

# **Broxbourne Borough Council**

**Greater Brookfield**

**Final Report August 2006**

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# 1 Introduction and Scope

- 1.1 GVA Grimley has undertaken an extensive assessment of the existing role of Greater Brookfield, its current strengths and weaknesses, and the scope for further development in line with the Council's long standing policy objective to transform this area into an attractive, accessible properly planned development meeting current and future retail, leisure and other needs up to 2016 and beyond.
- 1.2 The assessment has included a number of parallel work streams.
- 1.3 We have examined the national, regional and local policy context; the key policy tests which will be applied to any further significant retail/leisure or other development at Greater Brookfield; and the appropriate policy route for delivering the Council's aspirations for the area:
- We have held a series of meetings for the key stakeholders to establish their views and aspirations, which are summarised in this report.
  - We have updated and extended the DTZ Retail Assessment to provide a comprehensive review of retail and other key town centre needs across the Borough for the period up to 2016 and beyond, and considered the existing role and scope for new development in existing centres and the scale and form of new retail/leisure development that could be supported at Greater Brookfield, having regard to the key PPS6 tests.
  - In parallel with this review, and in order to consider the appropriateness of further major residential development in the Greater Brookfield area, we have undertaken an urban capacity study for the Borough as a whole, to establish current/future housing needs, to assess the scale of residential development likely to be needed, and in particular the case for development on Green Belt land.
  - Capita Symonds have examined the current highway network and levels of accessibility of Greater Brookfield to its catchment by car and alternative means of transport, considered the capacity of the existing network to accommodate forecast growth and the requirements of new development at Greater Brookfield, and developed a strategy for addressing Greater Brookfield's current problems at accommodating forecast capacity.
  - Drawing these and related workstreams together, we have identified what we regard as the key development options for Greater Brookfield, summarised the strengths and weaknesses of each, and set out our recommendations on next steps for identifying and delivering the preferred option.
- 1.4 Following this a viability assessment of these development options was undertaken, based on a design analysis of the site, and we have identified options for delivery including the need for Council, public sector and stakeholder involvement.

## 2 Stakeholder Engagement

- 2.1 Stakeholder engagement formed an integral part of the Greater Brookfield Study. The process ensured that discussions with the various parties, which in some cases had continued for some time with Broxbourne Borough Council, were maintained.
- 2.2 This section sets out the consultation programme and provides a summary of the key themes that emerged from the discussions.

<b>Table 2.1</b>	
<b>Stakeholder</b>	<b>Agent</b>
<i>Second Round Consultation</i>	
• Bayfordbury Estates Ltd	CB Richard Ellis
• Marks and Spencer	Nathaniel Lichfield and Partners
• Hertfordshire County Council – Planning and Property Departments	
• Tesco Stores	
• Standard Life	

### **Existing Position**

- 2.3 Discussions with retail stakeholders suggested that the current trading position at Greater Brookfield is strong and has been for some time. However, some indicated a desire to identify opportunities to expand both within the centre and also on the surrounding land such as the Travellers' site and, if possible, the adjacent Greenfield land area.
- 2.4 There was a general awareness about the hurdles that need to be overcome before a comprehensive scheme is brought forward for Greater Brookfield, including the potential for Green Belt release. As such, because of such perceived constraints any expansion of their businesses has tended to be concentrated on addressing individual short-term requirements within the centre.
- 2.5 Overall, there was support, if deliverable, for a more comprehensive re-development of Greater Brookfield.

### **Potential for Growth**

- 2.6 Stakeholders were in agreement that potential exists for Greater Brookfield to grow as a retail centre. Moreover, some of the private retail stakeholders indicated that they would not let their current land holding at Greater Brookfield stand in the way of achieving a larger vision for the area and more specifically their businesses.
- 2.7 Investment in a significant increase in floorspace was flagged by some landholders as being probable if the redevelopment of Greater Brookfield was taken forward.
- 2.8 The stakeholders agreed that because Greater Brookfield is currently trading at capacity, the next question to be asked would be, what else could be integrated and what opportunities exist to create a more sustainable and identifiable place?

### **Policy Framework**

- 2.9 All stakeholders agreed that although they are keen to see a comprehensive vision for Greater Brookfield, future investment would not be possible until an appropriate policy framework is implemented. However, they are supportive of the need for a policy/ commercial led approach rather than a design/ masterplan led approach.
- 2.10 HCC officers emphasised that they are keen to see comprehensive masterplans produced for Greater Brookfield but reiterated that this would need to be included as part of the Council's work on its LDF Core Strategy and come forward in greater detail as an Area Action Plan or SPD. Discussions with HCC suggested that, a strong strategic argument would be required in order for Broxbourne's objectives to be taken forward in policy terms.
- 2.11 The landowners were also aware that a broader approach to Brookfield would need to form part of this process and said that they would be keen to participate in the process.

### **Accessibilty**

- 2.12 All stakeholders agreed that the internal access arrangements within Greater Brookfield and external transport links to the A10 are unsatisfactory.
- 2.13 In particular, it was noted that the link from the A10, while operating satisfactorily on most days at present, does not have sufficient capacity during peak times e.g. Christmas and some weekends.
- 2.14 The need for improvements to public transport services was also identified as an issue as was the perception that the area is becoming less pedestrian friendly despite 'improvements' to junctions being undertaken.

### **Travellers' Site**

- 2.15 Discussions with Herts County Council revealed that if a wider scheme for Greater Brookfield were to be developed, alternative locations for the Travellers' and waste disposal sites would be required. This is also a requirement in the Council's adopted local plan.
- 2.16 Retail stakeholders expressed a commitment to substantially expand their businesses if the right conditions prevailed at Greater Brookfield. They felt that there was an opportunity to relocate and reconfigure the site if this was to benefit all stakeholders financially and Greater Brookfield as a whole. Many potential advantages that they identified included the opportunity of being a part of a wider, comprehensive solution for the centre and enabling improvements to access and parking.
- 2.17 While all stakeholders are keen to work with Broxbourne Borough Council to achieve the vision and most are keen to work with the other landowners, some stakeholders expressed a view that a scheme could be brought forward without the involvement of all the landowners.
- 2.18 As part of the discussions about potential funding options, some stakeholders foresaw the need for all landowners to contribute to the funding of new access arrangements due to the benefit that this would bring to the whole scheme and therefore all stakeholders.

### **Second Round Discussions**

- 2.19 A final series of discussions with the Stakeholders was undertaken following the presentation of the draft Greater Brookfield report to the Council Officers in early 2006. The discussions were centred on the study's findings, in particular the preferred scheme for Greater Brookfield. Each stakeholder expressed their support in principle. However, their level of buy-in and involvement would depend on the delivery mechanism and partnering arrangement selected by BBC. There was also a concern regarding the detail of the masterplan to be prepared for the sites. The stakeholders would be particularly interested to see any design complement and enhance their plans for anticipated business growth.

### **Conclusion**

- 2.20 In summary, all parties are keen to see the development of a clear policy framework to establish Greater Brookfield as a town centre.
- 2.21 Overall, the commercial stakeholders agree that this is a location in which they are currently trading well, would like to invest in further and would be keen to do so given the right planning support.
- 2.22 The prevailing view from the landowners is that they would be keen to work with other stakeholders to see progress and achieve the vision for Greater Brookfield. They are awaiting the outcome of further research from Broxbourne Borough Council as it emerges. Importantly, BBC will need to consider the most appropriate way forward to ensure that the stakeholders' involvement complements the Council's objectives whilst ensuring the commercial robustness of the future of the centre.

## 3 Policy Framework

3.1 The purpose of this section is to provide a review of the planning policy framework against which the proposals at Greater Brookfield would be assessed. This includes a review of current national, regional, strategic and local plan policy as well as emerging planning policy.

### **National Planning Policy**

3.2 PPS1 states that planning should facilitate and promote sustainable and inclusive patterns of urban and rural development. PPS1 seeks to promote high quality, sustainable, liveable and mixed use communities with good access to jobs and key services for all members of the community.

3.3 PPG2 advises that once the general extent of the Green Belt has been approved it should only be altered in exceptional circumstances. If such an alteration is proposed the Secretary of State will wish to be satisfied that the authority has considered opportunities for development within the urban areas contained by the Green Belt. Very special circumstances will need to exist to justify inappropriate development in the Green Belt.

3.4 PPG3 states that local planning authorities in preparing development plans should adopt a systematic approach to assessing the development potential of sites, and the redevelopment potential of existing buildings, deciding which are most suitable for housing development and the sequence in which development should take place. In identifying sites through allocations in Local Plans and UDP's, local planning authorities should follow a search sequence, starting with the re-use of previously developed land and buildings within urban areas identified by the Urban Housing Capacity Study, then urban extensions and finally new development around nodes in good public transport corridors.

3.5 PPS6 covers town centres and the main town centre uses. It states that the Government's key objectives is to promote their vitality and viability by planning for the growth and development of existing centres; and promoting and enhancing existing centres.

3.6 PPS6 states that local planning authorities should actively plan for growth and change in town centres over the period of their development plan documents by:

- Selecting appropriate existing centres to accommodate the identified need for growth by:
- Making better use of existing land and buildings, including where appropriate, redevelopment; and
- Where necessary, extending the centre.
- Managing the role and function of existing centres by, for example, promoting and developing a specialist or new role and encouraging specific types of uses in some centres; and
- Planning for new centres of an appropriate scale in areas of significant growth or where there are deficiencies in the existing network of centres.

- 3.7 New centres should be designated through the plan-making process where the need for them has been established, such as in areas of significant growth, or where there are deficiencies in the existing network of centres, with priority given to deprived areas where there is a need for better access to services, facilities and employment by socially excluded groups. Whether this is done at the regional or local level will depend on the size of the proposed centre and its proposed role in the hierarchy of existing centres and how the proposed centre and its proposed role in the hierarchy of existing centres would function and complement the network of existing centres. Current availability or future development of transport infrastructure and choice of modes should be a key part of the decision-making process on the location of new centres.
- 3.8 Unless they are identified as centres in regional spatial strategies and/or in development plan documents, planning authorities should not regard existing out-of-centre development, comprising or including main town centre uses, such as shops, shopping centres, leisure parks or retail warehouse parks, as centres.
- 3.9 PPG13 states that where there is a clearly established need for such development and it cannot be accommodated in or on the edge of existing centres, it may be appropriate to combine the proposal with existing out-of-centre developments, provided that improvements to public transport can be negotiated.

#### **Regional Policy**

- 3.10 Policy SS1 of the East of England Plan draft requires a sequential approach to the location of major development. Policy SS1 states that in most instances development will be focused in or adjacent to major urban areas where there is good public transport accessibility and where strategic networks (rail, road, bus) connect.
- 3.11 Policy SS3 relates to development in and adjoining urban areas and allows urban extensions subject to the effect on previously developed land and green field development being the most sustainable option.
- 3.12 Policy SS5 relates to town centres and states that within the context of a community strategy approach, local development documents, supported by transport plans and economic and environmental and cultural strategies, will:
- Include a strategy for each town centre to promote successful mixed use economies, manage change, refocus where necessary and support cultural heritage;
  - Protect and enhance existing neighbourhood centres and, where a need is established, promote new provision of an appropriate scale and function to meet local day to day needs; and
  - Ensure land is allocated to meet the full range of identified needs.
- 3.13 Policy SS7 sets out Green Belt policy. It states that the broad extent of the Green Belts in the East of England is considered to be appropriate and will be maintained. However, reviews will be undertaken in three locations including Harlow, The Upper Lea Valley and Bishops Stortford.



- 3.14 Within the Stanstead/M11 sub-region Policy ST2 states that provision will be made in local development documents to accommodate up to 40,000 net additional jobs in the sub-region by 2021. Policy ST4 states that the sub-region will provide for a net increase of 35,050 new dwellings between 2001-2021 in excess of existing capacity commitments with provision made within the Broxbourne/A10 Corridor for 2,500 dwellings between 2001-2021.
- 3.15 Policy E3 sets a requirement for local development documents to allocate employment land to provide a range of sites and premises to meet the quantitative and qualitative needs of businesses.
- 3.16 Policy E9 sets out the regional structure of retail centre's, which are as follows:
- Major regional centres: Basildon, Cambridge, Colchester, Chelmsford, Ipswich, Norwich, Peterborough, Southend and Watford;
  - Regional centres: Bedford, Bury St Edmunds, Great Yarmouth, Harlow, Hemel Hempstead, Kings Lynn, Lowestoft, Luton, St Albans, Stevenage and Welwyn Garden City;
  - Other towns and market towns. Local development documents will define the towns and market towns which comprise the structure of main retail centres within their areas; and
  - Villages and local centres. Local development documents will define the villages and local centres that complete the structure of retail provision within their areas.
- 3.17 In accordance with the regional structure in Policy E9, Policy E10 states that:
- New retail development will be located in existing centres and will be consistent in scale with the size and character of the centre and its role within the regional structure.
  - Local development documents will propose a higher order provision only where a need is clearly established, it will result in a more sustainable pattern of development and movement, including a reduction in the need to travel, there would be no significant detrimental impact on other centres or the transport network, and there is environmental capacity. Any new regional centres will be subject to similar considerations, and will be brought forward only as part of their review of this RSS.
  - In the Sustainable Communities Plan growth areas, local development documents will propose development of retail and services in new and existing centres in accordance with sub-regional strategies and policies.
  - Local Development Documents will consider the role of retail within priority areas for regeneration and propose development and enhancement to implement regeneration strategies.
- 3.18 Policy E12 relates to out of town retail and states that it is considered there is no need for any additional regional out of town shopping centres in the plan period. Local Development Documents will define the current and future of existing out of town centre retail sites in relation to existing town centres, in particular to determine whether:

- Out-of-town centre sites should remain purely retail centres; and
- They should be developed into town centres with a full range of service provision.

3.19 The policy states that out-of-town centres will only be developed into town centres where they will:

- Improve social, environmental and economic sustainability; and
- Deliver improved sustainable transport accessibility, particularly to improve public transport access.

3.20 Supporting text specifically refers to the Brookfield Centre in Broxbourne as a significant out-of-town centre site. It states that Local Development Documents will set policy for such centres, to indicate the role they should fulfil within the retail structure.

3.21 Under Policy H1 of the RSS, Local Development Documents will provide for a net increase of 5,100 dwellings over the period 2001-2021 at an annual rate of 255 dwellings in Broxbourne.

3.22 However, Broxbourne's ability to accommodate the number of units allocated to it has been debated at the Examination in Public for the East of England Plan, which was completed on 2nd March 2006. The report of the Panel's findings was released in June 2006. The Panel recommended that Broxbourne's allocation be increased to 5,600 units for the period 2001 to 2021.

3.23 Policies T12 and T13 encourage improvement and usage in walking, cycling and public transport. Policy T14 relates to traffic management and states that through a combination of the measures presented in the Regional Transport Strategy, a reduction will be sought in the rate of growth of car traffic in the region.

3.24 Policy T16 relates to parking and states that as transport accessibility improves, demand constraining maximum parking standards will be applied for commercial development. At regional inter-change centres and other urban centres, once the public transport accessibility levels outlined in the RSS have been met, parking standards will be no higher than 70% of PPG13 standards. Elsewhere PPG13 standards will be achieved.

#### **Hertfordshire Structure Plan, April 1998**

3.25 The policies in the Hertfordshire Structure Plan will be replaced by the forthcoming version of the Regional Spatial Strategy for the East of England. Nevertheless, in the meantime, the Structure Plan forms part of the development plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act 2004.

3.26 Policy S1 relates to sustainable development and states that the general aim will be to encourage economic growth; make provision for the housing and social needs of people; improve people's quality of life; avoid pollution in all its forms; contain road traffic growth; conserve the county's critical capital and other important environmental assets; conserve natural resources; and, minimise resource depletion.

- 3.27 Policy 4 relates to town centres and states that they should be the preferred locations for developments that attract many trips. Their vitality and viability will be maintained and strengthened.
- 3.28 In relation to Green Belt policies, Policy 5 allows the review of Green Belt boundaries around towns to identify land at settlements listed in Policy 6 (which include Cheshunt) for the purposes of limited peripheral development under Policy 7 (as set out below). In addition, Policy 5 states that minor adjustments may be considered in reviews to secure a more sustainable pattern of development and activities within these settlements.
- 3.29 The main development strategy is set out under Policy 7. This policy states that development will be brought forward mainly through planned regeneration in the towns listed under Policy 6.
- 3.30 Policy 12 relates to gypsy sites and states that provision will be made for gypsies who reside in or resort to the County.
- 3.31 Policy 22 relates to the reduction of travel need and car usage and states that the aim will be to reduce the growth in private motor traffic and roads, and minimise its environmental impact, especially during peak periods and in towns. Policy 23 states that developments that enable provision of improved facilities for pedestrians, cyclists, passenger transports and where appropriate horse riders will be supported and encouraged, subject to other policies of the Plan.
- 3.32 Land to the north of Greater Brookfield lies within a defined Landscape Conservation Area. Policy 43 states that the future of these will be reviewed in the course of implementing Policy 44 (Landscape Regions) in the Local Plans. Particular regard is to given to the setting, siting, design and external appearance of such development as is permitted in these areas.

#### **Borough of Broxbourne Local Plan Second Review 2001-2011**

- 3.33 The policies referred to below are those that are contained within the Second Deposit version of the Borough of Broxbourne Local Plan, March 2003 or contained within the Proposed Modifications to the Plan, July 2005.

#### **Greater Brookfield**

- 3.34 The Local Plan designates a specific area known as Greater Brookfield. Paragraph 6.2.5 states that the Council's objectives for the Greater Brookfield area are:
- To promote Greater Brookfield as a single entity for mixed use development comprising comparison and convenience retailing, leisure, business uses, housing and associated community facilities and to ensure that all development is planned and implemented in an integrated and comprehensive manner irrespective of land ownership boundaries;
  - To create a more sustainable centre at Greater Brookfield by broadening the mix of development and by introducing enhanced public transport provision;
  - To create an identity and sense of place;

- To address problems of traffic congestion;
- To improve pedestrian and cycle routes between the various parts of the centre;
- To assimilate the New River Green Chain into the centre;
- To ensure that all new development maintains the high design standards already achieved; and
- To pay high regard to landscaping, especially in proximity to the boundary of the Metropolitan Green Belt and residential properties.

3.35 These objectives are brought together in Policy BFC1A which seeks to bring forward development at Greater Brookfield in a comprehensive manner in accordance with an agreed masterplan which will provide direction on the location and quantum of development within the centre and will include proposals to relieve the centre of through traffic, reduce congestion and enhance public transport, pedestrian and cycle routes.

3.36 Land to the east of the A10 at Canada Fields, is allocated under Policy BFC1 for housing. Brookfield Farm and Brookfield Retail Park are subject to a specific designation under Policy BFC2 which states that the Council supports continued retail use of existing buildings at Brookfield Farm and Brookfield Retail Park, together with the introduction of A2, A3 and D2 uses, subject to the type and level of such uses remaining appropriate and subordinate to the primary use for A1 purposes.

3.37 The New River Trading Estate is the subject of a specific designation under Policy BFC3. This policy states that whilst development of New River Trading Estate is not expected within the first period of the Plan, changes of use which are compatible with a commercial environment and industrial uses which require an element of associated retail floorspace will be acceptable subject to:

- The proposed use being capable of being accommodated without major structural alteration to the physical fabric of the building;
- The proposal not being prejudicial to implementation of the masterplan; and
- Maintenance of high environmental standards.

3.38 The household waste site and highway depot are subject to a specific policy designation under Policy BFC4. This policy states that redevelopment of the household waste site and highway depot will be acceptable provided that:

- In the case of the household waste site, alternative provision has already been made at a location within the Borough equally accessible to the general public; and the new facility is fully operational prior to commencement of redevelopment of the site;
- All proposals must be demonstrated to be compatible with the Council's objectives for Greater Brookfield as set out in Section 6.2 of the Plan;

- Redevelopment is planned, and is executed, on a comprehensive basis;
- Measures to improve the highway network and public transport to allow the proposed development to be accessed without any material adverse impact on local highway conditions are incorporated; and
- Proposals satisfy the requirements of policies BFC8 (design and appearance) and BFC9 (protection of the setting of the metropolitan Green Belt and Great Cambridge Road).

3.39 In assessing the suitability of alternative uses for these sites, the Council will require applicants to demonstrate that:

- In the case of Class C1 uses (hotels) or Class D2 uses (assembly and leisure) that the PPS6 sequential test has been satisfied;
- In the case of A3 uses, that the type and level of A3 use remains a complementary component of a comprehensive mixed use redevelopment;
- In the case of A3 and other leisure uses, the requirements of Policies SUS9-11 are met; and
- Redevelopment for unrestricted retail (A1) purposes will not be acceptable.

3.40 Policy BFC5 relates to the land allocated to the west of Halfhide Lane (Halfhide Land site). The policy states that the Council allocates land west of Halfhide Lane for the provision of up to 8,000 sqm of additional retail floorspace, with sales restricted to bulky goods only (i.e. retail warehousing). Applicants for proposals for development within either use class D2 or hotel/motel use will be required to demonstrate that the PPS6 sequential test has been complied with. In the case of A3 uses, applicants will be required to demonstrate that the type and level of A3 use remains a complementary component of a comprehensive mixed use redevelopment. Policy BFC5 requires that all development proposals for land west of Halfhide Lane must:

- Demonstrate compatibility with the Council's objectives for Greater Brookfield as set out in Section 6.2 of this Plan;
- Be planned and executed on a comprehensive basis;
- Incorporate measures to improve the highway network and public transport to allow the proposed development to be accessed without any material adverse impact on local highway conditions;
- Satisfy the requirements of Policies BFC8 (design and appearance), BFC9 (protection of the setting of the metropolitan Green Belt and Great Cambridge Road), and BFC10 (New River Green Chain – pedestrian link);
- Include provision for relocation of all of the existing occupiers;

- In the case of A3 and other leisure uses also satisfy the requirements of policies SUS9-11; and
- Redevelopment for unrestricted retail (A1) purposes will not be acceptable.

3.41 Policy BFC6 relates to the relocation of travellers and requires proposals for relocation of the existing travellers housed on the Halfhide Lane site to satisfy the following criteria:

- Alternative provision must be made available and ready for occupation prior to the commencement of redevelopment of the existing site and allow for retention of established links with schools and health facilities; and
- Provision must be made for the accommodation of a similar number of travelling families.

3.42 In the event of a new site or sites being promoted within the Borough for travellers the Council will require under Policy BFC6 that:

- Sites are conveniently located in relation to schools and health facilities;
- Site(s) provide a reasonable level of amenity to proposed occupiers;
- Detailed landscaping schemes are incorporated which provide for screening by indigenous planting to an appropriate bio mass;
- The amenities and environment of neighbouring occupiers are not materially adversely affected;
- Location of a new site(s) does not prejudice implementation of other policies in this plan; and
- Sites meet the full range of traveller's needs including the ability to keep animals and park and manoeuvre commercial vehicles.

3.43 Policy BFC7 (formerly BFC8) relates to the impact of development on the highway network within the Greater Brookfield locality. It requires that all development proposals in the locality of Greater Brookfield, as defined on the Proposals Map, or in the immediate locality will be required to demonstrate that either the development can be accommodated without any material adverse impact on the existing highway network or appropriate localised measures to ameliorate the impact of additional traffic can be made.

#### **Green Belt**

3.44 Policy GBC2 relates to development within the Metropolitan Green Belt. The policy restricts development to agriculture, forestry, recreation and crematoriums, limited extensions, re-use of existing buildings and mineral extraction.

### **General Retail Policies**

- 3.45 Policy RTC1 states that the Council will permit new retail development within town and district centres that is compatible with their function and position within the retail hierarchy. Retail development will not be permitted elsewhere in the Borough unless otherwise provided for in the Plan or where a qualitative and/or quantitative need can be demonstrated; a sequential test has been followed, the proposals would not have a material adverse impact upon the vitality and viability of town, district and local centres; and, the development accords with the criteria set out in Policy RTC4.
- 3.46 In order to assist the maintenance and/or improvement of the vitality and viability of the Borough's town and district centres Policy RTC2 states that the Council will prepare town centre frameworks for Hoddesdon and Waltham Cross and seek to ensure an appropriate range of uses in Cheshunt Old Pond district centre.
- 3.47 Under Policy RTC3, all proposals for development within the hierarchy of shopping centres will be determined having regard to the objectives of the town centre frameworks and the Council's community plan where appropriate, and Policy RTC4.

### **Key Policy Tests**

- 3.48 Greater Brookfield is not allocated as a centre within regional, strategic or local planning policy. Although the Local Plan Review provides policy support for further retail, leisure and other development to provide a more sustainable development, the key policy tests of national, regional and strategic policy will still need to be met to promote major development at Greater Brookfield.
- 3.49 We consider the key policy tests to be as follows:
- The requirement for development at Greater Brookfield to facilitate and promote sustainable development as set out in PPS1, draft Policy SS1 of the RSS, and Policy S1 of the Structure Plan.
  - In order to meet the provisions of sustainable development, the need to undertake a sequential approach to major development with development focused in or adjacent to major urban areas where there is good public transport accessibility as required under draft Policy SS1 of the RSS.
  - Draft Policy SS7 of the RSS allows the review of Green Belt boundaries in the Upper Lea Valley. However, for revisions to the Green Belt boundary to the north of Halfhide Lane to take place, exceptional circumstances will need to be proven as required under PPG2 and under Policy 5 of the adopted Structure Plan with development be undertaken in a comprehensive manner.
  - PPG3 would require that it is demonstrated that there are no previously developed sites and buildings within urban areas suitable for development before examining urban extensions.
  - Draft Policy SS3 of the RSS would require that urban extensions demonstrate that there would be no adverse impact on the maximum use of previously developed sites and if greenfield, have good public transport access, utilise existing physical and social infrastructure; have good access to

housing, jobs, schools, shopping and leisure facilities; and, have no adverse impact on environmental assets.

- In accordance with PPS6, and Policy RTC1 of the Local Plan a need for the retail, leisure and other town centre uses will have to be demonstrated; that the uses are of appropriate scale; that there are no sequentially preferable sites in town centres or edge-of-centre locations; and, there will be no impact on the vitality and viability of town centres within the Borough or nearby centres.
- PPG13 would require that if proposals cannot be accommodated in the town centre or at edge-of-centre locations, proposals at out-of-centre locations should be combined with improvements to public transport.
- At the local level, Policy BFC4 of the Local Plan requires the relocation of the household waste site and highway depot within the Borough and Policy BFC6 requires alternative provision to be made for the relocation of the existing travellers before commencement of redevelopment. Policy RTC2 requires the Council to prepare town centre frameworks for Hoddesdon and Waltham Cross.

3.50 The following sections of the report address the key policy tests outlined above.



## 4 Retail and Town Centres

### Introduction

- 4.1 In order to determine the scale and form of new retail and associated town centre uses likely to be justified at Greater Brookfield and develop a complementary strategy for the defined centres of Hoddesdon, Waltham Cross and Cheshunt, we have examined the role of the established centres and their relationship with the network of competing higher order centres; undertaken health checks of each of the centres; updated the previous DTZ capacity projections and examined the capacity for meeting retail and other town centre needs within defined centres within the Borough.

### Context

- 4.2 It is clear the role of centres in Broxbourne is strongly influenced by 'higher order' centres outside the Borough, particularly Enfield, Harlow and Welwyn Garden City. Due to the size of the DTZ survey area and the proximity of the outer zones to these centres, it is reasonable that expenditure from these outer zones will be going to centres outside Broxbourne. However our analysis supports DTZ's view that looking forward, it is not appropriate or sustainable for expenditure from Zones 1 and 2 (which covers most of the Borough of Broxbourne) to be leaking to surrounding centres to the extent that it currently takes place, especially out of centre locations as far afield as Lakeside and Bluewater.
- 4.3 Broxbourne's main competing centres have all either recently improved their retail offer or they have schemes in the pipeline to do so. Collectively, the level of investment planned in the competing sub-regional centres will strengthen their role in the retail hierarchy, and increase their market share from the Broxbourne catchment area. The level of competition and threat of continued polarisation of retail activity to Broxbourne's larger competitors will result in significant challenges for the Borough without corresponding improvements to its own facilities. This suggests that securing retail development is critical to safeguarding its future and to help ensure more sustainable shopping patterns.
- 4.4 There are other Government objectives which need to be taken account of in the context of the key objective above:
- Enhancing consumer choice by making provision for a range of shopping, leisure and local services, which allow genuine choice to meet the needs of the entire community, and particularly socially-excluded groups;
  - Supporting efficient, competitive and innovative retail, leisure, tourism and other sectors, with improving productivity; and
  - Improving accessibility, ensuring that existing or new development is, or will be, accessible and well-served by a choice of means of transport.
- 4.5 PPS6 states that local planning authorities should actively plan for growth and manage change in town centres over the period of their Development Plan Documents by:

- Selecting appropriate existing centres to accommodate the identified need for growth;
- Managing the role and function of existing centres by, for example, promoting and developing a specialist or new role and encouraging specific types of uses in some centres; and
- Planning for new centres of an appropriate scale in areas of significant growth or where there are deficiencies in the existing network of centres.

4.6 Local planning authorities should seek to ensure that the number and size of sites identified for development or redevelopment are sufficient to meet the scale and type of need identified. Paragraph 2.7 advises that in areas of significant growth or where deficiencies are identified in the existing network of centres, new centres may be designated through the plan-making process. Therefore it is entirely appropriate to consider the potential of Greater Brookfield to contribute to meeting defined needs, as well as the Boroughs.

### **Retail Trends**

4.7 National retail trends indicate a continued growth in incomes and expenditure, albeit not at such strong levels as in the last 15-20 years. The growth in expenditure is focused on comparison goods with virtually no increase in convenience goods expenditure. This presents significant opportunities and challenges to Broxbourne.

4.8 Increased car ownership has resulted in greater household mobility and therefore the choices for shopping centres to visit and the distances that can be travelled are much greater. The Broxbourne catchment is relatively affluent and mobile; as such, unless attractive, modern shopping facilities are provided in the area, shoppers will travel further by car to facilities which meet their expectations.

4.9 Internet shopping has grown phenomenally in the last few years and looks set to continue in certain sectors. However, it remains only a very small percentage of overall spending and it would be unrealistic to assume this medium will make a significant contribution to meeting forecast needs in Broxbourne over the next 10-15 years.

4.10 Retail planning policy has become much more focused on promoting and protecting town centres. Although new forms of retailing, such as purpose built out-of-centre regional shopping centres, factory outlet centres and retail warehouse parks have emerged, where these are out-of-centre, they are now largely restricted by planning policy. However, as 'out of centre' facilities like Greater Brookfield have become an established part of the network of centres, and in effect perform the role of 'new centres', local planning authorities are increasingly acknowledging the need to recognise their role in meeting future shopping needs.

4.11 The foodstore operators have continued to evolve their formats and offer. With restrictions on out-of-centre stores growing, and changing socio-economic trends, several large operators have returned to the high street with small convenience stores. Operators are also seeking to extend their comparison goods offer, turning stores into variety or mini department stores.

- 4.12 There has been a continued polarisation towards larger centres and the provision of larger stores in these centres. In Broxbourne, this is evident by the success of Greater Brookfield, which has become the main concentration of key multiple comparison retailers i.e. M&S, Next etc. Where smaller centres have been unable to diversify their offer or create niche markets they have suffered. In Broxbourne, the established centres have generally maintained their more localised, convenience and service function. However their role and significance as comparison shopping centres has experienced relative decline, and is overshadowed by Greater Brookfield.

## **Town Centre Healthchecks**

### **Hoddesdon**

- 4.13 It is clear from a number of key indicators and the Household Telephone Survey that Hoddesdon is performing a strong convenience and service role. There is a high percentage of convenience floorspace and a range of banking and financial service providers. Hoddesdon is lacking in mid range and quality comparison retailers and this is reflected in the Household Survey results where the most frequent responses were all concerned with the lack of clothing stores.
- 4.14 Hoddesdon has no 'higher order' comparison multiples and there is no significant demand from retailers to locate there. Without key data in terms of rents and yields it is somewhat difficult to assess the performance of the town centre, although the fall in retailer requirements over recent years is consistent with wider national trends. There is a very high percentage of vacant units although a number of these were along Fawkon Way and these are currently under redevelopment.
- 4.15 There are a total of 960 car parking spaces in the town centre although the majority of these are either in Sainsburys or the Tower Centre. The Household Telephone Survey suggests that there may be a perceived under provision as 'more parking provision' was the fourth highest response when people were asked how the centre could be improved.
- 4.16 Hoddesdon is not performing as a comparison shopping destination, with the survey indicating that only 1.6% of the catchment area shop at Hoddesdon for clothing and footwear. Based on retail trends and the current function of the centre this is unlikely to change. We consider that the retail function of Hoddesdon is likely to consolidate, and looking ahead the main focus of the centre will be for convenience shopping, local services and eating/drinking.

### **Waltham Cross**

- 4.17 Waltham Cross is performing well and fulfilling its role as a town centre in the Borough. Considering the relatively small size of the centre the town has a good representation of comparison multiple retailers but only 8 of Experian's 'key attractors'. Vacancy rates are exceptionally low at only 2 units. The offer is generally low/mid market; Waltham Cross has no higher order comparison multiples and there is no significant demand from these kind of retailers to locate in the town. There are 11 retailer requirements for the town centre from 'discount retailers' such as TK Maxx and Savers.
- 4.18 Waltham Cross is the most popular town centre in Broxbourne for comparison shopping, with 5.3% of the catchment area last shopping for clothing and footwear there. However, compared to surrounding

competing centres (including the Brookfield Centre) Waltham Cross is not a strong comparison shopping destination and based on retail trends and the current function of the centre this is unlikely to change.

### **Cheshunt**

- 4.19 Cheshunt is performing primarily a service role in the Borough with a high proportion of banks and estate agents and very few comparison stores. Only 0.8% of the survey area last shopped for clothing and footwear in Cheshunt. Demand is the highest in the whole Borough at 15 potential requirements, but 10 are from services which would further strengthen the current role of the centre. There are only 3 vacancies in the centre.
- 4.20 Cheshunt is performing well as a district centre and the focus should be on consolidating its role to meet local convenience shopping and service needs. The role should also be complemented with the continued provision of eating/ drinking establishments. However, the prospects of any significant additional comparison retail development in the centre are limited.

### **Retail/Leisure Capacity up to 2016**

- 4.21 Our updated projections indicate capacity for some additional convenience goods floorspace, potentially up to one medium sized superstore i.e. circa 25,000 sqm net by 2016. This would support provision of a new or extended larger foodstore in the established centres to reinforce their current role, and/or enhanced local shopping facilities.
- 4.22 We have identified more significant capacity for additional comparison goods floorspace. We consider a more realistic estimate is between 23,700-30,000sqm net depending on what benchmarks are applied to the turnover of existing centres, and the potential to increase market shares in the core catchment.
- 4.23 On this basis, the Borough should plan for up to 42,860 sqm gross additional comparison floorspace by 2016, over and above existing facilities. Beyond 2016, the requirement will increase further, and therefore the recommended strategy should build in future capacity for expansion above this level.
- 4.24 In addition, we anticipate significant growth in demand for services, in the eating and drinking sector and in the main stream commercial leisure market, including capacity for a multiplex cinema and associated leisure facilities. While it is difficult to quantify the requirements of this dynamic sector, we consider the strategy for the Borough should identify appropriate locations for a circa 10,000 sqm of D2/A3 floorspace to meet these needs.

### **Policy Options for meeting Retail/Leisure Needs**

- 4.25 The Borough of Broxbourne Local Plan Second Deposit 2003 states that new retail development within the town and district centres should be compatible with their function and position within the retail hierarchy. Policy also states that retail development will not be permitted outside these centres unless it can be demonstrated that land and premises requirements of development cannot be accommodated within existing centres or on the edge of existing sites or that existing centres cannot accommodate development without damage to their historic or architectural heritage.

## Existing Centres

- 4.26 Hoddesdon has one allocation within its town centre which is for strategic housing. Much of Hoddesdon is a Conservation Area, which will severely restrict the type and scale of development that the town centre can accommodate. The town centre boundary is constrained by the A1170 major road to the north and east and by Green Belt and housing development to the west. The south of the town centre is a continuation of the Conservation Area. For these reasons it is not considered that it is suitable to extend the town centre outward and there are no suitable sites for the scale of retail development needed within the existing town centre.
- 4.27 There are no site allocations within Waltham Cross town centre. As with Hoddesdon, it is considered unfeasible to extend the existing town centre to accommodate retail growth. The M25 tightly confines the centre to the south as does Monarchs Way to the west and the A121 to the north, established housing also constrains any growth of the town centre to the west. Due to the scale of Cheshunt district centre it is considered an inappropriate location for any further comparison retail development. In any event, there are no strategic sites available to materially extend its offer.
- 4.28 Our health checks show that the town/ district centres in the Borough are performing a vital role for convenience shopping and services such as banking and eating/ drinking. These centres need to continue serving this convenience role in the Borough and focus on providing a greater role in terms of leisure and eating/ drinking. Spending on convenience goods, and in restaurants and cafes and other services is forecast to grow, and will reinforce the current role of the established centres. However, there are no opportunities in Cheshunt, Waltham Cross or Hoddesdon to facilitate the scale of comparison floorspace needed.
- 4.29 Notwithstanding the physical constraints and limited market demand for new development in the existing centres, we have undertaken a detailed assessment of physical capacity for accommodating additional retail/commercial leisure development, looking at sites and existing developments where there may be potential for expansion/increased density. Adopting what we consider are highly optimistic assumptions about the potential to realise additional development in Hoddesdon and Waltham Cross, which in practice would involve significant redevelopment and raise a range of planning/highway issues, we have assessed the physical capacity of the existing centres in the Borough as not more than circa 22,700 sqm gross.
- 4.30 On this basis, taking the identified comparison floorspace need for the Borough of circa 55,000 sqm gross by 2016 indicates that even with radical intervention to promote high density development in existing centres, there will be a shortfall of circa 32,250 sqm gross of additional comparison retail floorspace. In addition, we expect growth in the leisure sector, and the quantitative and qualitative need for a cinema facility serving the Borough, together with ancillary eating and drinking, health and fitness, and other related uses.
- 4.31 This suggests an additional need for circa 10,000 sqm gross of A3/D2 leisure provision for which there are not readily identifiable sites in existing centres. On this basis, a strategy based on meeting Broxbourne's retail/leisure needs based solely within existing centres is unsustainable.

### **Alternative Options**

- 4.32 PPS6 urges local authorities to plan positively to meet identified retail and other main town centre needs. PPS6 and PPG13 also seek to achieve sustainable shopping patterns, to reduce the need to travel unnecessarily, and to provide an effective network of town, district and local centres. Where necessary, this process involves reviewing the role of different centres, and the scope to create new centres or expand existing out-of-centre facilities.
- 4.33 It is self evident from the DTZ study, and our own updated analysis, that the Brookfield Centre already functions as by far the most significant convenience and comparison shopping destination within Broxbourne. The Tesco/M&S and Retail Park collectively provide a comparable offer to a major town centre serving the Broxbourne area, and have a well established role within the wider retail hierarchy.
- 4.34 The existing facilities are already performing strongly, and based on forecast population and expenditure growth, and recent and committed extensions, the Brookfield Centre's retail function is likely to continue to expand. In these circumstances, in any future scenario the Brookfield Centre will continue to be the dominant, higher order comparison retail destination serving the Borough and beyond.
- 4.35 As part of our assessment, we have examined whether there is any merit in considering provision of a new centre, in addition to existing facilities at Greater Brookfield, in order to accommodate identified comparison and leisure needs. However, as the requirement needs to be met within a highly accessible location which is central to the Broxbourne catchment, there appears to be no merit in seeking to create a second alternative destination. This option is unlikely to be attractive to retailers/operators, in that it fails to build on the established attraction of Greater Brookfield with its key anchor stores. It also fails to secure the potential to address the evident problems at Greater Brookfield by using the new retail/leisure revision as needed as a commercial catalyst for change.

### **Capacity for Greater Brookfield**

- 4.36 In these circumstances, having regard to national, regional and local policy objectives, we are satisfied that there is a robust case to plan for at least 32,250 sqm gross of additional comparison shopping floorspace at Greater Brookfield. There may be scope for some limited additional convenience goods floorspace, although in policy terms may be more appropriate to focus local convenience shopping into the existing network of established centres where opportunities arise.
- 4.37 We consider there is also a clearly defined need for significant additional leisure provision, including a cinema. For the reasons outlined above, consider that Greater Brookfield represents an appropriate location in policy terms for this type of facility and that provision for circa 10,000 sqm of additional A3/D2 floorspace is also supportable in this location.
- 4.38 Looking at the existing provision, we anticipate that any long term strategy for Greater Brookfield is likely to involve relocation/redeveloping some of the existing retail facilities on a phased basis, in order to create a properly planned development and achieve an appropriate density and move away from the low density single level 'retail park' type layout. This could involve relocation of both Tesco and Marks & Spencer and, potentially the Standard Life, as part of an effectively integrated mixed use retail/leisure development underpinning the evolution of Greater Brookfield into a genuine centre.

- 4.39 Assuming the redevelopment of Tesco/Marks & Spencer stores is likely to be required in any significant development option at Greater Brookfield, replacement of these stores and the need for additional comparison retail floorspace suggests a minimum scale of circa 50,000 sqm gross of comparison retail floorspace is likely to be required, with provision for circa 10-15,000 sqm of A3/D2 uses. We recommend that these figures are incorporated into the core strategy for the Borough, and brought forward through an Area Action Plan or SPD for Greater Brookfield.
- 4.40 Translating these capacity figures into an appropriate retail mix, we consider the Borough Council should plan for the provision of a third major anchor store at the Brookfield Centre, to accommodate the requirements of a department store operator. In addition, we consider the enhanced retail offer of the Brookfield Centre would include a range of larger shop units, capable of accommodating key high street names such as Next, H&M, Gap, Zara, Mango, etc., together with a cinema, health and fitness, family entertainment e.g. bowling, and a mix of A3 uses.

### **Impact Considerations**

- 4.41 We have considered the implications of this scale and form of development at Brookfield on the existing Broxbourne centres, and neighbouring higher order centres.
- 4.42 In the case of the Broxbourne centres, we consider each is currently a vital and viable centre and has potential to further enhance its primarily local comparison/convenience and services function. This should be achieved through the development of effective town centre strategies and where opportunities arise, small scale redevelopment. Looking ahead, each is likely to continue to focus on its convenience offer, and services/eating/drinking, supplemented by a more local 'everyday' comparison offer.
- 4.43 Provided the new development at Greater Brookfield is aimed at the 'higher order' comparison multiple retailers, including a department store operator, we consider the impact on existing Broxbourne Centres is likely to be negligible. Our capacity assessment makes provision for significant new comparison retail development within Hoddesdon and Waltham Cross, and makes provision for existing retailers to increase their turnover by circa 2.5% per annum in real terms.
- 4.44 In practice, these levels of growth may be difficult to achieve. However, in purely expenditure terms there is more than sufficient headroom within the Broxbourne area to support the expansion of Greater Brookfield while retaining and enhancing the vitality and viability of the established town centres. The only concern which may arise is if the Greater Brookfield proposals include significant additional convenience shopping facilities, over and above the retained/redeveloped Tesco, and/or attract the mid-market/discount retailers which currently characterise the retail offer of the Broxbourne Centre.
- 4.45 Paradoxically, we consider the most effective way to ensure that the proposals for Greater Brookfield are complementary to the future role of the existing Broxbourne Centres, besides restricting the scale of additional convenience floorspace permitted, is by supporting a development of sufficient critical mass to attract the necessary third anchor store and the type of quality High Street operators not currently represented in the area. In addition to minimising the impact on the existing Broxbourne centres, the provision of a new level of quality comparison retail and leisure operators at Greater Brookfield also

maximises the prospects of retaining a higher level of expenditure within the Broxbourne core catchment area.

- 4.46 We have considered the potential impact of such a scale of development on neighbouring 'higher order' centres including Harlow. In the context of the scale of growth forecast over the next ten years and beyond, and the relatively modest change in shopping patterns likely to be required within the Broxbourne core catchment area to support this scale of development, we consider the proposals are unlikely to have any significant adverse impact on Broxbourne's stronger neighbouring centres. All the competing centres are the subject of recent/ongoing development proposals, which are likely to reinforce their retail/leisure offer.
- 4.47 We consider the further development envisaged at Greater Brookfield is likely to help the centre, and Broxbourne generally, to retain its current position relative to expanding neighbouring centres. On this basis, we are satisfied that the scale of additional comparison/leisure floorspace proposed could be regarded as being of an appropriate scale, and would be capable of satisfying all the key tests set out in PPS6 i.e. need/appropriateness of scale, the sequential approach and impact.



## 5 Urban Capacity Study

### Introduction

- 5.1 The following analysis presents the findings from the Borough-wide Urban Capacity Study, undertaken following a comprehensive analysis of sites in Broxbourne. This document sought to quantify the development potential of the Borough's brownfield land and other available sites, for which could be developed for residential use prior to 2021. The method of the study followed Government guidance outlined in Planning Policy Guidance 3 (PPG3) and in *Tapping the Potential*, the accompanying best practice guide published in 2000 by the DETR (now DTLR). PPG3 states that '...in order to establish how much additional housing can be accommodated within urban areas, and therefore how much greenfield land may be needed for development, all local planning authorities should undertake urban housing capacity studies'.
- 5.2 Urban capacity studies are not intended to identify specific sites for development. However, in this case, aggregate results will be used to determine the quantity of new allocations to be made in Broxbourne's Local Development Framework and its Proposals Map.
- 5.3 The Capacity Study ensured that all land and buildings with housing potential were identified based on a discrete number of sources, known for the purposes of the study as Typologies. These are listed below.

#### List of Potential Sources or 'Types'

• Intensification of existing areas	• Previously developed vacant and derelict land and buildings (non housing)
• Conversion of commercial buildings to residential use	• Redevelopment of car parks
• Review of existing housing allocations	• Review of land and buildings allocated for other uses
• Redevelopment of existing housing	• Vacant land not previously developed
• Subdivision of existing housing	• Flats over shops
• Empty homes	

- 5.4 Each of these sources were surveyed to identify the potential (unconstrained) yield and then discounted to identify the realistic potential of land in the borough. This was undertaken in the following three stages:
- **Stage 1: Identifying the Potential** – Site surveys based on urban character of areas recording initial appraisal of sites.

- **Stage 2: Exploring the Potential** – Stocktaking of all sites identified based on the acceptability, in principal, of development for housing in line with PPG3 objectives. On the basis of this process, sites were either ‘Accepted’ or ‘Rejected’ for the purposes of the study with design work applied to those sites that were ‘Accepted’.
- **Stage 3: Delivering the Potential** – Analysis of sites including an assessment of their viability and deliverability. A yield was then applied based on an analysis of market densities supported by design exercises.

### **Discounting**

5.5 This stage filtered out those sites that were not considered to have the potential to come forward for residential development within the East of England Plan period (2001-2021). There were a variety of policy and market constraints taken into account as well as issues of practicality. Given that judgements on the potential of sites up to 2021 had to be made there was assumed to be some degree of uncertainty. We drew upon our knowledge of the market in Broxbourne, outlined below, as well as discussions with Council Officers on potential constraints and policy issues to identify a core list of suitable sites for residential development. These sites were categorised into one of the following groups, based on their suitability for development:

**Category 1 – Previously identified sites** – Existing local plan housing allocations that were deemed appropriate following review under PPG3 and employment land criteria.

**Category 2 – Likely future development sites** – sites with limited constraints and good potential for residential development.

**Category 3 – Possible future development sites** – sites with good residential potential up to 2021, but which have some constraints to be overcome that are not considered insurmountable.

**Category 4 – Sites with limited potential** – sites with significant development constraints and limited potential for development.

**Category 5 – Discarded sites** – sites with overriding constraints and/or unsuitable locations for residential development.

5.6 Sites in Categories 4 and 5 were discounted.

### **Source Types**

5.7 The following analysis provides an explanation of each of the surveyed Typologies and reflects the assumptions applied as part of the discounting process, details the development potential emerging from each and the identified number of sites and area.

### **Review of Land and Buildings Allocated for Other Uses**

- 5.8 Although this source contributed significantly to the unconstrained figure, the market analysis indicated that there is not a significant amount of surplus employment floorspace in the Borough and should be retained. In addition, the majority of allotments, playing fields and parks/recreation grounds were considered necessary amenity space and were also discounted. This source provided **7 new sites or 11.58 hectares of land**.

#### **Review of Existing Housing Allocations**

- 5.9 This source comprised sites that were allocated for housing within the existing Broxbourne Local Plan that had not been implemented at the time of the survey. This source provided 2 sites comprising **8.58 hectares** of land.

#### **Previously Developed Vacant and Derelict Land and Buildings (non housing)**

- 5.10 This source provided a large proportion of the potential. However, following market testing operational sites were deemed difficult to redevelop because of issues of land assembly. As the Borough has a strong commercial market, it was not considered appropriate to identify many of these sites for residential development and most were discounted as part of the process. This source provided **22 sites** comprising **6.87 hectares** of land.

#### **Vacant Land not Previously Developed**

- 5.11 Despite the recent demand for vacant land in the borough, a number of sites remain and were identified as suitable for future development. This type includes land often shown within built up areas on proposals map as a white area without any annotation. This land was identified from the survey and from consultation with the Council officers. The survey identified a further **15 sites** comprising **6.17 hectares** of land.

#### **Intensification of Existing Sites**

- 5.12 Although, assembling sites for residential development using land from backlands and garages could be considered to be problematic given access and perceived land assembly issues, a number of sites were identified in the Borough. This was due to the large number of sizable detached properties on offer. It was assumed that clusters of detached properties with more than three ownerships and limited accessibility would be discounted. Despite this, the study identified **14 sites** comprising **3.78 hectares**.

#### **Redevelopment of Car Parks**

- 5.13 Broxbourne is a car dependant Borough and therefore car parks were not considered to provide a large source of supply. Despite this, residential development has previously taken place on such sites. Therefore, a number of car parks were identified as having potential and **8 sites** comprising **3.71 hectares** were identified.

#### **Redevelopment of Existing Housing**

- 5.14 This source only provided a limited amount of potential. A total of **5 sites** were identified comprising **1.13 hectares** of land.

## Conversion of Commercial Buildings to Residential Use

- 5.15 Non-residential conversions have previously provided a source of supply with a number of office building recently being converted. A lack of strength in Broxbourne's commercial office market, revealed from discussions with local agents, indicated that there is little interest for the conversion of other commercial buildings such as pubs. In other stock such as office accommodation, the current vacancy rate is very low. Therefore, the Council is reluctant to see commercial land converted into residential and the identified sites were discounted. This source, therefore, did not prove to be a significant supplier of potential. Apart from sites with existing planning approval, **no new sites** were included as capacity.

### Summary of Discounted Potential

<b>Total Sites Identified</b>	<b>Area (ha)</b>	<b>Initial Sites Rejected</b>	<b>Further Sites Removed</b>	<b>Accepted Sites</b>	<b>Area (ha)</b>
222	125.81	63	86	73	41.82

- 5.16 Overall, from an initial unconstrained area of 125.81 hectares, an estimated **41.82 hectares** of potential capacity was identified from sites suitable for development prior to 2021.

### Dwelling Calculations and Density

- 5.17 Following the discounting process, the residual sites were then classified based on geographic location. Sites were assumed to be located either within the town-centre boundary, accessibility corridor or elsewhere. By applying an upper and lower density to individual site areas, the capacity and therefore a potential upper and lower dwelling yield was calculated for individual sites.
- 5.18 Density assumptions were made in accordance with Policy H11 of the Borough of Broxbourne Local Plan Second Review 2001-2011 (December 2005), which sets out the parameters for the density of new housing in the Borough.
- 5.19 The accessibility corridor set out in Supplementary Planning Guidance (SPG) was used as the basis for categorising the sites and applying appropriate densities.
- 5.20 The lower boundary was assumed to be the figure set out in Policy H11, as follows:
- Sites within the boundaries of town centres **80 DPH**
  - Sites within the accessibility corridor **60 DPH**
  - Elsewhere – A density compatible with the general prevailing density of existing housing in the vicinity provided this is not below **30 DPH**
- 5.21 An analysis of past market trends was supported by a design exercise to test higher density scenarios. The higher density boundaries were assumed to be as follows:

- Sites within the boundaries of town centres **160 DPH**
- Sites within the accessibility corridor **80 DPH**
- Elsewhere – A density compatible with the general prevailing density of existing housing in the vicinity provided this is not below **50 DPH**

5.22 The density analysis identified that from a total of 73 surveyed sites, 41.82 hectares could yield potential for 1,909 dwellings based on the low-density scenario and 2,573 dwellings based on the high-density scenario.

<b>Table 5.2: Accepted site potential</b>				
<b>Type</b>	<b>No. of sites</b>	<b>Area (ha)</b>	<b>Scenario A Units</b>	<b>Scenario B Units</b>
Review of Other Existing Allocations	7	11.58	495	653
Existing Housing Allocations	2	8.58	257	343
Previously Developed	22	6.87	347	494
Vacant Land not Previously Developed	15	6.17	304	416
Intensification of Existing Areas	14	3.78	195	257
Redevelopment of Car Parks	8	3.71	225	312
Redevelopment of Existing Housing	5	1.13	86	98
Conversion of Commercial	0	0	0	0
<b>TOTAL</b>	<b>73</b>	<b>41.82</b>	<b>1,909</b>	<b>2,573</b>

## Other Sources

### Subdivision of Existing Houses

5.23 There have been some developments of this type in the Broxbourne area mainly as a result of a shortage of larger sites. This type of sources is traditionally dependent on a stock of larger detached dwellings or terraced housing. Although Broxbourne has a significant supply, subdivision of housing into two or more unit did not prove to be a significant source.

5.24 To calculate this rate the unit gains from implemented and non-implemented planning permissions for subdivisions have been counted between the period November 2001 to November 2005. A total of 35

units were gained over this 4 year period equating to an approximate gain of 9 units per year. Projected up until 2021 this would equate to a total of **131 units**.

- 5.25 A further assumption was made following conversations with Broxbourne Borough Council revealed that there might be a shift in policy to allow an increased rate of subdivision in 'smaller' units. Thus an upper rate was assumed (scenario B) of 11 units per year equating to **165 units** to the end of the Plan period (i.e. 2006-2021).

#### **Potential of Living over Retail Units**

- 5.26 There is some potential in Broxbourne to convert space over shops (and local offices) into flats.
- 5.27 While some new town centre schemes have provided a mixture of houses and flats, most of the viable sites providing these types of units have already been developed. There is some potential demand for this typology but the main restriction was considered to be the adequate provision of car parking spaces. Most development potential was considered to come forward on smaller sites. Again, based on recent trends around **315 units** could come forward by 2021.

#### **Empty Homes**

- 5.28 While Tapping the Potential considered this type of housing to provide a significant source of capacity, the current vacancy rate in Broxbourne was found to be below the national average. Therefore any potential sites were discounted. This is due to the strong demand for housing of all types, sizes and tenures in the Borough.

#### **Sites with Planning Permission**

- 5.29 Furthermore, as at March 2006, there were extant planning permissions for a total of 926 residential units for which planning approval had been obtained, but where the sites had not been developed out.

#### **Potential Supply**

- 5.30 In addition to the physically identifiable sites, the additional sources provide capacity for an estimated 446 units at scenario A, and 480 units at scenario B. Total extant planning permissions can also be included as potential to come forward within the Plan Period. The total potential is summarised below:

<b>Table 5.3: Total Potential</b>				
<b>Total Surveyed Potential</b>	<b>No. of sites</b>	<b>Total Area</b>	<b>Scenario A Units</b>	<b>Scenario B Units</b>
	73	41.82ha	1,909	2,573
<b>Additional Sources</b>				
Subdivision of existing housing			131	165
Flats over shops			315	315
Empty Homes			0	0
Total Yield (Excluding Extant Planning Permissions)			2,355	3,053
<b>Total Yield (Including Extant Planning Permissions)</b>			<b>3,281</b>	<b>3,979</b>

### Timing

- 5.31 It was considered appropriate to estimate that sites with planning permission or sites with minimal development constraints could come forward for development prior to 2011. Therefore, sites in Category 1 were included within this time period and Category 2 and 3 in the medium term between 2012 and 2021. The table below indicates the quantum that could come forward for development in these periods.

<b>Table 5.4: Table showing the spread of capacity across the study period</b>				
<b>Category</b>	<b>Time Period</b>	<b>Area of Land</b>	<b>Total Units Scenario A</b>	<b>Total Units Scenario B</b>
Category 1	2006-2011	13.07ha	416	547
Category 2 + 3	2012-2021	28.75ha	1,493	2,026
Rate based		N/A	446	480
Total		41.82ha	2,355	3,053

- 5.32 If the number of sites with planning permission were factored into the above figures, we would assume that **1,342 units** from Category 1 sites in the low-density scenario (416 plus the 926 from planning

permissions) would be due to come forward before 2011. The remaining **1,493 units** from surveyed sites would be delivered by 2021. The estimated yield from rate based assessments can be apportioned over the remaining 15 years of the plan period.

### Key Findings

- 5.33 The survey of the existing Broxbourne Borough urban area identified a total of 73 sites comprising 41.82 hectares of land considered to have potential for residential development prior to 2021. This equated to an estimated yield of 1,909 units at the lower density scenario (Scenario A) and 2,573 units at the higher density scenario (Scenario B). This was supplemented by an estimated yield from other sources of 446 units at Scenario A and 480 units at Scenario B. The total estimated potential equated to **2,355 units** at Scenario A and **3,053 units** at Scenario B.
- 5.34 The Draft East of England Plan allocates an average target of 255 new units per annum to Broxbourne. This equates to a total allocated target of 5,100 units for the plan period 2001-2021. A total of 1,828 units have been completed in Broxbourne between 2001 and 2006. Further to this there are an additional 926 units with extant planning permission (as at March 2006). As such Broxbourne's remaining target stands at **2,346 units** up to 2021.
- 5.35 The study has estimated that if development were to follow the densities advocated in the existing Local Plan (Scenario A), Broxbourne will be able to meet its existing Draft East of England Plan target on land in the existing urban area. The study indicates that there would be a small unit surplus in relation to the existing Draft East of England Plan target, equating to **9 units**. If development can come forward at the higher density Scenario B, then there will be an estimated surplus of **707 units**.
- 5.36 However, The Panel Report on the Examination in Public for the East of England Plan has recommended that Broxbourne's allocation be increased from 5,100 units to 5,600 units for the period 2001 to 2021. The study indicates that if development were to continue to come forward at the densities advocated in the existing Local Plan then Broxbourne would not be able to meet this revised target. It is estimated that if development were to continue to come forward at the existing Local Plan densities (Scenario A) then there would be a deficit of **491 units** against the revised East of England Plan target.

### Conclusions

- 5.37 The above findings suggest that Broxbourne will be able to meet its existing Draft East of England Plan target to provide 5,100 residential dwellings between 2001 and 2021 within the existing urban area if development were to continue to come forward at the existing Local Plan densities. If development can come forward at the higher density Scenario B, then it is estimated that there will be a unit surplus against the existing Draft East of England Plan target.
- 5.38 However, the lower density Scenario A has been based on densities advocated within the Broxbourne Local Plan. It should be noted that these densities appear to be in accordance with the latest guidance contained within PPS3. Therefore, it is believed there is not significant scope to increase densities in the Borough much beyond current levels. It should be noted that Scenario B reflects an optimistic density that if implemented would challenge the existing urban character in Broxbourne.



- 5.39 The Panel Report on the Examination in Public for the East of England Plan has recommended that Broxbourne's allocation be increased from 5,100 units to 5,600 units for the period 2001 to 2021. This figure has yet to be formally approved and adopted. However, initial estimates show that Broxbourne would not be able to meet this revised target on land in the urban area if development continued to come forward at existing Local Plan densities (Scenario A). The study has estimated that there would be a deficit of **491 units** against the revised East of England Plan target. Increasing densities beyond those advocated in the existing Local Plan would challenge the existing urban character in Broxbourne and exceed guidance contained in PPS3. Therefore, if the revised housing target is adopted then it will be necessary for Broxbourne to find capacity from additional sources or outside the existing urban area.
- 5.40 Further to this, it should be noted that final estimates of potential against existing and revised Draft East of England Plan targets assume that all of the identified sites will come forward for development within the remaining Plan Period (2006-2021). However, this is likely to be an optimistic assumption. In practice it is unlikely that all of the identified sites will come forward for residential development. As such it may be necessary to discount the final estimates to reflect this.
- 5.41 As a means of providing additional capacity to meet the revised RSS quota, the Borough's supply of non-residential land uses should be scrutinised. Greenbelt and the majority of Greenfield sites were not considered suitable for development and, therefore, either not assessed or discounted in the UCS. Furthermore, employment land was also discounted in most cases due to its diminishing supply and because it is vital to maintain the Borough's essential mix of uses and employment base, albeit minimal.
- 5.42 However, Broxbourne's supply of Green Belt land is substantial. Although, to absorb some of this for residential development should be considered as a last resort, if it is not considered, the question of where the demand should be located must be raised, in order to meet the revised draft RSS requirements.
- 5.43 The Borough's Green Belt sits in large wedges along the eastern and western boundaries of the Borough. Much of this area would not be considered suitable for residential development because few sites are located adjacent to urban areas or are in areas of high accessibility as recommended by PPG 3 in Paragraph 21. As such, the most suitable sites could be considered at Greater Brookfield and at Hoddeson. Of these, Greater Brookfield's Green Belt land, a site to the west of the New River, is demonstrably the most appropriate. This is due to its proximity to a concentration of retail floorspace, transport linkages such as the A10, juxtaposition with the New River and location adjacent to a high quality residential environment mean such site could be integrated within the wider Greater Brookfield context.
- 5.44 The advantage of providing residential floorspace at Greater Brookfield, is that it would not require significant infrastructure works before land could be delivered for such development. The current stakeholders' interest in Greater Brookfield would assist with the delivery of the required infrastructure, thereby reducing the constraints and assisting with viability. The timing of this development could also mean that it is consistent with the deliverables in the draft RSS.

- 5.45 Existing market interest surrounding Greater Brookfield at Canada Fields and Hertford Regional College suggests that the area exhibits favourable market conditions. Furthermore, the stakeholders have also expressed interest in this Green Belt site, again highlighting the support for expansion.
- 5.46 In addition, to ensure that Greater Brookfield remains a vibrant centre of activity within Broxbourne, a sustainable community should be fostered and a mix of uses encouraged.

## 6 Transport and Infrastructure

6.1 Capita Symonds Ltd (CSL) was commissioned by Broxbourne Borough Council in August 2005 to provide advice on transport and highways issues in relation to development proposals at Greater Brookfield, Broxbourne.

6.2 This section of the report:-

- reviews previous studies and reports on transport issues relating to Greater Brookfield and beyond;
- describes the existing position , including pedestrian and vehicle movements within the site, public transport accessibility of the site and pedestrian and cycle links to the site;
- assesses the impact of forecast traffic growth, and new development at Greater Brookfield, and
- sets out proposals for improvements to public transport, pedestrian and cycle accessibility.

### **Review of previous studies and reports**

6.3 Over the last two decades, Greater Brookfield has evolved as a major retail destination. However, the centre has evolved as a series of individual elements, resulting in a high degree of severance both from each other and from the surrounding communities.

6.4 The need to promote Greater Brookfield as a single entity for mixed-use development with clear identity and sense of place is identified in the Borough of Broxbourne emerging Local Plan. Previous studies have identified that key to delivering this vision is the need to promote public transport, improve pedestrian and cycle links to the various developments within Greater Brookfield, and address existing and future traffic congestion on the local highway network.

6.5 Three specific problems have been consistently highlighted: -

### **Traffic Congestion**

6.6 At peak shopping periods on Friday afternoon sections of the local highway network suffer from significant congestion, leading to unacceptable environmental conditions. Turnford Interchange itself has been identified as operating with significant spare capacity. However, as development continues and general traffic levels increase, the congestion problems in the vicinity of Greater Brookfield will be more severe and spread to a wider area.

### **Severance**

6.7 Although some improvements to the pedestrian linkage within Greater Brookfield have been delivered (at the time of the Tesco store extension), Halfhide Lane still severs the development sites, discouraging pedestrian movements between them. The road network and associated traffic around Greater Brookfield severs it from residential areas east of the A10.

## **Public Transport**

- 6.8 At the time of the previous reports, there were several low-frequency free bus services operating at the Brookfield Centre provided by Tesco and Marks and Spencer, independently of each other. These routes served a wide area but operated an unattractive timetable. A bus service through the study area was piloted but withdrawn from lack of interest.
- 6.9 Previous work anticipated that a Masterplan to deliver and enhance retail and leisure provision serving the whole of Broxbourne and beyond would increase public transport demand, as the basis for a more sustainable and commercially viable public transport network. It was envisaged that Halfhide Lane will continue to provide the means of delivering public transport accessibility to the development sites.

## **Existing Situation**

- 6.10 The site is strategically well located in highway terms, directly on the A10. Vehicular access from the A10 northbound is via a direct slip. Access southbound from the A10 is via the Turnford Interchange, Marriot Roundabout and Halfhide Lane. While not ideal, the current access arrangements have evolved and been revised as Greater Brookfield has developed, and generally work adequately in capacity terms.
- 6.11 The centre is well served by extensive free surface car parking. This reinforces its evident attraction as a car borne shopping destination, and underpins the success of the Tesco and M&S stores and retail park. However, the internal access and circulation within the centre reflects its incremental development, and linkages between the individual components are poor.
- 6.12 The centre is poorly served by public transport. The level of public transport provision has deteriorated since the previous studies. The A10, and Halfhide Lane provide significant barriers to pedestrian access into, and around the centre. There is little provision for cyclists. As a consequence, the centre has poor accessibility by any means of transport other than the car. Given that it functions as the principal 'higher order' shopping destination in the Borough, this is a significant concern.

## **Future Requirements**

### **Highway Capacity**

- 6.13 Capita Symonds have developed a model to examine the current functioning of the highway network and access to Greater Brookfield in order to test the effects of forecast traffic growth and requirements of new development. This indicates the existing access arrangements are able to cope with current traffic generation, with some capacity at the main roundabouts serving the development. However, even without new development at Greater Brookfield, by 2011 there will be significant congestion on the local network.
- 6.14 This situation will be compounded by further growth up to 2016; by then severe traffic congestion at the Marriot Roundabout will have a knock on effect on the rest of the network. CSL consider the magnitude of the problem suggests that it cannot be resolved by minor modifications or signalisation.

- 6.15 In these circumstances, even without new development at Greater Brookfield, the combination of the current problems – the poor access/layout, lack of permissible and inadequate public transport, and the effects of background traffic growth, indicate that major improvements will be required to both the highway network and the accessibility of the site by other means.
- 6.16 The effect of meeting part of the Borough's identified shopping/leisure needs at Greater Brookfield, by adding circa 40,000 sqm of additional comparison retail floorspace, will further reinforce the need for significant improvements. Having reviewed all the options, Capital Symonds conclude that the provision of a new link road from the A10 at Turnford Interchange is the only workable option to address the current and forecast requirements of the area.
- 6.17 This provides the opportunity to relieve Halfhide Lane, reducing its severance within the area, and to realign the existing access/circular within Greater Brookfield to provide a better planned, more integrated centre providing clear segregation between pedestrians and cars. This also offers the only realistic option to improve public transport links to the site, via Halfhide Lane.

#### **Public Transport**

- 6.18 To encourage travel to Greater Brookfield by more sustainable modes, improvements to accessibility by public transport, walk and cycle are required. By increasing the scale of development and range of attractions at Greater Brookfield, the viability of public transport solutions is likely to improve.
- 6.19 Increasing the frequency of the local bus services is likely to effectively bring areas around Greater Brookfield closer time wise. The viability of new routes also needs to be considered if the centre is to be genuinely accessible to its primary catchment by non-car modes.
- 6.20 Making a section of Halfhide Lane a bus only street and linking multi-storey stores either side by bridging over Halfhide Lane would improve the pedestrian links within Greater Brookfield. Providing pedestrian links over the A10 would effectively bring areas to the east of the A10 closer walk time wise to Greater Brookfield, with walk time reducing by as much as 20 minutes from some locations. This needs to be examined as part of the masterplan for the centre.

## 7 Options and Way Forward

7.1 In this section we set out the vision for the future development of Greater Brookfield, considering the strategic objectives and options for this. We also examine the delivery and implementation issues and outline the next steps to take this project forward.

### Headline Options

7.2 In deriving the vision and strategic objectives a series of headline, overarching options were examined. These are summarised against the principal strengths and weaknesses for each in the following table.

Option	Strengths	Weaknesses
<b>Do nothing</b> – continuation of existing situation	<ul style="list-style-type: none"> <li>Does not involve disruption of existing business activities</li> <li>No other evident strengths</li> </ul>	<ul style="list-style-type: none"> <li>Does not address existing problems of accessibility, quality of environment or future role and function of Greater Brookfield</li> <li>Makes no future contribution to maintaining or extending the vitality and vibrancy of Greater Brookfield</li> <li>Doing nothing is not reflective of stakeholder and landowner ambitions</li> </ul>
<b>Do minimum</b> – relieve immediate effects of traffic congestion and improve internal traffic/pedestrian circulation	<ul style="list-style-type: none"> <li>Low cost resolution to immediate accessibility and pedestrian circulation/connectivity issues</li> <li>Implementation would be relatively straight forward</li> <li>Does not involve disruption of existing business activities</li> <li>Does not involve additional land take</li> </ul>	<ul style="list-style-type: none"> <li>Does not address existing problems of accessibility, quality of environment or future role and function of Greater Brookfield</li> <li>Does not respond to the commercial or role and function challenges which Greater Brookfield faces</li> <li>Does not take the opportunity to capitalise on significant Borough-wide benefits which redevelopment of Greater Brookfield represents</li> <li>Not reflective of stakeholder and landowner ambitions</li> </ul>
<b>Extend existing retail/commercial mix and scale of activities</b> –	<ul style="list-style-type: none"> <li>Will enhance integration with existing local communities, improve quality of life and well</li> </ul>	<ul style="list-style-type: none"> <li>Relatively high cost and will require re-design of existing layout, access and circulation</li> </ul>

<p>enhanced retail and commercial offer within a high quality environment, without expansion of the mix of uses to include non-retail/commercial elements</p>	<p>being through extended provision of services and facilities in a high quality urban environment</p> <ul style="list-style-type: none"> <li>Limited reflection of stakeholder and landowner ambitions</li> </ul>	<p>without generating sufficient value opportunities to ensure delivery and implementation of necessary infrastructure</p> <ul style="list-style-type: none"> <li>Requires changes to existing spatial planning policy for Broxbourne through forthcoming Local Development Framework</li> <li>Requires balance of scale and mix of proposed uses against the opportunity for these to be located in existing town centre locations</li> <li>Not fully reflective of stakeholder and landowner ambitions</li> </ul>
<p><b>Comprehensive re-development</b> – extensive re-development of existing uses, layout and connectivity coupled with introduction of a new mixture of leisure facilities and residential elements into a high quality environment</p>	<ul style="list-style-type: none"> <li>Defines new role and function for Greater Brookfield which matches the scale of competitive challenge and the evident opportunity presented by the area</li> <li>Matches and reflects stakeholder and landowner ambitions</li> <li>Will enhance integration with existing local communities, improve quality of life and well being through extended provision of services and facilities in a high quality urban environment</li> <li>If the scale of retail, leisure and residential uses is developed to a sufficient level, issues of infrastructure cost and viability and landowner compensation can be effectively resolved</li> </ul>	<ul style="list-style-type: none"> <li>High cost and deliverability issues with regard to new infrastructure provision</li> <li>Requires significant changes to existing spatial planning policy for Broxbourne through forthcoming Local Development Framework</li> <li>Increase in developed area, including the need to take Green Belt land</li> <li>Long development timescales to provide infrastructure, resolve construction decanting and re-development</li> <li>Requires stakeholder and landowner agreement in detail to proceed</li> </ul>

7.3 Examination of the headline options in discussion with stakeholders leads us to conclude that without pursuing the comprehensive development option for Greater Brookfield, the opportunity will be lost and

the area will almost certainly succumb to the current threats to its long term position and function within Broxbourne as a whole.

- 7.4 On this basis we have prepared a vision and set of overarching options to deliver the comprehensive redevelopment and expansion of the Greater Brookfield area.

### **Vision**

- 7.5 Greater Brookfield is challenged in a number of critical ways. The area's function as an out-of-centre retail location has grown in importance over the past decade to the point where it now performs a major retail role for Broxbourne and more widely within Hertfordshire. Despite this growth in stature as a retail location, future performance is challenged by other town and out of centre retail locations. Greater Brookfield is in need of a significant enhancement of its breadth, mix and quality of retail offer alongside other leisure and residential activities if it is to play a future role and function as a more rounded urban place and centre in its own right.
- 7.6 The Greater Brookfield area must become more closely embedded within the existing residential communities which surround the area to the east and south. At present Brookfield is a very internalised space, poorly connected to its surroundings and unwelcoming to local communities.
- 7.7 Easy access to Greater Brookfield is convoluted and sub-optimal at present as evidenced by traffic congestion at many peak periods of the week and at weekends. Even without additional development occurring at Greater Brookfield, the indications are that the key road and junctions which provide strategic access to the area will be over-capacity by 2011 with consequent impacts on amenity for surrounding communities and commercial viability for commercial occupiers. The need to deal with strategic access to Greater Brookfield is further compounded when proposals for additional development are considered. The area requires a solution to this critical issue in any event.
- 7.8 The poor quality of environment and space within Greater Brookfield is a further disincentive to integration, greater vibrancy and ultimately the contribution of the whole area to the quality of life in Broxbourne. The division, mix and location of land uses is currently sub-optimal, failing to make best use of available land.
- 7.9 Addressing these concerns together, The vision for Greater Brookfield is:
- To reposition Greater Brookfield as an urban centre which provides a significant and broad mix of retail, commercial, leisure, and residential uses set within a very high quality environment and which is easily accessible for local communities in Broxbourne.
- 7.10 In delivering this vision, the development of Greater Brookfield will meet the following strategic objectives:
- Protect and enhance Broxbourne's ability to compete commercially with town and out of centre locations in the sub-region in terms of the quality, breadth and mix of its offer to Broxbourne communities – The retail and town centres analysis has identified the current and future demand



position for Broxbourne centres and particularly notes the increasing town centre and wider retail/leisure competition from other centres in the sub-region. From the town centre supply analysis, additional retail/leisure floorspace quanta have been identified recognising the difficulty and impact of securing this in the existing centres. With a total projected additional retail floorspace requirement for Broxbourne of some 55,000 sqm gross by 2016 and realistic capacity within the existing town centres for only some 22,750 sqm gross of this, Greater Brookfield is the next preferred location to absorb additional retail floorspace of some 32,250 sqm gross and an additional 10,000 sqm of identified A3/leisure uses. The role of Greater Brookfield in protecting and enhancing Broxbourne's competitive position, serving local communities is therefore critical to supplement provision in the town centres.

- Offer development opportunities to substantially broaden the mix of land use activities to include leisure and residential uses as significant ingredients in a successful and sustainable community – National and regional policy encourages the creation and growth of rounded centres, communities and neighbourhoods. Greater Brookfield can become a mixed use community forged around a core retail/leisure offer. The mix of uses needs to extend beyond core activities to include residential and supporting community facilities. The Broxbourne Urban Capacity Study has identified a requirement for additional, greenfield housing land to provide for the residual housing land requirement that cannot be accommodated on previously used sites in the Borough. The figures from the Borough Urban Capacity Study suggest that land for new residential dwellings (dependent upon future development densities) will be required in the forthcoming plan period. Greater Brookfield provides a suitable opportunity to meet residential land requirements given it already has many of the characteristics of an urban centre, has existing residential communities immediately adjacent to it and has capacity on both existing developed land in conjunction with new greenfield land to absorb future Borough housing requirements. The area's existing and future proposed transportation infrastructure coupled with additional community services and facilities make Greater Brookfield a prime candidate for new residential development to form a sustainable community.
- Provide easy access by a range of means of private and public transport to a range of services and facilities – The various analyses in this report identify both the retail spending leakage from Broxbourne and Greater Brookfield in particular to other centres as well as the existing and future forecast traffic congestion around the Brookfield area at key junctions, which will further compound the problem. By locating further development in Greater Brookfield, this recognises the need to assist Broxbourne Borough to retain existing retail/leisure trade, reduce future leakage and maintain vitality and viability. In doing so, access to Greater Brookfield must be significantly enhanced as a mechanism to reduce the need to travel overall and to secure acceptable levels of transport accessibility. The future development of Greater Brookfield must recognise that good accessibility by private car will remain the predominant form for retail and commercial visitors, but that there is an existing public transport network which serves the area, which has the potential to be enhanced in terms of quality, frequency, destinations served and costs. Resolution of existing traffic congestion and circulation issues are pre-requisite in any event.
- Create a high quality urban environment which allows for the development of strongly defined focal places and spaces and which relates to surrounding communities and integrates features such as

the New River – Analysis of Greater Brookfield’s current form, layout and massing suggests that there are many deficiencies and also significant opportunities to create a high quality urban environment. The public realm and environmental infrastructure of Broxbourne centres is critical to their long-term vitality and viability in the face of improving offers elsewhere. Greater Brookfield requires a step-change in the quality of its urban environment and the future re-development of the area is opportune to achieve this.

### **Towards an Urban Design Strategy**

7.11 In considering how such a complex project such as an urban centre with a significant broad mix of retail, commercial, leisure and residential uses could be delivered a number of issues have been explored related to: -

- The constraints related to the project and the site
- Investigating the options for delivering the project within the broader site area
- The delivering of the project including its phasing and
- Issues of creating a sustainable urban place of a high environmental quality

7.12 Inevitably these issues react to conclusions drawn between each and the process is iterative rather than linear.

## **Constraints**

### **Mixed Use Urban Centre**

7.13 The project aims to deliver a mixed-use urban centre. It is recognised that it will have a focus of retail and this will be within the core development of the scheme. This core development will also include residential, leisure and commercial. The areas outside this will be of a mixed-use character. To the south of the development there will be a focus on residential uses that will create a transition area between the core and the existing residential areas. Other areas of mixed use will develop a character suitable to their location and may be more weighted towards leisure, commercial and business uses.

### **High Quality Environment**

7.14 The development will aim to be of a high environmental quality and accord with the tenets of good urban design. It will be planned in a manner that the visitor can instinctively understand how to move through it and what they will find in certain locations (legible). Additionally it will offer a variety of routes through it (permeable) and aim to make strong links with the existing urban area. It will draw on the character of the Broxbourne Borough and the wider sub region.

### **Quantity of Development**

7.15 These have been defined in the additional chapters related to retail capacity and the urban capacity study. These are effective quantities to develop an initial design for the development and may in turn be reviewed as the opportunity evolves. The Development Options outlined below have considered:-

- Retail – An additional 32,250 sqm gross floor area with associated servicing infrastructure. The retention of a similar quantity of the existing retail uses (the Marks & Spencer's Store, the Tesco store and the retail outlets on the Standard Life site)
- Leisure - An additional 10,000 sqm of leisure including (potentially) a cinema, cafes restaurants and bars. It is understood that there may be other large leisure uses that may be included within the site but as yet these have not been identified.
- Residential – The Borough's Urban Capacity Study has suggested that there may be the need to identify land for 490 non residential dwellings, based on (current attained development densities). It is assumed that the density of such development would, as a minimum, accord with PPG3 and be at 30-50 dwellings per hectare (d/ha) and in such an urban location could conceivably increase to 80 d/ha.

### **Car Parking**

7.16 It is expected that the development will make great strides in improving the public transport offer and providing facilities for pedestrian and cycle access to the site. However it is understood that the nature of transport within the wider area will continue to be car dominated and there will be the need to accommodate cars within the development. The quantity of car parking spaces required would have a land take that exceeds the footprint of the built development should it be on ground level only, and therefore decked/multi level parking will be required. The Development Options assume that there will be enough value within the development to accommodate this.

### **Boundaries**

7.17 Some of the existing boundaries are fixed and do not offer scope for development beyond them, namely:

- The A10 to the east, although the opportunity to make more positive pedestrian links to the neighbourhood should be explored
- New River to the west, beyond which is the golf course and is initially considered to be not a viable area to expand into due it being within the Green Belt and the value of the land use.
- Residential neighbourhood to the south, whilst some development options could be explored in this area, the complexities of land ownership and the potential requirement for CPO's has suggested that it is not considered in the first instance.

- 7.18 The northern boundary is at present not fixed and the Development Options consider how this could be approached related to the Allotment land, the route of the New River and the alignment of the new link road.

#### **A New link Road to Turnford Interchange**

- 7.19 The transport analysis has concluded that this will be required irrespective of development in the area and that the development would offer the opportunity to deliver this infrastructure. The alignment of this has not been fixed but it is expected that it would enter the site some where in the vicinity of the Standard Life Site and the County Council's travellers site. Its alignment through the development will be subject to more detailed scrutiny.

#### **Halfhide Lane**

- 7.20 In association with the new link road it is expected that east of the junction, of Halfhide Lane and the new link road, will be a public transport, cycle and pedestrian route only, that forms an integral component of the new development townscape and character. The exact nature of this and the access to it will be developed as the project moves forward.

#### **The overhead electricity lines and pylon**

- 7.21 We recognised that these may be perceived as a considerable constraint on the site development due to their physical appearance and costs related to diversion. However we consider that it would be possible, through careful site layout, to develop the site should they need to remain.

#### **Phasing and continued trading**

- 7.22 All the existing retail uses (bar those on the employment land) will need to trade continuously and so new accommodation will have to be available before these areas are available for redevelopment.

#### **Existing uses**

- 7.23 Such a complex development will need to alter all the land uses within the site to create a mixed-use urban centre. It is expected that suitable alternative accommodation will be made within the Borough for those uses that are to be removed off-site if necessary, i.e. the industrial employment area, the travellers' site, the allotments and the recycling centre.

### **Development Options**

- 7.24 Three broad options have been developed that consider the potential location of the development in the Greater Brookfield vicinity. This have been prepared taking note of the issues related to delivering such a large and complex project in particular the issues of land ownership, phasing related to continuation of existing uses and the opportunities that the sites offer to create a unique place of high quality and character. The options are described in the following diagrams (Drawing Number 001) where the strengths and weaknesses are discussed. The options are: -

**Option A – Existing Site**

This focuses the core development on the existing retail and employment areas. There would need to be detailed programmes related to the construction phase of the project on the industrial / employment land prior to this area being built out with retail uses. This would enable the existing retail uses (Tesco , M&S, and the Brookfield Retail Park) to continue trading before being relocated. Additionally it considers retaining the Brookfield Retail Park (Standard Life) area as part of the retail core and there would be issues related to the severance of pedestrian movement that Halfhide Lane creates.

**Option B – Halfhide Lane Focus**

The core development focused on the northern end of the existing retail area the industrial / employment area and the allotments to the north of Halfhide Lane. This would develop Halfhide Lane as a focus for the retail uses and redevelop the Standard Life site as a mixed uses area (of employment and residential) relocating those uses within the core area.

**Option C – New River Focus**

The core development is focused on the allotment area and land to the north of the new river. This would enable the development to focus on the New River and for this to be a significant driver in areas central character. The Brookfield Retail Park / Standard Life uses would be relocated onto the core area. The existing Tesco and Marks & Spencer’s would be able to trade until the major infrastructure works had been completed and then move into completed premises. This would then allow these areas to be developed for a mixed-use development.

<b>Existing</b>	
<p><b>Strengths</b></p> <ul style="list-style-type: none"> <li>• Land uses retained within the existing area ie no expansion into Greenfield / Green Belt</li> <li>• Retains existing retail park (Standard Life)</li> </ul>	<p><b>Weaknesses</b></p> <ul style="list-style-type: none"> <li>• South section of Halfhide lane remains a pedestrian barrier</li> <li>• Phasing difficulties related to construction in close proximity to shops still trading and reduction in car parking</li> <li>• Doesn't make best use of riverside setting</li> <li>• Little room for expansion or additional growth within existing core area</li> </ul>
<b>Halfhide Lane Focus</b>	
<b>Strengths</b>	<b>Weaknesses</b>

<ul style="list-style-type: none"> <li>• Halfhide Lane becomes an 'urban square' and defines a new character.</li> <li>• Makes best use of southern edge of river as a retail, leisure and residential site</li> <li>• Allotments land is in a willing partners ownership</li> <li>• More efficient phasing can be achieved by building away from shops that are trading</li> <li>• Provides additional space to create a high quality environment</li> </ul>	<ul style="list-style-type: none"> <li>• Uses a 'greenfield' site</li> <li>• There may be constraints (financial and other related to development on a riverside edge)</li> <li>• Increased infrastructure cost of a 'longer' internal link road</li> </ul>
<p><b>River Focus</b></p>	
<p><b>Strengths</b></p> <p>Utilises the northern edge of the river that creates a unique south facing public area for leisure opportunities</p> <p>Provides additional space to create a high quality environment</p> <ul style="list-style-type: none"> <li>• Halfhide Lane becomes an 'urban square' and defines a new character.</li> <li>• Makes best use of southern edge of river as a retail, leisure and residential site</li> <li>• Allotments land is in a willing partners ownership</li> <li>• More efficient phasing can be achieved by building away from shops that are trading</li> <li>• Provides additional space to create a high quality environment</li> <li>• May not require works to the overhead power cables</li> </ul>	<p><b>Weaknesses</b></p> <p>Development on Greenfield / Green Belt site.</p> <p>There may be constraints (financial and other related to development on a riverside edge)</p> <p>Expansion of the urban area may raise significant objections</p>

## **Project Delivery**

### **Commercial Requirements**

- 7.25 The retail capacity report has concluded that there is a requirement for 55,100 sqm of comparison retail use and ancillary town centre uses within the district. It recognises that some of this may be accommodated within the existing town centres of Hoddesdon and Waltham Cross but that there will still be the opportunity to develop in the order of 32,250 sqm in the Greater Brookfield area and retaining the existing uses. Additionally the retail market requires the provision of sufficient car parking to enable efficient functioning of large 'anchor' stores. In this instance the car parking provision will be in the order of 40,00sqm. To accommodate such a large area - whilst according with good urban design practice - it is considered that there will be the need for multi-storey car parks. It is acknowledged that there is a considerable cost in such structures and that it will be necessary for the quantum of development to be such that the land values can support this. Further detailed work on this issue will need to be progressed.

### **Access and Car parking**

- 7.26 The highways report has concluded that by 2016 the Marriott Roundabout will be working significantly over capacity and that the most expedient way to resolve this as a lasting solution is to create a new link road from Turnford Interchange to Halfhide lane. The exact location of this has to be investigated further but its alignment once south of the New River will have a bearing on the manner in which the development is arranged. The strategic development options consider that it could either run by the shortest route to Halfhide Lane or that it could run adjacent to the River. There are merits and disadvantages to each of these that will need to be considered in more detail as the site layout is developed.
- 7.27 Within the site, the movement network will need to ensure that the urban design and traffic movement do not compromise each other. Requirements for servicing and car parking are as important to the vitality and success of such a project as the quality of the public spaces, streets and roads that are in it.

### **Sequencing**

- 7.28 In delivering such a complex project the land ownership and the continued function of existing uses will influence the final arrangement. It will be important that the existing major stores can continue to trade until they are able to open alternative (and enhanced) premises. Such a project is likely to take considerable time in its design and planning prior to a construction phase that will last for a number of years. It will be important that conflicts are reduced at all stages be it the physical implications of site traffic or the broader implications of changes in uses et al.

### **Infrastructure**

- 7.29 Any future development will have a considerable infrastructure requirement related to roads, utilities and in this instance the New River. In addition to this an approach will need to be taken to the overhead power cables that run east west through the centre of the site. Ideally it would be preferable that these

could be diverted around the site or placed underground. The response to these issues will need to be considered in the light of any additional value that it may create.

### **The Preferred Option**

7.30 Options A and B achieve much in moving towards the vision for Greater Brookfield in that core existing and additional future retail/leisure demand can be met within the Core Areas. Nevertheless, neither Option A or B provides:

- Best use of the available land budget to create a strong sense of place or maximise the opportunities the area presents to create a higher level of critical mass of retail, leisure, residential and related land uses;
- Suitable flexibility to create a high quality urban realm including public spaces and places and optimum layout of uses and activities;
- The opportunity to address the River as a major asset to any great extent;
- Sufficient opportunity to generate value from future development to ensure the viable delivery of necessary transport and community infrastructure.

7.31 The deficiencies and weaknesses of Options A and B lead us to conclude that Option C – River Focus, is our recommended, preferred option for the future development of Greater Brookfield. Option C should be the focus for further, detailed technical and masterplanning work.

7.32 In developing and expanding the role and function of Greater Brookfield, Option C responds to the opportunities provided by the New River, existing and proposed access points and developable area to enable the future vision for Greater Brookfield to be realised. Comprehensive development proposed in Option C will:

- Address the New River as the heart of Greater Brookfield to create a place of distinction;
- Provide a critical mass of residential, retail, leisure and communities activities which are of a sufficient nature and scale to contribute to a rounded, sustainable community;
- Capitalise on existing transport accessibility and future enhancements;
- Use land that is either already developed and greenfield sites that immediately border to existing development;
- Ensure viability of infrastructure and community facilities.

### **Design Parameters**

7.33 Regardless of the merits of each Development Option any future development will be required to deliver an urban environment that responds to the tenets of good urban design (as discussed in By Design:



Better Places to live, The Urban Design Compendium, et al) to ensure the creation of a place that is distinct; of high quality and is an asset to Broxbourne. Such a framework must address the following issues including;

### **Mixed Use Development**

- 7.34 Current good practice suggests that 'sustainable' developments need to respond to the requirements of the local community and a place that provides the opportunity for the community to reside in, work in and spend their leisure time in. The development of Brookfield offers the opportunity to create a mixed use scheme with retail (the economic driver for the development) at its heart. To ensure that the retail core is a vibrant place where activity carries on beyond a core shopping time of 9am – 5pm, it is essential that other uses are introduced within the core area and particularly the edges of the development. This will result in greater movement through the area and making it a more active - and therefore safe and secure - environment.
- 7.35 The mix of uses will need to be considered carefully and should include residential, employment and community facilities.
- 7.36 The residential component of the development will require an urban approach within the core development and to its immediate edges, creating a well defined street pattern that have edges of terraced town houses and apartment blocks. These will have a strong emphasis on defining the public and private realm. Where the development area neighbours existing residential area the urban form should take on the characteristics of these areas – being more traditional housing types of small terraces, semi detached and some larger detached properties. This would create a transitional zone between the core development and the existing neighbourhood. At all times the development must aim for a residential density of 30–50 units per hectare; and within the core development it would be expected that this would be in the region of 60-80 units per hectare. This density would be easily achievable using the urban types of dwellings described above through a high proportion of apartments and terraced town house in buildings 3 –5 storeys, development types that are not uncommon in the region.
- 7.37 The Development Options offer a broad range of total dwellings that could be accommodated within the potential development areas. However the findings of the Borough's Urban Capacity Study have identified the potential need to provide land for 490 dwellings at the densities described above. Such a quantum of development will need to provide uses that serve the new community and the local neighbourhoods that it will impact on. Depending on the final quantity of residential development there will be a requirement to provide health and education facilities (or improvements of existing) and broader community uses (these may include Faith Centres, Community Centres, social meeting facilities etc.)
- 7.38 The development will offer a considerable opportunity for employment for Broxbourne. In addition to the employees of the new retail and leisure facilities there is also the opportunity to introduce a limited amount of development aimed at small to medium enterprises. Whilst Broxbourne does not have a reputation as a business centre, the proximity of the Greater Brookfield site to the A10 and the improvements proposed in the highways section to the public transport system suggest that there would be the opportunity to promote these uses within the development. In particularly the mixed use areas,

that are adjacent to the busier roads serving the area would be suitable for these uses where they would help to screen the traffic from the core and (predominantly residential) mixed-use area.

### **Movement Networks**

- 7.39 The final development form must be pedestrian friendly and allow an ease of movement through and across it, ensuring that all pedestrian desire lines are accommodated, removing or reducing any significant barriers. The current treatment of Halfhide Lane - that is traffic dominated - must not be repeated. Whilst the importance of vehicular movement is understood related to the proposed sub-regional status of the A10, within the development, roads must not create severance of pedestrian routes. In addition the movement network must be permeable – allowing choice in routes – and legible, ensuring that the visitor can find their way around the development with ease. Where there is a high pedestrian flow on streets, buildings must face them and create a high degree of overlooking over an extended period of time - and not confined to the core shopping hours. This will have an influence on the distribution of uses within the core so that it is retail focused but includes a degree of residential, leisure and business uses.

### **Scale and Massing**

- 7.40 The development will be expected to have a character that relates to an urban environment. As such it is expected that buildings will be 2-4 storeys high and in some locations in excess of this to create visual punctuation and sense of place. The manner in which these heights relate to the street width will need careful consideration. The width of streets will be greatly influenced by the uses that are located to their edges and define their character.
- 7.41 here retail uses face onto streets there must be adequate space for pedestrians to circulate, windowshop and meet friends. Inevitably this will make the streets wider than normal and to ensure there is a sense of enclosure – to strengthen the urban character- building heights will have to be carefully considered.
- 7.42 The manner in which the development addresses the main routes around the site will be important. The character of the development will need to be implied at these locations but it should not detract from the character of the local context.

### **Landmarks, gateways & townscape**

- 7.43 Prominent buildings and spaces will be important in creating character for the development and aiding orientation for the visitor. The relationship between this townscape and the key building occupiers and uses will create an environment that is memorable. It is expected that the development will include a high street environment that is punctuated by focal spaces. The quality of the public realm in the high street must be commensurate in increasing land value and a considerable asset to the development. The function of it will need careful consideration, being a place for pedestrians to circulate through, make a choice of it as a route across the development and as a place to meet friends and colleagues. Only environments with high design and management quality will achieve this. The public spaces within the development will need to be developed with a traditional town square functions in mind incorporating the opportunity to accommodate occasional events, although their design should be contemporary in nature.

### **Active Frontages**

- 7.44 Creating a vibrant and lively place will ensure that the development is a memorable experience. Ensuring that buildings face onto the public realm will be paramount in enabling this. Where there are buildings that have large footprints they must have other uses 'wrapped' around them to reduce any large expanses of building that has no activity. Commercially active frontages will be beneficial to maximising value and viability. The period of activity in each land use will have a considerable effect on the activity of the street. Where retail uses may have a core time of 9am-5pm this can be extended by including leisure uses (restaurants and bars) along with residential above the ground floor. This will have the effect of creating a mixed use development that exhibits the character that is associated with the traditional town centre.

### **Public Open Space**

- 7.45 Undoubtedly a development of this size - particularly the residential element of it - will have a requirement for open space. This will be of both a formal and informal nature. The proximity of the area to the countryside is a bonus in this instance and the opportunity to create links with existing open space, public rights of way etc. will need to be explored in detail. One of the major opportunities for this will be the development of the New River as a resource for the new and existing local neighbourhoods. The development of riverside walks that vary in character from rural to urban will be integral in developing the perception of the development. In addition it will be important to ensure that within the core development where public spaces - including squares and plazas - are developed to create a sense of townscape, that they are of a high quality from the start, enhancing the development rather than being a burden to it.

## 8 Viability Assessment

8.1 The viability assessment assessed Options A and B followed by Option C, indicated above, in terms of their overall project value. The assessments included assumptions on development phasing, infrastructure and build costs, provided by Capita Symonds, and revenue from the uses and floorspace indicated above. Where possible, the assessment included book values from each of the stakeholders, however, where this information was unavailable, GVA Grimley has provided an estimation.

8.2 Although the Options and Way Forward Section indicated three discrete options. However, for the purposes of this analysis Options A and B have been assessed as one option due to the similarity of the land assembly and infrastructure requirements included in the design. Option C, in comparison, includes additional land ownerships and a more comprehensive infrastructure allocation.

### **Options A&B**

8.3 A number of assumptions were made for the assessments of Options A and B:

- the site would be sold as a single parcel of land with the benefit of vacant possession, planning permission and all other necessary consents
- the site would be sold to a single developer
- phased payments, clawback or overage have not been allowed for
- 40% of all residential development would be affordable and that of this, 70% will be socially rented and 30% shared ownership.

### **Development Area**

8.4 In Options A and B, it was assumed that the following sites would be developed:

- Broxbourne Council Depot
- Broxbourne Council owned New River Trading Estate
- Broxbourne Council owned allotments
- County Council Depot
- County Council owned Travellers Site
- Tesco Site
- M&S Site
- Standard Life owned Retail Park

8.5 A new link road would be developed which is accessed from the A1170 and crosses the canal.

**Phasing**

8.6 The following phasing sequence has been assumed. This includes the a broad overview of the component parts:

**Phase 1:**

Demolition of Standard Life estate

Construction of new 13,000 sq m gross Tesco store

Construction of 5,700 sq m gross 'high street' retail

Construction of 12,400 sq m gross private residential (165 units approx)

Construction of 8,300 sq m gross affordable residential (111 units approx)

Car Parking constructed

Tesco move in to new store and vacate existing store

High street retail let

Private residential sold on open market

Affordable housing sold to RSL.

\*Assumed average size of residential apartment = 75 sq m gross.

**Phase 2:**

Demolition of existing Tesco Store

Construction of new 9,600 sq m gross M&S store

Construction of 10,200 sq m 'high street' retail

Construction of 8,000 sq m gross private residential (107 units approx)

Construction of 5,300 sq m gross affordable residential (71 units approx)

Car Parking constructed

M&S move in to new store and vacate existing store

High street retail let

Private residential sold on open market

Affordable housing sold to RSL

*\* Assumed average size of residential apartment = 75 sq m gross*

**Phase 3:**

Demolition of existing M&S Store

Construction of third 7,500 sq m gross 'Anchor' store

Construction of 15,300 sq m gross 'high street' retail

Construction of 9,300 sq m gross leisure

Construction of 3,000 sq m gross employment space

Construction of 2,700 sq m gross private residential apartments (36 units approx)

Construction of 2,700 sq m gross private residential houses (28 units approx)

Construction of 1,800 sq m gross affordable residential apartments (24 units approx)

Construction of 1,800 sq m gross affordable residential houses (19 units approx)

Car Parking constructed

3<sup>rd</sup> anchor tenant moves in to new store

High street retail let

Leisure let

Employment space let

Private residential sold on open market

Affordable housing sold to RSL

*\* Assumed average size of residential apartment = 75 sq m gross*

*\* Assumed average size of residential house = 95 sq m gross*

**Phase 4:**

Construction of 700 sq m gross leisure

Construction of 1,500 sq m gross private residential apartments (20 units approx)

Construction of 13,500 sq m gross private residential houses (142 units approx)

Construction of 10,000 sq m gross affordable residential houses (105 units approx)

Leisure let

Private residential sold on open market

Affordable housing sold to RSL

*\* Assumed average size of residential apartment = 75 sq m gross*

*\* Assumed average size of residential house = 95 sq m gross*

## Costs

8.7 Estimated costs are as follows:

### Infrastructure Costs

- |   |             |
|---|-------------|
| • Demolition                                    | £1 million  |
| • Removal/ undergrounding of electricity pylons | £5 million  |
| • Reverse premiums payable to anchor tenants    | £12 million |
| • S.106 Payments                                | £15 million |
| • On site infrastructure and estate roads       | £15 million |
| • Two lane link road                            | £4 million  |

- Off site foul drainage, electricity sub station upgrade and new gas connection £1 million

#### **Build Costs**

- Private residential build costs £37 million
- Affordable residential build costs £22 million
- Retail build costs £49 million
- Leisure build costs £8 million
- Employment build costs £5 million
- Car Parking £14 million

#### **Additional Costs**

- Preliminaries (15%) £23 million
- Contingency (15%) £23 million
- Professional Fees (12%) £18 million
- Agents and Lawyers Fees £18 million
- Marketing £2 million
- Finance £75 million

8.8 A developer's profit of 20% profit/ cost has been assumed. This equates to approximately £124 million.

8.9 (the costs of off site foul drainage, electricity sub station upgrade, new gas connection and two lane link road have been provided by Capita Symonds)

#### **Revenue**

8.10 An assessment of the revenue that could be generated by the above uses is as follows:

<u>Use</u>	<u>Revenue</u>
• Retail	£580 million
• Leisure	£20 million



• Employment	£7 million
• Residential	£135 million
Total	£742 million

8.11 It should be noted that although in practice the Tesco and M&S stores may be transferred to Tesco and M&S for £0, in order to assess the development value of the site an appraisal of their worth has been required. Therefore, in our appraisal, we have assumed that both retailers will take a lease back at a market rent on standard institutional lease terms.

8.12 We have assumed that the new Tesco will comprise 14,000 sq m net and the M&S will comprise 11,150 sq m net. We have not attributed a value to the car parking.

8.13 We would normally expect a scheme of this nature to generate a site value of approximately 20% - 30%. This would suggest a figure of between say **£150million and £250 million**.

8.14 However, it should be borne in mind that there could be some exceptional costs in this scheme associated with the new link road and canal crossing and the removal/ relaying of the electricity pylons. Costs for these items have been included but it is possible that additional costs could vary in comparison with those first anticipated.

#### **Value of Existing Site Interests – Options A & B**

8.15 The above figures exclude the cost of acquiring any of the existing interests on the site. We have been provided with a book value of the Travellers Site (£450,000) and an indication from M&S of the value of their site. We have not been provided with any further details of any of the existing interests. However, using information obtained from the Valuation Office Agency (VOA) and areas obtained from pro-map, an estimate of the value of the existing interests on the site is assumed to be in the region of **£150 - £300 million**.

8.16 The above valuations have been undertaken using limited information and until we are provided with more detailed property and tenancy information we will not be able to undertake more accurate valuations.

8.17 The allotments have been valued assuming that planning consent could be obtained for residential development on the site.

8.18 Please note that the above valuations have not been carried out in accordance with the Appraisal and Valuation Manual published by the Royal Institute of Chartered Surveyors.

### **Option C**

- 8.19 It was assumed that the site is to be sold as a single parcel of land with the benefit of vacant possession, planning permission and all other necessary consents. It is also assumed that the site would be sold to a single developer. Although, no allowance has been made for phased payments, clawback or overage.
- 8.20 There is an assumption that 40% of all residential development would be affordable and of this, 70% would be socially rented and 30% shared ownership.

### **Development Area**

8.21 In option C, that the following sites are assumed to be developed:

- Broxbourne Council Depot
- Broxbourne Council owned New River Trading Estate
- Broxbourne Council owned allotments
- County Council Depot
- County Council owned Travellers Site
- Tesco Site
- M&S Site
- Standard Life owned Retail Park
- Bayfordbury owned land
- Cheshunt Park Farm.

8.22 A new link road will be developed which is accessed from the A1170 and crosses the canal.

### **Phasing**

8.23 The following phasing sequence has been assumed

**Phase 1:**

Demolition of Standard Life estate

Construction of new 13,000 sq m gross Tesco store

Construction of 5,700 sq m gross 'high street' retail

Construction of 12,400 sq m gross private residential (165 units approx)

Construction of 8,300 sq m gross affordable residential (111 units approx)

Car Parking constructed

Tesco move in to new store and vacate existing store

High street retail let

Private residential sold on open market

Affordable housing sold to RSL

*Assumed average size of residential apartment = 75 sq m gross*

**Phase 2:**

Demolition of existing Tesco Store

Construction of new 9,600 sq m gross M&S store

Construction of 10,200 sq m 'high street' retail

Construction of 350 sq m gross leisure

Construction of 8,300 sq m gross employment space

Construction of 8,000 sq m gross private residential (107 units approx)

Construction of 5,300 sq m gross affordable residential (71 units approx)

Car Parking constructed

M&S move in to new store and vacate existing store

High street retail let

Leisure let

Employment space let

Private residential sold on open market

Affordable housing sold to RSL

*Assumed average size of residential apartment = 75 sq m gross*

**Phase 3:**

Demolition of existing M&S Store

Construction of third 7,500 sq m gross 'Anchor' store

Construction of 15,300 sq m gross 'high street' retail

Construction of 9,300 sq m gross leisure

Construction of 8,100 sq m gross employment space

Construction of 2,700 sq m gross private residential apartments (36 units approx)

Construction of 2,700 sq m gross private residential houses (28 units approx)

Construction of 1,800 sq m gross affordable residential apartments (24 units approx)

Construction of 1,800 sq m gross affordable residential houses (19 units approx)

Car Parking constructed

3<sup>rd</sup> anchor tenant moves in to new store

High street retail let

Leisure let

Employment space let

Private residential sold on open market

Affordable housing sold to RSL

\* *Assumed average size of residential apartment = 75 sq m gross*

\* *Assumed average size of residential house = 95 sq m gross*

**Phase 4:**

Construction of 350 sq m gross leisure

Construction of 15,600 sq m gross employment space

Construction of 2,938 sq m gross private residential apartments (39 units approx)

Construction of 26,438 sq m gross private residential houses (278 units approx)

Construction of 19,584 sq m gross affordable residential houses (206 units approx)

Leisure let

Employment space let

Private residential sold on open market

Affordable housing sold to RSL

\* *Assumed average size of residential apartment = 75 sq m gross*

\* *Assumed average size of residential house = 95 sq m gross*

**Costs**

8.24 Costs for Option C are estimated as follows:

**Infrastructure Costs**

- Demolition £1 million
- Removal/ undergrounding of electricity pylons £5 million
- Reverse premiums payable to anchor tenants £12 million
- S.106 Payments £20 million

- On site infrastructure and estate roads £20 million
- Two lane link road £4 million
- Off site foul drainage, electricity sub station upgrade, and new gas connection £1 million

**Build Costs**

- Private residential build costs £49 million
- Affordable residential build costs £29 million
- Retail build costs £49 million
- Leisure build costs £8 million
- Employment build costs £48 million
- Car Parking £14 million

**Additional Costs**

- Preliminaries (15%) £33 million
- Contingency (15%) £33 million
- Professional Fees (12%) £27 million
- Agents and Lawyers Fees £20 million
- Marketing £2 million
- Finance £82 million

8.25 The developer's of 20% profit/ cost is assumed. This equates to approximately £143 million.

8.26 (the costs for off-site foul drainage, electricity sub station upgrade, new gas connection and two lane link road have been provided by Capita Symonds)

**Revenue**

8.27 The revenue generated by the above uses is assumed to be as follows:

<u>Use</u>	<u>Revenue</u>
• Retail	£580 million
• Leisure	£20 million
• Employment	£75 million
• Residential	£185 million
Total	£860 million

8.28 It should be noted that although in practice the Tesco and M&S stores may be transferred to Tesco and M&S for £0, in order to assess the development value of the site their worth was needed to be appraised. Therefore, in the appraisal, that both retailers are assumed to take a lease back at a market rent on standard institutional lease terms.

8.29 It is assumed that the new Tesco will comprise 14,000 sq m net and the M&S will comprise 11,150 sq m net.

8.30 A value to the car parking is not attributed.

8.31 Overall, a scheme of this nature would be expected to generate a site value of approximately 20% - 30%. This would suggest a figure of between say **£175million and £275 million**.

8.32 However, it should be borne in mind that there could be some exceptional costs in this scheme associated with the new link road and canal crossing and the removal/ relaying of the electricity pylons. Costs for these items have been included but it is possible that additional costs could vary in comparison with those first anticipated.

#### **Value of Existing Site Interests - Option C**

8.33 The above figures exclude the cost of acquiring any of the existing interests on the site. We have been provided with a book value of the Travellers Site (£450,000) and an indication from M&S of the value of their site. We have not been provided with any further details of any of the existing interests. However, using information obtained from the Valuation Office Agency (VOA) and areas obtained from pro-map, we have estimate the value of the existing interests to be acquired on the sites to be in the region of £200 - £350 million.

8.34 The above valuations have been undertaken using limited information and until we are provided with more detailed property and tenancy information we will not be able to undertake more accurate valuations.

8.35 The Bayfordbury land, Cheshunt Park Farm and allotments have been valued assuming that planning consent could be obtained for residential development on the site.

8.36 Please note that the above valuations have not been carried out in accordance with the Appraisal and Valuation Manual published by the Royal Institute of Chartered Surveyors.

**Conclusion**

8.37 The headline figures for Options A & B are included below.

Gross Revenue	£700m - £750m
Total Costs	£350m – £400m
Developer's Profit	£125m - £150m
Site Value	£150m - £250m
Existing Values	£150m - £300m

8.38 The key figures for Option C are included below:

Gross Revenue	£800m - £900m
Total Costs	£450m - £500m
Developer's Profit	£125m - £175m
Site Value	£200m - £300m
Existing Values	£200m - £300m



## 9 Delivery

- 9.1 The options analysis contained in the earlier sections of this report demonstrates the potential for change at Greater Brookfield, in a manner that should establish it as a new urban centre. Option C 'River Focus' in particular demonstrates the land area that would need to be made available to achieve optimum benefits. Such an approach presents significant challenges, particularly in terms of the Green Belt and therefore needs to address fundamental issues before all the land can be considered for comprehensive development.
- 9.2 This section identifies the challenges that will be faced in taking the project forward towards delivery. It reconfirms the planning context required; considers the potential roles of the current landowners; the potential to bring in additional public sector skills; opportunities for securing developer expertise; and the options available to the Council to take the project forward. It then goes on to review the importance of robust legal advice; delivery vehicle options and initial risk analysis. It concludes with preliminary recommendations.
- 9.3 This is very much an initial assessment of the delivery issues and therefore needs to be seen as a first step in the process. As such, the report does not recommend a single option, rather three options are put forward for discussion. In any event, delivery of the project is complex and will require considerable commitment by the parties and clear and strong leadership.

### **Planning Policy**

- 9.4 The existing planning context has been set out earlier in this report. Clearly, if Option C is to be pursued, it will be vital that an appropriate policy context is set for the whole land area through the LDF Core Strategy and Area Action Plan coupled to any suitable SPD. This will have a two-fold benefit; first, it will send the message to the market that Broxbourne BC is to promote comprehensive change at Greater Brookfield and second, it will protect against inappropriate applications or piecemeal actions which could undermine the overall delivery of a comprehensive scheme.
- 9.5 The LDF Core Strategy and Greater Brookfield AAP will be a vital policy tool for the Council and will provide strong messages to other parties, including prospective developers, that the approach the Council wishes to take for the development of the whole area is robust. This will provide a key plank in the 'de-risking' of the project.

### **Current Landowners**

- 9.6 Option C covers a land area with significant landownership issues. In order to secure the optimum approach it will be necessary for all of these interests to be brought together into an appropriate delivery vehicle.
- 9.7 Negotiations will need to be undertaken to reach agreement with each of the parties, where possible. This must be the first step in securing landowner involvement for a comprehensive scheme.

- 9.8 Compulsory Purchase powers (CPO) may be required to bring all the land into the vehicle where particular parties were unwilling or overly expectant. CPO generally raises concerns and can be seen as an adversarial act. However, it is a positive planning tool, and can be both useful in negotiation and help to focus negotiations prior to Inquiry.
- 9.9 The Council has CPO powers set in legislation that have been well tested at Public Inquiries across the country, however, it may be reluctant to use such powers. If necessary both EEDA and English Partnerships have similar powers and may be able to run a CPO for the project.
- 9.10 The key risk issue will be the relative strengths of the various parties and their willingness to join an appropriate delivery vehicle. However, CPO may benefit the overall project as it can deliver clean title to the land and therefore remove historic covenants, easements, rights of way, etc.
- 9.11 Experienced legal advice will be required, both in terms of landownership and delivery vehicle legal structures for this project. A number of firms have such experience. The Council may need to procure external legal advice if it does not have the expertise in-house.

#### **Public Sector Partners**

- 9.12 The Council has a number of core skills , particularly with regard to setting planning policy. However, it may be less experienced in the strategic and delivery issues relating to converting that policy into actual development.
- 9.13 It is recommended that the Council works with other public-sector organisations that have experience in delivering complex urban area projects as a risk reduction mechanism. Both EEDA and English Partnerships have regional and rational experience, skills and resources that should supplement the Council's skills. In turn this should send a strong message to the private sector that it would be less likely to take advantage of any Council inexperience. Such an approach is working well on many major projects throughout the country.
- 9.14 In this case, EEDA and EP could be attracted to the project for its employment and affordable housing potential, respectively. For Broxbourne BC, their assistance could bring professional expertise and if appropriate could also bring financial support. The latter should be requested carefully, as these organisations are continually asked for financial help. The hook is to bring them in early, involve them and allow them to fully understand the project and its potential. It will be important to show that the project has more to offer than simply new retail development, as it is usually considered that retail requires little if any support in delivery, particularly in the south of the country, due to the values it generates. However, creating a more mixed use place with employment potential, a mix of housing set in a high quality place should be of interest.

#### **Developer Expertise**

- 9.15 As publicly-owned land is to be included as part of the project, it will be important for the Council to receive legal advice on its delivery route options. In particular, it will be necessary to establish how each

of the development elements could be procured. Will existing parties be able to deliver, or will the whole or part of the project need to be procured through an appropriate marketing exercise, in order to satisfy public sector procurement rules?

- 9.16 Once these issues have been addressed and, for now, assuming that external developer expertise is required, it will be important to identify the procurement process that will not only meet Council risk and value requirements but also one that will help to optimise developer interest in the project.
- 9.17 Recent experience of the OJEU process shows this route can deter a number of parties due to its cost, due to an extended process and risk of bid failure. However, such an approach tends to be followed as it is regarded as the best approach for public sector procurement. The primary objective should be a strong competition that attracts as many of the best developers as possible.
- 9.18 This will be encouraged where interested developers can see a realistic opportunity that is backed by strong policy, land assembly powers, strong public sector leadership and a motivated private sector.
- 9.19 Well planned procedures for advertising, requesting information, analysis of bids against pre-agreed criteria, interviews and appointment procedures will need to be put in place at the outset, so bidding parties are clear on the commitment that is expected of them.

### **Council Options Analysis**

- 9.20 The project could in theory be brought forward for development in a number of different ways. The key issue will be whether the sensitivities of the project, mean that the only way forward is through a comprehensive delivery approach. This will need to be addressed in order to give clarity to the options available for delivery.

#### *1. Setting Policy Only*

- 9.21 This option assumes the Council will act as the Strategic Planning Authority only. It will then leave it to the private sector to deliver.
- 9.22 Such an approach will limit Council time, risk and expenditure having set a clear policy framework. However, the whole land area forms a major, strategic site for significant new development and therefore may require a greater role to be played by the Council.
- 9.23 One of the early tests will be whether the Council would anticipate the private sector being able to deliver the required mix and density of development. Linked to this would be the consideration of whether the project would need to be delivered in a comprehensive manner, or would be capable of delivery in a piecemeal way.
- 9.24 The complexity of the infrastructure, the high value of some of the existing uses, the need to create an 'urban' development form, infrastructure requirements and particularly Green Belt issues suggest a comprehensive approach should be adopted.

- 9.25 That the major landowners are expressing a desire to join forces to deliver the new development is a positive step but does not equate to formal commitment, or acceptance of the right form and mix of development. It should therefore not be given too much weight in consideration of the Council's potential role at this early stage.
- 9.26 It is recommended that while the policy side of the Council's role is key, it may well need to play a more substantive role in leading the delivery to ensure the complexities of the project are addressed and a competitive scheme is delivered.

**SUMMARY**

- Robust planning framework required
- Council to oversee the delivery of the project in line with its planning framework
- No guarantee of delivery until JV agreement signed.
- Little control over the delivery of the complexities of the project.

*2. Setting Policy and Council Leadership Only*

- 9.27 Assuming that the Council is reminded that it should actively lead the project, it will need to establish clear roles between its planning function and its landowning/ strategic function. This can be addressed through careful internal management, clear roles and senior leadership.
- 9.28 The Council will be able to act on the Greater Brookfield Framework and bring appropriate powers to the project, such as Compulsory Purchase. This will be a potentially important tool both to aid negotiations between the parties and to buy in land and rights over land, to enable the whole project to be delivered.
- 9.29 The Council will need to consider whether the current landowners have sufficient development skills to deliver the whole project, or whether it will need a Master Developer Partner (MDP). The MDP will be able to bring development and financial skills. It will not necessarily deliver all the elements of the scheme but will bring private sector expertise to negotiate the right terms with the parties.
- 9.30 Procurement will be a key judgement in delivering the whole project. It is anticipated at this stage that in order to deliver a comprehensive solution, the Council will either want to appoint a MDP or be fully persuaded that the current landowners have the ability to undertake the role required, through agreeing a joint venture strategy.
- 9.31 The Council will, in addition, need to take legal advice on its own landholding and the rules that will apply to ensure that any development solutions are in accordance with European and Section 123 (Local Government Act 1972) requirements, which would require the Council to ensure best consideration is sought.

**SUMMARY**

- Robust planning framework required.
- Ability to engage CPO powers if required.
- MDP or JV between land owners if they hold sufficient development skills.
- Council to ensure Best Consideration is maintained for its landholdings.

*3. Setting Policy and Wider Public Sector Leadership*

- 9.32 This approach will seek to bring EEDA, EP, or both organisations in as partners to the Council. Such an approach has considerable merits and provides a strong basis for delivery.
- 9.33 Both parties should be approached and involved in the project from the professional viewpoint.
- 9.34 They will also have access to additional funding, on a case by case basis, which may be helpful to the project in the future. However, it will be vital that they have a clear understanding of the project before any applications for funding are made.
- 9.35 These parties will also help to reinforce a strong public sector approach to secure optimum benefits from the project and provide a robust approach to negotiations with landowners and developers.
- 9.36 Both parties also have CPO powers and experience of using them. This may be beneficial from the Council's viewpoint.
- 9.37 Overall, it is recommend that the Council establishes strong policy and an AAP for the land, takes on a larger role in then translating the AAP into a real and comprehensive project and partners with other parties to ensure, as far as possible, that it optimises the chances of success.

#### **SUMMARY**

- Robust planning framework required.
- Strong Basis for delivery through involvement partnering with EP and or EEDA.
- Brings further support and delivery expertise to the Council.
- Public sector approach to assist in delivering the complexities of the project.
- Council to ensure Best Consideration is maintained for its landholdings.
- Back up of CPO powers available, if required.

#### **Legal Advice**

- 9.38 The Council should secure early strategic legal advice. Much of the success of the project will be based on what the Council will and will not be able to do; where it should have confidence in the delivery system and where it should be wary.
- 9.39 Whilst much advice can come from the planning, surveying and delivery perspectives, it will be vital that this is set within the legal context.
- 9.40 The specific challenges of this project mean that clarity on the way forward is key. The earlier this can be set the better, as it will help avoid decisions being made that may be at variance with legal advice.
- 9.41 Procurement advice will be key, as the Borough and County Council's will need to secure best consideration for their ownerships and ensure they have met the requirements for open competition. Due to the nature and mix of the current landowning parties, it may be possible to structure a delivery vehicle without going to outside parties. However, there may be good legal reasons to pursue a wider competition, to secure the best partner to deliver the whole project.

#### **Delivery Vehicle Options**

- 9.42 It will be vital for all relevant landowning parties, the Council and any other public sector partners to agree on the right delivery vehicle. The appointed developer partner or partners will then join this vehicle.
- 9.43 Options can include the following:
- Partnership: A partnership is a traditional arrangement between the developer and council. It tends to limit council risk and is well proven as a means of the public and private sectors partnering to deliver projects.

- Joint venture: A joint venture tends to be a more formal arrangement that seeks to share risks. Whilst risks can be limited, such an arrangement can be unattractive to councils. Special Purpose Vehicle (SPV): The SPV and company structure approaches are specifically developed for projects, where the partnership or joint venture approaches are inappropriate. The main issue regarding the company approach is that development is bound by company law.

9.44 It is best to set up a vehicle that is as simple as possible and can be established in the least time. With potential risks that will need to be managed, it is recommended that any delivery vehicle needs to limit public sector liability and pass risk to the private sector.

9.45 The vehicle also needs to allow for the delivery of the proposed project based on the proper planning of the whole area. This suggests a comprehensive approach that will be broken down into phases. It needs to create a basis for return and reward based on the proposed scheme and not on historic/current land ownership boundaries. The project therefore needs to create an approach that shares future costs/risks/values in proportions that exist at the outset. This approach then enables all the parties to plan the whole area to optimise its potential, rather than seeking to optimise current land ownerships. It helps to deliver the right land uses in the right locations and optimises the comprehensive approach.

#### **Initial Risk Analysis**

9.46 Risk needs to be considered at this early stage from two perspectives:

- The Greater Brookfield project: The project needs to have a robust planning basis to promote the acceptable and resist the unacceptable.
- The Council: The Council needs to protect itself from the vagaries of the marketplace.

9.47 The Council should have clear legal advice on the structure of the delivery vehicle and avoid taking on risk where possible. The private sector should be encouraged to take on the risk and receive an appropriate financial return for this and the responsibility to deliver the whole project successfully.

9.48 The Council will need to ensure that appropriate planning policy is in place for the whole land area. This is part of its statutory function and therefore cannot be passed to an outside party.

9.49 Public sector leadership in a project of this nature will be important. With multiple landownerships, other land issues such as possible easements, rights of way, covenants, public land ownership, powers to secure the land through partnership, acquisition or a combination of the two, there is a real opportunity for the public sector to play a full part. However, such a role needs to be managed carefully in terms of risk. A strong role by the public sector will improve the potential of the project to be delivered in the form required. It will therefore reduce the overall risk for the scheme.

### **Preliminary Recommendations**

- Establish a robust planning basis through LDF Core Strategy and AAP that will set a clear strategy for the area, make the case for inclusion of Green Belt land, promote comprehensive change, resist inappropriate or piecemeal proposals and provide the platform for planning permission(s) to be granted.
- Existing landowners will need to continue to be engaged effectively as part of the planning process.
- Seek to partner with EP, EEDA and ERA primarily for professional expertise and potentially for financial assistance. Discussions with EEDA and ERA should progress as soon as possible to introduce them to the concept of the project. These discussions should not focus on funding in the initial phases.
- Seek early, strategic legal advice, either in-house or through external advisors. This is a specialist area with a limited number of good practitioners.
- With legal help, and through landowner engagement build clarity on the most appropriate approach to delivery.
- Limit risk for the Council, particularly with regard to exposure to the marketplace.



## 10 Next Steps

- 10.1 It was considered that there is a compelling case to support significant additional comparison/leisure development and other mixed uses, including residential development, as part of a planned redevelopment of the Greater Brookfield area.
- 10.2 There is a clearly defined need to improve access by car and alternative means of transport, and to improve circulation and permeability within the area. A new link road from the A10 serving Greater Brookfield offers the only workable and lasting means of addressing forecast road/junction capacity constraints and achieving these objectives.
- 10.3 There is a measure of consensus on the part of the key stakeholders to the problems Greater Brookfield currently experiences and the need for a comprehensively planned approach. We consider that the key stakeholders all in principle support the development of a strategy to transform Greater Brookfield into a genuinely accessible, fully functioning centre serving the higher order retail/leisure and other needs of Broxbourne residents. Further discussions with stakeholders indicated that there was also in principle support for Option C, due to its comprehensive structure.
- 10.4 Having established what we consider to be a clear policy case to support this scale of new development, it was important to assess the costs of the infrastructure required, in order to establish whether this scale of development is likely to be viable, offers the potential to fund the necessary improvements and meet the legitimate expectations of existing landowners. This is likely to have a key bearing on the case for including any significant development north of New River associated with the proposed link road. The results indicate that there is not a significant difference between the viability of Options A, B and C. However, Option C, while it indicates a slightly higher gross revenues and costs will deliver a more comprehensive scheme.
- 10.5 We consider the key to delivery is the ability to secure an appropriate level of policy support for the scale of retail/leisure expansion, provision of the new link road, and, if necessary, the Green Belt release for additional residential development north of New River. Representations have been made to safeguard a measure of policy support for this initiative through the RSS. The next stage is to deliver the Council's aspirations for Greater Brookfield through preparation of the LDF Core Strategy and an Area Action Plan, in conjunction with strategies for the three town centres which combine the support the case for to support the case for and expand the role of Greater Brookfield.
- 10.6 In addition to securing the necessary measure of development plan support, which in our view will be a prerequisite to supporting any planning application(s), this would also provide the basis for supporting the use of compulsory purchase powers if necessary and provides an appropriate vehicle for effective public consultation.

## Appendices