EXAMINATION OF THE BOROUGH OF BROXBOURNE LOCAL PLAN

RESPONSES TO ACTIONS REQUIRED FOLLOWING HEARING SESSIONS FOR MATTERS 4: GREEN BELT (WEEK TWO)

STATEMENT OF HERTFORDSHIRE COUNTY COUNCIL (HCC) GROWTH & INFRASTRUCTURE UNIT ON BEHALF OF HCC SERVICES - BROXBOURNE BOROUGH COUNCIL’S PROPOSED MAIN MODIFICATION AS RESPONSE TO ACTION POINT 6

AP6. [Broxbourne] Council to prepare a main modification to policy INF10 (“Reserve Secondary School Site”) and reasoned justification to ensure that the Plan is consistent with national policy relating to development in the Green Belt, justified and effective. In so doing, the Council should take account of the uncertainties about whether the site at Church Lane, Wormley safeguarded in the Plan is deliverable; the expected timescale for the provision of a new secondary school; and national policy relating to schools, infrastructure and plan-making as well as Green Belt.

OCTOBER 2018
1.0 **Summary**

1.1 This statement provides Hertfordshire County Council (HCC) Growth and Infrastructure Unit’s (GIU) position with regard to Broxbourne Borough Council’s response to Action Point 6 (AP6).

2.0 **Background**

2.1 Through its submission to Matters 4 and 6 HCC has made its position very clear that the Church Lane Wormley site is considered undeliverable for a number of reasons including ecology, tree preservation orders, flood plain, and third party land issues. Most notably concerns regarding transportation issues exist where the site is considered unsustainable and incapable of being accessed safely. No evidence has been forthcoming from Broxbourne Borough Council before, during or after the EiP process to prove otherwise.

2.2 Following the Matter 4 session the Inspector has instructed the council to prepare a main modification to the plan as follows:

> **AP6.** Council to prepare a main modification to policy INF10 (“Reserve Secondary School Site”) and reasoned justification to ensure that the Plan is consistent with national policy relating to development in the Green Belt, justified and effective. In so doing, the Council should take account of the uncertainties about whether the site at Church Lane, Wormley safeguarded in the Plan is deliverable; the expected timescale for the provision of a new secondary school; and national policy relating to schools, infrastructure and plan-making as well as Green Belt.

3.0 **Broxbourne Borough Council proposed main modifications Issue 4.2**

3.1 The Council have proposed a main modification which proposes amendments to the text of paragraphs 17.28 and 17.29 and a reworded Policy INF10.

3.2 The modifications as proposed by the council disappointingly continue to refer to the Church Lane Wormley site as the Local Planning Authority’s preference but, in addition, they now propose a “Secondary School Site Development Plan Document” as an alternative. The proposed DPD is considered to be unnecessary given that the local plan is presently allocating growth sites, currently being examined and therefore capable of being modified to provide certainty and assist soundness. Also site searches have already been conducted (see 3.4 below) and sufficient information is already available to enable an appropriate deliverable allocation to be made as part of this plan. The proposed Broxbourne modification is therefore neither justified nor effective and that this approach should be considered unsound. This does not provide the proactive, positive and collaborative approach required for the delivery of school places required by Paragraph 72 of the NPPF.

3.3 Section 4 (Education) of HCC Growth and Infrastructure Unit’s Matter 6 submission (see Appendix 1) sets out very clearly the county council’s position with regard to this matter. Section 6 of that statement proposes modifications to both the plan and Policy BR1 that would provide for a
secondary school allocation at Brookfield should the Inspector be minded to recommend that the principle of growth be accepted in that location.

3.4 To assist the examination process (and for clarity) HCC has commissioned a September 2018 update of its September 2016 “Broxbourne Secondary School Site Search – Report”. The updated site search has assessed 124 potential school sites and modified the search criteria to recognise that land at Brookfield is proposed for allocation and may be removed from the Green Belt. Following this detailed assessment, site SA1 (Brookfield) is considered to be the least constrained and as a result the more desirable location for a new 8FE secondary school. The updated site search is submitted to accompany this Statement.

3.5 Furthermore this land is in the joint ownership of HCC and Broxbourne Council who are jointly promoting the site for allocation in the local plan. The Councils planning consultants WYG have helpfully produced a plan to show how a secondary school could be achieved at Brookfield and this is attached at Appendix 2. This confirms the suitability and deliverability of the site.

4.0 Conclusion
4.1 HCC reaffirms the need for an accessible, deliverable and economically viable secondary school site to meet the needs arising from the submitted Plan and that this plan should be modified to propose an allocation to provide certainty on the matter.

4.2 HCC considers that the proposed modifications submitted by Broxbourne Borough Council in relation to this matter under AP6 are neither effective nor justified and therefore should be considered “unsound”.

4.2 HCC has already set out proposed modifications in its Matter 6 Statement that if adopted would enable the plan to be considered “sound”.

Russell Monck MA MRTP
HCC Growth & Infrastructure Unit
October 2018
APPENDIX 1

HCC GIU MATTER 6 STATEMENT
APPENDIX 2

BROOKFIELD GARDEN VILLAGE SECONDARY SCHOOL MASTERPLAN
EXAMINATION OF THE BOROUGH OF BROXBOURNE LOCAL PLAN

STATEMENT OF HERTFORDSHIRE COUNTY COUNCIL (HCC) GROWTH & INFRASTRUCTURE UNIT ON BEHALF OF HCC SERVICES
REPRESENTOR ID: 1148292

IN RELATION TO MATTER 6: POLICIES & PROPOSALS IN DIFFERENT PARTS OF THE BOROUGH

BROOKFIELD

AUGUST 2018
1.0 Summary
1.1 This statement provides Hertfordshire County Council (HCC) Growth and Infrastructure Unit’s (GIU) position with regard to the Inspector’s questions 91 and 92 regarding the timely re-provision of HCC assets currently located at Brookfield Riverside.

1.2 This statement also cross references with HCC GIU’s earlier Matter 4 Statement with respect to the Inspector’s Question Q 55A (the identification of a site for a new secondary school in the Borough of Broxbourne Plan) given that HCC no longer supports the Church Lane Wormley site. In this statement HCC sets out that both Policy BR1 Brookfield and the plan can be modified such that the masterplan for Brookfield Garden Village can be required to identify a site for a secondary school.

1.3 HCC considers that Policy BR1 Brookfield can be modified to give greater certainty (and therefore be more effective) both with regard to the necessary re-provision of existing assets and the identification of a new secondary school site, such that the soundness of the Borough of Broxbourne Plan can be improved.

2.0 Background
2.1 The Inspector has raised specific questions regarding the approach taken in the plan with regard to HCC assets at the Halfhide Lane Travellers Site and the Household Waste Recycling Centre (HWRC) both of which would be required to be relocated by the proposals for the Brookfield Riverside development. Specifically the Inspector has asked the following questions:

Q91. Does the Plan make adequate provision for the relocation of (a) Halfhide Lane travellers site; (b) Halfhide Lane allotments; and (c) Broxbourne Council depot.

92. Does the Plan make adequate provision for the relocation of the household waste recycling centre, and is it consistent with the Hertfordshire Waste Core Strategy and Development Management Policies Development Plan Document 2012 and national policy 39

2.2 HCC is specifically concerned with Policy BR1 Brookfield as it relates to its assets – namely the HWRC and the Halfhide Lane Travellers Site. This statement suggests modifications to that policy to improve the clarity and the effectiveness of the policy such that the soundness of the plan (so modified) could be improved.

2.3 Additionally through its Matter 4 statement (see Appendix 1) HCC has made clear that HCC has taken a final view that the Church Lane Wormley site is undeliverable. It is also HCC’s view that the soundness of the plan could be called into question unless an alternative secondary school site is specifically
identified. Again through its Matter 4 statement HCC has already set out that a secondary school site could be provided at Brookfield Garden Village.

2.4 Hertfordshire County Council (HCC) therefore also respectfully requests that appropriate modifications be made to Policy BR1 “Brookfield” of the Regulation 19 Draft Local Plan to require that a site for a new secondary school is identified within the masterplan for the Brookfield Garden Village allocation.

3.0 HWRC and Traveller Site re-provision
3.1 The current wording of Policy BR1 Brookfield states that four uses currently located within the Brookfield Riverside site will require relocation. Two of these four uses requiring relocation are the HCC assets namely the Halfhide Lane travellers site and the HWRC.

3.2 Whilst it is understood that the emerging Brookfield Garden Village masterplan references both HCC assets there are no specific allocations or policy support in the plan to require or provide for their successful relocation. It is therefore HCC’s position that the current wording of Policy BR1 lacks precision in terms of the re-provision of these uses and that Policy BR1 is likely to be ineffective.

3.3 Furthermore Hertfordshire County Council as the Waste Planning Authority for Hertfordshire maintain that in line with Policy 5: Safeguarding of Sites in the adopted Waste Core Strategy and Development Management Policies document (2012), and paragraph 20 of the NPPF, that prior to closure of the Turnford HWRC, a new enhanced site location must be identified.

3.4 This lack of policy support regarding the relocating uses calls into question the effectiveness and therefore raises issues of soundness with the plan. HCC GIU considers that modifications are required to require that both points are dealt with and that the re-provided assets are operational prior to the decommissioning of the existing sites. The suggested modifications are set out at Section 5 of this statement.

4.0 Education
4.1 As set out in our Matter 4 statement HCC is the local authority with responsibility for the planning and commissioning of school places throughout Hertfordshire. HCC has a statutory duty to secure sufficient school places, which ensures that every child has access to a school place. This is fulfilled by forecasting the demand for school places against existing supply.

4.2 Current secondary capacity is required to meet the rising demand from the existing community. Over and above this, pupil yield from new housing outlined in the Local Plan is anticipated to create additional demand of up to 15.5 FE, based on 500 homes equating to 1 form of entry.
4.3 Therefore, HCC has a need to provide additional secondary school places within the Borough and specifically within the Hoddesdon and Cheshunt Education Planning Areas (EPA). It is considered that in order to meet the anticipated growth that is outlined in the Regulation 19 plan, it would be necessary to provide a new 6 to 8 form of entry (FE) secondary school towards the end of the plan period. From an education perspective, HCC has identified that this additional capacity should be provided in the centre of the Borough.

4.4 HCC GIU Matter 4 Statement makes clear that further feasibility work has concluded that the original reserve site at Church Lane, Wormley (Policy INF 10 of the submitted plan) is now considered undeliverable. HCC’s original site search work concluded that the Brookfield Garden Village site (once allocated in the plan) is likely to be a suitable location to provide a secondary site. A refresh of this work has been commissioned. The Highway Authority has raised no objection in principle to the suitability of the site from a sustainability and strategic site allocation perspective.

4.5 Therefore HCC GIU are seeking modifications to Policy BR1 Brookfield to require that a secondary school site is identified and allocated in the Masterplan for Brookfield Garden Village. The suggested modification is set out at Section 5 below.

5.0 Proposed Modifications

5.1 The modifications proposed to the applicable policies and supporting text below are shown in strikethrough and underlined text.

**Figure 3 Brookfield Riverside and Garden Village Indicative Concept Plan**
Delete references to the Reserve Secondary School Site within the indicative concept plan, along with the arrows showing the site’s proposed access from the A10 slip road and Church Lane. Allocate land within the masterplan area for a new secondary school site.

**Policy BR1: Brookfield**
Within the list of uses identified for Brookfield Garden Village, insert the following underlined text :

1. c. 1,250 new homes;
2. 40% affordable housing;
3. Elderly persons’ accommodation;
4. 3 forms of entry of primary schooling;
5. A new 6-8 forms of entry secondary school;
6. A Household Waste Recycling Centre (HWRC) as a re-provision from Brookfield Riverside;
7. A Gypsy and Traveller Site as a re-provision from Halfhide Lane;
5.8. Local centre;
6.9. Public open space and woodland including enhancement of the valley of the Turnford Brook as a green corridor and linear park through the development;
7.10. Protection and enhancement of scheduled monuments.

Underneath the list of ‘Relocated Uses’ insert a new sentence which states:

The new Household Waste Recycling Centre (HWRC) will be relocated to an area to be shown on the Brookfield Masterplan and shall be operational, prior to the redevelopment of its existing site. The Halfhide Lane travellers’ site will be relocated to a site within Brookfield Garden Village, to be shown on the Masterplan. The re-provided travellers’ site shall be made available for occupation prior to the redevelopment of the existing Halfhide Lane site.

Policy INF10: Reserve Secondary School Site at Brookfield Garden Village
Amend the title of Policy INF10 as above, along with the following wording within the policy:

Land is safeguarded at Church Lane, Wormley allocated for the development of a new secondary school at Brookfield Garden Village.

Paragraph 5.22
Amend the wording within paragraph 5.22 with additional text to include the need for a new secondary school site within the garden village:

5.22 The village will look to Brookfield Riverside for certain facilities but is also expected to contain a local shop(s), a new primary school, a new secondary school and local areas for play and relaxation.

Paragraph 12.2
Delete the title: ‘Wormley Secondary School’ and paragraph 12.2 in relation to the provision of a new secondary school site on land between Church Lane and the A10, Wormley:

Wormley Secondary School

12.2 The Policies map defines the land between Church Lane and the A10 Turnford link road as the proposed site of a new secondary school within the Green Belt. The primary road access into the school site would be from the A10 to Turnford link road with a secondary access from Church Lane. The precise location of the school and grounds within the wider site are still to be determined. However, the site layout will need to take account of the tree preservation order and local wildlife site designations which cover this area. Policy INF10 identifies the broad location of the school site and grounds.

Paragraph 17.28
Amend the wording within paragraph 17.28 in relation to the safeguarded land at Church Lane, Wormley for a new secondary school:

17.28 There is currently secondary capacity within existing schools. However, this is expected to fill up as a result of the ageing of existing children currently in primary schools and new children within new development. Towards the end By the middle of the Plan period, a new secondary school is likely to be required. Locational options have been considered for this new school and a central location within the Borough is considered to be most suited. Land is consequently being allocated within the Masterplan area of Brookfield Garden Village safeguarded at Church Lane, Wormley for the development of this school. Based on feasibility work commissioned by Hertfordshire County Council, it is considered that the primary vehicular access to the site should be from the A10 link road to the south, with a secondary access from Church Lane. Masterplanning will determine the configuration of the site but it is anticipated that a substantial area will be set aside for environmental mitigation and enhancement.

Associated amendments are required to the Local Plan Policies Map Pre-Submission Consultation Draft November – December 2017. The “Inf 10” designation of Church Lane Wormley should be moved so as to lie within the Residential and Mixed Use site allocation at BR1 Brookfield/Cheshunt Park Farm.

6.0 Conclusion

6.1 HCC reaffirms the need for an accessible, deliverable and economically viable secondary school site to meet the needs arising from the submitted Plan.

6.2 HCC also considers that Policy BR1 as drafted is ineffective in terms of the planning policy support provided for uses requiring to be relocated from Brookfield Riverside.

6.2 HCC has set out proposed modifications at Section 5 above that if adopted would enable the plan to be considered “sound”. These modifications apply both to Policy BR1 Brookfield and to additional associated/complementary sections of the Broxbourne Local Plan 2018 – 2033 (Regulation 19 Draft Consultation Document)
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