adopted in 1991.

The wording of a typical policy approach to land safeguarded as an **Area of Special Restraint** would be:

- (I) To list the safeguarded sites/areas
- (II) Within the Areas of Special Restraint (ASRs) identified on The Proposals Map there will be a presumption against development which would prejudice future long term planning requirements. The ASRs will remain available to meet future development needs, as identified by a subsequent revision of this Core Strategy or other LDD. In the interim, there will be a presumption against development other than that which would be allowed within the Metropolitan Green Belt in accordance with Policy XXX and the Council will seek to ensure that its openness is maintained.
- (III) Prior to the release of any ASR land for development, a comprehensive strategy/Masterplan shall have been approved by the local planning authority to ensure that a co-ordinated approach is followed.

Reserve Housing or Employment Land

It is generally envisaged that land which is to be designated as an Area of Special Restraint will not be required to be brought forward for development within the lifetime of the Local Plan or Core Strategy which removes it from the Green Belt. In this instance, the Core Strategy is to cover the period to 2021. Hence ASR land will be safeguarded for possible development during the period of 2021 to 2031. Land which it is known will be required before 2021, and for which the required use has already been established, should rather be allocated as either **Reserve Housing Land**, or **Reserve Employment Land** (or as reserve land for any other nominated use for which there is an identified need).

Reserve Sites should also be identified on the Proposals Map and be subject to a specific policy within the Core Strategy. The policy should identify the approximate date when the land is envisaged as likely to be required to be brought forward for development and identify the trigger for its release for development. In the interim, Reserve Land is treated in the same way as ASR land and is subject to the normal policy of Green Belt restraint. Since the timing for the release of the various sites identified as Reserve Land is likely to be different, it is likely that a separate policy will be required for each Reserve Site.

The wording of a typical policy approach to land designated as **Reserve Land** would be:-

- (I) To list all Reserve Land, broken down into Housing, Employment etc.
- (II) Residential/Employment development may be permitted after 20XX on Reserve Housing/Employment Land provided that:
 - (a) The Council's Annual Monitoring Statement has shown a need for additional land in order to meet its identified Housing/Employment requirements; and
 - (b) There appears to be no reasonable expectation of other, more suitable, land within the urban area coming forward to meet this identified need.
- (III) Pending the release of Reserve Land for development, there will be a presumption against development other than that which would be allowed within the Metropolitan Green Belt in accordance with Policy XXX and the Council will seek to ensure that its openness is maintained.

Land Released from the MGB and Required for Development Immediately

Finally, because the existing urban area is already quite densely developed, there will be cases where land proposed for release from the MGB as part of the Core Strategy will be required to be brought forward for development immediately following its adoption. The obvious instance of this is land to the west of The New River at Greater Brookfield which is required to provide land for a variety of purposes including retail, leisure, community, business and residential. The Council gave prior notification of its intention to promote Greater Brookfield as a single entity for mixed use development in its December 2004 Adopted Local Plan Second Review (policy BFC1 refers). That policy requires that development here is brought forward in a comprehensive manner in accordance with an approved Master Plan. The work which has been undertaken on the Master Plan following adoption of policy BFC1 has established that the Council's objectives for the Greater Brookfield area cannot be met without some release of land from the MGB. Given that the currently adopted Local Plan runs to 2011, and the Council continues to wish to promote development here within the timeframe originally envisaged, then land proposed for release from the MGB to the west of The New River should be released for development immediately upon adoption of The Core Strategy.

The Review

Attached to this report are four appendices, each of which sets out the conclusions of the review in terms of a specific area of the Borough. Thus, Appendix A deals with land on the north western and western edges of Hoddesdon; Appendix B with land on the edge of Broxbourne, Wormley and

Turnford, Appendix C with land at Goffs Oak and West Cheshunt and Appendix D with land in the southern part of the Borough.

The recommendations within each appendix are based on a purist, technical approach as advised in PPG2 and required by policy SS7 of The East of England Plan. However, policy SS7 fails to make clear whether the review which it requires should adopt such a purist approach or be concerned solely with the identification of enough land to meet development needs to 2031. It could be, of course, that in reality either approach would lead to the same conclusions. However, it is considered that it is necessary to have first identified land currently within the Green Belt but which could be released from such designation without harming the purpose of retaining by far the majority of the Borough's remaining open countryside as Green Belt before a sensible assessment can be made of how much of that land is actually required to be removed from the Green Belt to meet the Borough's long term development needs.

On the basis of current information, having regard to the findings of the SHLAA, it would appear that at least the following Green Belt releases will be required to meet development needs to 2031:

- Land at Brookfield for retail, leisure/community and residential needs in the short term
- Sites on the periphery of Goffs Oak to meet short/medium term housing needs
- Land south of Goffs Lane, within LEW to meet short/medium term development needs
- Land west of Hoddesdon for short to medium term housing needs
- Land at West Cheshunt to meet longer term (post 2021) development needs.

APPENDIX A

Review of the Inner Boundary of The Metropolitan Green Belt As It Relates to Land around The Northern and Western Edges of Hoddesdon

Land on the northern and north western edges of Hoddesdon, where it lies close to the boundary of the administrative District of East Herts, arguably fulfils a strategic Green Belt function in terms of checking the unrestricted outward sprawl of Hoddesdon which is already part of a long urban corridor which runs throughout the length of the Borough.

Keeping this land open also helps to prevent the coalescence of Hoddesdon with, to the north, the large Category 1 village of Stansted Abbots/St Margarets and to the north west with the large Category 1 village of Hertford Heath and its outlying development at Hailey which focuses on Haileybury College. Whilst these settlements are not “towns” as referred to in the second of the five purposes for including land within a Green Belt as set out at paragraph 1.4 of PPG2: Green Belts, it is considered that the principle is nevertheless relevant and in any event, allowing additional development in this location would add to urban sprawl.

Hence, no change is proposed to the location of the inner boundary of the MGB on the northern and north western edge of Hoddesdon other than at 303 Ware Rd and at Roselands Junior Mixed Infants School. The rationale for these proposed amendments to the MGB boundary is discussed below but in summary it is considered that these two parcels of land do not fulfil a strategic Green Belt function, do not display strong countryside characteristics and do not contribute to the character or appearance of a Conservation Area.

The next parcel of land to be reviewed on this side of Hoddesdon forms an approximately triangular shaped wedge which lies to the north of Hertford Road (B1197) immediately east of the A10 flyover, extending eastward toward College Rd. It has previously been referred to as “The Leach Land” having been promoted by Hubert C Leach for release from the MGB at The Local Plan Second Review. Whilst The Inspector made no modification to the Council’s decision not to promote the release of the land from the Green Belt at that time, he concluded that there were no material factors which needed to preclude the site from future consideration should releases of Green Belt be required when the Plan was next reviewed as part of the LDF process. In summary, this land occupies a reasonably sustainable location and makes only a limited contribution to countryside character. It does not fulfil an important role in terms of maintaining openness and the line of the A10 would create a clear and defensible boundary to the Green Belt. Development here would have no impact on the character or appearance of a Conservation Area. Hence, it is also proposed for release from the Green Belt as explored in more detail below.

There is a substantial area of land on the western edge of Hoddesdon which was the subject of considerable study at the time of the last Local Plan Review. This is the large area of land to the east of the A10 sandwiched between the Dinant Link Road to the south and Hertford Rd to the north and the smaller area to the south of The Dinant Link Road extending to the northern edge of Lord Street. The land has been promoted by Landmatch.

When the Council published its First Deposit version of the Local Plan Second Review in April 2001, it proposed that this land be released from the Green Belt and allocated as an Area of Special Restraint to meet the Borough’s development needs during the second part of the plan period (post 2006 through to 2011). However, this was at a time when it was thought that there

would be insufficient capacity within the urban area to meet the Structure Plan housing allocation. As a result of consultation on First Deposit, a decision was taken to re-visit the policy approach to land at Canada Fields which had been given planning permission some years earlier for development with motor showrooms and built leisure facilities (bowling alley, cinema etc) but which had not been taken up. As a consequence, land at Canada Fields was re-designated as a Strategic Housing Site with an allocation to provide in the region of 600 dwellings. This allowed the Council to meet its Structure Plan housing allocation to 2011 without the need to release any Green Belt land. Hence, the Second Deposit version of the LPSR, when published in March 2003, retained land north and south of the Dinant Link Road within the MGB. The Inspector at the Local Plan inquiry confirmed the Council's decision not to release this land from the MGB, concluding that whilst there was no inherent objection to its development if/when a need arose, there could be other equally suitable land elsewhere within the Green Belt which should also be considered before any decision was made concerning land west of Hoddesdon.

That comparative analysis has now been undertaken as part of the comprehensive review of the inner boundary of the MGB within the Borough. For reasons examined below, it is considered that there is no need to keep this land permanently open and that it should accordingly be released from the MGB and designated as an ASR.

Although the proposed ASR land is visually quite self contained, it does form part of a larger open area between the A10 and Hoddesdon which extends southward to the northern side of Cock Lane. Hence it is also necessary to consider the future of all of the land south to Cock Lane. Spital Brook flows eastward through the lower portion of this area and creates a flood plain which must be kept free from development. The eastern part of the land provides a very important urban recreational area in the form of Barclay Park which should be retained. Barclay Park also helps to provide an open setting to the town and to protect the character of the adjacent Hoddesdon Town Centre Conservation Area. The open land which abuts the south side of Lord Street forms part of the High Leigh Conference Centre which, as an institutional use in large grounds, is appropriate within the Green Belt whilst the remaining, open farmed land was created in the 1960s following gravel extraction and subsequent filling with household waste and hence would not be suitable for development. Hence, land east of the A10 sandwiched between the south side of Lord Street and Cock Lane continues to fulfil a Green Belt function and should be permanently retained within the MGB.

The final parcel of land to be reviewed in this part of the Borough is the pocket of Green Belt land occupied by Sheredes School extending to the rear of the Woodlands Drive properties.

Rationale for Proposed Boundary Changes

303 Ware Road, Hoddesdon

This site comprises a detached dwelling fronting Ware Road with a large garden. The southern boundary abuts a public footpath and south of that there is the new residential development referred to in The Local Plan Second Review as the Hailey site. At First Deposit, 303 Ware Road was included in that residential land allocation but it was removed at Second Deposit and the Local Plan Inquiry Inspector concluded that no very special circumstances existed at that time (2004) to remove the site from the MGB. However, he noted that the Hailey site was being developed at a relatively high density in accordance with PPG3 advice and because of its sustainable location and also that 303 Ware Rd shared that sustainable location. He also commented that the footpath that separates these two sites would form no more logical a boundary than the northern fence/hedge of

the garden to the dwelling at 303 Ware Road. Hence, he concluded that *If any Green Belt land were needed, this site would appear to have several advantages, and in those circumstances could be said to meet the requirements of Structure Plan Policy 7. I consider that the site would be a logical extension to the developed area of Hoddesdon, given its sustainable position.* Hence, whilst at that time, The Inspector recommended no modification to the position of the MGB boundary in respect of 303 Ware Road, his report provided a clear steer for how to view the site at such time as a need exists for additional development land. That time has now arrived and having regard to the Inspector's advice, it is considered that it would be unreasonable not to release 303 Ware Road from the MGB as part of the LDF process. The site has only a limited capacity in terms of its contribution to meeting the Borough's housing requirements so there is no reason why its development should be delayed for a subsequent review. It is recommended that it be released from the MGB with immediate effect and listed in the Site Allocations DPD as a short term housing site.

Roselands Junior Mixed Infants School

This land has not previously been promoted for release from the Green Belt but following development of the Hailey site to the north with reasonably high density housing, and given the urban character of land to the south, its retention within the Green Belt appears rather anomalous. Its existing use can be safeguarded by imposition of an "Education" designation either instead of, or in conjunction with, the existing Community Open Space Recreational Facility designation on the west part of the site.

The Leach Land

This is an area of land of about 10.7 hectares and whilst it currently displays a predominantly rural character, comprising areas of grazing land and a wooded former gravel pit, there are also suburban features in the form of a covered reservoir and car park in the central area of the site. The site adjoins the urban area and abuts, but lies outside, the Accessibility Corridor shown on the Adopted Proposals Map. There are two schools at Westfield Road and Roselands within 500 metres of the site boundary, and other facilities such as local shops about 1 km away from the main part of the site. However, development on the western part of the site would be highly visible from the higher ground to the west and hence there should be a policy requirement for substantial screen planting along its western boundary.

Pending further work on identification of the amount of Green Belt land which will be needed to satisfy the Borough's housing needs, it should either be identified as Reserve Housing Land and an approximate period identified when it should be brought forward, or safeguarded for the long term as an ASR.

Land West of Hoddesdon

The land proposed for release from the MGB is substantial. Most parts lie within about 1.5 km of Hoddesdon town centre, with the retail and other facilities it provides. It is also reasonably close to the accessibility corridor. Hence, there was no dispute at the Local Plan Inquiry which took place in 2004 that the land was located in a sustainable location. The Inspector noted that the A10 would effectively constrain any spread of development to the west and would provide a clear, firm boundary to the Green Belt. He further commented that the character of the landscape is somewhat different from the land west of the A10, which rises up to the west and contains substantial areas of woodland.

Policy SS7 of the East of England Plan emphasises that when undertaking its review of the MGB within Broxbourne, the Council should have regard to *supporting the regeneration of towns in the Lee Valley*. It is considered that the provision of substantial additional development close to the existing town centre will help to support regeneration of Hoddesdon and the Council's objectives for the town as set out in its Draft Town Centre Strategy.

APPENDIX B

Review of the Inner Boundary of The Metropolitan Green Belt As It Relates to Land around the edges of Broxbourne, Wormley and Turnford

This appendix deals with land in the central part of the Borough and includes Broxbourne, Wormley and Turnford.

Land located between the edge of the existing built up area and the A10 on the western edge of Broxbourne and Wormley, between Baas Lane/Bell Lane to the north and the A10 slip road to the south, is predominantly open and rural in character. Hence it fulfils an important Green Belt function of checking the unrestricted outward sprawl of Broxbourne and Wormley, which is already part of a long urban corridor which runs throughout the length of the Borough, as well as assisting in safeguarding the countryside from encroachment. Much of this area is already protected by existing designations in addition to its Green Belt status; for example, land to the south of Church Lane is a Local Wildlife Site with a TPO protecting the parkland trees which originally formed part of the grounds of Wormleybury Mansion but which were cut off from the mansion by the A10 bypass. The remaining land in the south of this area which is not included in the Wildlife Site is liable to flood. Land to the north of Church Lane and south of development fronting Baas Lane/Bell Lane is predominantly protected under a Community Open Space and Recreational Facilities designation. Other open land is in use as playing fields in association with Broxbourne School and hence should be given an Education designation. Hence, the vast majority of this area on the west side of the Borough has virtually no development potential. However, there is an anomaly in that the frontage of the school site with Broxbourne High Road is also currently included within the MGB notwithstanding its predominantly developed character and lack of contribution to any of the five purposes for including land within the Green Belt. So whilst it is recommended that Green Belt status be confirmed on the vast majority of this area, the inner boundary as it affects Broxbourne School should be moved westward to form a continuous line with the boundary immediately to the south around Wentworth Cottages.

There are further anomalies on the eastern edge of Broxbourne where Green Belt designation currently applies to land on the south side of Station Road which is essentially urban in character. Whilst it is essential to the character of the Broxbourne Conservation Area that the open character of the recreation ground and the setting of the New River be preserved, this is just as achievable under Conservation Area legislation. Additionally, the recreation ground is already protected under a Community Open Space and Recreational Facilities designation. This open area is very attractive but has the characteristics of an urban open space and not of countryside which needs to be safeguarded by Green Belt designation.

It is therefore considered that a more logical and defensible Green Belt boundary would be created by taking the inner boundary eastward, either to follow the west bank of The River Lee as far south as the southern edge of the small residential development, Mill Lane and The Mill Bungalow, beyond which the land has a wooded character or to the western side of the railway line. If the latter approach were adopted, the railway line would then become a continuous and defensible inner boundary for the Green Belt for a considerable distance through the Borough. This change would not release any significant amount of land for development. There may be a small area suitable for housing in the vicinity of Welcome Cafe/New Station Cottages, subject to satisfactory access being available. Land between the river and railway line is liable to flood so would not be developable.

Finally, the Council is known to have aspirations of releasing from the Green Belt land west of the A10 at Turnford to allow for the expansion of The Brookfield Centre. The Council's objectives for this area are embodied in Chapter 6 Greater Brookfield of the December 2005 Adopted Local Plan Second Review and relate to the creation of a more sustainable centre. Moreover, the supporting text to Policy E5 Regional Structure of Town Centres from the East of England Plan requires that the Council defines the future role of The Brookfield Centre with particular reference to whether it should remain a purely retail centre or develop into a centre with a fuller range of service provision. The latter approach is only to be adopted where this would improve social, environmental and economic sustainability and deliver improved sustainable transport accessibility, particularly by public transport.

It has now been demonstrated from work undertaken by the promoter of development at this location that the Council's clearly stated objectives for Greater Brookfield, with particular regard to improved transport connections, cannot be met without the release of some land west of the A10 for a new road together with mixed use development. The nature of the land under review is currently rural, being a former mineral extraction site which has only partially been restored. The land is not currently accessible to the public having no public vehicular access and no rights of way across it. Nor is it readily visible from the A10 being screened by a mature hedge line.

Given the identified need for the release of land in this location to fulfil strategic objectives, the issues to be addressed by this review are the exact quantum of land to be removed from Green Belt designation and the definition of a new defensible boundary. Of the two, the latter is arguably the more important since it is a requirement of PPG2 that a newly defined Green Belt boundary must be carefully drawn so as not to include land which it is unnecessary to keep permanently open; otherwise there is a risk that encroachment into the Green Belt may have to be allowed in order to accommodate future development needs.

There are, unfortunately, no obvious natural features west of the A10 which could form the basis of a defensible boundary throughout the full length of the proposed development site. Rather, there are sporadic copses interspersed throughout generally open, flat land. However, there is a reasonably well defined belt of woodland (Hell Wood) to the west of the mineral haul road which is designated as a Local Wildlife Site as well as accommodating a Scheduled Ancient Monument. Hence, the edge of the woodland could provide a defensible boundary at the northern end with a belt of structural planting to be provided along the western edge of the development site throughout the remainder of its length until it meets up with The New River. Given that Cheshunt Park lies to the south of the proposed development site and is protected by a Community Open Space and Recreational Facilities designation, there is already a defined boundary to the south. There will also be a need to assess whether the link road to be provided between the Turnford roundabout and the Brookfield Centre may in itself be a determining feature in respect of a clearly defined Green Belt boundary but until such time as the precise route of this road is known, the Green Belt boundary should be drawn in more general terms, as described above, to allow adequate land to be released from the MGB to meet Brookfield development needs to 2031.

APPENDIX C

Review of the Inner Boundary of The Metropolitan Green Belt As it relates to West Cheshunt/Goffs Oak

West Cheshunt consists of various settlements or estates of houses grouped, with the exception of St James Village, on the ridges on the north and south sides of the Rags Brook Valley, with Goffs Oak terminating the western head of the valley and Cheshunt itself to the east. Although objectors promoted many sites in this area to The Inspector who conducted the inquiry into The Local Plan Second Review in 2004, he declined to release any land from the Green Belt in the West Cheshunt area on the basis that, within the time span he was considering in respect of the Second Review, sufficient land for housing purposes had been found elsewhere in the Borough. Thus there were no very special circumstances demanding the release of Green Belt land in the West Cheshunt area. However, he made some very pertinent points on how recent development in West Cheshunt had been carried out in a rather haphazard way and that it had not achieved the intended purpose when first mooted in the mid 1980s. This was to provide residential development in certain areas allowing the removal of unsightly derelict horticultural uses and other inappropriate uses of land which detracted from the appearance and rural character of the area. Although he was not prepared to release land for housing purposes through the Second Review, he strongly recommended that the Council carry out a comprehensive review of the West Cheshunt area, commencing with a sustainability assessment of the remaining horticultural activities in the area, in the hope of improving upon the current unsatisfactory situation.

PPG2, in setting the purposes of the Green Belt, seeks to prevent unrestricted urban sprawl and to prevent neighbouring towns from merging into one another. In terms of this strategic-related requirement, and with development interspersed with open land on all sides, the Rags Brook Valley no longer plays an important part in preventing the coalescence of towns. The intervening open areas between the settlements about and in this valley certainly play a part in maintaining the character of the area and preventing urban sprawl, but only in relatively local terms. Furthermore, the visual inter-relationships of both new and older housing, together with intervening areas of glass houses and other inappropriate uses within this area impact severely upon openness and raise the question of whether Green Belt designation has assisted in safeguarding the countryside or indeed preventing localised urban sprawl.

In this context, and in the light of the Inspector's expectation that any comprehensive review of Green Belt boundaries in Broxbourne will inevitably result in the need to release more land for development purposes, one of the key objectives should be to improve the damaged landscape of the valley. Accordingly, there is a need to consider on a comprehensive basis the entire concept of development within the Rags Brook Valley. Assuming this allows further development to take place, it must generate the ability to remove derelict structures and other activities which impinge seriously upon rural character. It must also provide the necessary infrastructure and other local facilities in order to improve upon the sustainability aspects of the development, both present and future. In this context substantial development may need to be considered if the character and appearance of the area overall is to be improved.

A comprehensive masterplan is considered the best way to achieve this. This should address detailed land use designations as well as the very important issues of infrastructure and clearance of dereliction, general landscape enhancement etc. However, such a master plan cannot be contemplated as part of the exercise required by Policy SS7 to review the extent of the Green Belt

throughout the borough. Rather, as a first step it is necessary to radically review the existing Green Belt boundary to roll it back to around the extremities of the development which currently occupies the north, west and south sides of the Rags Brook Valley and then to follow this up with a master planning exercise.

On the basis that development within this area will not be required for some years, all of the area removed from the Green Belt should be designated an Area of Special Restraint, where for the time being Green Belt policies continue to be applied.

In the context of this long-term plan for improvement in the overall environment of the West Cheshunt area, in the light of recent developments and the general expectation which has been expressed by the local population in the past, it is important to consider the various settlements within the area on an individual basis, as set out below.

Goffs Oak is seen by residents as an independent settlement or “village” and hence it is recommended that it should maintain physical separation from recent development in St James village. However, it is not necessary for the open land between the two to be designated as Green Belt in order to retain separation. This can be achieved by a Countryside Protection policy or similar. Nor is it necessary to retain an area of physically enclosed land to the rear of 92-94 Cuffley Hill as Green Belt. This land has potential for residential development and should be allocated as either a short term Housing site or as Reserve Housing Land.

St James Village is a modern settlement (1990s) with arguably less strong resident attachment and hence there is no particular reason why its separate identity should be retained for its own sake. But it is important to have regard to the landscape characteristics of its setting. This leads to a recommendation to maintain a strong element of open land along the valley of Rags Brook thereby maintaining a degree of separation from the northern edge of St James village and the southern edge of the development which in planning terms was known as WC1.

WC2 is currently out on a limb and arguably ought to be connected to the existing urban edge to the east but it is recommended that it remains physically separate from Goffs Oak to the south.

Extensive tracts of land in the West Cheshunt area are “common land” which must be kept open. This land also displays strong countryside characteristics and hence fulfils an important Green Belt function. However, its open character can be maintained without the need for a Green Belt designation. Adjoining land should be assessed carefully and physically linked to the common land and also to other land along and beside Rags Brook to provide an accessible rural finger throughout the length of the valley. Where appropriate, there should be links into Green Belt designated land beyond. There are also a number of local wildlife sites which should not be developed.

APPENDIX D

Review of the Inner Boundary of The Metropolitan Green Belt As It Relates to Land Bounded by Lieutenant Ellis Way and Winston Churchill Way and other land in the south of the Borough

Notwithstanding its essentially urban character, and lack of relationship with open countryside, much of the land south of Goffs Lane and north of the existing residential area known as Bury Green, bounded to the west by Lieutenant Ellis Way, is currently designated as MGB. Having regard to its character and to the purposes of including land within a Green Belt, as set out in PPG2: Green Belts, no reason is seen to retain this Green Belt designation.

There are already land use designations on much of this land and these should be retained. For example, the playing fields fronting Goffs Lane should continue to have a Community Open Space and Recreational Facilities designation. The playing field to the east which backs onto properties in Churchgate is to remain open and in use as an additional playing field for Goffs School and should therefore be protected by an Education designation. Land proposed for a new community hall immediately north of St Mary's Church should be covered by a Community Open Space and Recreational Facilities designation. The existing built footprint of St Mary's School already benefits from planning permission for residential development and hence should be recorded as a Housing Site and indicated accordingly on The Proposals Map. It is also considered that land to the west of the area already granted planning permission, fronting Dark Lane, could sensibly be developed for housing. Depending upon the timing of the need for this housing, the site should either be released from the Green Belt and allocated for housing development in the short term or designated as Reserve Housing Land with an indication of when it will be required to come forward.

Land occupied by Goffs Secondary and by Bonneygrove Primary Schools should be safeguarded under an "Education" designation whilst the allotments to the north of the primary school should be subject to a Community Open Space and Recreational Facilities designation.

The western end of the land fronting Goffs Lane is occupied by a single storey building of rather tired appearance occupied by the V & E Sports Club with open land beyond. However, this land is not currently safeguarded under a Community Open Space and Recreational Facilities designation and would therefore appear to have development potential. It is recommended that detailed consideration be given to the use of this land by the V&E Club with a view to establishing whether it might be relocated and the land designated for housing development, either as a short term Housing allocation or as Reserve Housing Land. It would appear that the only vehicular access available to a housing development would be via the existing V & E Club access. The existing woodland, which is protected by a TPO, should of course be retained in an undeveloped state. It already benefits from designation as a Local Wildlife Site.

A substantial part of the land immediately north of LEW and south of the Bury Green housing is under development with a replacement for St Mary's School. As an institutional use in extensive grounds, a school can represent appropriate development within a Green Belt. However, it is considered that the scale of the building under construction is now becoming quite apparent and dominant and is impacting upon the previously open character of this area. Hence, this is considered an appropriate time to remove the land included within the school development from the Green Belt but to safeguard it by an Education designation.

The Bury Green residential area is penetrated by the open land occupied by the cemetery and there are current proposals to extend the cemetery onto the land immediately to the south. Again, whilst a cemetery is an appropriate use for Green Belt land, in this instance it is considered that LEW would represent a much more defensible inner Green Belt boundary. It is therefore proposed that all of the land to the south of the Bury Green housing area enclosed to the west by Lieutenant Ellis Way and extending eastward to the New River should be removed from the MGB in the interest of creating a long term, defensible inner Green Belt boundary.

This leaves one parcel of land, immediately to the west of the public footpath, which connects Temple House to the south with Bury Green to the north, without a proposed use. The site is flat and open and adjoins the large roundabout recently constructed to serve the new school. Whilst there is currently no access to this parcel of land from that roundabout, it would appear feasible that such access could be provided. However, if this land were to be considered for housing, it would be undesirable to access it direct from LEW because any development would then effectively turn its back on, and not be well integrated, with existing housing to the north (Meux Close). It could be worth consideration as a replacement for the Council's depot which needs to be moved from Brookfield in order to facilitate redevelopment of the trading estate, or alternatively it might be worth consideration for a travelling showmen's site.

The next swathe of open, Green Belt land is on either side of the A10, north of LEW and Winston Churchill Way (The B198). Currently to the west of the A10 Green Belt designation extends as far north as the edge of the developed campus of the Cheshunt School whilst to the east, to the rear of housing off Albury Walk. Land on the west side of the A10 is predominantly occupied by school playing fields, by the small industrial units recently converted from redundant mushroom growing sheds at Maxwells Farm and by open agricultural land. However, there are also two dwellings either side of the unmetalled part of Theobalds Lane together with a recently constructed agricultural barn in the field which occupies the north west quadrant of the large roundabout junction of LEW with the A10.

Fronting the A10 to the east, there is a flat arable field abutting the housing to the north. This field is associated with Albury Farm, with a private sports club (the Cheshunt Club) in the north east corner. South of this there are the playing fields and club house associated with Cheshunt Football Club together with premises occupied by Cheshunt Rifle and Pistol Club. The Cedars Park lies to the south of Theobalds Lane.

Thus, the vast majority of the uses which occupy this land either side of the A10 and north of the B198 are entirely appropriate within the MGB, the only exception being the two dwellings either side of the unmetalled section of Theobalds Lane, the impact of which is only slight. Moreover, this land is flat, not well screened and therefore very open to view. It currently appears as an undeveloped green corridor which extends northward toward the built up area. Together with the open swathe of land south of LEW and west of the A10, it fulfils an important strategic Green Belt function by preventing the urban area of Broxbourne merging with the London Borough of Enfield to the south along a strategic highway route. The gap between these two quite densely developed urban areas is already narrow, especially to the east of the A10 and south of the B198 where a large tract of land has been developed/awaits development as the Park Plaza Key Employment Site.

Having regard in particular to its strategic Green Belt importance, but also to the limited contribution which this land could make in terms of meeting the Borough's longer term

development needs (assuming that most of the sports and recreational uses would remain in situ) it is recommended that the MGB status of all of this land be retained. It is considered that this approach is fully justified by the very clear visual distinction between the land which is recommended above for removal from the MGB (that is, south of Goffs Lane and contained by LEW) and which possesses reasonable development potential and the land either side of the A10 in the extreme south of the Borough which is much more open and rural in character. Hence, any Inspector conducting the inquiry into the Core Strategy in due course would immediately focus upon these differences and seriously question the Council's rationale of promoting release from the MGB of land which fulfils an important Green Belt function when other, more suitable land is clearly available within the same locality.

It is appreciated that the recommendation to retain MGB status on land either side of the A10 is at odds with the approach taken in the Council's draft Core Strategy which identifies the area to the north of the B198 as a "Potential Growth Location" for additional employment and the land west of the A10 opposite Park Plaza as a Strategic Employment Site notwithstanding the fact that there is currently no evidence of need for a strategic employment site within Broxbourne. However, if it transpires that there is a need to allocate additional employment land to meet the Borough's needs for the latter part of the period covered by the Core Strategy, it may be necessary to reconsider the status of the land located behind the existing industrial units at Maxwell's Farm. This would allow access to any development to be taken via the existing access to these units since it is understood that the Highway Authority is most unlikely to allow a separate, new access onto the A10. If such a need exists, then the requisite amount of land should be removed from the MGB and allocated as Reserve Employment Land with a requirement for the provision of a wide belt of structural planting on the remaining open land to the south.

The final area reviewed in the south of the Borough is the site off Britannia Road occupied by Britannia Nurseries which is also indicated in Figure 2 Draft Key Diagram of the draft Core Strategy as a potential area of search for future development needs and possibly for release from the MGB. The site is predominantly open and what few buildings there are, are single storey and low key. Hence, in its current condition it contributes to the openness of this part of the MGB and reads very much as part of the countryside extending northwards. Any intensive form of development (it would be contrary to government advice to release land for development from the Green Belt and not then make best use of it) would completely change its character and impact and the rural character of the wider area in which it is situated. It would be very difficult to define a defensible boundary around the site given its rather isolated location beyond the existing built up edge of the Borough. It is therefore recommended that the site should be retained within the MGB.