Local Plan Examination in Public
Council Hearing Statement

Matter 4: Green Belt

July 2018
Contents

Issue 4.1: Are there exceptional circumstances to justify altering established Green Belt boundaries, and will the proposed boundaries promote sustainable patterns of development and be capable of enduring beyond the plan period? .................................................................................................................................................. 3

Issue 4.1A: Green Belt Purposes .................................................................................................................................................. 4

Issue 4.1B: Accommodating identified development needs in the Borough ................................................................. 6

Issue 4.1C: Proposed Green Belt boundaries................................................................................................................................. 7

Issue 4.1D: Exceptional Circumstances.................................................................................................................................................. 9

Issue 4.2: Are policies in the Plan that propose specific developments in the Green Belt justified and are they likely to be effective? ........................................................................................................................................ 9

Issue 4.3: Are the Plan’s Green Belt Development Management policies consistent with national policy, justified, and likely to be effective? .................................................................................................................................................. 12

Issue 4.4: Potential Main Modifications .................................................................................................................................................. 13

Appendices

These appendices relate to the Reserve Secondary School site (Q55a)


Appendix 2: Secondary School site options (Broxbourne Borough Council, 2015)

Appendix 3: Email from Herts and Middlesex Wildlife Trust (2018)
**Issue 4.1:** Are there exceptional circumstances to justify altering established Green Belt boundaries, and will the proposed boundaries promote sustainable patterns of development and be capable of enduring beyond the plan period?

The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Once established, Green Belt boundaries should only be altered in exceptional circumstances.

When reviewing boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt, or towards locations beyond the Green Belt.

The amount of housing and economic development, and the approach to accommodating it, was considered under matters 2 and 3. This included consideration of whether the Plan optimises the use of brownfield and other land within existing urban areas and whether the locations proposed for development would promote sustainable patterns of development.


The following areas are proposed to be removed from the existing Green Belt in the Plan:

<table>
<thead>
<tr>
<th>Area</th>
<th>Proposed built development</th>
<th>Hectares</th>
</tr>
</thead>
<tbody>
<tr>
<td>Brookfield</td>
<td>Housing, school, retail, leisure and offices</td>
<td>128</td>
</tr>
<tr>
<td>Rosedale Park</td>
<td>Housing and school</td>
<td>85</td>
</tr>
<tr>
<td>Bury Green (north and south)</td>
<td>Housing</td>
<td>70</td>
</tr>
<tr>
<td>West of Hoddesdon</td>
<td>Housing, school, retail and leisure</td>
<td>42</td>
</tr>
<tr>
<td>Park Plaza West</td>
<td>Offices</td>
<td>40</td>
</tr>
<tr>
<td>Albury east of A10</td>
<td>Housing, community, commercial and redeveloped football stadium</td>
<td>40</td>
</tr>
<tr>
<td>Maxwell Farm / Rush Meadow</td>
<td>Not specified</td>
<td>37</td>
</tr>
<tr>
<td>Goffs Oak (4 sites)</td>
<td>Housing, and restaurant and related uses</td>
<td>14</td>
</tr>
<tr>
<td>Broxbourne school</td>
<td>Housing</td>
<td>7</td>
</tr>
<tr>
<td>Britannia Nurseries, Waltham Cross</td>
<td>Housing</td>
<td>4</td>
</tr>
</tbody>
</table>

**Total** 467
Issue 4.1A: Green Belt Purposes

National policy states that Green Belts serve five purposes:

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

45. Is the Plan based on reasonable evidence about the purposes that the Green Belt serves in the Borough?

The main source of evidence regarding the 5 purposes of Green Belt is the Green Belt Review carried out by Scott Wilson in 2008 (Evidence Library document GB3). Although carried out 10 years ago, the five purpose of Green Belt have not changed in that time and therefore the study methodology remains valid. The assessment parcels cover all areas of Green Belt across the borough and the assessment parcels enable comparative analysis and benchmarking of differences in the performance of different areas, and are sufficiently fine-grained for Local Plan purposes.

46. What purposes does the Green Belt serve in the broad areas of the Borough where alterations are proposed?

The main source of evidence relating to this is the Green Belt Review 2008 (document GB3).

Brookfield: The Review indicated that the green belt performs well in this area in terms of checking sprawl and safeguarding the countryside from encroachment but had no real role in terms of preventing the merging of neighbouring towns (parcel B9).

Rosedale Park: The Review identified variations within the area in terms of performance in relation to encroachment into countryside, and proposed redesignation of parts of the area with a landscape/open space protection policy (parcels C13-20).

Bury Green: The Review indicated that the Green Belt does not perform well against purposes 1-3.

West of Hoddesdon: The Review identified mid-range scores preventing countryside encroachment and medium-poor performance in terms of preventing the merging of towns. Differences are noted between the performance of parcels A14/15 (High Leigh) and A10 North of Hertford Road.

Park Plaza West: parcel D19 plays a strong role in terms of safeguarding the countryside from encroachment and checking sprawl, and a medium-level role in preventing the merging of towns.

Albury east of the A10: The Review suggests that this area checks urban sprawl, mid-range scores in terms of preventing the merging of neighbouring towns, and scores well in terms of safeguarding the countryside from encroachment.

Goffs Oak: the Green Belt in this area prevents encroachment into the countryside to the north, south and west and prevents the merging of Goffs Oak and Cuffley.
Broxbourne School: The Review suggested that the Green Belt (at parcel B5) played a role in preventing sprawl, achieved a mid-range score in terms of safeguarding the countryside from encroachment and made little contribution to preventing neighbouring towns from merging.

Britannia Nurseries, Waltham Cross: The Review encompassed the site within a much wider parcel (E28) and did not provide more detailed commentary on this site.

47. How would the alterations to the Green Belt affect the purposes of including land in the Green Belt in the following locations?

a) Brookfield: Negative impacts would be mitigated by the establishment of new defensible Green Belt boundaries relating to physical features, landscape and topography. These would be encapsulated within the masterplan-led approach which will secure landscape mitigations to successfully accommodate Brookfield within its wider Green Belt setting.

b) Rosedale Park: Tudor nurseries is developed in character and the Rags valley is inaccessible. Neither of these locations are open countryside and release would result in little harm to countryside, and impacts to this or to the separation of settlements could be mitigated by the consented masterplan-led approach.

c) Around Goffs Oak village (4 sites): Minimal harm to Green Belt purposes would be caused from release of these small sites which do not intrude into open countryside.

d) Bury Green: The purposes of Green Belt are not well served currently due to the developed nature of the area and severance from open countryside due to Lieutenant Ellis Way and the disaggregated settlement form in this area. Minimal harm to Green Belt would ensue from release.

e) West of Hoddesdon: the open land at High Leigh is disfigured by pylons and roads and removal would therefore cause little harm. A new firm and defensible boundary would be provided by the A10.

f) Maxwells Farm / Rush Meadow west of A10: The contribution of this area to Green Belt purposes would be significantly diminished by the release of Park Plaza West to the south, and therefore release of the land would not cause further additional harm.

g) Albury east of A10: The same comments apply as to Maxwells Farm West/Rush Meadow above.

h) Broxbourne School: release would correct an existing anomaly by removing land of a developed character from the Green Belt. Little harm to Green Belt purposes would result.

i) Britannia Nurseries: Green Belt impacts were fully considered through consideration of the approved planning application for this development. The site is now under development.
At Park Plaza, the impacts on the strategic gap between Cheshunt and Enfield would be eroded. However, the policy seeks to mitigate this impact through masterplanning and the creation of the new open space.

48. **Cumulatively, what effect would the proposed alterations to the Green Belt have on the purposes that the Green Belt serves in the Borough?**

Taken together, the proposed alterations to the Green Belt would create a significant erosion of the amount of Green Belt land within Broxbourne. However, whilst there will inevitably be a collective loss of openness, the purposes of the Green Belt will be respected and sprawl, merging and undermining encroachment will be avoided.

Given the dispersed nature of proposed alterations, the cumulative impacts would be very limited beyond those already addressed in relation to specific sites above. The main cumulative impacts could be in the vicinity of Goffs Oak and West Cheshunt, where there are proposed releases of the 4 sites around the village and also the strategic allocation at Rosedale Park nearby. However as stated above, none of these releases would harm open countryside or result in sprawl. In terms of the risk of merging of West Cheshunt and Goffs Oak, the main cumulative consideration would be in terms of the release of land North of Goffs Lane (policy GO2) and Rosedale Park at Tudor Nurseries (policy CH2). Whilst these releases are in close proximity, the land at both sites is of a developed character and therefore any additional cumulative harm to Green Belt purposes would be minimal. Further north at the Rags Valley any potential merging would not be attributable to cumulative impacts, and mitigations could be achieved as detailed above.

49. **Are there other parts of the Green Belt in the Borough where development would have less of an impact on Green Belt purposes than the locations proposed in the Plan?**

The Green Belt topic paper considered this matter in detail and concluded that there are not any other parts of the Green Belt where development would have less of an impact on Green Belt purposes than the locations proposed in the Plan. When considered alongside the most sustainable choices for development within the Borough, the Council considers that the boundaries of the Green Belt proposed for realignment represent the most sustainable overall approach to protection of the Green Belt within Broxbourne.
Issue 4.1B: Accommodating identified development needs in the Borough

50. (a) Could some of the Borough’s identified development needs realistically be accommodated in other areas, and (b) if so would such an approach contribute to sustainable patterns of development?

Within Broxbourne, the Council considers that it has presented within the Local Plan the most sustainable pattern of development over the Plan period. The corollary of this is that development in other areas would not contribute to sustainable patterns of development when compared with the Plan. In evidence of this position, the Council has undertaken a range of options assessments in arriving at its preferred development strategy.

a) Outside Broxbourne, paragraph 2.6 of the Green Belt Topic Paper indicates that during the early stages of plan-making, a workshop with other authorities was held and these authorities indicated that they would be unable to help accommodate any of Broxbourne’s unmet needs.

51. Should some of the identified development needs not be accommodated by the Plan even if it were unlikely that they would be met elsewhere?

The Council considers that the full extent of the identified development needs to 2033 can be sustainably accommodated within the borough as set out in the Local Plan, having regard to the specific NPPF requirements for plan-making as set out in the Green Belt Topic Paper.

Issue 4.1C: Proposed Green Belt boundaries

When defining boundaries, local planning authorities should:

- ensure consistency with the Plan strategy for meeting identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open;
- where necessary, identify areas of safeguarded land between the urban area and the Green Belt in order to meet longer term development needs stretching well beyond the plan period;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent\(^1\).

52. Would the boundaries around the land that the Plan proposes to remove from the Green Belt be clearly defined using physical features that are readily recognisable and likely to be permanent?

In most cases a firm physical boundary is used but in some cases softer boundaries such as hedgerows are utilised. In some cases it is not possible to identify hard physical boundaries without opening up areas where development would be inappropriate, and the role of Green Belt is therefore very important in terms of achieving a sustainable pattern of development. Masterplanning is also considered to play a role in some locations, notably Brookfield.

\(^1\) NPPF paragraph 85.
The boundaries are plotted on detailed maps contained within Appendix E of the Green Belt Topic Paper. The area numbers below refer to that document.

**Area 1 - High Leigh** – A10, Lord Street, and back gardens.

**Area 2: Broxbourne School** – existing hedgerow/fence to the west and the edge of the existing school buildings to the south. If it is considered necessary to remove the relocated school buildings from the Green Belt, the track west of Cozens Lane west could provide a suitable alternative southern boundary.

**Area 3: Brookfield Garden Village and Brookfield Riverside** – Woodland at Wormleybury and existing hedgerows form the northern boundary. To the south the boundary is provided by Cheshunt Park. Green Belt boundary based around masterplan-led approach. To the west, the Plan purports to establish a new Green Belt boundary through woodland planting. Park Lane Paradise could provide an alternative Green Belt boundary to the west, should this be considered appropriate in order to accommodate land uses to the west of the currently proposed Green Belt boundary.

**Area 4: North of Cuffley Hill** – the boundaries are provided by the woodland and a brook/steep drop.

**Area 5: North of Goffs Lane** – existing hedgerow to the east and the tennis courts and public facilities to the west.

**Area 6: South of Goffs Lane** – boundary of the existing developed area. In accordance with the modification proposed to this site in order to ensure deliverability [EXAM6], the proposed boundary should be amended to follow the eastern boundary of Lafiya House.

**Area 7: Newgatestreet Road** – St James’ Road to the north and a hedgerow to the east.

**Area 8: Rosedale Park** – Burton Lane/Rags Lane and Goffs Lane to the south.

**Area 9: Bury Green North** – Lieutenant Ellis Way.

**Area 10: Bury Green South** – Lieutenant Ellis Way.

**Area 11: Maxwell Farm West** – Lieutenant Ellis Way/New River to the South.

**Area 12: Albury East of the A10** – will no longer adjoin Green Belt. Nearest new boundary at New River (Area 13).

**Area 13: Park Plaza West** – New River.

**Area 14: Britannia Nurseries** – Trinity Marsh ditch to the east and drain to the north.

53. Is it likely that the Green Belt boundaries would not need to be altered again at the end of the plan period?

The inclusion of the reserve ‘white’ land at Maxwell Farm West could accommodate longer-term needs if necessary. The Regulation 18 draft Local Plan proposed to safeguard this land in order to address long-term needs beyond 2033. There may be some possibility of further Green Belt release
at Broxbourne station linked to Crossrail 2, but that would be a matter for the proposed Area Action Plan (see EXAM 6: 1st Schedule of Main Modifications, Policy BX2: Broxbourne Station and Environs).

**Issue 4.1D: Exceptional Circumstances**

54. (a) Do exceptional circumstances exist to justify the alterations to the Green Belt proposed in the Plan? (b) If so, what, in summary, are they?

a) Yes, as demonstrated by the Green Belt Topic Paper (2017 – Evidence Library document GB1). This is demonstrated by reference to criteria-based set of exceptional circumstances and the Calverton principles established in case law relating to Local Plans.

b) A summary checklist is provided in Appendix B of the Green Belt Topic Paper. In brief, this comprises a list of 26 criteria in the following categories: Local Plan Strategy; Green Belt; Sustainable Place-Making; Design, Landscape and Biodiversity; and Transport. The analysis in the Topic Paper (pages 14-16) also establishes exceptional circumstances in relation to the 5 principles established in the Calverton case as follows:

- **Principle i: Acuteness/intensity of objectively assessed need:** for housing, as evidenced by the Justin Gardner work; and for employment, based on the Council’s economic development strategy and a ‘step change’ in provision;
- **Principle ii: Inherent constraints on supply/availability of land available for sustainable development:** this is demonstrated by the insufficient urban capacity in the borough;
- **Principle iii: difficulties in achieving sustainable development without impinging on the Green Belt;**
- **Principle iv: the nature and extent of harm to the Green Belt (or those parts of it which would be lost if the boundaries were reviewed);**
- **Principle v: the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.**

Site-level consideration of principles iii to v is provided within the Topic Paper.

**Issue 4.2: Are policies in the Plan that propose specific developments in the Green Belt justified and are they likely to be effective?**

*Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. The construction of new buildings in the Green Belt should be regarded as inappropriate other than in a limited number of circumstances.*

*The Council response to Further Preliminary Question 2 [EXMA4A] provides an explanation for why various policies in the Plan are proposing development in the Green Belt that would be inappropriate according to national policy.*
55. Are the following policies in the Plan, which potentially propose inappropriate development in the Green Belt contrary to national policy, justified and likely to be effective:

   a) A new secondary school at Church Lane, Wormley (policy INF10).

Hertfordshire County Council (HCC) secondary school forecasting in 2013/14 indicated the need for a new secondary school within Broxbourne towards the end of the Local Plan period and HCC sought the identification of a secondary school site through the Local Plan;

This Council agreed (and still agrees) with that position and it was also agreed that this would be best centrally located within the Cheshunt area;

This Council assessed the land options (Appendix 2) and concluded that there were only two realistically deliverable sites – at Church Lane, Wormley and Brookfield. The reasons for the selection of the Church Lane site are set out in Appendix 1;

HCC latterly undertook a more extensive site search of the borough (Appendix 2). This assessment also concluded that a central location would be the most appropriate – at Wormley or Brookfield.

Whilst both councils have agreed the long term need for a secondary school, school placement forecasting is uncertain and existing secondary schools (all academies) are expanding. Rather than allocate a site, this Council has therefore determined that the Wormley site should be retained within the Green Belt and safeguarded to ensure that it could be made available as and when it is required. It is likely that this would be through a Local Plan review c. 2023/24.

A reserving position requires a reasonable degree of certainty that the site can come forward for the use proposed. This being the case, the main issues have been ecology, access and land ownership:

- The ecological position has been satisfied as demonstrated by the Ecological Mitigation Strategy and (document EV3) and recently confirmed in an email from the Herts and Middlesex Wildlife Trust (Appendix 3);
- Both councils have concluded that bus access would need to be from the Turnford link road and feasibility and design work has been undertaken by the County Council. This has indicated that bus access would be feasible, subject to more detailed design;
- This Council is the majority land owner and is willing to release the land in due course for the secondary school as and when it is required. The road access would traverse land in the ownership of Derwent Holdings. Preliminary discussions with Derwent had indicated a willingness to accommodate this access, although Derwent was/is also seeking housing development. This Council has indicated that housing would not be appropriate on the Derwent site but has no reason to believe that this wold stymie acquisition of the school land at an appropriate value. This Council has therefore brokered a dialogue between HCC and Derwent but does not know the outcome of that dialogue;

To date, both councils have been working on the basis that HCC would acquire the site, develop the school and procure a user (an academy). However, there are alternative, more direct procurement options open to the Council.
In view of the foregoing, the Council remains of the view that the reserving of the Wormley site is justified and likely to be effective.

b) Redevelopment of Broxbourne School (Council’s proposed main modification to policy BX3 [EXAM6])
   Justification of the proposals is provided by two factors: the urgent need to provide additional school capacity in the area, and the need to invest in the fabric of the buildings in order to ensure that the school is able to provide an appropriate learning environment for students for years to come. Planning permission has been granted, with implementation anticipated during the early part of the Plan period.

c) Residential development and “wider development” on the Broxbourne leisure pool site (policy LV3).
   As set out in the Council’s response to the Inspector’s Further Preliminary Questions (EXAM4A), some development on the western end of the Broxbourne Leisure Pool site could improve the site in the vicinity of the existing lido structure, in order to open up the opportunity for significant enhancements to the area. The site is owned by the Lee Valley Regional Park Authority and it is understood that the Authority will be submitting its own justification of the proposals.

d) Leisure and recreation facilities including a visitor hub at Spitalbrook (policy LV4).
   These proposals have emerged from consideration with the Lee Valley Regional Park Authority of the potential long-term opportunities associated with Cross Rail 2, and could form part of the proposed Area Action Plan as set out in the Set 1 modifications [EXAM6]. Subject to confirmation with the Lee Valley Regional Park Authority, a ‘visitor hub’ could include provision for activities compatible with the Park, such as wild camping facilities or a visitor centre. It is understood that the Park Authority will provide further information in relation to this.

e) Meeting the needs of Gypsies and Travellers on sites at Hertford Road; St James’ Road; Wharf Road; and Brookfield (policy GT1).
   As set out in the Council’s response to the Inspector’s Further Preliminary Questions (EXAM4A), justification is provided in paragraphs 5.9 to 5.16 of the Green Belt Topic Paper, and relates to the presence of established traveller pitches at these locations. The Council is preparing a supporting statement relating to the specific circumstances relating to each of these sites which will accompany the Hearing Statement for Matter 7.

f) Meeting the needs of Travelling Showpeople on the Goffs Lane site (policy GT2).
   As set out in the Council’s response to the Inspector’s Further Preliminary Questions (EXAM4A), this policy is proposed to accommodate the only known additional (albeit unquantified) accommodation needs of travelling showpeople in the borough. The proposal would be achieved by expansion within the landholdings of the operator of the existing site, and is therefore considered deliverable.

g) Development that would ensure a “sustainable future” for the Cheshunt Country Club (policy CS1). Justification of the policy was provided by ensuring a sustainable future for the club as set out in the policy. It has become clear that the current landowners are proposing levels of development at the site which are incompatible with the aspirations set out in the policy and therefore the policy is not effective in this respect. A modification is therefore proposed to remove the policy and accompanying text from the Plan (see below).
Issue 4.3: Are the Plan’s Green Belt Development Management policies consistent with national policy, justified, and likely to be effective?
The Council responded to Preliminary Questions 27 and 28 relating to this [EXAM3A].

56. (a) Is policy GB1 consistent with NPPF paragraphs 87 and 89? (b) If not, is it justified?
As drafted, this policy does not fully consistent with these paragraphs. A modification to the policy is proposed which points to national policy to avoid duplicating the full list of provisions.

57. Policy GB2, which allows the redevelopment of disused horticultural glasshouse sites for self-build housing in certain defined circumstances, is not consistent with national policy relating to new buildings in the Green Belt. Is policy GB2 justified, and would it be effective in maintaining the openness and enhancing the visual amenity of the Green Belt?
Policy GB2 is justified by the need for a mechanism to address the problem of dereliction at glasshouse sites, which has been a long-term problem facing the borough, whilst avoiding giving residential hope value and hastening the decline and dereliction of the remaining sites. Demand for self-build and custom build in the borough centres on the availability of aspirational ‘rural’ sites rather than conventional housing sites. If self-build housing is to be delivered in the borough the approach facilitated by policy GB2 is the most practical way to achieve that. Policy GB2 could lead to pressure from site promoters to increase the level of development in order to meet the costs of providing a served site. However in such cases the policy would enable the Council to resist the development on Green Belt grounds. A modification is proposed to GB2 in order to make it effective.

58. Policy GB3, which allows “rural/farm diversification schemes” in certain defined circumstances, is not consistent with national policy relating to new buildings in the Green Belt. Is policy GB3 justified, and would it be effective in limiting the impact on the openness and visual amenity of the Green Belt?
The policy attempts to reconcile NPPF Green Belt policy with paragraph 28 regarding promotion of a strong rural economy. The policy is substantially the same as adopted 2005 Local Plan policy GBC14: Rural Diversification, which has been effective in limiting the impact on the openness and visual amenity of the Green Belt. A modification to part I d) is proposed to ensure consistency with national policies relating to new buildings in the Green Belt, in particular paragraph 90 which relates to re-use of existing buildings in the Green Belt. Deletion of Part II c) is proposed because this is not consistent with NPPF paragraph 87.

59. Is policy GB4, which states that the Council will strongly resist the removal of any restrictive occupancy conditions relating to rural housing, consistent with national policy, justified and is it likely to be effective?
This policy is based on policy GBC5 within the adopted 2005 Local Plan, which is effectively the second part to a criteria-based policy (GBC4) for determination of applications for agricultural and forestry dwellings. NPPF paragraph 54 relates to rural exception sites. Paragraph 89 (bullet 5) refers to Green Belt exception as follows: “limited affordable housing for local community needs under policies set out in the Local Plan.” It is understood that re-use of existing buildings, whether as
Council Hearing Statement Matter 4: Green Belt

dwellings or other use, are now permitted development under Class Q and therefore attempts to restrict the use of these through occupancy conditions would be ineffective.

In Broxbourne there are a small number of historic cases where market dwellings have been permitted with restrictive occupancy conditions relating to agriculture and forestry use. However as above it is recognised that provision of new market housing within the Green Belt is inappropriate and therefore this is something of a ‘legacy’ issue.

60. Is paragraph 26.17, which refers to housing being permitted in rural areas in certain circumstances, consistent with national policy and does it provide appropriate reasoned justification for policy GB4?

As set out the wording is not consistent with national policy in relation to Green Belt, in particular Paragraph 89. The Council is prepared to modify this paragraph to reflect the necessary modifications to ensure consistency with national policy as set out in response to question 59 above.

Issue 4.4: Potential Main Modifications

61. What, if any, main modifications are needed to ensure that the Plan is consistent with national policy, justified and likely to be effective with regard to development and the Green Belt?

<table>
<thead>
<tr>
<th>Policy</th>
<th>Proposed modification</th>
<th>Q. no</th>
</tr>
</thead>
<tbody>
<tr>
<td>Paragraph 14.3</td>
<td>This area provides strategic separation between metropolitan London and the southerly settlements of Hertfordshire. It is mainly characterised by attractive rolling farmland and woodlands. It is also interspersed by a number of public paths.—The only significant development issue is the future of the Cheshunt Country Club at Theobalds Park which is owned by Tescos and contains a number of sports facilities including a pavilion and sports pitches. The company has proposed that this area be allocated for a range of uses and has specifically identified its potential for development as a business park. That is not proposed within this Plan and the site remains in the Green Belt. Nevertheless, it is clear that there needs to be a solution for the building and the site.</td>
<td>55g, 127</td>
</tr>
<tr>
<td>CS1: Cheshunt Country Club</td>
<td>CS1: Cheshunt Country Club The Council will work with the land owner to secure a sustainable future for the Cheshunt Country Club that is compatible with its countryside location.</td>
<td>55g, 127</td>
</tr>
<tr>
<td>Policy GB1: Green Belt</td>
<td>Within the Green Belt, as defined on the Policies Map, permission will not be given for development identified within the NPPF as inappropriate development, unless very special circumstances are demonstrated which clearly outweigh the harm. Planning applications will be considered in line with the provisions of the National Planning Policy Framework.</td>
<td>56</td>
</tr>
</tbody>
</table>
| Policy GB2: Residential Development on Derelict Glass House Sites | i. Operating glass house sites will be safeguarded for horticultural production. Where horticultural production has ceased, their redevelopment for self-build housing will be considered in accordance with the following criteria:
   i) The glass houses were erected and in place prior to 20th October 2015; and | 57 |
| Policy GBC3: | i. Rural/farm diversification schemes will be permitted where: | 58 |
### Council Hearing Statement Matter 4: Green Belt

#### Policy GB4: Occupancy Conditions

Where a restrictive occupancy condition has been imposed, the Council will strongly resist the removal of the condition. Any applications for removal will need to demonstrate that:

- a) there is no demand in the Borough for rural workers dwellings; and
- b) the dwelling has been comprehensively marketed for at least two years to rural workers at an affordable price.

#### Policy

<table>
<thead>
<tr>
<th>Rural Diversification</th>
<th>Proposed modification</th>
<th>Q. no</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) the proposal retains existing or provides additional employment; and</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(b) the proposal is complementary to, and financially supports, the agricultural operation and farming activities; and</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(c) the scale and character of the use is not inappropriate to the rural location; and</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(d) the proposal <em>maximises opportunities to re-uses</em> existing buildings, <em>provided that these are of permanent and substantial construction</em>; and</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(e) the proposal will not result in a significant increase in adverse effects associated with site related traffic or have an unacceptable adverse impact on the local environment, residential amenity, or ecological interests or green belt openness when compared with the existing use.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>II. Where new buildings are required in connection to the use they must:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(a) be necessary to enable the diversification; and</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(b) be minimal in size and located adjacent to the existing buildings; and</td>
<td></td>
<td></td>
</tr>
<tr>
<td>c) have a limited impact on the openness of the Green Belt.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>III. Where appropriate, the Council welcomes proposals that would involve the conversion of suitable premises for visitor or tourism activities, subject to compliance with national policy and the policies in this Plan.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Church Lane School Proposal

1:2500 @ A3

- **Soft PE:** Approx. 30,260 sqm including full-size G3 football & hockey pitches, MUGA and ancillary building.
- **Hard PE:** Approx. 3,425 sqm including 5-court sports hall & facilities and MUGA.
- **Hard & soft informal & social:** Approx. 7,200 sqm.
- **School Building:** Indicative footprint for 10,853 sqm G+1.
- **Vehicular parking:** 262 spaces.
- **Tree Category A:** High Quality
- **Tree Category B:** Moderate Quality
- **Tree Category C:** Low quality
- **Tree category U:** Unsuitable for retention
- **New tree planting**
- **Sports Hall**
- **Developed area**
- **Hard & soft landscaping**
- **All-weather sports**
- **Buildings**
- **Parking**
- **Environmental mitigation**
- **Cycle-parking:** 410 spaces.
- **SUDS Drainage:** Approx. 1,625 sqm + additional landscaping.
- **Primary Access onto the Turnford Junction off-slip**
- **Secondary Access onto Church Lane**
Broxbourne Local Plan 2014-2030
Secondary school site options

Purpose of report
To discuss the options for providing sufficient secondary education places in the borough for the period to 2030 as an integral part of the new Local Plan.

Background
There are currently 7 secondary schools within the borough
John Warner, Stanstead Road, Hoddesdon – a 6 forms of entry (fe) school with academy status. It is currently full and over subscribed
Sheredes School, Cock Lane, Hoddesdon – a 6 fe school. Some spare capacity at present.
Broxbourne School, High Road, Broxbourne – a 7 fe school with Academy status. It is currently full and over subscribed.
Turnford School, Mill Lane, Cheshunt - a 6 fe school with some spare capacity.
Cheshunt School, College Road, Cheshunt – a 6 fe foundation specialist technology college with significant spare capacity.
Goffs School, Goffs Lane, Cheshunt – a 6 fe school with no spare capacity.
St Mary’s High School, Lieutenant Ellis Way, Cheshunt – a 8 fe CoE school with academy status with some spare capacity.

There are a number of ongoing and potential schemes to improve secondary education provision within the borough which are summarised below.

John Warner School has a phased programme of improvements to replace outdated buildings with new teaching blocks. It has recently submitted a planning application to demolish the existing mathematics block and replace it with a two storey 8 classroom building. These proposals will not though increase the capacity of the school.

Sheredes School has no current improvement proposals but it is known that it would like to improve the sporting facilities on the site.

Broxbourne School is looking to promote through the Local Plan a comprehensive scheme to provide a new school on part of the existing playing fields to be funded by residential development on the site of the existing school buildings. This would increase the capacity of the school to 8 fe. This proposal is supported in principle by the Council and will be included as a proposed allocation in the new Local Plan.
Cheshunt School is progressing a phased improvement programme and has submitted a planning application for residential development on part of the existing school site and the construction of a new science and technology block and sporting facilities for the school. The Council has approved a planning brief for the residential development and supports in principle the school’s objectives. At present the school has only around 500 pupils against a possible capacity of 1,100.

The Council is not aware of any proposals for improvements at Turnford School.

St Mary’s School has planning permission for additional buildings but this would not extend its capacity beyond 8 fe (about 1,500 pupils).

Goffs School has been granted planning permission for the redevelopment of the school within its existing site. This will provide a small additional increase in 6th form capacity which will increase the school role to 1,350 pupils from 1,292. It will not increase the overall fe capacity of the school.

There are therefore a number of ongoing and planned developments which will improve secondary education facilities in the borough and will increase the overall fe capacity within Broxbourne. However, even with these improvements the County Council considers that there is a further requirement to increase secondary school capacity in the borough. By 2024 it forecasts a deficit of 3.5 fe and given the development proposals in the Local Plan forecasts a need for a further 3 fe by 2030. It has requested the Council to reserve a new site for a secondary school in the new Local Plan, preferably in the central to northern half of the borough. This paper assesses the site options for delivering this.

**Broad Options**

There are two broad options for meeting the requirement for improved secondary education provision in the borough:

1. Extending and improving existing schools
2. The identification and allocation of a site for a new school in the Local Plan
3. Relocating and extending and expansion school.

As mentioned above a number of the borough’s secondary schools are already progressing improvement plans. In some cases these will improve capacity e.g. Broxbourne School, in others they will just replace outdated buildings with modern facilities e.g. Goffs School. The County Council has already factored into its forecasts the current planned and emerging proposals to improve secondary education capacity.
in the borough. Given the limited scope to improve capacity at the remaining schools, mainly because of site constraints, it is considered that the projected need for an additional 6.5 fe of entry by 2030 can only realistically be met through the provision of a new school or possibly through the relocation and expansion of an existing school.

**Site requirements**

The borough’s existing secondary schools have varying site areas. John Warner has a total site area of 6.78 hectares, Turnford 6.77 hectares, Cheshunt (after the disposal of part of the site for housing development) 10.13 hectares. Building Bulletin 103 published by the Department for Education and the Education Funding Agency provides area guidelines for mainstream schools. From this it is considered that a site of 8 - 9 hectares is required to meet modern education requirements with the required associated playing fields for a secondary school accommodating 1,200 pupils (6 fe).

Any site should preferably be flat, with convenient access to the main road network, good public transport links and be located on the edge of the urban area. Given that any site to be allocated in the Local Plan would probably be taken out of the green belt regard must be paid to the potential impact on the green belt and other planning considerations such as flood risk, landscape impact and ecological considerations. The County Council has indicated a preference for a site in the mid to northern half of the borough.

**Site options**

In preparing the new Local Plan the Council has concluded that the borough’s future development needs can only be met through the allocation of some sites in the green belt for development. The Council has undertaken a Strategic Green Belt Review to inform the preparation of the new Local Plan and from this has identified 6 broad areas which should be the preferred areas of search for potential development sites in the green belt. Development Options reports have been prepared for 5 of these areas and the other (land west of Hoddesdon) has been the subject of a planning application for a major housing development.

Three of these broad areas are located in the mid to northern half of the borough:

- West of Hoddesdon
- West of Wormley
- Brookfield Area

It is considered that the search for a new secondary school site should focus on these areas.
Planning permission has been granted, subject to a s106 agreement, for High Leigh Garden Village west of Hoddesdon. The approved scheme includes a site for a new primary school. Whilst this development only covers part of the overall West of Hoddesdon area it is considered that there are no potential secondary school sites in this area given the site requirements. The search for a new school site should therefore focus on West of Wormley and Brookfield.

West of Wormley includes the site of Broxbourne School which is subject to emerging redevelopment proposals. Land north of Church Lane is largely in recreational use and includes the borough’s Wormley Playing Fields which provides a range of outdoor recreational facilities. An area of land south of Church Lane, Wormley is identified as a potential development site (see plan below). The total site area is 24.82 hectares. The Development Options paper discusses the potential options for this area and concludes that “of the three possible options for change opening the land south of Church Lane up as community open space would have the least negative impact, with potentially major benefits in terms of allowing better enjoyment of its attractive parkland landscape.”

The Brookfield Area Development Options Paper discusses the potential of a comprehensive development to the north and west of the existing Brookfield Centre to provide up to 1,800 homes, new retail and leisure floorspace, commercial and civic offices and associated community facilities. The new Local Plan is likely to include this proposal as a strategic allocation (referred to as Brookfield Park) and remove around
125 hectares from the green belt. The proposals include allocating two sites for new 2 primary schools. There is the additional option of allocating a site within the overall masterplan for a new secondary school.

The conclusion is that there are two broad options for a new secondary school site in the borough:

Land south of Church Lane, Wormley
As part of the overall masterplan for Brookfield Park

**Land south of Church Lane, Wormley**
The total site area of this land is 24.82 hectares of which the northern 19.88 hectares is owned by the Borough Council.

This is a predominantly flat area of land which is located between Church Lane to the north, the A10 to the west, the A10 Turnford slip road to the south and the New River to the east. Beyond the New River is the urban area of Wormley and Turnford and to the north of Church Lane is the Council owned Wormley Playing Fields.

Vehicular access to the site is via Church Lane which connects to the east with High Road Wormley (A1170). The site is located within 400 metres of the centre of Wormley which provides a range of local shopping facilities. A number of regular bus services run along the A1170 connecting with Broxbourne and Hoddesdon to the north and Cheshunt and Waltham Cross to the south. The New River footpath runs along the eastern boundary of the site which connects to the south with the Brookfield area and Cheshunt and to the north with Broxbourne and Hoddesdon.

The site is primarily given over to open grassland. The northern part of the site includes a number of trees which are the subject of a Tree Preservation Order. The Order was made in 1981 is an area order and includes “all trees whatever species” on the land owned by the Borough Council. This area is also identified as a wildlife site. The Hertfordshire Biological Records Centre describes it as follows:

“Old parkland composed of neutral to slightly acidic grassland with many large parkland trees, mainly Common Lime (Tilia x europaea). The sward is moderately diverse and includes species such as Common Knapweed (Centaurea nigra), Bird's-foot Trefoil (Lotus corniculatus), Sweet Vernal-grass (Anthoxanthum odoratum), Meadow Vetchling (Lathyrus pratensis), Field Wood-rush (Luzula campestris), Common Sorrel (Rumex acetosa) and Sheep’s Sorrel (Rumex acetosella). Additional tree species present include Pedunculate Oak (Quercus robur), Norway Maple (Acer platanoides), Horse-chestnut (Aesculus hippocastanum), Beech (Fagus sylvatica) and Betula pendula. Patches of regenerating Silver Birch scrub and numerous large ant hills are also
present. Wildlife Site criteria: Grassland indicators.”

Part of the southern part of the site which is outside the Borough Council's ownership is identified as a high risk flood area. An aerial photo of the site is shown below.
The nearest existing secondary school is Broxbourne School which is located 1300 metres to the north via Church Lane and the A1170.

The advantages of this site for a new secondary school are:

- It is more than large enough and the topography and shape of the site could readily accommodate the new school buildings and associated playing fields and other facilities.
- Nearly 20 hectares of the site is owned by the Borough Council and is therefore potentially available and deliverable.
- The site is centrally located within the borough.
- The site is well located to existing bus services which connect to most parts of the borough.
- The site is well located to the New River footpath.
- The site is well located to Wormley village centre.
- There is potential to provide, as an integral part of the development, new joint use sporting facilities which could complement the existing facilities provided on the northern side of Church Lane.
- There is the potential to provide car parking within the site which could also serve the playing fields where at peak times there is inadequate off street car parking.
- A school could be accommodated on this site without causing any undue impact to any adjacent residential properties.
- Vehicular access could readily be provided from Church Lane with space within the site to provide pupil dropping off and picking up facilities so as not to prejudice highway safety along Church Lane.
- The site is located within close proximity of the proposed Brookfield development which is the major new housing development planned in the borough. Whilst the A10 is a barrier there is scope via the New River footpath to provide pedestrian (and cycle) access from Brookfield to this site.
- The development of this site for a new secondary school would not prejudice any other potential development options.

The disadvantages of this site are:

- It is an identified wildlife site. The scale of the site is though sufficient to enable areas to be retained as habitat areas which would be required in any event to support a new secondary school.
- All the trees on the site are protected by preservation order. However, it should be possible to deliver a scheme which would be able to retain many of the best trees whilst enhancing the appearance of the proposed development.
• Improvements would be required to Church Lane given the rural nature of the road west of the New River and the design of the bridge over the New River.

• Any development would inevitably impact on the landscape character of the site. However, a school and associated playing fields could be delivered which would retain its essentially open character.

Brookfield Park
The key strategic proposal in the Local Plan is the Brookfield Development which will provide:

• Up to 1,850 new homes
• Up to 47,000 gross sqm of office floorspace for business uses
• A new Civic Centre for the Borough
• 36,000 sqm gross (28,000 sqm net) of retail floorspace
• 12,000 sqm gross (10,000 sqm net) of leisure floorspace
• Two number two forms of entry primary schools
• A new access road from the A10 Turnford interchange
• Associated open space and community/recreational facilities

This will include the release of around 125 hectares of land to accommodate a garden village development to the north and west of the existing Brookfield Centre. This development will incorporate around 1,500 family and executive homes, new primary schools, open space and other community facilities and the relocation of the gypsy site, the allotments and possibly the Council depot and the household waste site.

Consultants are to be appointed to prepare a masterplan for Brookfield Park and the overall development could accommodate a site for a new secondary school.

The advantages of this site for a new secondary school are:

• Much of the perceived need for a new school is generated by the housing development proposed at Brookfield Park. The school will therefore be very well located to serve this need limiting the need to travel.

• The school could be provided and funded as an integral part of the overall Brookfield Park development providing facilities to support the adjacent residential development.

• It is intended that new bus routes and footways/cycleways will be delivered as an integral part of the development linking Brookfield Park with the borough’s existing urban areas. A secondary school in this location would therefore be well located for non-car modes of travel.

• A secondary school could co-locate with one of the proposed new primary schools.
The land is in public ownership and therefore in theory available for such a development.

The disadvantages of this site are:

- Due to the physical and other constraints which impact on the overall Brookfield Park development there is no scope to extend the area to be removed from the green belt to accommodate a secondary school. It could only therefore be provided within the development at the expense of housing development. A 9 hectare site could accommodate around 270 houses assuming a medium density development of 30 dwellings per hectare. Such a loss of housing would need to be provided elsewhere within the borough necessitating the allocation of other less acceptable green belt site(s) for housing development.
- A key advantage of the Brookfield Park development as currently envisaged is that it will provide a comprehensive and integrated mixed use development providing a range of housing in an attractive environment. Once you start to dilute individual elements it has knock on implications for other aspects of the scheme. For example, reducing the scale of housing development at Brookfield Park would in itself reduce the on-site requirement for primary and secondary education facilities. It could also fundamentally impact on the overall viability of the scheme and its ability to deliver the associated infrastructure and affordable housing.
- At present the County Council’s requirement is to reserve a site for a new secondary school. There is no guarantee that a school will be required and if so when it would be provided. Reserving a site at Brookfield Park could prejudice the delivery of a comprehensive masterplan. In that respect a freestanding site that could revert to an alternative open use should the school not be required would be preferable.

Relocation and expansion of an existing school

As mentioned at the outset there is the possible option of relocating one of the borough’s existing secondary schools to a new site to facilitate its improvement and expansion. In terms of site options Church Lane, Wormley or Brookfield Park would remain the only feasible and deliverable options which have been identified. The potential benefit of this option is that it could release the existing school site for housing development. If relocated to Church Lane, Wormley this would be an additional allocation which would reduce the requirement to release green belt land elsewhere in the borough for housing. If Brookfield Park was chosen it would offset the loss of land within that overall development for housing. It is considered that the most obvious school to relocate would be Turnford as this occupies a constrained site and many of the existing school buildings are outdated by modern standards. The School occupies a
site of 6.8 hectares which if developed could in theory accommodate at 40 dph around 270 houses. It should though be noted that this site is currently within the green belt, part is identified as a high risk flood risk area and access is constrained.

Aside from any site specific constraints which could affect the delivery of this option it raises two fundamental concerns. Relocating and expanding say a 6 fe school to create an 8 fe school would only result in an additional 2 fe capacity in the borough. The County Council forecasts a requirement for 6.5 fe by 2030. Delivery would require the support and involvement of the school in question. Whilst there are potential benefits in providing new up-to-date educational and supporting facilities such an approach would result in considerable upheaval for the school and could prove very challenging to deliver. For these reasons this option is not favoured.

**Conclusions**

Whilst it might initially appear logical to plan for a new secondary school as an integral part of the proposed Brookfield Park development the conclusion is that the land south of Church Lane should be the preferred location if a site is to be reserved in the Local Plan. The key benefits of this location are:

- It is centrally located within the borough with good accessibility to existing bus services and Wormley village centre.
- The site is in public ownership and deliverable.
- With improvements to footpaths and cyclepaths the site is well related to the proposed Brookfield Path development.
- Development on this site would not prejudice any other potential opportunities. Pending development it could be retained in its current use and if the site is not required for a secondary school it could be retained as informal open space.
- It would provide an attractive setting for a new school.
- There would be an opportunity to provide leisure and recreational facilities to complement those provided at Wormley playing fields to the north of Church Lane.

It is recommended that the suitability of this site be considered further in liaison with the County Council.
Dear Martin

Herts and Middx Wildlife Trust have considered the ecological information supplied to us by Land Use Consultants regarding the Church Lane proposed development site in Wormley. The site is a registered local wildlife site and as such our preferred option would be to avoid any impacts on the site by locating the development elsewhere. If this is not possible, and it is deemed in the public interest to pursue a development here, the ecological information supplied demonstrates that it is possible to deliver a real and measureable net gain to biodiversity, as required by the emerging local plan and NPPF. The application of the DEFRA metric as contained in the Biodiversity Impact Calculator shows that if the avoidance, mitigation and compensation measures stated in the ecological report are applied, the development can deliver a measurable net gain in terms of habitats. The measures concerning the mitigation of impacts on species are also acceptable.

It is critical that if and when an application is forthcoming on this site, the measures in the ecological report must be translated into the proposals in a clear and transparent way. Measures must be definitively stated and marked on plans, habitat creation and management measures must be clearly stated and the mechanisms for ensuring their delivery in perpetuity must also be made clear. This includes areas of responsibility and evidence that the financial processes are in place to provide certainty that the stated management can be delivered.

I hope this makes our position clear. If you would like any further information or to discuss our response please do not hesitate to get in touch. We are also able to advise on how the proposals can deliver even more biodiversity gain by imaginative measures that may not involve increases in costs.

Best wishes

Matt

Matt Dodds
Planning & Biodiversity Manager
Herts & Middlesex Wildlife Trust

This email has been scanned by the Symantec Email Security.cloud service. For more information please visit http://www.symanteccloud.com