



**BOROUGH OF
BROXBOURNE**

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Green Belt Topic Paper



June 2017

Planning Policy Team

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Executive Summary

- i. *This Topic Paper sets out the justification for the exceptional circumstances necessary under national planning policy to release sites from the Green Belt through the Local Plan review process.*
- ii. *The Topic Paper begins with an overview of the whole of the Green Belt in Broxbourne (see also Appendix A), and then proceeds to sift out a number of areas for further consideration.*
- iii. *The case for exceptional circumstances is based on 26 criteria grouped under five broad headings: Local Plan strategy; the Green Belt; sustainable place-making; design, landscape and biodiversity; and transport, as set out in Table 1 and applied in Appendix B. The Topic Paper also considers the principles established in a recent legal judgment (“Calverton”), including the intensity of need, constraints, difficulty of achieving sustainable development without Green Belt release, the nature and extent of harm to Green Belt, and the potential for mitigation of impacts on the Green Belt.*
- iv. *Based on this analysis, it is considered that exceptional circumstances exist to merit release of land from the Green Belt at the following locations: Britannia Nurseries site, Waltham Cross; Broxbourne School (residential area only); Brookfield Garden Village and Brookfield Riverside; north of Cuffley Hill; north and south of Goffs Lane; Newgatestreet Road; Rosedale Park North and South (Rags Brook and Tudor Nurseries); Bury Green; Park Plaza West; Maxwells Farm West and Rush Meadow; Albury Farm east of the A10; and High Leigh Garden Village. This will result in retention of 86% of the Borough’s Green Belt, including the majority of the best performing areas, and improving access to the countryside and open space. Maps of the areas proposed for removal from Green Belt are contained in Appendix E.*
- v. *In relation to glasshouse sites in the Green Belt, it is proposed to apply a self-build policy within the Green Belt in order to enable the tidying up of derelict sites. The only exception to this is Tudor Nurseries, which is proposed for release from Green Belt by virtue of its combination with the Rags Brook development proposals to create extensive new parkland at Rosedale Park.*
- vi. *Rather than release school sites from the Green Belt, it is considered that retention of these sites in the Green Belt and designation with a school sites policy offers the best combination of control and flexibility, enabling educational objectives to be achieved through targeted planning applications.*

1. Introduction

- 1.1. Broxbourne Borough Council is preparing a new Local Plan to guide development in the Borough over the next 15 years. The Borough-Wide Options and Scenarios Report (April 2016)¹ demonstrated that having examined all the available options in the urban area, it is not possible to accommodate the borough's housing and development needs without some release of Green Belt.
- 1.2. The main purpose of this Green Belt Topic Paper is therefore to draw on the available evidence as well as the evidence of the emerging strategy underpinning the Local Plan to reach a balanced judgement as to whether there are specific locations where the necessary exceptional circumstances exist to suggest that Green Belt should be released for development. The Topic Paper also considers the long-term future of the Green Belt in Broxbourne.

Aim and purposes of Green Belt

- 1.3 The National Planning Policy Framework (NPPF) states that *“the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and permanence.”* (NPPF paragraph 79)
- 1.4 The NPPF defines five purposes² of Green Belt as follows:
 - 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
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land
- 1.5 A Green Belt Review was undertaken in 2008 which assesses the performance of all areas of Green Belt against the aim and purposes of Green Belt. This Topic Paper does not repeat that assessment but where appropriate does draw on the judgements made in that study to inform the judgements made about release of Green Belt.

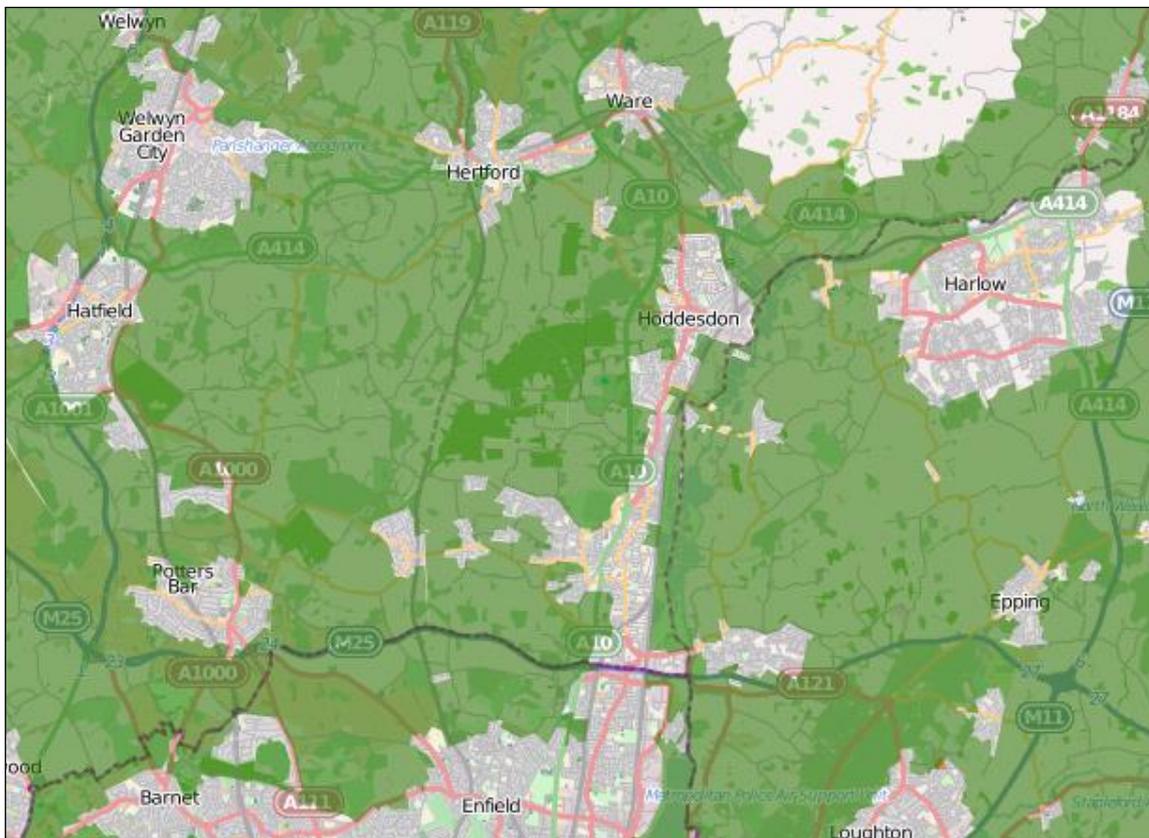
¹ See www.broxbourne.gov.uk/evidencestudies

² NPPF Paragraph 80: <https://www.gov.uk/guidance/national-planning-policy-framework/9-protecting-green-belt-land>

Green Belt in Broxbourne

- 1.6 Broxbourne shares a boundary with the London Borough of Enfield. It is located within the Metropolitan Green Belt, which was first proposed in 1935, and the 1947 Town and Country Planning Act, and enabled Green Belt proposals to be incorporated in the first development plans. The original Green Belt in Hertfordshire was based on proposals in Abercrombie's Greater London Plan of 1944. It covered a ring around the London that was south of a line roughly from Hemel Hemstead to St. Albans and Hertford. The Hertfordshire Structure Plan reviews have extended the Green Belt adding 5,000 hectares along the Stort corridor as far as Bishop's Stortford.
- 1.7 The primary role of the Metropolitan Green Belt is to stop the growth of London from continuously growing into the surround countryside. The Green Belt around Broxbourne is characterised by rural agricultural areas, open countryside with high landscape value and important natural areas. The Green Belt also contains Broxbourne Woods part of a Special Area of Conservation (SAC), Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs), the Lee Valley Corridor (includes a Special Protection Area (SPA) and RAMSAR site for their importance of the area for birdlife) plus a large number of local wildlife sites. All these areas are marked on Broxbourne Local Plan Policies Map. Figure 1 details the Green Belt in the borough and in the surrounding area:

Figure 1: Green Belt in Broxbourne and surrounding area



- 1.8 Records show that all of the Green Belt that currently exists in Broxbourne was designated as part of the original Metropolitan Green Belt. It therefore performs both a local role in terms of the aim and purposes set out in national planning policy and a wider role to prevent the outward sprawl of London.
- 1.9 The borough's Green Belt not only consists of swathes of open countryside interspersed with woodland, agricultural land and farming activities, it also includes a number of businesses and uses that have become established in the Green Belt or justified as being acceptable. This includes a number of disused glasshouses and horticultural and nursery sites, leisure facilities and sports pitches, education establishments, cemeteries, allotments as well as some properties and industrial activities. These uses do not mean that the land does not fulfil Green Belt purposes set out in the NPPF or mean that the land should be released from the Green Belt or redeveloped.

'Very special' and 'exceptional' circumstances

- 1.10 National policy makes a distinction between 'very special' circumstances that need to be demonstrated to justify inappropriate development in the Green Belt through planning applications, and 'exceptional' circumstances that need to be demonstrated to alter Green Belt boundaries through the plan-making process.
- 1.11 In relation to planning applications, national policy states: *As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances....When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.*³
- 1.12 In relation to plans, national policy states: *Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.*⁴ Neither national policy nor guidance set out what should be considered 'exceptional' or 'very special' circumstances'.
- 1.14 The Green Belt Topic Paper forms part of the evidence base for the Local Plan and therefore the focus of this document is on 'exceptional' circumstances' rather than on 'very special circumstances'.

³ National Planning Policy Framework, paragraphs 87-88

⁴ National Planning Policy Framework, paragraph 83

Previous Green Belt studies

- 1.15 The [2008 Green Belt Review prepared by Scott Wilson](#) and the [2008 Review of the Inner Green Belt Boundary prepared by Prospect Planning, both prepared for Broxbourne Borough Council](#), are informing the Local Plan process.
- 1.16 The Green Belt Review prepared by Scott Wilson divided the borough into five areas and then a further 139 sub-areas and assessed them against three of the Green belt purposes i.e. checking unrestricted sprawl, preventing merging and safeguarding countryside. The other two purposes, preserving historic towns and assisting in urban regeneration were not assessed. This is because the study concluded that Broxbourne is not considered to be an historic town (although it does have some historic heritage) and all Green Belt land would gain the same score in regeneration terms as it all assists in this process by directing development to the urban area.
- 1.17 The Review scored the areas against the three purposes. A maximum of 5 points could be awarded for areas under purposes 1 and 2 and a maximum of 20 points for purpose 3 as it had more definable criteria. These scores were weighted to ensure that purpose 3 held equal importance to the other two purposes. The results and assessment by sub-area are contained in a table within Appendix A of the Review.
- 1.18 A summary of the results of the Review is as follows:
- Green Belt located in the north-west of the borough provides a buffer between Broxbourne and open countryside and separates the urban area of Broxbourne with Hertford Heath;
 - Green Belt located in the south-west separates a number of settlements and Cuffley from the large urban area of Broxbourne;
 - Green Belt located to the south provides a barrier between the large urban area of Broxbourne and the London Borough of Enfield;
 - Green Belt to the east forms part of the Lee Valley Regional Park and provides a barrier between the urban area of Broxbourne and settlements in the district of Epping Forest;
 - In terms of inner Green Belt boundaries, the study identified areas around St James, Goff's Oak village, south of Bury Green and west of Hoddesdon as being particularly weak;
 - It recommended that Green Belt boundaries around Bury Green and south of Cock Lane in Hoddesdon could be amended to strengthen them and to remove the most poorly performing sub-areas; and
 - It recommended 'long term area of search' and 'open space protection' policies for other weak areas, more specifically, land north of Goff's Lane and south of Hammondstreet Road and all land east of the A10 i.e. land north and south of Church Lane Wormley, land north and south of Dinant Link Road and Barclay Park in Hoddesdon.

1.19 The Inner Green Belt Boundary Review prepared by Prospect Planning approached the assessment in the following manner:

- Land considered to fulfil a strategic Green Belt function in terms of maintaining separation of towns was identified and recommended for safeguarding as Green Belt. This then met the requirement of Green Belt purposes 1 and 2 (check unrestricted sprawl and prevent merging);
- Land which displayed strong countryside characteristics and was visually closely related to the wider open countryside was also identified and recommended for safeguarding as Green Belt. This then met the requirement of Green Belt purpose 3 (safeguarding countryside);
- Green Belt land which abuts the Borough's six Conservation Areas was assessed to see whether it made an important contribution to the character and appearance of that Conservation Area, in which case it was also recommended for safeguarding as Green Belt, thereby meeting the requirements of Green Belt purpose 4 (preserving historic towns).

1.20 A summary of the outcomes of this study are as follows:

- There are areas to the east of the A10 in Hoddesdon that could be released and safeguarded. Land between Lord Street and Cock Lane however should be retained in the Green Belt;
- Land to the east of the A10 in Wormley should be retained in the Green Belt but land to the east of Broxbourne up to the River Lee should be removed and protected by other policy constraints (open space/Conservation Area). Land at Broxbourne School should be removed;
- Land at Brookfield, to help support development (strategic site identified in the previous Core Strategy), to be released and new boundaries created through planting but Cheshunt Park to be retained;
- Goff's Oak, between Hammondstreet, Newgatestreet Road, Goff's Lane and the main urban area, no longer plays a part in preventing coalescence and only a local role in preventing sprawl and should be reviewed and masterplanned accordingly;
- Land at Bury Green should be removed as Lieutenant Ellis Way provides a more robust defensible boundary;
- Land to the south of the borough performs an important Green Belt function by preventing the merging of Broxbourne and Enfield.

1.21 The Scott Wilson study provides a comprehensive assessment of the borough's Green Belt particularly individual small parcels of the Green Belt. The Prospect Planning study did not include an assessment of all of the borough's Green Belt and instead focussed on areas which were considered more likely to come forward for development. This makes the assessment less comprehensive than the Scott Wilson study and therefore focuses too heavily on the development potential of sites rather than their contribution towards Green Belt purposes.

Previous Local Plan Inspectors' Reports

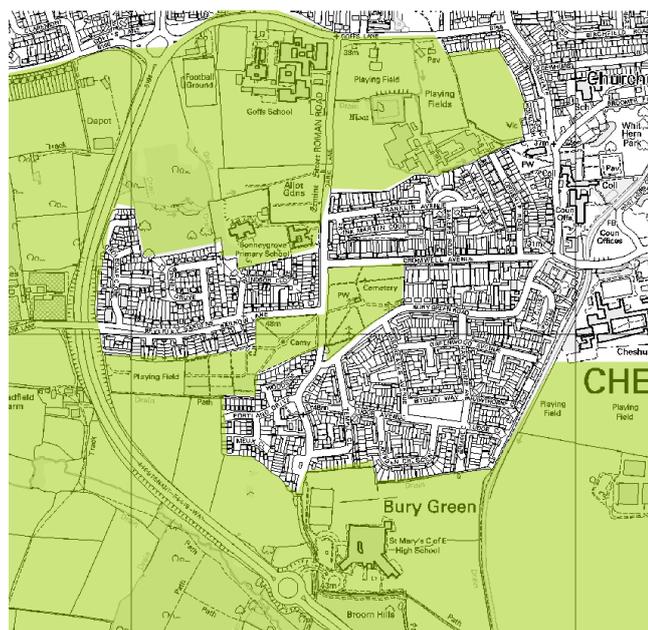
1.22 In preparing this Topic Paper the Council has had regard to the reports of the 2005 Local Plan Inspector and the 2011 Core Strategy Inspector. Extracts from both these documents are contained at Appendices C and D respectively. It should be noted that since the publication of these reports PPG2 (previous guidance on Green Belt) has been cancelled and replaced by the NPPF, which although substantially the same, differ in the amount of weight given to housing need in terms of providing 'exceptional circumstances' (see section 2 below), hence the Council's criteria-based approach set out in Section 2 of this report.

Promoting Sustainable Patterns of Development

1.23 Paragraph 84 of the NPPF states that *"When drawing up or reviewing Green Belt 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 outer Green Belt boundary."*

1.24 The whole of the open area of Broxbourne is designated Green Belt and, on the assumption that Broxbourne will try to meet its own development needs within its administrative area, a number of development options reports were produced to inform the development of the Local Plan and which were published in April 2016. These are the Development Options Reports for Bury Green, Park Plaza, Brookfield, West of Wormley, and the Borough-Wide Options and Scenarios Report. Each of these studies explored Green Belt issues in some detail, in the context of potential Local Plan growth options and the implications for sustainable patterns of development.

1.25 Through this work one of the most significant conclusions for future patterns of development was the proposal to redraw the Green Belt in Bury Green along Lieutenant Ellis Way. The 2008 *Green Belt Review* carried out by Scott Wilson, divided the Bury Green area into 7 sub-areas. It recommended release of all of these sub-areas due to weak boundaries, weak performance in relation to



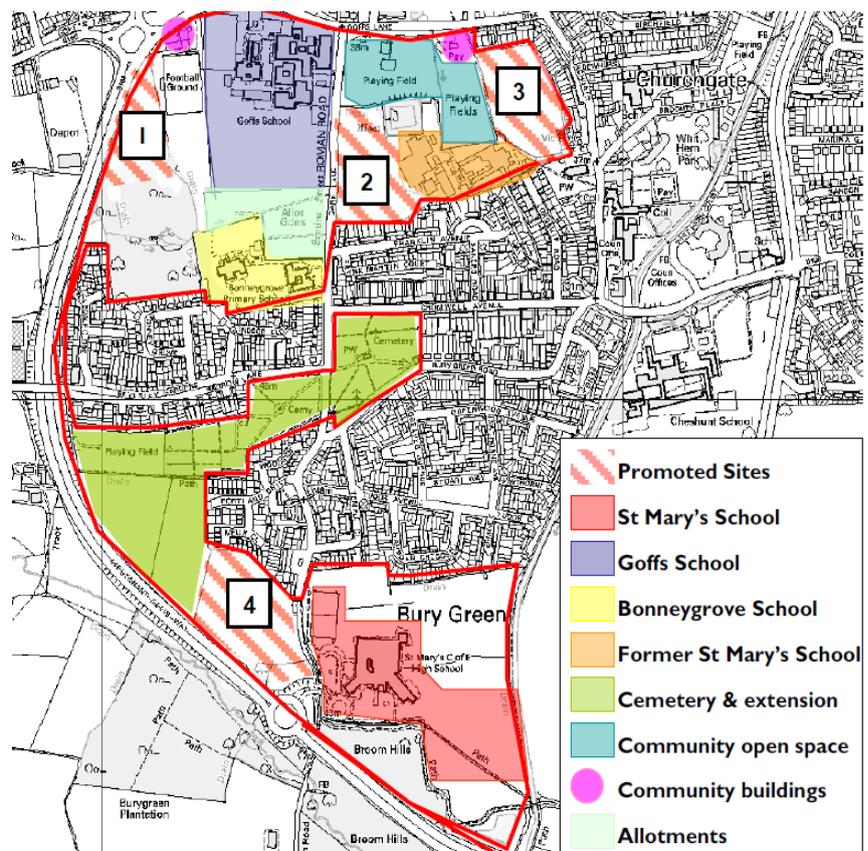
8 **Figure 2: Green Belt in Bury Green (2005 Local Plan)**

the five purposes of retaining green belt and because of its urban character. It recommended that Lieutenant Ellis Way becomes the new green belt boundary as it would provide a more robust and permanent boundary and would prevent further encroachment towards the west.

1.26 These conclusions were reinforced by the *Review of the Inner Boundary of the Green Belt* prepared by Prospect Planning in 2008, identified its urban land uses and its proximity to the urban area as a weakness of the Bury Green area and agreed that Lieutenant Ellis Way would be a more defensible green belt boundary. It also identified land fronting Lieutenant Ellis Way, the V&E Sports Club at Goffs Lane and land east of Dark Lane as having the potential for future development.

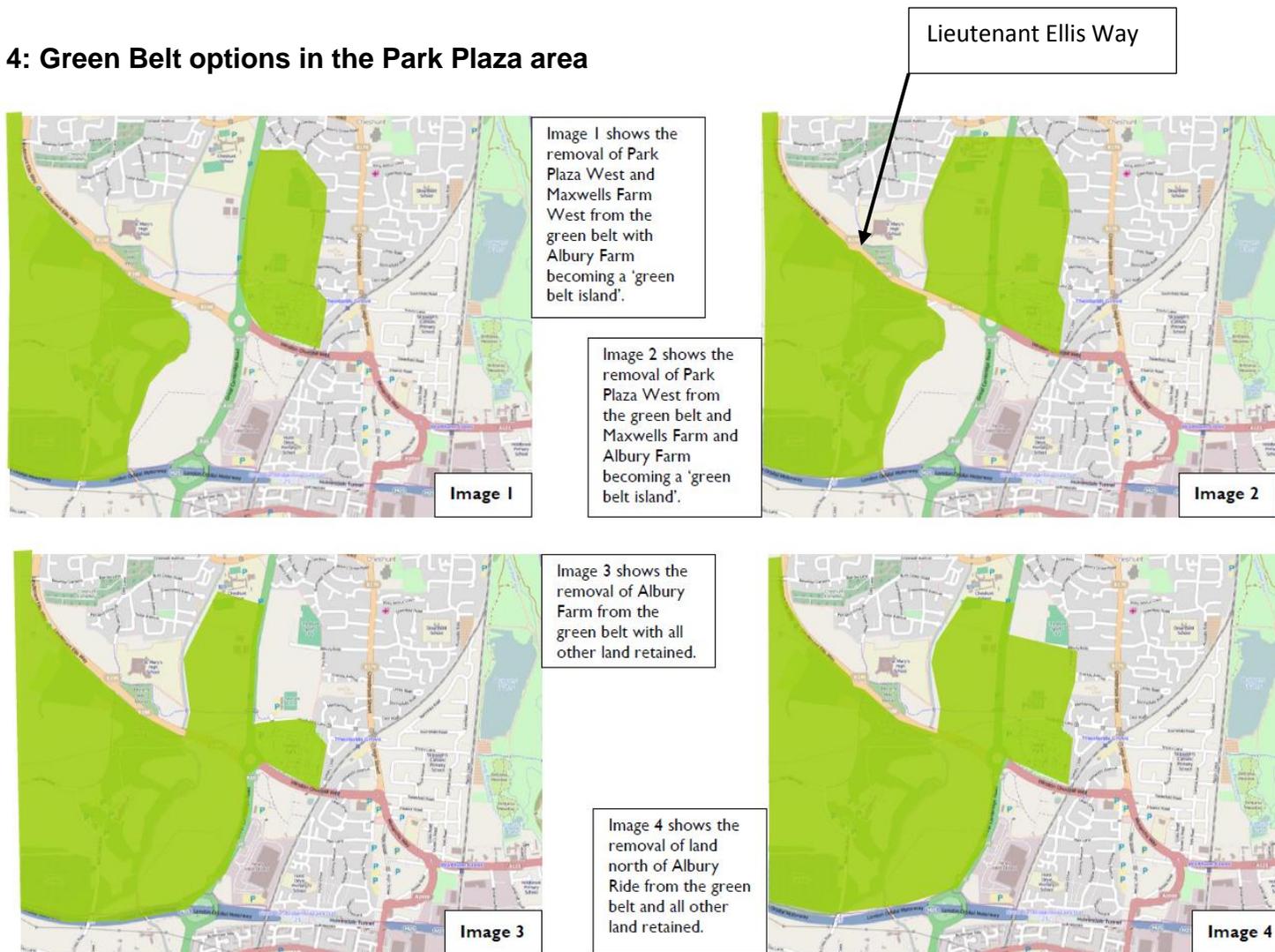
1.27 The Bury Green Development Options Report (April 2016) pointed to the potential for re-designation of the area with more appropriate policies based on the existing and proposed land-uses, as set out in Figure 3.

Figure 3: Existing and proposed land uses in Bury Green.



1.28 Consideration of the implications of growth proposals, including development in the Albury area and at Park Plaza, as well as the implications of redrawing the Green Belt along Lieutenant Ellis Way, were set out in the Park Plaza Development Options Report. Figure 4 below illustrates the strategic-level thinking which has informed site-level consideration of options.

Figure 4: Green Belt options in the Park Plaza area



Source: Park Plaza Development Options Report, April 2016, page 39

2 Defining 'Exceptional Circumstances'

- 2.1 Neither the NPPF nor the Planning Practice Guidance (PPG) defines 'exceptional circumstances', and therefore each Local Planning Authority must decide for itself whether these circumstances exist in relation to designated Green Belt within their administrative area.

Examination of all the other reasonable options

- 2.2 The Housing White Paper 'Fixing our Broken Housing Market' (February 2017) re-emphasizes that part of the test of exceptional circumstances requires that all other reasonable options have been considered first before Green Belt boundaries are amended. The White Paper states that "*we propose to amend and add to national policy to make clear that...authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including:*
- *making effective use of suitable brownfield sites and the opportunities offered by estate regeneration;*
 - *the potential offered by land which is currently underused, including surplus public sector land where appropriate;*
 - *optimising the proposed density of development; and*
 - *exploring whether other authorities can help to meet some of the identified development requirement."*
- 2.3 As part of its emerging Local Plan evidence base, the Council considered the options for use of suitable brownfield land and underused land through the Borough-Wide Options and Scenarios Report (April 2016). The report drew together the evidence assembled from the emerging Strategic Land Availability Assessment (SLAA), which considered a wide range of sites within the urban area, together with completions and existing commitments.
- 2.4 The report identified the Waltham Cross Northern High Street and Delamare Road areas (vacated by Tesco's headquarters) as the only significant intensification opportunities. The development of 'commuter hubs' around the stations were also considered
- 2.5. Taking account of all the above, the report concluded that there was a shortfall of 3,700 homes, once the potential of urban sites had been assessed.
- 2.6 During the early stage of plan preparation a shortfall of around 1,000 homes against the borough's Objectively Assessed Needs was anticipated. A workshop was held on 16 June 2015 to which a number of Local Planning

Authorities were invited⁵. At that meeting it became clear that none of the authorities was in a position to accommodate any of Broxbourne's housing needs over the plan period. The Head of Planning and Development wrote to all the authorities concerned to confirm this position in a letter dated 4 August 2015. No responses were received to suggest that any authorities were in a position to assist

- 2.7 Following this, recognising the potential of the Delamare Road area, the Council decided to address the unmet need through the expansion of the proposed allocation at Delamare Road, raising the proposed number of dwellings from 400 in the October 2015 Framework Document to 1,000 in the draft Local Plan (July 2016).
- 2.8 Site promoters Inland have undertaken masterplanning suggesting that potentially up to 1,990 homes could be accommodated on the site, once fully assembled. The Council's view is that given the constraints/context including the need to provide sufficient space for a primary school and associated play/sports space, a figure of 1,750 dwellings may be more appropriate, subject to transport modelling and further testing.
- 2.9 The redevelopment of existing residential areas has also been considered. This concluded that there are a small number of former Council estates where there may be very limited development opportunities. However *"the delivery of strategic scale numbers of new homes is not considered to be tenable"*⁶.
- 2.10 The issues around redevelopment of derelict glasshouse sites are assessed in detail in section 4 below.

Exceptional Circumstances - criteria

- 2.11 PPG asks *"Do housing and economic needs override constraints on the use of land, such as Green Belt?"* and states *"The National Planning Policy Framework should be read as a whole: need alone is not the only factor to be considered when drawing up a Local Plan."*⁷ The approach taken by Broxbourne Borough Council is to have regard to a wide range of NPPF factors summarised as criteria under the five headings of Local Plan Strategy; Green Belt; Sustainable place-making; Design, landscape and biodiversity; and Transport. These criteria are contained in Table 1 and were published alongside the draft Local Plan in summer 2016.

⁵ North Herts, Watford, Enfield, East Herts, Harlow, St Albans, Stevenage, Hertsmeire, Welwyn Hatfield, and Epping Forest.

⁶ Borough-wide Options and Scenarios (April 2016), paragraph 2.11

⁷ <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

Paragraph: 044 Reference ID: 3-044-20141006

Table 1: ‘Exceptional Circumstances’ – sustainable development criteria

Local Plan Strategy	1 2 3 4 5 6 7 8	Consistency with the Local Plan strategy and objectives Meeting identified requirements for sustainable development ⁸ Housing provision to meet objectively assessed needs Inclusion of jobs and access to employment opportunities Supporting town centres and the retail hierarchy Restoration of derelict or underused land/buildings Minimising the impact on roads Sustainable transport solutions
Green Belt	9 10 11	Minimising the impact on and maintaining the aim and purposes of the Green Belt Establishing the permanence of the Green Belt Improving the Green Belt and the countryside
Sustainable Place-Making	12 13 14 15 16 17 18	Place creation – unique, beautiful and safe with a sense of place, community and belonging Strong connection to existing place and/or creation of new place Strong mix of uses and facilities Inclusion of and/or accessibility to shops Inclusion of and/or accessibility to school(s) Inclusion of and accessibility to sports, recreation, open space and countryside Inclusion of other services and/or accessibility to other services
Design, landscape and biodiversity	19 20 21 22	Respecting heritage and landscape assets Exceptional design Sustainable design and construction Exceptional landscaping and biodiversity
Transport	23 24 25 26	Minimising the need to travel by car Inclusion of and/or accessibility by public transport to a variety of destinations Walking and cycling connections Accessibility to countryside

2.13 This Topic Paper contains a site-by-site justification for any proposed Green Belt release, drawing on the 5 main headings in the text. Assessment tables for all 26 criteria are contained in Appendix B.

⁸ Based on emerging Local Plan policy PM1: Sustainable Place-Making: *“New developments proposed within the Borough are required to complement existing towns and villages and the countryside around them. Major developments must also establish their own identities through the implementation of place making principles.”*

Calverton Parish Council v Nottingham City Council

- 2.14 Mr Justice Jay in the Calverton PC v Nottingham City Council High Court judgement⁹ sets out the following five matters for consideration to lead to the planning judgements as to whether there are exceptional circumstances with regard to the release of Green Belt land through the local plan process in a particular case having determined the objectively assessed need (para 51):
- i) *the acuteness/intensity of the objectively assessed need;*
 - ii) *the inherent constraints on supply/availability of land prima facie suitable for sustainable development;*
 - iii) *the consequent difficulties in achieving sustainable development without impinging on the Green Belt;*
 - iv) *the nature and extent of the harm to the Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and*
 - 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.*
- 2.15 Principles i) and ii) of the Calverton judgment apply Borough-wide and are considered further below. Principles iii), iv) and v) are site specific and are considered in the screening of the parcels.

Principle i) Acuteness/intensity of the objectively assessed need

- 2.16 The June 2016 Objectively Assessed Needs (OAN) Update (Justin Gardner Consulting) was based on the 2012 household projections. This indicated an OAN of 7,000 homes. A further OAN update (June 2017) based on the 2014 household projections indicated an increase in the OAN to around 7,700 (incorporating a 10% buffer for market signals), suggesting increasing intensity of need.
- 2.17 In relation to the need for employment land, the Council completed an employment Land Review (2016) which demonstrates that based on 'business as usual' trends there is not an acute need for new employment land. In terms of addressing sustainable development there is a significant need for a step-change in provision within the Borough. This is addressed further below.

Principle ii) Inherent constraints on supply/availability of land available for sustainable development

- 2.18 The Strategic Land Availability Assessment (SLAA), June 2017, assessed the suitability, availability, and deliverability of a wide range of sites across the

⁹ [2015] EWHC 1078 (Admin)

Borough. In respect of non-Green Belt sites, the SLAA concluded that there is capacity for around 2,600 dwellings (see Table 2 below).

- 2.19 The SLAA includes an assessment of the appropriateness of an increase in density at urban sites. The promoter of Cheshunt Lakeside has proposed an increase in the number of dwellings to be accommodated at that site. Having reviewed the promoter's technical work, the Council is satisfied that additional development could be accommodated sustainably on-site.

Table 2: Urban Capacity (non Green-Belt sites)

SLAA Ref No.	Site Name	Settlement	Dwellings (net)
HOD-U-12	Former Turnford Surfacing Site	Hoddesdon	40
CG-U-56	Cheshunt Lakeside	Cheshunt	1,750
CG-U-29	Land south of Hammondstreet Road	Cheshunt	44
WX-U-13	Land off Sturlas Way	Waltham Cross	300
CG-U-59	Land rear of Flamstead End Shops	Cheshunt	10
CG-U-47	Whit Hern	Cheshunt	28
CG-U-54	Borough Council Offices	Cheshunt	45
BWT-U-15	Gas Distribution Station	Broxbourne	36
CG-U-15	Fourfields	Cheshunt	15
CG-U-40	Wolsey Hall	Cheshunt	24
HOD-U-23	19 Amwell Street and Scania House	Hoddesdon	60
HOD-U-39	Westfield Primary School	Hoddesdon	40
HOD-UC-08	Land east of Dinant Link	Hoddesdon	50
HOD-U-36	Lampit Mansard Roofs	Hoddesdon	33
CG-U-59	The Whitehouse	Cheshunt	15
WX-U-25	Theobalds Grove Station	Waltham Cross	22
HOD-U-27	Land to the south of Brewery Road	Hoddesdon	22
HOD-U-35	Former Hoddesdon Police station	Hoddesdon	30
		Total	2,564

- 2.20 Based on the analysis contained within the Strategic Land Availability Assessment, it is clear that the capacity of the identified urban sites falls significantly short of objectively assessed housing need in the short to medium term, even after the proposed increase in the level of development at Cheshunt Lakeside is taken into account.
- 2.21 The Local Plan development strategy proposes to include a mix of larger and smaller sites in order to optimise the flow of development and reduce the risks of non-delivery, ensuring a continuous supply of residential development.
- 2.22 In order to provide a short/medium-term and continuous housing supply in sustainable locations it is considered necessary to explore further options for Green Belt sites.

Calverton Principles 3, 4 and 5

2.23 Meaningful assessment of the remaining Calverton principles requires site-by-site consideration. The general approach taken to each principle is as follows:

Principle iii: difficulties in achieving sustainable development without impinging on the Green Belt:

2.24 The National Planning Policy Framework states that there are social economic, and environmental dimensions to sustainable development, and that *“the policies in paragraphs 18 to 219, taken as a whole, constitute the Government’s view of what sustainable development in England means in practice for the planning system.”* For the practical purposes of this report, therefore, the Council proposes 26 criteria as set out in Table 1 above as the basis for reaching a considered judgement.

Principle iv) the nature and extent of the harm to the Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and

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.

2.25 Harm to the Green Belt is considered in relation to the first three purposes set out in paragraph 80 of the NPPF (checking the unrestricted sprawl of large built-up areas, preventing neighbouring towns merging into one another, and assisting in safeguarding the countryside from encroachment).

2.26 Planned growth as set out in a Local Plan is by definition the opposite of sprawl as set out in purpose 1, but site allocations without planned-in elements beyond housing and no clear limit may take on the characteristics of sprawl. Amelioration of such impacts may be achieved through careful layout and design, depending on the opportunities offered by each site.

2.27 Purpose 2 refers to the merging of towns rather than villages or other development areas. However, for the purposes of this assessment the concept includes protection of strategic gaps but not local gaps, which may be better protected by other designations. Purpose 3 ‘encroachment’ refer specifically to areas of open countryside rather than enclosed areas of mostly open land.

3. Screening of large-area parcels

3.1 Given the extent of the Green Belt in Broxbourne it was considered that there is a need to screen the whole of the borough's Green Belt prior to highlighting areas for more detailed consideration. This initial stage of work was undertaken during 2014-15 in order to inform the development of the borough-wide development strategy, prior to publication of the Local Plan Duty to Co-Operate Framework Document (October 2015).

3.2 For ease of comprehension, the borough was divided into eleven parcels (A to K) as shown in Figure 4.

- Parcel A – Hoddesdon Woods contains a number of wooded areas and a string of properties set within a unique landscape character. It is situated between the A10 and the borough boundary to the east;
- Parcel B – West of Hoddesdon is situated to the east of the A10 and adjoins the main urban area. It is defined mostly by urban roads and open spaces;
- Parcel C – Broxbournebury and Wormleybury adjoins the borough boundary to the west, rural roads to the north and south and the A10 to the east. It contains Wormley West End, a collection of properties interspersed by fields and hedgerows;
- Parcel D – West of Wormley is located to the east of the A10 and is bounded by the main urban area. It is urbanised in nature and accessible to the public by footpaths and leisure uses;
- Parcel E – Brookfield and Cheshunt Park, like Parcel D is defined by the borough boundary, rural roads and the A10;
- Parcel F – Hammondstreet is located between the main urban area and the borough boundary and is defined by plateaus, ridges and wooded areas;
- Parcel G – Goff's Oak contains a number of settlements and is situated between the main urban area of Cheshunt and the most western part of the borough boundary. This is the area most closely associated with the horticultural industry;
- Parcel H – Theobalds is situated in the far south of the borough and mostly consists of farmland. It is rural in nature, inaccessible and straddles the M25;
- Parcel I – Bury Green wraps around the urban area of Bury Green and is situated east of Lieutenant Ellis Way. It contains a number of urbanised land uses;
- Parcel J – Southern A10 Corridor is partly located in-between the urbanised area of Cheshunt but also adjoins junction 25 of the M25 junction, the main access route into Enfield;
- Parcel K – Lee Valley Regional Park is distinctive in character and contains a number of water/environmental features. This parcel is bounded by the borough boundary to the east.

3.3 Maps and descriptions of the parcels and sub-areas are at **Appendix A**.

Figure 4 – Strategic Green Belt parcels

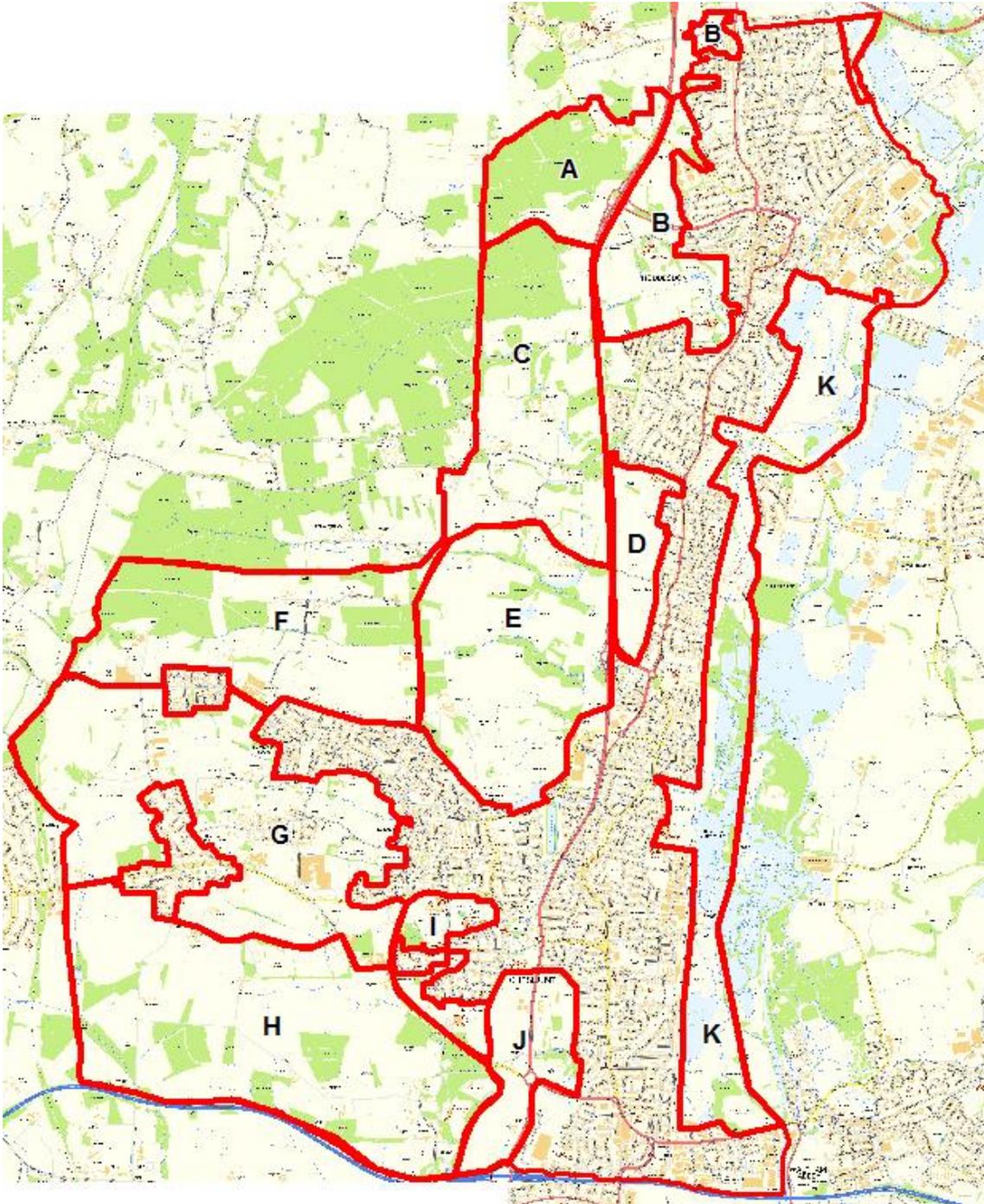


Table 3: Screening of large-area parcels

*Note: See Appendix A for descriptions of the sub-areas and maps showing their location.

Sub-areas*	Green Belt Review 2008 – summary of recommendations.	Sustainable patterns of Development (ref ‘exceptional circumstances’ Table 1, criteria 1-26)	Calverton Principles – 3, 4 and 5.	Conclusion: Exceptional Circumstances?
Parcel A – Hoddesdon Woods				
Not sub-divided	No alterations proposed	Very sensitive landscape area and protected woodland. Development would not meet any of the criteria.	The A10 provides a firm boundary. Release of GB would cause considerable damage not capable of mitigation.	No
Parcel B – West of Hoddesdon (location of Parcel B sub-areas 1-6 on map p. 52)				
1. West of Ware Road	No alterations proposed.	Development would not meet criteria.	Most of area strongly performing. Brownfield opportunities fronting Ware Road.	No. Retain in GB.
2. South of Boundary Park	Schools policy to cover area 1.10 (Roselands primary school). Landscape/ open space protection policy on Boundary Park (area 1.9).	Designate Roselands with schools policy.	No clear justification for release.	No. Retain in GB.
3. North of Hertford Road	Long-term option to remove from GB and designate with landscape/countryside/open space protection policy.	Development would not meet criteria.	Characterised by tree cover and small open spaces. GB adjoins East Herts so no clear boundary line (see	No. Retain in GB.

Sub-areas*	Green Belt Review 2008 – summary of recommendations.	Sustainable patterns of Development (ref ‘exceptional circumstances’ Table 1, criteria 1-26)	Calverton Principles – 3, 4 and 5.	Conclusion: Exceptional Circumstances?
			Figure .	
4.North and south of Dinant Link Road	Safeguard for longer-term development.	The principle of development in this area has already been established through the grant of planning permission at High Leigh Garden Village	Firm boundary provided by A10, Lord Street, and Hertford Road.	Remove from GB. EC provided by LP strategy.
5.Barclay Park and Spital Brook Valley	Remove from GB and designate with landscape/countryside/open space protection policy. Safeguard areas A22, A19 and A16 for longer-term development.	Does not meet criteria.	Sensitive valley landscape with existing clear boundaries. Significant harm likely to be caused by GB modifications in this area.	No EC. Retain in GB.
6.South of Cock Lane	Remove from GB and designate Sheredes School (area 1.2) with schools policy. Safeguard land to west of Woodlands Drive (area 1.3) for development.	Difficult to create sustainable pattern of development east of Woodlands Drive.	Removal from GB would encourage piecemeal development between the school and Woodlands Drive.	No EC. Retain in GB.
Parcel C – Broxbournebury and Wormleybury				
Not sub-divided	No alterations proposed	Very sensitive landscape area and protected woodland, clean break from the urban area. Does not	The A10 provides a firm boundary and release of GB would cause considerable damage not capable of	No EC. Retain in GB.

Sub-areas*	Green Belt Review 2008 – summary of recommendations.	Sustainable patterns of Development (ref ‘exceptional circumstances’ Table 1, criteria 1-26)	Calverton Principles – 3, 4 and 5.	Conclusion: Exceptional Circumstances?
		meet any of the criteria.	mitigation.	
Parcel D – West of Wormley				
Not sub-divided	Remove from GB and designate with landscape/countryside/open space protection policy.	The area south of Church Lane has been identified as a reserve secondary school site and would therefore make a significant contribution to sustainable place-making.	Much of the site area south of Church Lane would be returned as open land (including sports pitches) and mitigation of the impacts on openness could therefore be achieved.	Exceptional Circumstances could exist to remove the area south of Church Lane from GB. However, the objectives of sustainable development are better addressed by retention of the site in the Green Belt. See pages 43-4 below.
Parcel E – Brookfield and Cheshunt Park				
Not sub-divided	No alterations proposed.	Meets large number of exceptional circumstances criteria – see Appendix A.	Harm could be limited by containing development within the topographical bowl.	Remove area from GB to provide for Brookfield Garden Village. See further discussion under Appendix A.
Parcel F - Hammondstreet				
Not sub-divided	No alterations proposed apart from Limes Nursery, which (C30), recommended as safeguarded land.	Very sensitive landscape area and protected woodland, clean break from the urban area. Does not meet any of the criteria.	Forms edge of the open countryside, with Broxbourne Woods beyond. Area lies high on the crest of a ridge, prominent in the landscape.	No. Retain in GB.
Parcel G – Goffs Oak (location of Parcel G sub-areas 1-4 on map p. 56)				

Sub-areas*	Green Belt Review 2008 – summary of recommendations.	Sustainable patterns of Development (ref ‘exceptional circumstances’ Table 1, criteria 1-26)	Calverton Principles – 3, 4 and 5.	Conclusion: Exceptional Circumstances?
1. West of Goffs Oak Village	No alterations proposed, except for areas 2.5 and 2.6 which could be safeguarded for development, and area 2.6 which could be designated as landscape/countryside/open space.	Majority of this area not well related to Goffs Oak or elsewhere, apart from small parcel of land north of Cuffley Hill – see page 35.	Apart from land concealed by trees to rear of Cuffley Hill, development in the valley of Cuffley Brook would cause significant harm to strategic gap and could not be mitigated.	Remove site to the rear of Cuffley Hill from the Green Belt – see assessment on page 35. Retain remainder in GB.
2. North of Crouch Lane	Long-term areas of search. Remove from GB and designate with landscape/countryside/open space protection policy. Safeguard areas C12 and C30 for development.	No coherent approach to sustainable place-making or other criteria apparent. Fragmented landownership.	GB release would threaten piecemeal and unsustainable development. Varied uses but significant landscape and countryside value including Cheshunt Common, Crouch Lane and public rights of way..	Retain in Green Belt
3. Around St James’ and north and south of Andrews Lane	Long-term areas of search. Remove from GB and designate with landscape/countryside/open space protection policy. Safeguard areas C14, 15, 16, and 18 for development.	The patterns of development strongly between different parts of this area. See detailed assessment on pages 20-21)	Harm to openness of Rags Valley offset by parkland creation and public access. Little if any sense of openness at Tudor Nurseries.	Exceptional circumstances west of Burton lane/Rags Lane and south of St James’ Road. See detailed explanation below p 20-21.

Sub-areas*	Green Belt Review 2008 – summary of recommendations.	Sustainable patterns of Development (ref ‘exceptional circumstances’ Table 1, criteria 1-26)	Calverton Principles – 3, 4 and 5.	Conclusion: Exceptional Circumstances?
	Consider allocating areas C20, 21, 22, 24, 26, 27, and 29 for development.			
4.South of Goffs Lane and north of Silver Street/Halstead hill	No alterations proposed, with the exception of part of C24 (former showman’s site, Goffs Lane)	Small part of the area is close to Goffs Oak centre. Halstead Hill triangle is remote and difficult to form a coherent urban extension with facilities.	Strong sense of openness in the valley south of Goffs Lane. Harm could be mitigated by restricting any GB release to brownfield land which does not intrude into the valley.	Release area C24 (former showman’s yard) and parts of the piggery from GB. Retain Oak Field in GB (see Goffs Oak conclusions below p. 21-23)
Parcel H - Theobalds				
Not subdivided	No alterations proposed.	Sensitive landscape and open countryside. Development would not meet the criteria.	Development in this area would cause considerable harm with little prospect of mitigation.	No. Retain in GB.
Parcel I – Bury Green				
Not subdivided	Remove from Green Belt and designate areas 1.14-6 with schools policy, with remaining areas designated as landscape/countryside /open space protection policy.	Release of Green Belt enables the ‘completion’ of leftover land in Bury Green. Whilst not directly addressing many of the criteria owing to their small size, the sites are important in terms of	Areas of Green Belt form a GB anomaly as fingers penetrating the urban area severed by construction of Lieutenant Ellis Way. Redesignate with more appropriate policies.	Yes. Realign GB to Lieutenant Ellis Way (see Figure 2 above).

Sub-areas*	Green Belt Review 2008 – summary of recommendations.	Sustainable patterns of Development (ref ‘exceptional circumstances’ Table 1, criteria 1-26)	Calverton Principles – 3, 4 and 5.	Conclusion: Exceptional Circumstances?
		contribution to the acute short-term housing need.		
Parcel J – Southern A10 Corridor (location of Parcel J sub-areas 1-5 on map p. 60)				
1.Cheshunt School Playing Fields	No alterations proposed.	Development not appropriate on the pitches, would not meet the criteria.	Would form a GB anomaly following redrawing of Green Belt boundary along Lieutenant Ellis Way and the New River (see Figure 2 p.9 and Figure 4). Pitches more appropriately protected by schools policy.	Yes. Remove from GB.
2.Maxwells Farm West	No alterations proposed.	Meets a significant number of the criteria. See assessment on page 31.	Would form a GB anomaly following release of Park Plaza West. Safeguarded land policy requires buffer strip to retain open A10 corridor.	Remove from Green Belt and safeguard for development beyond the plan period.
3.Albury Farm East	No alterations proposed.	Place-making – provision of primary school site and securing future of the Cheshunt Club and Cheshunt Football	Would form a GB anomaly following redrawing of Green Belt boundary along Lieutenant Ellis Way and the New River (see	Remove from GB. Separation and landscape more appropriately protected by landscape policy.

Sub-areas*	Green Belt Review 2008 – summary of recommendations.	Sustainable patterns of Development (ref ‘exceptional circumstances’ Table 1, criteria 1-26)	Calverton Principles – 3, 4 and 5.	Conclusion: Exceptional Circumstances?
		Club.	Figure 2 and 3 p 9-10) Safeguarded land policy requires buffer strip to retain open A10 corridor.	
4.Cedars Park	No alterations proposed.	Development not appropriate in the park, would not meet the criteria.	Would form a GB anomaly following redrawing of Green Belt boundary along Lieutenant Ellis Way and release of Park Plaza West (see Figure 2 and Figure 4 p9-10) No material harm caused – strong protections in place through open space policy.	Yes. Remove from GB. Area would be more appropriately protected by open space policy.
5.Park Plaza West	No alterations proposed.	See assessment on pages 18-20.	Creation of Local Green Space as a new park retains the strategic gap with Enfield and reinforces gateway feature. Strong GB boundary along the New River.	Remove from GB. See assessment on pages 18-20.

Sub-areas*	Green Belt Review 2008 – summary of recommendations.	Sustainable patterns of Development (ref ‘exceptional circumstances’ Table 1, criteria 1-26)	Calverton Principles – 3, 4 and 5.	Conclusion: Exceptional Circumstances?
Parcel K: Lee Valley Regional Park				
Not sub-divided	<p>Remove Broxbourne Recreation Ground (area 1.19) from GB and designate as landscape/countryside/ open space.</p> <p>No alterations proposed to remainder of Green Belt.</p>	No areas identified which meet the criteria, apart from Britannia Nurseries site, which has been granted planning permission.	Release of Green Belt in this area would cause considerable damage to setting of the Lee Valley Regional Park. Planning permission for a significant housing development at Admirals Walk Lake was recently refused permission in part on GB grounds.	Remove Britannia Nurseries site (outline permission granted) from Green Belt.

4. Site-level assessments

4.1 Having completed a borough-wide screening of the large-area Green Belt parcels above, together with initial consideration of potential site options through the Strategic Land Availability Assessment, a short-list of site options has been considered against the criteria using the framework set out in Table 1 above. The assessment tables are included in Appendix B and the most significant features of this assessment against the five main categories of criteria are provided below.

A. Strategic Sites

Brookfield Riverside and Garden Village (Table B1 p. 61)

Criteria	Comments - Brookfield
Local Plan Strategy (criteria 1-8)	<p>Brookfield is the largest and single most important development in the Local Plan. Brookfield has been designed as a mixed-use settlement incorporating residential, retail and leisure, and employment opportunities. It addresses all the Local Plan objectives (see paragraph 4.2 below).</p> <p>Brookfield Garden Village and Brookfield Riverside are intrinsically linked. Together, the developments will provide a very significant contribution towards the long-term housing needs of the Borough. Given constraints elsewhere, the borough cannot meet its housing needs without Brookfield Garden Village and Riverside.</p> <p>Uniquely in Broxbourne, the release of this area of Green Belt offers the potential to create a new identity for the borough, complementing the existing town centres with additional facilities that would not be appropriate or desirable in their constrained locations, and preventing the leakage of retail and leisure spend by Broxbourne residents travelling to retail destinations further afield.</p>
The Green Belt (criteria 9-11)	<p>Although the site would entail release of Green Belt, the masterplan-led approach ensures that the proposed development area is contained within the topographical bowl of the Turnford Brook. Rather than release the Green Belt as far as the obvious boundaries of Park Lane Paradise to the west and Church Lane to the north, the sensitive landscaped approach enables mitigation of potential harm to the wider landscape. The countryside in the Turnford Brook valley includes large areas of former landfill. There are currently no public rights of way through the area and there are no views into the area from the surrounding land. The masterplan-led approach, plus the obvious limitations of the Turnford valley setting ensure that there is little or no risk of future sprawl beyond the currently planned development</p>

Criteria	Comments - Brookfield
	extents.
Sustainable place-making (criteria 12-18)	Brookfield provides a unique potential to provide a new heart and identity for the borough. The emerging masterplan linking Brookfield Riverside and Brookfield Garden Village provides access to a range of facilities in the form of a mixed-use, integrated development, thereby addressing the concerns of the Core Strategy inspector in his report in December 2011 (see Appendix C below, paragraph 67). It is proposed that the development will include a new primary school and good access to a new secondary school site.
Design, landscape and biodiversity (criteria 19-22)	Considerable care and attention has been given through the development of the Brookfield concept to high quality layout and design. The setting of the Wormleybury Manor and park to the north will be respected, and the green spine along the Turnford Brook will be a central feature of the development. Design principles are set out in more detail in the 'Vision for Brookfield' design brochure ¹⁰ .
Transport (criteria 22-26)	Co-location of the proposed Borough centre and significant amounts of residential development and employment, at a site accessible from large parts of the existing built-up area at the centre of the borough. The Walking and Cycling Strategy and the bus strategy for the area demonstrate how Riverside will be accessible from large parts of the borough without the need for residents to use their cars. Specifically, new cycle routes will be provided along the New River and Cheshunt Reservoir, and a new bus service linking the development with the stations has gained support from bus operators.
Conclusion	There is a strong case that the exceptional circumstances exist to release this site from the Green Belt through the Local Plan review.

4.2 As set out in the draft Local Plan, the proposed development aims to meet the following principles:

1. Creation of a sustainable and integrated mixed use garden suburb that will accommodate retail, leisure, civic, housing, jobs and social facilities;
2. The creation of an identity and sense of place for Brookfield and the borough of Broxbourne;
3. To create a strengthened and cohesive retail centre and a new leisure and civic hub for the borough of Broxbourne;
4. To achieve a step change in the economy of Broxbourne and increase the attractiveness of Broxbourne as a place to live in, invest in and visit;
5. To address traffic congestion and to create sustainable patterns of movement within Brookfield and with the remainder of the Borough;
6. To achieve exceptional standards of design and sustainability;
7. To retain and enhance the landscape and ecology of the Brookfield area

¹⁰ A Vision for Brookfield (November 2016). See www.broxbourne.gov.uk/lpsites

- 4.3 To enable the Brookfield Riverside proposals, it is proposed to relocate the Halfhide Lane Traveller Site to another site within the Green Belt. The case for ‘very special circumstances’ for this is set out in Section 5 below. The adjacent Halfhide Lane allotments are also proposed for relocation, although allotments are compatible with Green Belt and therefore do not require a ‘very special circumstances’ case.
- 4.4 Alternative locations within the Borough for a new settlement and sustainable urban extensions have been considered in some detail in the Borough-wide Options and Scenarios Report (April 2016). This work demonstrated that there are no suitable alternative locations in the borough for a new settlement or garden development to meet aspirations for sustainable development¹¹.
- 4.5 In summary, it is considered that the exceptional circumstances necessary for release of Green Belt exist at Brookfield because of the contribution of the proposals to the objectives of sustainable development, the capacity for effective mitigation of Green Belt harm, contribution to addressing an intense housing need, and

Park Plaza West (see Table B2 p. 63)

Criteria	Comments – Park Plaza West
Local Plan Strategy (criteria 1-8)	<p>The site has been identified as central to the Council’s economic development strategy, Ambition Broxbourne. Park Plaza West is strategically located next to Junction 25 of the M25 and has the potential to realise a critical mass of employment when combined with Park Plaza North in an area otherwise highly constrained in terms of potential opportunity sites. The site is identified in the London Stansted Cambridge Corridor Vision (which is supported by other authorities in the area) and forms part of Hertfordshire Local Enterprise Partnership’s Strategic Economic Plan.</p> <p>B1 office uses would enable a step-change in the quality of employment in the area. Although the site is potentially attractive to B8 warehousing and distribution, it is considered that such uses would undermine the economic development strategy and would not provide the exceptional circumstances needed to justify release of the site from the Green Belt. It is considered that the Policy PP1 provides strong safeguards in terms of limiting development to suitable B1 uses.</p>
The Green Belt (criteria 9-11)	Although the site does possess a sense of openness which is protected by Green Belt, it is enclosed by development and main roads and is not connected to the wider countryside. The New River provides a logical Green Belt

¹¹ Borough-wide Options and Scenarios Report (April 2016), paragraphs 3.49-52, Appendix A and accompanying map of areas of search.

Criteria	Comments – Park Plaza West
	boundary which would prevent development from extending into the countryside beyond. Redrawing of the Green Belt along Lieutenant Ellis Way as recommended by the previous Green Belt studies suggests that a new approach to using firm. The proposed creation of a new, permanent buffer designated as Local Green Space on the southern part of the site helps to mitigate some of the impact on the loss of Green Belt.
Sustainable place-making (criteria 12-18)	The site will form a prominent southern gateway to the borough and will strengthen the sense of arrival in the borough, creating a sense of place.
Design, landscape and biodiversity (criteria 19-22)	The proposals for Park Plaza West include a landscaped park to the south, reinforcing the separation and providing a degree of openness, mitigating the harm caused by loss of Green Belt. The Council is conscious of the vulnerability of this landscaped area, particularly in light of the precedent set by the News International Printworks opposite the site, and therefore proposes to protect this land in perpetuity through a Local Green Space designation. Provision of Local Green Space ¹² in perpetuity is therefore considered to be critical to the case for the identity of this area as a prestige location, and maintaining the sense of separation between London and Hertfordshire. The proposed Local Green Space, maintenance of which should be funded in perpetuity from the development, is considered an important part of the case for exceptional circumstances for release from the Green Belt.
Transport (criteria 23-26)	In terms of sustainable transport, the area lies adjacent to the New River, proposed as a priority cycle route linking the borough with Enfield. A new cycle bridge is proposed over the A10 to connect with Waltham Cross and a potential new station at Park Plaza. Operators have expressed interest in providing a frequent peak-hour shuttle bus service between Waltham Cross station and Park Plaza West. Taken together, the proposals for improved transport significantly increases the sustainability of the site and the case for exceptional circumstances for release from the Green Belt.
Conclusion	There is a strong case that the exceptional circumstances exist to release this site from the Green Belt through the Local Plan review.

4.6 The Broxbourne Core Strategy Inspector Geoff Salter stated in his report that *“the evidence base, particularly the Employment Opportunities Study (Derrick Wade Waters, 2010) supports the need to change the Borough’s employment*

¹² NPPF paragraph 76 <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

profile through development of 'higher end' jobs at new business parks that would also involve release of green belt land (Paragraph 11).

- 4.7 In respect of Park Plaza West, Mr Salter concluded that *“The loss of green belt can be justified by the exceptional circumstances of a highly constrained urban area and consequent limited opportunity to achieve a step change in employment profile without release of such land.”* (Paragraph 33, reproduced in Appendix C below).
- 4.8 The Hertfordshire Strategic Sites Employment Study (Regeneris, 2011) states that *“Potentially the best opportunities currently available appear to be at Park Plaza, Waltham Cross for a major new business park adjacent to the M25 and at Watford Junction”* (page 5). Park Plaza West forms an important part of the Hertfordshire Local Enterprise Partnership’s Strategic Economic Plan, as well as part of the agreed vision for the London-Stansfeld-Cambridge Consortium (LSCC) group of authorities.
- 4.9 Site promoters CEG have undertaken work to look at the availability of other strategic sites both within and outside the Green Belt in an arc around London on the M25 to demonstrate that the Park Plaza West site is the most suitable site to meet this need.
- 4.10 Redrawing the Green Belt along Lieutenant Ellis Way, Bury Green (see Figure 2, page 9 above) provides an opportunity for a strategic look at the future of Green Belt in the southern part of the borough. Within this context use of the New River as a new Green Belt boundary at Park Plaza is a logical next step.
- 4.11 Release of Park Plaza west from Green Belt necessitates consideration of a land to the north and north-east, including **Maxwells farm West/Rush Meadow** and **Albury Farm/east of the A10**. As shown in Figure 4 above (page 10), various options for redrawing of the Green Belt were considered as part of the Park Plaza Development Options Report (April 2016). Removal of Park Plaza West from Green Belt would result in this hinterland becoming a Green Belt ‘island’ surrounded by development.
- 4.12 Alternative policy designations are considered more appropriate than Green Belt for these areas. The designations are addressed in the draft Local Plan but include open space designations for Cedars Park and the playing fields at Albury and Cheshunt school, and safeguarding of Maxwells Farm West/Rush Meadow for longer-term development. In terms of harm to Green Belt, Local Plan objectives are considered to be more appropriately achieved by means of these alternative designations.
- 4.14 The Core Strategy inspector commented that at Maxwells Farm West *“A defensible green belt boundary would be formed by the river to the west and there are exceptional circumstances for its release, to create critical mass with Park Plasas North and West.”* (Paragraph 36 cited in Appendix C below). The Draft Local Plan does not indicate a preference for either housing or employment. It is considered that this flexible approach is appropriate in order to provide time for employment at Park Plaza West to become established

and to understand long-term housing needs. However, taking account of the proximity of the site to facilities including Cheshunt School, and sustainable transport access along the proposed New River Cycle Path and into Cheshunt via the Paul Cully Cycle bridge over the A10, the site could be appropriate for a mix of uses. A comprehensive masterplanned approach will be pursued as part of the next Local Plan review.

- 4.15 The **Cheshunt Country Club** site is located to the west of Park Plaza West. This site has been promoted for residential development but scores very poorly on a number of criteria including transport and sustainable place-making. In addition, it is located on the ‘wrong’ side of the clear green Belt boundary provided by the New River. The site is closely related to the Theobalds Park area of woodland and countryside. The draft Local Plan Policy CS1 proposes that *“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.”* It is not considered that removal of Green Belt designation is necessary in order to achieve this objective.

Rosedale Park (Table B4 p. 67)

Criteria	Comments – Rosedale Park
Local Plan Strategy (criteria 1-8)	The proposals for Rags Brook contribute towards a number of Local Plan objectives, in particular the housing and environmental objectives, as well as providing a comprehensively planned approach to an area of significantly under-used land including a mix of open land (Rags Brook) and brownfield land (Tudor Nurseries) joined together to provide improved accessibility to local facilities such as Rosedale Sports club at the heart of the development.
The Green Belt (criteria 9-11)	Tudor Nurseries is a large brownfield site in the Green Belt (although not falling within the NPPF definition of previously developed land for planning purposes). The countryside of the Rags Brook is currently inaccessible. There are very few viewpoints into the valley and there are no public rights of way across it. The proposals for the creation of an extensive new public park at the heart of the development would outweigh the harm caused by release of Green Belt in this location. Rags Lane/Burton Lane to the west provide firm Green Belt boundaries. Beyond these lanes there is a patchwork of small landownerships and there is little prospect of a cohesive proposals which would address the wider place-making and strategic objectives. The remaining areas of Green Belt are therefore judged to be of strategic long-term importance to countryside protection.
Sustainable place-making (criteria 12-18)	The location of the Rosedale Sports Club and a new primary school will provide a heart to the development. Opportunities to provide a small local centre including some shops are currently being explored. Although in different landownerships, the developments are being planned

Criteria	Comments – Rosedale Park
	comprehensively as a single linked scheme with connections both between the new proposed developments and with the existing urban area, creating a network of paths through the area.
Design, landscape and biodiversity (criteria 19-22)	The Rosedale Park proposals are carefully designed around the parkland concept which has been produced through an iterative process of joint working with the developers, resulting in a significant proportion of the land being retained as public open park and a reduced visual and landscape impact from the proposed residential areas. The Rags Brook itself will form a key landscape and biodiversity feature of the proposed development, and will be opened up to public access for the first time.
Transport (criteria 23-26)	Although situated in a suburban location, the proposals for Rosedale Park offer significant opportunities for modal shift. The Walking and Cycling Strategy identifies Andrews Lane as a key cycling corridor providing rapid access to Church Lane and beyond. It is proposed that Andrews Lane itself will be retained for local access and sustainable transport only and access within the site will be provided by a new spine road through the site. There is potential for a new bus route into the heart of the site from Rosedale Way, probably involving a diversion from the existing 242 route.
Conclusion	There is a strong case that the exceptional circumstances exist to release this site from the Green Belt through the Local Plan review.

- 4.16 Located within the area of the Rosedale Park proposals are a number of small sites (Ballymour and the Langdons, South of Andrews' Lane, and Lea Mount Meadow) which will be released from Green Belt as part of the redrawing of the Green Belt to Rags Lane/Burton Lane in order to facilitate the Rosedale Park proposal.
- 4.17 The Council considers the extension of the place-shaping principles behind Rosedale Park as critical to the granting of planning permission at these small sites. These principles include securing a comprehensive masterplan for Rosedale Park, including continuous rights of way through a Green Infrastructure network which will help to structure future options for built development and avoid a continuous sprawl.
- 4.18 The Council will prepare a masterplan for these sites to illustrate how place-making objectives should be secured in the event of planning applications coming forward at these sites. It is proposed that new Local Green Space will be designated as part of these proposals.

B. Non-strategic sites

Goffs Oak (Table B3 p. 65)

- 4.19 This area was considered in some detail in the Goffs Oak Development Options Report (April 2016). To the **north, south, and west** of the village, the Green Belt plays a clear role in preventing the sprawl of the village, preventing merger with Cuffley, and maintaining the integrity of the open valley landscape provides a countryside setting for the village.
- 4.20 To the **north of Goffs Oak**, both east and west of Newgatestreet Road, there are a number of sites which have been promoted to the Council as suitable for Green Belt release. However, these sites are remote from the village centre and are too small to enable the creation of additional services and facilities, failing to meet the sustainable development criteria in Table 1.
- 4.21 West of the village, south of Goffs Lane, there are two sites which have previously been considered as meriting further consideration. These are Oak Field south of Doverfield, and west of Myles Court, the former travelling showperson's yard and piggery to the rear.
- 4.22 Oak Field (Doverfield)** has been the subject of two planning applications, the first of which was refused on a number of reasons including design and Green Belt. A second application for a reduced level of development, including a pollinator garden and proposed link to Woodside Primary School as part of the case for 'very special circumstances' was withdrawn. The connection to the school was included in the Goffs Oak Development Options Report (April 2016). However, it has subsequently become apparent that the proposed footpath link is unviable due to intervening landownerships. Permission has been granted for 4 houses in an infill site between 19 and 32 Doverfield, which are currently under construction. This latter site does not form part of the wider area of Oak Field and is not seen as justification in itself for release of the field behind. Although located near the village centre, the site meets few of the sustainable development criteria set out in Table 1. It is therefore considered that Oak Field does not present the exceptional circumstances necessary for release of Green Belt.
- 4.23 In the case of the **former travelling showperson's site**, this is a brownfield site which does not intrude into the landscape setting of the village. Its release from Green Belt would not result in loss of separation of Goffs Oak. The site is located directly on Goffs Lane and has good access to the existing bus stop. Given the intensity of housing need and the relative scarcity of small sites which are capable of delivering in the short term, this site is considered to provide the exceptional circumstances needed to merit release from Green Belt. The land at Latfiya House to the east of this site contains a large garden which has been promoted to the Council as a possible extension to the site allocation. However, given the largely greenfield nature of the site, and the contribution of the green frontage on Goffs Lane to the outskirts of the village, it is not considered that the Green Belt release should extend to encompass this site.

- 4.24 On the north side of Goffs Lane, the **nursery sites centred on Inex** are largely brownfield land located close to the shops on the north side of the village centre. The site does not contribute to Green Belt purposes, and scores relatively highly on sustainability criteria. In addition, the site contains the potential for a small centre to include a shop/café/business in addition to residential development. The site is located near the bus stop and the village centre, and adjacent to the library, village hall and health centre. The site therefore scores highly on sustainability criteria and release would cause minimal harm to the purposes of Green Belt.
- 4.25 **Between St James' Road to the north and Burton Lane** to the east lies a strip of Green Belt which plays a role in the separation of Goffs Oak and the residential areas of St James' and Tudor Villas/West Cheshunt. This includes a number of smaller sites, including White House Farm, Pendine, and land to the rear of Tudor Villas.
- 4.26 **White House Farm and Pendine** are both former small agricultural holdings comprising a mix of agricultural buildings and open land. The western part of White House Farm featured in the draft policy as a relocation site for the village green to enable the expansion of the Woodside School to the south. An alternative school expansion site to the east has been identified, avoiding the need for relocation of the existing village green at Jones Road. However, the creation of an additional public open space on the corner of Newgatestreet Road and St James' Road would provide a new amenity space accessible from the north of the village, from where it is currently a lengthy walk to the existing playing fields to the rear of the village centre. The new open space would be closely connected with the shops and facilities of the village centre and would be expected to provide a focal point and strengthened identity for the village. These benefits would be facilitated by the provision of c. 25 dwellings.
- 4.27 Adjacent to the east of the above site, the landowners at Pendine and White House Farm are pursuing separate proposals for development. The Council has considered the option of redrawing the Green Belt along St James Road to facilitate the provision of a publicly accessible 'green ring' between St James' and Goffs Oak. However, retention of a green gap in this location is considered important to the identity of Goffs Oak, a point reiterated by the 2001-2011 Local Plan Inspector (see Appendix D below). It is therefore not considered that the threshold needed to release Green Belt in this area has been reached.
- 4.28 To the **north of Cuffley Hill** lies the C.G Edwards site and the sites of the former Rosemead and Fairmead nurseries. The nursery sites are former horticultural uses and therefore do not fall within the definition of previously developed land. Although designated Green Belt, the area is screened from the open countryside to the north and west by a thick belt of trees and therefore development of these sites would not result in any loss of openness to the wider countryside.

- 4.29 The Green Belt Review 2008 recommended options to safeguard these sites for longer-term development¹³. The study noted the weak Green Belt boundaries in this location and the possibility of strengthening this through use of the established tree/hedge line. The Review commented that the area *“performs poorly against the Green Belt purposes, its location meaning that it does little in terms of preventing sprawl. In reality, also does little to separate existing settlements and thus, if anything, could score lower than that attributed here. Of medium to low countryside value. Consider possible release from Green Belt.”* The Review of the Inner Green Belt Boundary (2008) states that it is not *“necessary to retain an area of physically enclosed land to the rear of 92-94 Cuffley Hill as Green Belt. This land has potential for residential development and should be allocated as either a short term housing site or as Reserve Housing Land”* (page 15).
- 4.30 Any development coming forward in this area would be expected to achieve very high standards of design as part of a comprehensive masterplanned approach, retaining high-quality mature trees and using them as focal points within the design. It is understood that the site promoters are working on an ecological strategy to provide ecological enhancements and recreational opportunities in the woodland area to the north of the site. Given the low level of harm to the Green Belt resulting from de-designation, together with the efficient use of under-performing land, and the contribution towards the area’s housing needs, it is considered that the exceptional circumstances necessary to remove the site from the Green Belt exist.
- 4.31 To the east of this area is an open area of greenfield land **west of Tudor Villas** which forms an important gap between Goffs Oak and west Cheshunt, as well as containing a designated Wildlife Site (Meadow West of Tudor Villas). Given the configuration of land and constraints in this area it is difficult to see how a sustainable development proposals can emerge. It is therefore not considered appropriate to release this area from the Green Belt.
- 4.32 **Between St James and Crouch Lane** comprises housing, business premises, farms and associated farmland, active and derelict glasshouse sites and large areas of countryside. To date, the only coherent and sustainable proposals for development to have emerged in this area relate to the Rosedale Park proposals. Whilst a number of small-scale proposals have emerged in the remainder of the area, these are fragmented in nature and if brought forward in isolation would result in unsustainable patterns of development. Removal of this land from the Green Belt would encourage disjointed pockets of development and considerable strain on the narrow roads in the area, particularly Crouch Lane. Notwithstanding the intensity of housing need, it is considered unsustainable to release this area from the Green Belt.

¹³ Green Belt Review, 2008, Scott Wilson. GB parcels C33/34, options 2.5-7.

Bury Green (Table B5 p. 69)

- 4.33 The 2008 Green Belt Review carried out by Scott Wilson divided the Bury Green area into 7 sub-areas. It recommended release of all of these sub-areas due to weak boundaries, weak performance in relation to the five purposes of Green Belt, and because of its urban character. It recommended that Lieutenant Ellis Way becomes the new Green Belt boundary as it would provide a more robust and permanent boundary and would prevent further encroachment towards the west.
- 4.34 The review of the Inner Boundary of the Green Belt prepared by Prospect Planning in 2008 identified urban land uses and its proximity to the urban area as a weakness of the Bury Green area and agreed that Lieutenant Ellis Way would be a more defensible Green Belt Boundary. It also identified land fronting Lieutenant Ellis Way, the V&E Sports Club at Goffs Lane and land east of Dark Lane as having the potential for future development.
- 4.35 In terms of the exceptional circumstances necessary to justify release of Green Belt, the sites are similar and can be grouped together. These are as follows.
- 4.36 In terms of the Local Plan strategy and place-making, the release of Green Belt would enable the integration of these sites into the fabric of Bury Green effectively 'completing' the somewhat piecemeal development which has characterised the area during the twentieth century. This process was influenced significantly by the decision to relocate St Mary's School from its old site adjacent to the Church to a new Green Belt site, thereby funding the provision of new school facilities and more capacity and freeing up the old site for housing in the Green Belt¹⁴. According to the officer's report, the very special circumstances were constituted by enabling development for the school relocation as well as tidying up a derelict site in accordance with a development brief.
- 4.37 In terms of transport, the Bury Green area is largely suburban in character and is the 'wrong' side of the A10 from the town centre of the Old Pond, but in terms of distance it is not far, and there is significant potential for increased walking and cycling along the New River and also across the A10 using the Paul Cully cycle bridge as well as potentially improved crossings and Church lane and College Road. The 242 bus service passes nearby the area and the scope for increasing the frequency of this service through the area is being investigated. The area is located in close proximity to both local primary and secondary schools and as such has high potential for increasing school trips on foot and by bicycle.
- 4.38 In terms of site-specific factors, there is an urgent need in the borough for more accommodation for elderly people, and the site at the **former St Mary's**

¹⁴ The planning application reference 7/0159/03/CM (county matters). Planning permission for redevelopment of the former school site in the Green Belt reference number 7/14/0076 Planning and Regulatory Committee 24 June 2014

east playing fields could offer an opportunity for such accommodation within a parkland setting, as well as facilitating a new community centre for the church. The **V&E club** on Goffs Lane are seeking to secure the future of the club, and development here, combined with the adjoining triangle of land, could help to provide the new facilities the club needs, either on-site or at an alternative location. The site at **Theobalds Brook Field** is the last remaining part of the Bury Green jigsaw and is located next to the new St Mary's Secondary school. Harm to the wider Green Belt would be very limited because of the severance caused by Lieutenants Ellis Way, which separates the site from the countryside beyond. The site **east of Dark Lane** borders the scheduled monument of Halfmoat house. Development of this site could help to open up and preserve the setting of this site, which has the potential to form a more visible focal point for the local area.

Hoddesdon/Broxbourne (Table B6 p. 71)

- 4.39 High Leigh Garden Village:** has been granted planning permission for a residential development incorporating a primary school, and includes provision for a bus link to Broxbourne station via Hoddesdon town centre, as well as public open space, a shop, and a hotel¹⁵. There are clear Green Belt boundaries provided by the existing built-up area to the east, Lord Street to the south, and Hertford Road to the north. Brambles Lane offers the access for walking and cycling under the A10/Dinant Link Road between Hertford Road and Lord Street, connecting into the town centre. The 'very special circumstances' necessary to allow development in the Green Belt are set out in the officers report. In summary, the report states that:

"It is considered that the lands that are subject to this planning application remain the only feasible short to medium term option for a strategic housing development within the Hoddesdon area. They are well contained by topography and by the strategic road network, they are well connected into the town centre and close to major employment areas. They are accessible by vehicles and through the existing and planned path network. They are within Green Belt but as discussed in the foregoing section, the Green Belt in this location is compromised by roads and power lines and does not have a high ranking. Furthermore, the inherent qualities of the site offer the potential to create a high quality, green and attractive suburban residential extension to Hoddesdon." (Paragraph 8.34)

- 4.40** Whilst the majority of the development site is located north of Lord Street, the permission includes sports pitches and a children's play area adjacent to the High Leigh conference centre on the south side of Lord Street, together with a small amount of residential development. This proposal is located adjacent to Barclay Park, and would form an extension to the park. Given the clear Green Belt boundary along Lord Street, the 'very special circumstances' established through the grant of planning permission, and the proposal for the majority of this area to remain as open land (play/sports), it is proposed that the land south of Lord Street should remain designated as Green Belt, and labelled on

¹⁵ High Leigh planning permission reference number 07/13/0899/O. Planning Committee 30 July 2014.

the policies map as subject to the same policy as the remainder of the site allocation.

- 4.41 Cutthroat Lane Field¹⁶ and Roselands House¹⁷** together form Green Belt parcel B3 (see appendix A) between the A10, Hertford Road, and the western edge of the residential area of Hoddesdon. Cutthroat Lane Field has been promoted for residential development through the draft Local Plan consultation. The Prospect Planning Review of the Inner Green Belt Boundary (2008) referred to this as 'The Leach Land' (after the promoters) and it was referred to as 'Land North of Hertford Road' by the 2005 Local Plan Inspector. Prospect Planning proposed release of this land from the Green Belt although the Review did not consider the site against Green Belt purposes. The 2005 Local Plan Inspector's Report (see Appendix D below) gives little encouragement to release of this site. The Green Belt Review (Scott Wilson, 2008) suggested that the majority of the area "*performs strongly against Green Belt purposes and therefore merits retention*"¹⁸
- 4.42 At first glance the A10 appears to offer an alternative Green Belt boundary, but the northern side of the area adjoins East Hertfordshire but has no clear physical demarcation line along which the Green Belt could be redrawn. The area is characterised by woodland with small pockets of open land, and removal of this land from the Green Belt would be likely to result in the removal of large numbers of trees which form an important part of the character of the wider area, defining the edge of the countryside. It would be very difficult to integrate the site into the existing built-up area or provide additional services and facilities. In transport terms it is relatively inaccessible.
- 4.43 On all these measures, the site provides poor potential for sustainable development in terms of a conventional development. Roselands House is a fine building which contributes significantly to the character of College Road/Roselands Avenue and is located on the edge of the area of woodland and a public right of way. Other than the potential to provide a relatively small contribution to housing land supply there is little to recommend this area. It is not considered that either Roselands House nor Cutthroat Lane Field present the exceptional circumstances necessary to justify release of Green Belt.
- 4.44 The Piggery Site, Rye Road¹⁹** lies in the Green Belt between the railway line and the River Lee adjacent to the borough boundary with East Hertfordshire. Immediately to the south lies the Turnford Surfacing site, which lies outside the Green Belt and is proposed for allocation in the Local Plan (draft Policy HOD2), in accordance with the approved development brief. The piggery site has not been promoted through the recent Call for Sites, but it was previously suggested that it could have potential as a brownfield development site. However, in recent years the site has effectively returned to nature and now is largely greenfield in appearance, characterised by mature trees, particularly to

¹⁶ SLAA reference HOD-GB-03

¹⁷ SLAA reference HOD-GB-08

¹⁸ Green Belt Review (Scott Wilson, 2008), parcels A10, A11, A12, and A13. It suggested that consideration could be given to a landscape designation.

¹⁹ SLAA reference HOD-GB-06

its northern end. Whilst it may be possible to squeeze a few homes into the southern end of the site, this would not in itself constitute the exceptional circumstances needed to enable the northwards extension of the Turnford Surfacing Site into the piggery site.

4.45 Planning permission was recently refused for a residential development at the **Broxbourne Landfill site, Conduit Lane east, Hoddesdon**²⁰, which lies adjacent to the Lee Valley Regional Park and Admiral's Lake. The applicant proposed a case for 'very special circumstances' based on remediation of a landfill site through the creation of wetlands. The Council refusal of permission stated that the proposed very special circumstances did not outweigh harm to the Green Belt. Although (like much of the Lee Valley Regional Park) the site may have at one time have had a brownfield character, it now forms part of a high quality landscape. Walking along the New River there are the long views across the site to the Regional Park, including a dappled landscape of water, trees and open spaces. This landscape provides a significant contribution to local amenity. Whilst the site lies near Hoddesdon Town centre and provides easy access to Broxbourne station along the New River, and the railway line could form an obvious Green Belt boundary, it is considered that these advantages do not outweigh the damage to this area of landscape that would result in its removal from the Green Belt.

4.46 **303/305 Ware Road, Hoddesdon**, are empty buildings where regeneration and alternative uses could promote the amenity of local residents through improved vitality and street scene. However, these aspirations are somewhat hampered by their designation as Green Belt. The 2005 Local Plan Inspector drew attention to the possibility of providing a small amount of housing on these sites, which are effectively part of the urban area of Hoddesdon, and suggested that the sites could be looked at through a Green Belt Review. Prospect Planning's review of the Green Belt Boundary states that the report *"provides a clear steer for how to view the site at such time as need exists for additional development land. That time has now arrived and having regard to the inspector's advice, it is considered that it would be unreasonable not to release 303 Ware Road from the MGB as part of the LDF process."*²¹

4.47 However, the 2008 Green Belt Review by Scott Wilson suggested that both sites performed well against Green Belt Purpose 1 (checking the unrestricted sprawl of built-up areas) and *"thus merits retention"*²². As noted in paragraph 1.22 above, since the Local Plan Inspector's report, there is now a broader emphasis in national policy than housing needs in meeting 'exceptional circumstances' and the Council has followed a criteria-based approach to reflect this. Redevelopment of 303 and 305 Ware Road should be pursued as permissible development in the Green Belt rather than through the Local Plan.

²⁰ Planning reference 07/16/1144/F – Planning and Regulatory Committee, 31 January 2017

²¹ Review of the Inner Green Belt Boundary, Prospect Planning (2008), Page 10

²² Green Belt review 2008, Scott Wilson, parcel A4

4.48 Broxbourne School was granted planning permission for 153 dwellings as enabling development for improvements to the school²³. The officer's report considered the views across the site, based on a number of site visits, and states the following:

“The case put forward by the applicant is straightforward and goes to the heart of the principle of enabling development as well as seeking to justify inappropriate development in the Green Belt. It is considered that the applicant has shown clearly that, while in the short term the school can continue to provide a high quality standard of education, in the longer term there would be severe financial consequences generated by the failing buildings which have no method of resolution beyond the redevelopment proposed in this application. The result of this financial penalty would be declining standards and harm to the educational prospects of local children. Against this backdrop it is considered that the applicant has demonstrated very special circumstances which would justify inappropriate development in the Green Belt” (paragraph 8.10)

4.49 Taking account of the decision of the Planning and Regulatory Committee, it is proposed that the grant of planning permission has established a secure basis for the exceptional circumstances necessary to release the proposed residential part of the site from the Green Belt. The remainder of the school site, including the area of the new school buildings and the associated playing pitches, will be retained within the Green Belt.

Waltham Cross (Table B7 p. 73)

4.50 Britannia Nurseries, Bryanstone Road, Waltham Cross was granted planning permission for the demolition of existing former nursery buildings and structures and redevelopment of the site for residential development comprising 90 dwellings²⁴. The site lies within the Lee Valley Regional Park area. Paragraph 8.46 of the report summarises the case for 'very special circumstances' to permit development in the Green Belt as follows:

“The development of the Britannia Nurseries site has a significant role to play in the renaissance of Waltham Cross. It would open up a major new entrance into the Lee Valley Regional Park as well as providing a new reception area for visitors. It would clear a derelict site and remediate contamination. It would provide much needed family housing in a sustainable location. It would assist in maintaining a five year housing land supply and provide affordable homes

²³ Planning reference 07/16/0512/F – Planning and Regulatory Committee 26 October 2016. The Secretary of State decided not to call-in the application.

²⁴ Planning Reference 7/13/0158/O. Planning and Regulatory Committee 30 June 2015. This decision followed judicial review of an earlier, similar decision in 2014 following a challenge by the Lee Valley Regional Park on a number of grounds including interpretation of Green Belt policy in relation to 'very special circumstances'.

for local people. It would provide significant community benefits to be drawn from planning obligations. Its overall impact on the Green Belt would be mitigated by the benefits of the layout of the development, the inclusion of open space and the mature tree boundaries around the site. It is contended that all of these factors would amount to the very special circumstances required to justify the encroachment into the Green Belt.”

- 4.51 Paragraph 8.21 of the officer’s report details that approval of the application would lead to a redrawing of the Green Belt boundary through the new Local Plan. It is considered that the exceptional circumstances for release of the site from the Green Belt has been established as set out above, and reflected in Table B7.

5. 'Very Special Circumstances' – development in the Green Belt

- 5.1 There may be a limited number of specific cases where it may be preferable to identify areas where development in the Green Belt may be desirable, subject to certain criteria, rather than release of the site from the Green Belt altogether. The National Planning Policy Framework (NPPF) makes a distinction between release of Green Belt in 'exceptional 'circumstances' through a Local Plan²⁵ and approval of Green Belt proposals in 'very special circumstances' through a planning application.²⁶ Neither exceptional circumstances nor very special circumstances are defined in national policy or guidance.
- 5.2 'Very special circumstances' may apply in instances where there are critical facilities which are not part of an existing built-up area and which are designated Green Belt but where the nature of the facility and the need for change should be given due weight in the consideration of a planning application. There may also be cases where release of a small area of Green Belt could undermine a wider area of Green Belt, for example due to a lack of clear boundaries to which a new boundary can be drawn. These cases can result in areas where sustainable development can be stymied because of concerns about rigid or inconsistent application of Green Belt policy.
- 5.3 In such cases, a common approach is to introduce additional Local Plan designations which sit 'on top of' the Green Belt and provide guidance as to what will or will not be permitted, taking into account and balancing the Green Belt and the other planning objectives for the site. The Council prefers not to 'punch holes' in existing Green Belt through a Local Plan Review because this is likely to result in a loss of control and potential disputes in cases where proposals encroach on tightly drawn Green Belt boundary. A further approach is to provide a general policy which refers to certain types of land use in the Green Belt, without identifying such areas on the Policies map.
- 5.4 The following analysis sets out the Council's approach to those cases where it is considered that 'very special circumstances' are likely to be capable of being achieved. These circumstances relate to schools, derelict glasshouse sites, and a small number of existing brownfield sites where Green Belt designation may be hampering legitimate regeneration.

School Sites

- 5.5 Provision of suitable educational facilities to meet future needs is a key aim of the Local Plan. In terms of policy designations, there are two alternative approaches to meeting these needs at sites located within the Green Belt.
- 5.6 The first approach is to present a case for development in the Green Belt at the planning application stage, justified by 'very special circumstances' based

²⁵ NPPF paragraph 83

²⁶ NPPF paragraph 87-8

on educational need. Recent examples of this in Broxbourne include the case of enabling housing development at Broxbourne School, and the extension to Goffs School. The relocation of St Mary's School from one Green Belt location to another is another good example (Local Plan 2005 Policy EMP11). This option has the advantage of ensuring that control of sensitive areas of open land, including playing fields, is maintained.

- 5.7 A second approach is to remove schools from the Green Belt through a review of the Local Plan, with educational need contributing to the 'exceptional circumstances' necessary for Green Belt release. This approach makes the planning application process simpler (since Green Belt is not a consideration), and indeed was recommended in the Green Belt Review 2008²⁷. However, it also runs the risk of inappropriate developments unrelated to educational need on land which should otherwise be kept open.
- 5.8 One new secondary school site is proposed, at Church Lane, Wormley. This site requires inclusion of privately owned land to the south of the main school site. In order to ensure that any future development in this area is strictly limited to educational provision or related enabling development, as well as maximising the potential for on-site ecological mitigation, it is proposed that the whole site is retained within the Green Belt.

Traveller Sites

- 5.9 Given the Green-Belt constrained nature of the Borough, and the presence of established travelling communities, the Council considers it appropriate to provide for the needs of genuine gypsies and travellers at these existing locations, sufficient to accommodate the identified need for additional pitches set out in the Gypsy and Travellers Accommodation Needs Assessment (2017). This approach is compliant with National Policy for Traveller Sites, which sets out a general presumption against traveller sites in the Green Belt.²⁸
- 5.10 The Council proposes to allocate four existing/relocated gypsy and traveller sites in the Green Belt. Two of these, at **St James's Road** and **Hertford Road**, allocate existing pitches and provide for the needs of the existing communities at those locations.
- 5.11 It is proposed to relocate the County-Council operated site from Halfhide Lane to **Park Lane Paradise**. The Halfhide Lane site (also currently Green Belt) is located in the centre of the proposed Brookfield Riverside development and the sustainable development of the centrepiece of the Broxbourne Local Plan cannot be achieved without relocation of the traveller site.
- 5.12 The very special circumstances necessary to provide this site are related to delivery of the Council's aspirations for Brookfield Riverside, as well as provided part of an integrated masterplanned approach to Brookfield. The

²⁷ Green Belt Review (Scott Wilson, 2008), Pages 84-5

²⁸ Planning Policy for Traveller Sites, August 2015, paragraph 16-17.

principles upon which this is based are contained in the Brookfield section of the emerging Local Plan and reproduced in paragraph 4.2 above, as well as recognising the need to meet the needs of the existing residents plus anticipated future need.

- 5.13 The Council proposes to allocate the land shown on the proposals map in order to provide an extended site area to include a paddock. Connections will be provided through the Brookfield Garden Village development to provide easy access to local shops, schools and facilities.
- 5.14 In relation to **Wharf Road**, the Council proposes to regularise and service this site in the Green Belt, providing for the needs of genuine gypsies and travellers whilst securing enhancements to the wider area in accordance with the Lee Valley Regional Park Authority's Wharf Road Environmental Strategy and Park Plan²⁹. Removal of the sub-let pitches and realigned of pitches away from the riverfront will enable improvements to the amenity of visitors to the Park.
- 5.16 Notwithstanding the current lack of suitable alternative sites, given the presence of an established and genuine need at Wharf Road, the chequered success of the Council and the Authority in terms of previous enforcement action, and the practicalities and human rights issues associated with eviction, the Council has continued to discuss the option of a regularised and serviced site at Wharf Road³⁰.

Derelict Sites in the Green Belt

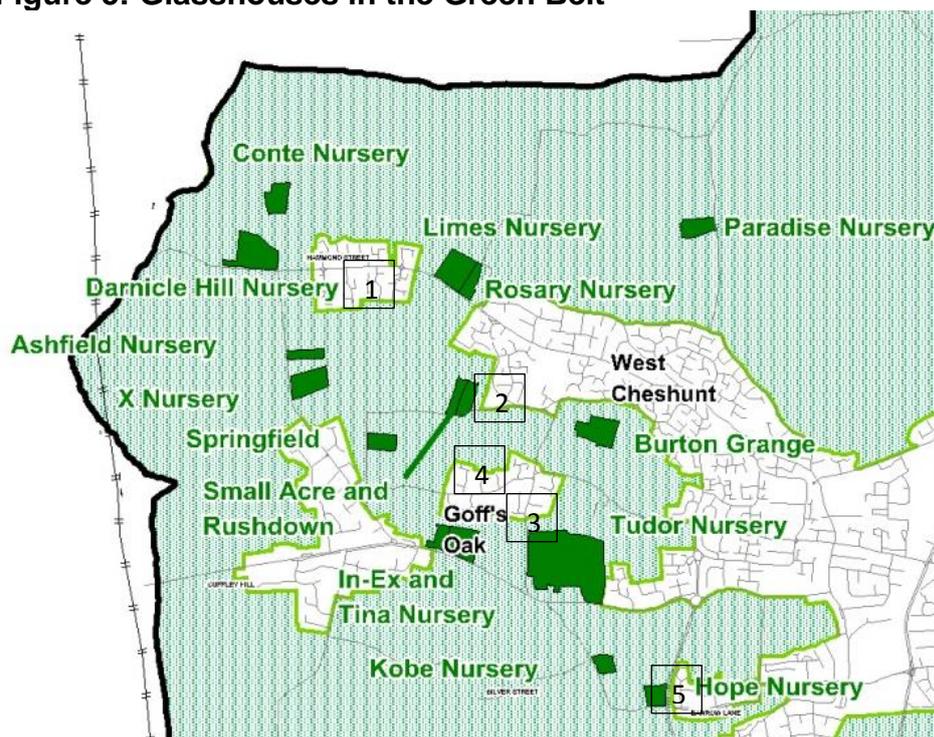
- 5.18 Two main types of sites have been identified: derelict glass house sites, and other former uses. The **glasshouse sites** are located in the Green Belt, as shown in Figure 5.
- 5.19 Areas 1, 2 and 3 as shown on Figure 5 show areas released from the Green Belt as part of the 1994 Local Plan as part of a strategy to address derelict nursery sites. A number of glasshouse sites were identified in the Scott Wilson Green Belt Review 2008 as potential options for safeguarded land for long-term development. However, the limitations of the previous strategy have become clear, both in terms of the creation of unsustainable patterns of development in the west Cheshunt area, and in terms of giving residential hope value to the remaining glasshouse sites, and possibly hastening their decline and dereliction³¹.

²⁹ Wharf Road Environmental Strategy, LUC for LVRPA (April 2013)

³⁰ Report to Broxbourne Council Cabinet, 4 April 2017

³¹ Whilst the Britannia Nurseries site offers an example of where the approach, this is not considered to a precedent for the glasshouse sites in West Cheshunt because of the particular issues regarding 'very special circumstances' set out above.

Figure 5: Glasshouses in the Green Belt



5.20 Options for the future of the glasshouse industry and these specific sites have been considered in the Goffs Oak Development Options Report (April 2016), taking account of the Glasshouse Study published in 2013³². Through the draft Local Plan (July 2016) the Council proposes a new approach to the remaining glasshouse sites, involving a criteria-based policy test for release of derelict sites for a small amount of self-build/custom-build housing only³³. The Council is pursuing a pilot scheme at Hope Nursery, Bury Green.

Permissible development in the Green Belt

5.21 Paragraph 89 of the NPPF sets out a number of exceptions to the rule that construction of new buildings in the Green Belt is inappropriate, including buildings for agriculture and forestry, sports facilities, replacements dwellings, and “*limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development*”.

³² Glasshouse Study (Laurence Goldman Associates, 2013); the Goffs Oak Development Options Report (April 2016), pages 8 and 23; and the Borough-wide Options and Scenarios Report (April 2016), paragraphs 3.6-3.17.

³³ Policy GB2: Residential Development on Derelict Glass House Sites:

<http://consult.broxbourne.gov.uk/portal/planning/dlp/dlpc?pointId=s1461748253348#section-s1461748253348>

- 5.22 The Glossary to the NPPF makes clear that previously developed land excludes *“land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.”* Appeal decisions in the borough have reiterated the fundamental point about loss of openness, including at nursery sites which are not considered to be previously developed land in the NPPF definition³⁴.
- 5.23 This Topic Paper sets out the sites which the Council proposes to release from the Green Belt through the Local Plan review. There may be other sites around the borough where a case could be made for development in accordance with the exceptions set out in paragraph 89 of the NPPF. However, these exceptions will be addressed through the consideration of planning applications received, rather than through the Local Plan process.
- 5.24 In relation to ‘limited infilling’, the Council considers that the NPPF implies small-scale development, and excludes infilling of local gaps or other pieces of land which serve a strategic planning purpose such as the prevention of sprawl or reduction in the openness of the Green Belt.
- 5.25 There are a number of sites located within the Green Belt which contain structures and which may or may not meet the national definition of previously developed land. The Council intends to prepare a Brownfield Register through which the merits of inclusion of such sites can be considered.

³⁴ Halstead Hill Nursery, Halstead Hill, Goffs Oak, EN7 5NA, appeal ref APP/W1905/W/16/3164574, 4 April 2017; The Bungalow, Corner of Crouch Lane, Goffs Oak, EN7 6TL, Appeal ref APP/W1905/A/14/2217163; 17 September 2014; Windrush House and Tanglewood House, Newgatestreet Road, Goffs Oak, EN7 5HR, appeal ref APP/W1905/A/11/2167217, 11 October 2012.

6. Conclusions

- 6.1 The Council has given careful consideration to the requirements of national policy and guidance as work on the Local Plan has progressed over the past few years, as well as considering the implications for sustainable development. Following assessment, the Topic Paper concludes that the areas set out in Table 4 below should be released from the Green Belt through the Local Plan review.

Table 4: Areas of Green Belt proposed for release

No.	Site	hectares
1	High Leigh Garden Village, Hoddesdon	42
2	Broxbourne School (residential area only)	7
3	Brookfield Garden Village and Brookfield Riverside	128
4	North of Cuffley Hill	4
5	North of Goffs Lane	5.5
6	South of Goffs Lane	2.5
7	Newgatestreet Road, Goffs Oak	2
8	Rosedale Park, West Cheshunt	85
9	Bury Green - north	35
10	Bury Green - south	35
11	Maxwells Farm West and Rush Meadow (including Cheshunt School Playing Fields)	37
12	Albury east of A10, Cheshunt (including Cedars Park)	40
13	Park Plaza West	40
14	Britannia Nurseries, Waltham Cross	4
	TOTAL	467

- 6.2 The existing Green Belt in Broxbourne covers 3,314 hectares and therefore approximately 86% of the Green Belt will be retained. The Council considers that the exceptional circumstances necessary to release this land from Green Belt have been demonstrated. Maps of all of the locations proposed for release from Green Belt are contained in Appendix E.
- 6.3 A significant proportion of the land to be released from Green Belt is not proposed for development but will remain as open land covered by more appropriate designations which restrict development. Examples of this include school playing pitches, Cheshunt cemetery, Cedars Park, sports clubs such as Rosedale and Cheshunt, and the Local Green Space proposed at Rosedale Park and Park Plaza West. The majority of the best performing Green Belt land will be retained, and access to the countryside and open space will be improved.

Long-term planning

6.4 National policy requires that a long-term approach should be taken to Green Belt:

When defining boundaries, local planning authorities should:

- *ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
- *not include land which it is unnecessary to keep permanently open;*
- *where necessary, identify in their plans 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;*
- *make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;*
- *satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
- *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.*³⁵

6.5 It is anticipated that a significant proportion of the borough's long-term development needs beyond 2033 can be met at two urban areas identified in the emerging Local Plan: the proposed Cheshunt Lakeside development adjacent to Cheshunt station, proposed for a mixed-use urban village including of c. 1,750 homes; and within the area defined on the policies map as the focus of the Waltham Cross Area Action Plan (AAP), which will take account of the potential opportunities offered by Crossrail 2.

6.6 As highlighted in the analysis of the Park Plaza area in section 4 above, the release of Park Plaza West from Green Belt makes the identification of Maxwells Farm West and Rush Meadow as safeguarded land an obvious choice for future development, as the majority of the land is in a single landownership and it benefits from clear boundaries as well as proximity to the facilities and schools of Bury Green and Cheshunt.

6.7 The Council considers that there is limited scope for Broxbourne to continue to accommodate significant new development in the Green Belt beyond 2031. It is a small Borough with significant growth constraints – the Lee Valley Park to the east, semi-ancient woodland and rural/suburban communities to the west and busy transport routes. On the basis of the work undertaken as part of this Local Plan review, the Council is satisfied that Green Belt boundaries will not need to be altered at the end of the development plan period.

³⁵ National Planning Policy Framework, paragraph 85.

Appendices

Appendix A – Description of Large-Area Green Belt Parcels

Parcel A – Hoddesdon Woods

Hoddesdon Woods refers to land to the west of the A10 encompassing Woollensbrook, Box Wood, Goose Green, Hoddesdon Lodge and Hoddesdon Park Woods. The area is of high landscape value and is heavily wooded with a few arable and pastoral fields bordering the A10. There is no access to the parcel from the A10 and only limited access via Hertford Road and Lord Street.

The parcel performs a strategic function in that if developed, it would result in sprawl between the main urban area of Hoddesdon out into open countryside. It would therefore result in ribbon style development away from the main built up area if developed. It is surrounded by Green Belt on all sides and provides a barrier between the built up area of the borough and the openness of the Green Belt. The A10 to the east provides a strong defensible boundary where if breached, would cause limitless sprawl with no physical or defensible boundaries identified in Parcel A to stop it.

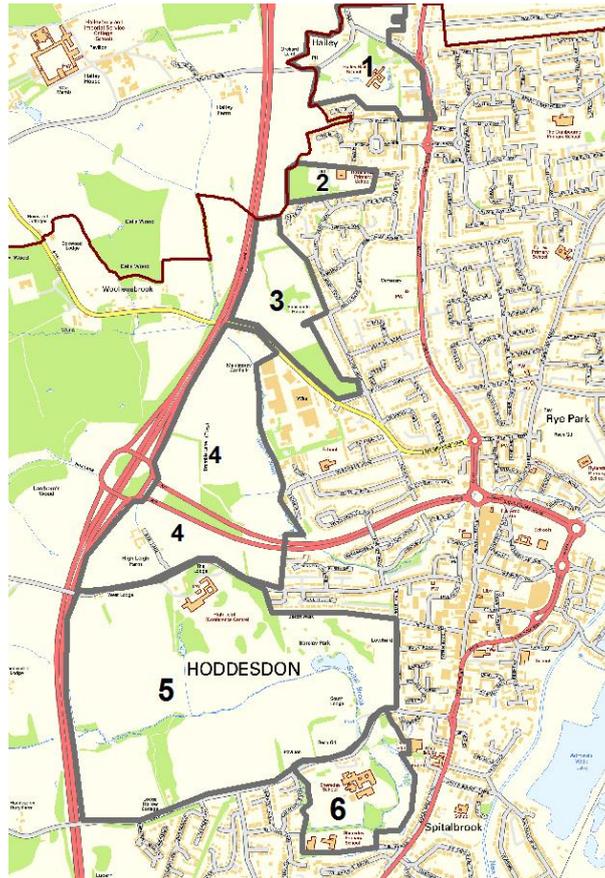
The parcel does not perform a local function in preventing towns from merging. It is not situated between local settlements in the borough and the nearest town is situated approximately 2 kilometres away. However it still plays an important strategic gap between towns (Hoddesdon and Hertford Heath).

The parcel does contain several wooded areas protected by a tree preservation order. Broxbourne Hoddesdonpark Woods is designated as a Special Area of Conservation (SAC) and protected under international law. The parcel is not grade 1 or grade 2 agricultural land. The Landscape Character Assessment does recognise sensitive landscape features in parts of the parcel which have limited capacity to accommodate change.

The boundaries of Parcel A are considered to be robust and there are no features that would be more permanent or more defensible than what is currently there, particularly given that the site is already bounded on all sides by Green Belt. The parcel is open in nature with only minor roads and wooded areas that could act as new boundaries.

Parcel B – West of Hoddesdon

West of Hoddesdon refers to Green Belt land between the A10 and the urban area of Hoddesdon encompassing seven distinct sub areas: (1) land west of Ware Road, (2) land south of Boundary Park, (3) land north of Hertford Road, (4) land north and south of Dinant Link Road, (5) Barclay Park and Spital Brook valley and (6) land south of Cock Lane. These are illustrated on the map below:



(1) Land west of Ware Road

Land to the west of Ware Road comprises Hailey Hall School, Galley Hall public house and a number of residential properties. It prevents ribbon development continuing along Ware Road and provides a buffer between Hoddesdon and other villages/towns to the north including Ware, Stansted Abbots, St Margarets and Hertford Heath. Although the rural road of Hailey Lane to the north could provide a defensible boundary, there are no physical boundaries to the west that would prevent sprawl. It is also bounded by Green Belt to the west, north and partly to the south. It is not grade 1 or 2 agricultural land although it does have some ornamental trees which contribute to its parkland character.

(2) Land south of Boundary Park

Land to the south of Boundary Park contains Roselands primary school and woodland. It is only bounded by Green Belt on one side i.e. the woodland to the west. Its release would not constitute sprawl due to its size and relationship to the existing urban area. Its development would connect two urban areas but the land has already been predominantly developed for the primary school. The wooded area to the west provides a sensitive land feature, however it is not protected by a tree preservation order and has no national or international environmental designations. The A10 could act as a new Green Belt boundary.

(3) Land north of Hertford Road

Land to the north of Hertford Road comprises open scrubland, dense woodland, a car park and a covered reservoir. The land is situated close to the urban area and is surrounded by Green Belt on one side. It performs well against purpose 1 in that it would prevent development sprawling out towards open Green Belt to the west, however the A10 would prevent any spread of that development. There is a lack of a definitive boundary to the north however. It would not prevent distinct towns from merging as it is situated in the main urban area of one town although it does aid in acting as a green buffer between residential developments and openness would be lost as a result of any development. It contains a large area of protected trees to the east, is sensitive to some landscape change but has no national or international designations or high quality agricultural land. The boundary in this area could be considered weak as the A10 could act as a new Green Belt boundary. The score for this sub area is set out below:

(4) Land north and south of Dinant Link Road

Land to the north of Dinant Link Road comprises open fields and woodland overlooking Merck Sharp Dohme pharmaceutical complex. Land to the south of Dinant Link Road comprises open fields and a tree belt along Lord Street. The sub area performs fairly well against purpose 1 in that it would prevent sprawl out towards open Green Belt to the west, however the A10 would prevent any spread of development and there are defensible Green Belt boundaries identified to the north and south as well. It would not lead to towns merging as Green Belt to the south of Lord Street provides a buffer between the settlement of Broxbourne and the settlement of Hoddesdon. It does not currently contain any environmental designations and it is not grade 1 or 2 agricultural land. The A10 would provide a more robust Green Belt boundary than the current boundary which includes the edge of the urban area.

(5) Barclay Park and Spital Brook valley

This sub area contains Barclay Park, Spital Brook valley and High Leigh conference centre and is a shallow sided valley with formal parkland and woodland giving way to open fields and extensive views. The area does provide a barrier between the urban area and open Green Belt to the west, but like the sub area above, the A10 could act as a new defensible Green Belt boundary. It is surrounded by Green Belt on two of its sides and partly on a third side to the south. It provides a barrier between the settlement of Broxbourne to the south and Hoddesdon to the north and its development would significantly affect the openness of the area. The site does not contain any national or international designations and is not grade 1 or 2 agricultural land, however there are groups of trees which are protected and it is protected community open space with high landscape value.

(6) Land south of Cock Lane

This sub area contains Sheredes primary and secondary schools, rear gardens and some community open space. The area does in some part prevent development from sprawling into Green Belt to the north but Cock Lane could act as a more defensible Green Belt boundary and the schools would be maintained for education uses preventing intense redevelopment of this sub area. It is bounded on all three sides by the urban area and plays a somewhat limited

function in preventing the same settlement from merging. There are groups of trees which are protected but no other designations in the sub area and no land of agricultural value.

Parcel C – Broxbournebury and Wormleybury

Parcel C is located to the west of the A10 encompassing Broxbournebury Mansion and golf course, Wormleybury Manor and a scattering of farms and farmland. It also forms part of a much larger swathe of open Green Belt countryside that extends northwards to Hertford and westwards towards Welwyn Garden City.

The parcel performs a strategic function in that if developed, it would result in sprawl between the main urban area of Broxbourne and Wormley out into open countryside. Its development would therefore result in ribbon style development away from the main built up area. It is surrounded by Green Belt on all sides and provides a barrier between the built up area of the borough and the openness of the Green Belt. The A10 to the east provides a strong defensible boundary where if breached, would cause limitless sprawl with no physical or defensible boundaries identified to the west to stop it.

The parcel does not perform a local function in preventing towns from merging. It is not situated between local settlements in the borough and the nearest town is situated approximately 2 kilometres away. However it still plays an important wider strategic gap between towns.

The parcel does contain Hoddesdonpark Woods, a site of special scientific interest. It also contains several wooded areas protected by a tree preservation Order. The parcel is not grade 1 or grade 2 agricultural land but is open and rural in nature. The Landscape Character Assessment states that the landscape in this area is relatively strong and has a distinctly recognisable sense of place throughout, with mature parkland and veteran trees and copses providing visual landmarks and focal points. Although there is evidence of urban influences, such as pylons, steel gates, signage and some barbed wire fencing, this landscape has a generally mature landscape structure and is considered to be in generally good condition throughout.

The boundaries of Parcel C are considered to be robust and there are no features that would be more permanent or more defensible than what is currently there, particularly given that the site is already bounded on all sides by Green Belt. The parcel is open in nature with only minor roads and wooded areas that could act as new boundaries.

Parcel D – West of Wormley

This parcel refers to playing fields and open space located between the A10 and the urban edge of the borough.

This parcel performs well against purpose 1 in that it prevents development from the main urban area from Broxbourne sprawling into open Green Belt. It is only bounded on one side by Green Belt and the A10 to the west could also act as a

new Green Belt boundary. However the New River to the east already provides a robust boundary.

The parcel does prevent the merging of small settlements to the south and north but performs less so on a strategic basis. The area does have some constraints that would prevent towns from merging and reduce the level of development on the parcel including playing fields and an open space allocation, protected trees and a local wildlife site designation.

The land to the north of Church Lane is grade 3 agricultural land whereas land to the south is classed as grade 2 agricultural land.

At present, the New River to the east and a link road off the A10 provide robust Green Belt boundaries. The rear gardens of properties to the north make this part of the parcel more susceptible and weak.

Parcel E – Brookfield and Cheshunt Park

This parcel encompasses land to the west of Brookfield shopping centre including Cheshunt Park, Cheshunt golf course and farmland.

This parcel performs well against Green Belt purpose 1 in that it currently provides a barrier between the main urban area of Broxbourne and open Green Belt. Although there are some semi-rural roads to the west and north which could act as new Green Belt boundaries, the existing road infrastructure already provides permanency.

The area performs less of a function against Green Belt purpose 2 as it does not prevent towns from merging or connect settlements due to its strategic location to the west and north of the urban area. The parcel does not reduce the openness between settlements due to its distance away from those settlements.

The parcel does have a number of wooded areas protected under a tree preservation order and some local wildlife sites. It has no national or international designations and is not high quality agricultural land.

Parcel F - Hammondstreet

Hammondstreet refers to the north of Hammondstreet and Appleby Street encompassing a number of woods and a scattering of farms, farmland and glasshouses.

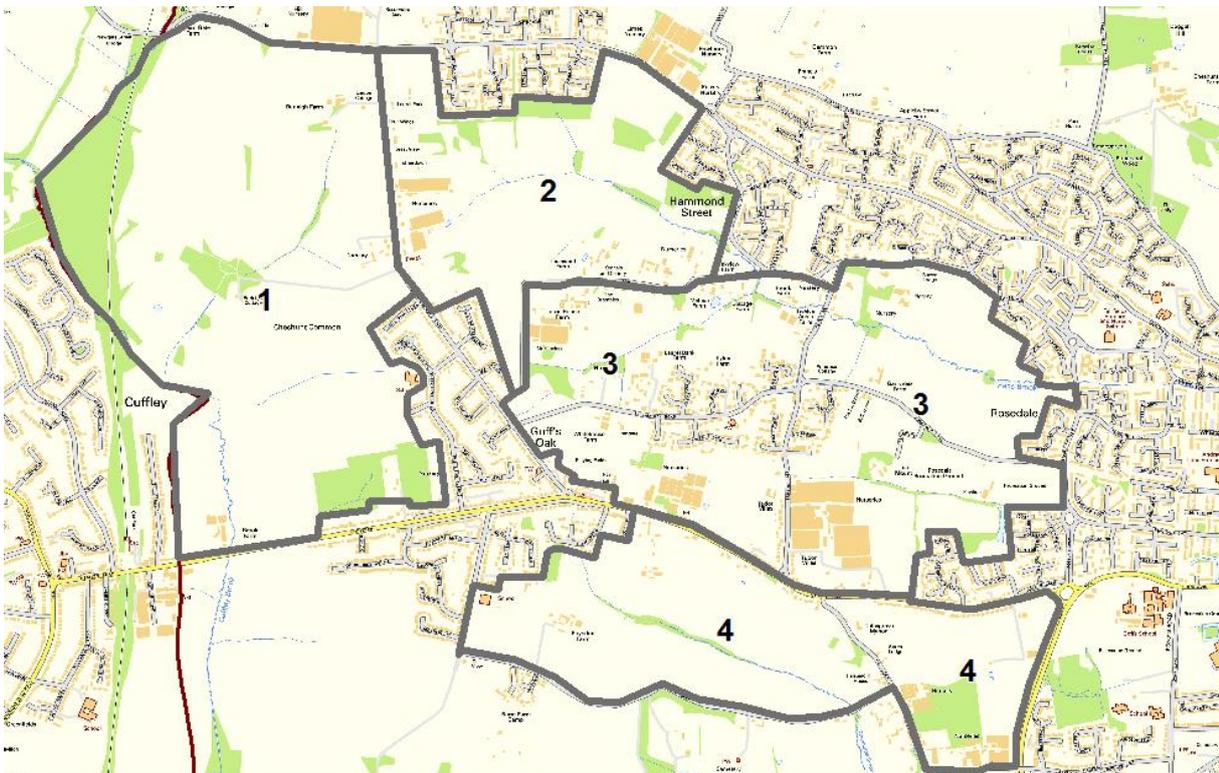
This area forms part of a much larger swathe of open Green Belt and countryside that extends northwards to Hertford and westwards towards Welwyn Garden City. It performs well against Green Belt purpose 1 in that it prevents ribbon development sprawling northwards into open countryside with no noticeable boundaries within the parcel to prevent it. Appleby Street already provides some form of permanent Green Belt boundary. The parcel is surrounded by Green Belt on three sides and provides a strategic gap between the large urban area of Broxbourne and villages and towns located westwards.

The land parcel provides less of a function against Green Belt purpose 2. It does not prevent towns and settlements from merging given its location on the edge of Hammondstreet. However the parcel is only protected by the edges of gardens and some rural roads which in themselves would not prevent sprawl. The area does contain a site of special scientific interest but is not grade 1 or 2 agricultural land.

As set out in the text above there are existing roads to the south of some of the parcel which provide a permanent boundary. However in other areas, the rear gardens of properties are the only boundaries which would prevent sprawl. There are no physical features to the north however that would prevent sprawl and act as more robust boundaries.

Parcel G – Goff's Oak

The Goff's Oak parcel is encompassed by Hammondstreet to the north, Rosedale to the east, Silver Street to the south and Cuffley railway line to the west and contains Goff's Oak Village and St James. Similar to the area west of Hoddesdon, this parcel has been divided into further separate sub areas: (1) land west of Goff's Oak Village, (2) north of Crouch Lane, (3) land around St James and north and south of Andrews Lane and (4) south of Goff's Lane and north of Silver Street/Halstead Hill. These are set out on the map below:



(1) Land west of Goff's Oak Village

This sub area performs well against Green Belt purpose 1 and 2 as it provides a strategic barrier between the borough of Broxbourne and the borough of Welwyn and Hatfield but also a local gap between Goff's Oak Village and Cuffley Village. It prevents sprawl of the urban area out towards Cuffley and other villages to the west and its development would reduce the openness of this strategic gap. It is

bounded on three sides by Green Belt and has no strong defensible Green Belt boundaries to prevent encroachment. Although the existing boundaries are weak as they consist mainly of residential gardens, there are no physical boundaries to the west that could act as a new Green Belt boundary.

The sub area contains some protected trees but has no other designations or high quality agricultural land.

(2) North of Crouch Lane

The area of land north of Crouch Lane consists mainly of open fields and a scattering of farms, glasshouses and business premises along Newgatestreet Road and Crouch Lane. It also contains Cheshunt Common land and the Wildlife Site Study recommends a large swathe of it be protected. The Landscape Character Assessment also recognises a number of pockets of woodland and historic hedgerows which support the character of the sub area.

The area does provide an important local green gap to help prevent the St James' area, Goff's Oak Village and Hammondstreet from merging and also helps to prevent, to some degree, the sprawl of development westwards towards sub area (1) and more open parts of the Green Belt.

Newgatestreet Road could be used as the new defensible Green Belt boundary as some of the existing boundaries, which are currently rear garden fences, are weak. It is bounded on only two sides by Green Belt but because of its position and topography, it is very open in nature and provides an important green wedge between residential areas.

(3) Land around St James and north and south of Andrews Lane

The sub area comprises open fields and a selection of farms, glasshouses, residential properties, play space and leisure facilities as well as businesses. The Landscape Character Assessment observes fields, hedgerows, pockets of woodland which contribute to the historic context of the area. However there are no national or international designations within the sub area and it is not grade 1 or 2 agricultural land.

Sub area (3) performs an important local function in preventing settlements from merging with one another. This includes the merging of the urban area of Cheshunt located to the east and St James and Goff's Oak Village located to the west.

It performs less well against purpose 1 in that its development would not cause sprawl into open Green Belt as there are built structures located to the west such as residential properties, agricultural and horticultural buildings, which would prevent ribbon development towards Cuffley. It is bounded by the urban area on most sides but its development would lead to the loss of openness between distinctive urban areas.

Most of the parcel's existing boundaries, which currently consist of rear garden fences, are weak.

(4) South of Goff's Lane and north of Silver Street/Halstead Hill

Sub area (4) refers to land between Goff's Lane and Silver Street which contains Theobalds Brook valley and Halstead Hill Triangle bordered by Lieutenant Ellis Way to the east, Barrow Lane to the south and Halstead Hill to the west. It is not high quality agricultural land but does contain a handful of protected trees and some local wildlife sites.

The area performs well against Green Belt purpose 1 as it prevents development from sprawling to the south of the borough into open countryside. It performs a strategic gap between the London Borough of Enfield to the south and the urban area of Broxbourne. It also prevents, to some degree, urban areas to the east merging with settlements to the west within the borough.

Development of this parcel would significantly affect the openness of land between settlements and urban areas.

Parcel H – Theobalds

Theobalds refers to land to the south of Silver Street and Lieutenant Ellis Way as far south as the M25. It mostly comprises of open fields and woodland.

This parcel forms part of a much larger swathe of open Green Belt countryside that extends southwards to Enfield and westwards towards Cuffley and Potters Bar. It therefore performs an important strategic function in preventing open countryside from being developed and merging key settlements and major towns. It is bounded on all sides by development and has no boundaries that would prevent development from spreading towards neighbouring towns. It has less of a local function in merging smaller settlements due to its location away from the main urban area. Although development of the parcel alone would not merge settlements as it is bounded on all sides by Green Belt, it would erode open countryside and would make other Green Belt land around it susceptible to development.

The Landscape Character Assessment states that this parcel has a strong sense of tranquillity which would be sensitive to any change and contains interspersed woodland blocks which contribute towards its character. It has no national or international designations and is not grade 1 or 2 agricultural land. As the parcel is surrounded on all sides by Green Belt there are no weak boundaries to be reviewed.

Parcel I – Bury Green

This parcel immediately adjoins the urban edge of Bury Green and is encompassed by Goff's Lane to the north, Lieutenant Ellis Way to the west and south and the New River to the east. It comprises of playing fields, an ancient moat, the former St Marys Secondary School which has planning permission for residential use, the new St Marys Secondary School, Goff's Secondary School, Bonneygrove Primary School, allotments and sports clubs. It is not high quality agricultural land and does not contain any national or international ecological sites.

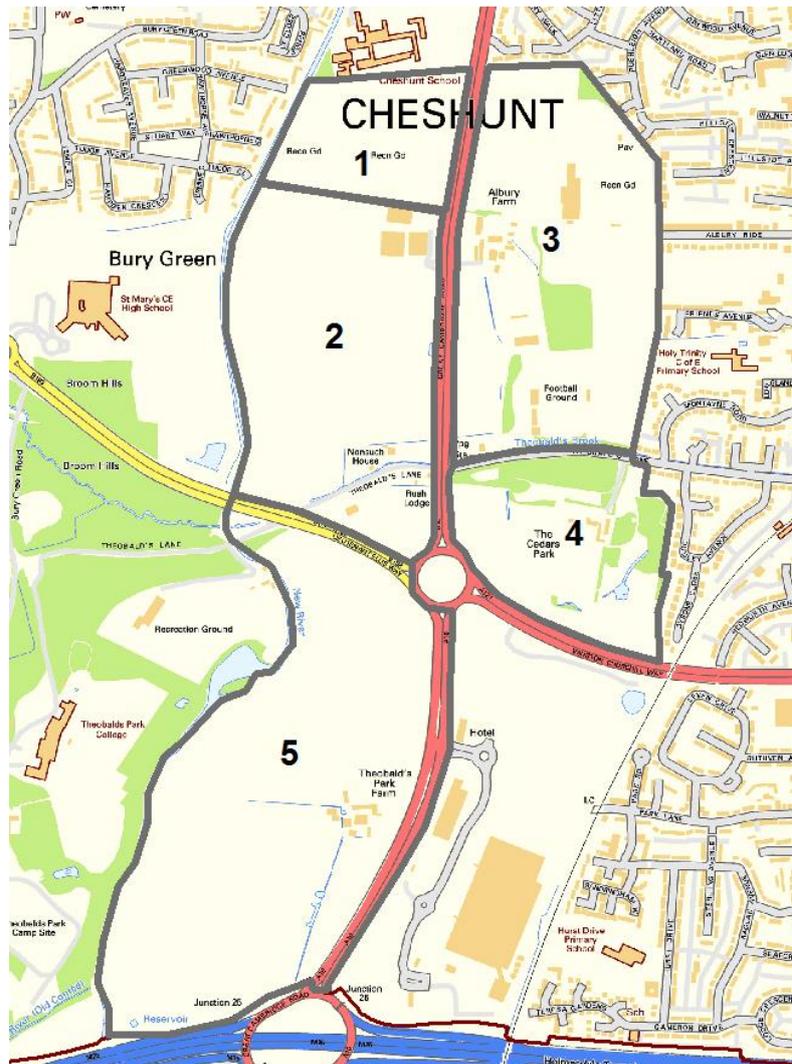
The development of the Bury Green Parcel would not lead to ribbon development or sprawl as Lieutenant Ellis Way would prevent any encroachment of development out into open countryside and Green Belt. It is bounded by the urban area on most sides and does not provide a barrier between distinctive settlements.

It performs slightly better under Green Belt purpose 2 as it does help prevent merging of smaller urban areas e.g. between areas of Churchgate and Bury Green. However there are a number of designations and allocations, such as educational buildings, that would prevent the complete merging of these smaller residential areas. The redevelopment of the parcel would reduce some openness but not between distinctive settlements.

Boundaries around the urban fringe of this parcel are weak as they only constitute garden fences. Lieutenant Ellis Way to the west would be a more robust boundary.

Parcel J – Southern A10 Corridor

The Southern A10 Corridor refers to land either side of the A10 to the south of the junction with College Road and encompasses five distinct sub areas: (1) Cheshunt School playing fields, (2) Maxwells Farm West, (3) Albury Farm East, (4) Cedars Park and (5) Park Plaza West. Their locations are illustrated on the map below:



(1) Cheshunt School playing fields

This sub area is clearly associated with the secondary school and separated from sub area (2) to the south by a thick hedgerow. Its development would lead to ribbon development spreading south into Maxwells Farm and although there is a hedgerow, this isn't considered to be a defensible Green Belt boundary.

It, along with other sub areas in this parcel, provides a strategic gap between Enfield and Cheshunt but also a local function by preventing the Bury Green area to the west merging with Cheshunt to the north and further to the east. Although the land is used as playing fields, some of the sub area is grade 2 agricultural land. The Landscape Character Assessment states that this parcel has a strong sense of openness but only contains limited hedgerows.

(2) Maxwells Farm West

Maxwells Farm West consists of a handful of industrial units but mostly encompasses agricultural fields. Comparable to sub area (1), this sub area performs well against purpose 1 in that it helps to prevent the merging of Enfield and the urban part of the borough (along with all other sub areas in this parcel).

It provides less of a contribution against purpose 2 as it is not bounded by the urban area and therefore does not help prevent the merging of towns. However it still provides a gap between the urban area to the west and the urban area further to the east of sub area (3) (see below). It is open and bounded by Green Belt on most of its sides.

The sub area is mostly grade 2 agricultural land and very open in nature.

(3) Albury Farm East

This sub area comprises of a number of sports facilities and farmland situated between the A10, Theobalds Lane and the main urban area of Cheshunt. Approximately 50% of the sub area is grade 2 agricultural land and is open in nature with some hedgerows situated along the borders.

The sub area performs an important strategic gap, as do the other sub areas in this parcel, by preventing the merging of Enfield to the south with the main urban area of the borough. However it is only bounded to the south and west by Green Belt. The A10 could be used as a new defensible Green Belt boundary to prevent the urban area to the east from sprawling. However the currently boundary, a public footpath, provides a robust boundary.

Development of this parcel, particularly the western edge, would reduce the openness of this area and would result in the loss of a local green buffer.

(3) Cedars Park

Cedars Park is a formal public park situated to the south of Theobalds Lane and north of the A121. It is important parkland which has an historic heritage, this making it sensitive to landscape change. It contains a number of well-established trees both within and around the periphery of the site although it is not a nationally or internationally designated site. The western corner is grade 2 agricultural land.

The sub area performs a strategic function along with the other sub areas by preventing the merging of Enfield and the urban area of the borough. It also helps to prevent the merging of Park Plaza North, an allocated employment site, with residential areas located further north and to the east. It helps prevent sprawl eastwards, however the A10 does provide a defensible Green Belt boundary.

(4) Park Plaza West

Park Plaza West is located between the M25 to the south, the A10 to the east, Lieutenant Ellis Way to the north and the New River to the west. It comprises Theobalds Park Farm and associated fields.

The site performs very well against both Green Belt purpose 1 and 2 as it prevents any development from Enfield to the south and Waltham Cross to the east from sprawling into open Green Belt to the west. It also prevents the merging of Enfield with the urban area of Cheshunt.

It is very open in nature, providing a buffer between distinct urban areas and providing long views across to the west. It is mostly grade 2 agricultural land, has some established hedgerows and would be sensitive to change from development.

Parcel K – Lee Valley Regional Park

The Lee Valley Regional Park (LVRP) parcel stretches the entire eastern edge of the borough and forms part of a much larger swathe of open Green Belt countryside that extends north into East Hertfordshire, east into Epping Forest and south into Enfield.

The parcel contains a number of sites of special scientific interest, water bodies, ecological areas, trees and hedges all of which provide an important sense of openness and tranquillity. The Landscape Character Assessment states that it will be very sensitive to any major development change although it does, in some areas, border industrial and residential areas. There is no grade 1 or 2 agricultural land in this part of the Park but the entire area safeguards countryside situated to the east of the parcel.

The LVRP provides an important buffer between Broxbourne and Epping Forest and prevents development sprawling eastwards. It is surrounded by open Green Belt to the east with no definitive boundaries to prevent further encroachment. Development of the parcel would reduce openness of the Green Belt particularly between distinct settlements and it would connect the towns of Waltham Abbey and Waltham Cross and parts of Broxbourne with Nazeing.

Appendix B

Tables of sites and exceptional circumstances

Table B1. Brookfield

Criteria		Garden Village	Riverside	Reserve Secondary School Site, Church Lane
Local Plan Strategy				
1	Consistency with the Local Plan strategy and objectives	✓✓✓	✓✓✓	✓
2	Meeting identified requirements for sustainable development (emerging policy PM1)	✓✓✓	✓✓✓	✓✓
3	Housing provision to meet objectively assessed needs	✓✓✓	✓	✗
4	Inclusion of jobs and access to employment opportunities	✓	✓✓✓	✓
5	Supporting town centres and the retail hierarchy	✓✓	✗	✗
6	Restoration of derelict or underused land/buildings	✓	✓	✗✗
7	Minimising the impact on roads	✗	✗	✗
8	Sustainable transport solutions	✓	✓✓	✓
The Green Belt				
9	Minimising the impact on and maintaining the aims and purposes of the Green Belt	✓	✓	✓
10	Establishing the permanence of the Green Belt	✓	✓	✓✓
11	Improving the Green Belt and the countryside	✓	✓	✗
Sustainable Place-Making				
12	Place creation – unique, beautiful and safe with a sense of place, community and belonging	✓✓✓	✓✓✓	✓
13	Strong connection to existing place and/or creation of new place	✓✓	✓✓	✓
14	Strong mix of uses and facilities	✓✓✓	✓✓✓	✓
15	Inclusion of and/or accessibility to shops	✓✓	✓✓✓	✓
16	Inclusion of and/or accessibility to school(s)	✓✓	✓	✓✓✓
17	Inclusion of and accessibility to sports, recreation, open space and countryside	✓✓	✓✓	✓✓
18	Inclusion of other services and/or accessibility to other services	✓	✓✓	✗
Design, landscape and biodiversity				
19	Respecting heritage and landscape assets	✓✓	✓✓	✓

Criteria		Garden Village	Riverside	Reserve Secondary School Site, Church Lane
20	Exceptional design	✓✓✓	✓✓✓	✓✓
21	Sustainable design and construction	✓✓✓	✓✓✓	✓✓
22	Exceptional landscaping and biodiversity	✓✓✓	✓✓✓	✓✓✓
Transport				
23	Minimising the need to travel by car	x	✓✓	✓
24	Inclusion of and/or accessibility by public transport to a variety of destinations	✓	✓✓	?
25	Walking and cycling connections	✓✓	✓✓	✓
26	Accessibility to countryside	✓✓	✓	✓
CONCLUSION – YES OR NO		YES	YES	YES♦

♦ However, it is considered more appropriate to retain the site within the Green Belt, and address any planning application for a school, access roads and ancillary uses as part of a planning application through the ‘very special circumstances’ route. For further explanation of this see Section 5.

Key

✓✓✓	Largely positive
✓✓	Moderately positive
✓	Slightly positive
xxx	Largely negative
xx	Moderately negative
x	Slightly negative
n/a	Not applicable

Table B2. Park Plaza

Criteria		Park Plaza West	Maxwells Farm West	Albury Farm	Cheshunt Country Club
Local Plan Strategy					
1	Consistency with the Local Plan strategy and objectives	✓✓	✓	✓✓	✗
2	Meeting identified requirements for sustainable development (emerging policy PM1)	✓✓	✓	✓	✗
3	Housing provision to meet objectively assessed needs	n/a	?	✗	✓
4	Inclusion of jobs and access to employment opportunities	✓✓✓	?	✓	✗
5	Supporting town centres and the retail hierarchy	✓	?	✗	✗
6	Restoration of derelict or underused land/buildings	✗✗	✗✗	✗	✓
7	Minimising the impact on roads	✗✗	✗	✗	✗✗
8	Sustainable transport solutions	✓	✓	✗	✗✗✗
The Green Belt					
9	Minimising the impact on and maintaining the aims and purposes of the Green Belt	✗	✗	✗	✗✗
10	Establishing the permanence of the Green Belt	✓	✓	✓✓	✗✗
11	Improving the Green Belt and the countryside	✗✗	✗✗	✓✓	✗✗
Sustainable Place-making					
12	Place creation – unique, beautiful and safe with a sense of place, community and belonging	✓✓	?	?	✗✗
13	Strong connection to existing place and/or creation of new place	✓✓	?	✓	✗✗✗
14	Strong mix of uses and facilities	✓	?	✓	✗
15	Inclusion of and/or accessibility to shops	✓	?	✓	✗✗✗
16	Inclusion of and/or accessibility to school(s)	✗	✓✓	✓✓	✓
17	Inclusion of and accessibility to sports, recreation, open space and countryside	✓	✓	✓✓	✓
18	Inclusion of other services and/or accessibility to other services	✓	?	✓	✗✗
Design, Landscape and Biodiversity					

Criteria		Park Plaza West	Maxwells Farm West	Albury Farm	Cheshunt Country Club
19	Respecting heritage and landscape assets	✓✓	?	n/a	xx
20	Exceptional design	✓✓✓	?	n/a	xx
21	Sustainable design and construction	✓✓	?	n/a	xx
22	Exceptional landscaping and biodiversity	✓✓✓	?	n/a	xx
Transport					
23	Minimising the need to travel by car	x	✓	✓	xxx
24	Inclusion of and/or accessibility by public transport to a variety of destinations	✓	?	✓	xx
25	Walking and cycling connections	✓✓	✓✓	✓✓	✓
26	Accessibility to countryside	✓	✓	✓	✓
CONCLUSION – YES OR NO		YES	YES	YES	NO

Key

- ✓✓✓ Largely positive
- ✓✓ Moderately positive
- ✓ Slightly positive
- xxx Largely negative
- xx Moderately negative
- x Slightly negative
- n/a Not applicable

Table B3. Goffs Oak

Criteria		North of Goffs Lane – Inex etc	South of Goffs Lane	Oak Field	Pendine and White House Farm (east)	Newgatestreet Road (White House Farm West)	North of Cuffley Hill	Glasshouse sites in and around Goffs Oak
Local Plan Strategy								
1	Consistency with the Local Plan strategy and objectives	✓	✓	x	x	✓	✓	xx
2	Meeting identified requirements for sustainable development (emerging policy PM1)	✓	✓	x	x	✓	✓	x
3	Housing provision to meet objectively assessed needs	✓	✓	✓	✓	✓	✓	✓
4	Inclusion of jobs and access to employment opportunities	✓	x	x	x	x	x	xx
5	Supporting town centres and the retail hierarchy	x	x	x	x	x	x	x
6	Restoration of derelict or underused land/buildings	✓✓	✓	x	✓	✓	✓	✓
7	Minimising the impact on roads	x	x	x	x	x	x	xx
8	Sustainable transport solutions	✓	✓	x	x	x	✓	x
The Green Belt								
9	Minimising the impact on and maintaining the aims and purposes of the Green Belt	x	xx	xx	x	✓	x	xx
10	Establishing the permanence of the Green Belt	✓	xx	xx	✓	✓	x	xx
11	Improving the Green Belt and the countryside	✓	✓	x	x	x	✓	✓
Sustainable Place-making								
12	Place creation – unique, beautiful and safe with a sense of place, community and belonging	✓	✓	x	x	x	✓	xx
13	Strong connection to existing place and/or creation of new place	✓	x	x	x	x	x	x
14	Strong mix of uses and facilities	✓	x	x	x	x	x	?
15	Inclusion of and/or accessibility to shops	✓	✓	✓	x	x	✓	?
16	Inclusion of and/or accessibility to school(s)	✓	✓	✓	x	✓	✓	x
17	Inclusion of and accessibility to sports, recreation, open space and countryside	✓	✓	x	✓	✓	✓	?

Criteria		North of Goffs Lane – Inex etc	South of Goffs Lane	Oak Field	Pendine and White House Farm (east)	Newgatestreet Road (White House Farm West)	North of Cuffley Hill	Glasshouse sites in and around Goffs Oak
18	Inclusion of other services and/or accessibility to other services	x	x	x	x	x	x	?
Design, Landscape and Biodiversity								
19	Respecting heritage and landscape assets	✓	✓	xx	x	x	✓	?
20	Exceptional design	✓	✓	x	x	x	✓	?
21	Sustainable design and construction	✓	✓	xx	x	x	✓	?
22	Exceptional landscaping and biodiversity	✓	✓	xx	x	✓	✓	?
Transport								
23	Minimising the need to travel by car	✓✓	✓	✓	x	x	x	xx
24	Inclusion of and/or accessibility by public transport to a variety of destinations	✓	✓	✓	✓	✓	✓	?
25	Walking and cycling connections	✓	✓	x	✓	✓	✓	?
26	Accessibility to countryside	✓	✓	x	✓	✓	✓	✓
	CONCLUSION – YES OR NO	YES	YES	NO	NO	YES	YES	NO

- ✓✓✓ Largely positive
- ✓✓ Moderately positive
- ✓ Slightly positive
- xxx Largely negative
- xx Moderately negative
- x Slightly negative
- n/a Not applicable

Table B4. St James'/Rosedale Park

Criteria		Rosedale Park North	Rosedale Park South	Between St James Road and Crouch Lane
Local Plan Strategy				
1	Consistency with the Local Plan strategy and objectives	✓✓	✓✓	xx
2	Meeting identified requirements for sustainable development (emerging policy PM1)	✓✓	✓✓	xxx
3	Housing provision to meet objectively assessed needs	✓✓	✓✓	✓✓
4	Inclusion of jobs and access to employment opportunities	✓	✓	?
5	Supporting town centres and the retail hierarchy	x	x	x
6	Restoration of derelict or underused land/buildings	x	✓✓	✓
7	Minimising the impact on roads	x	x	xx
8	Sustainable transport solutions	✓	✓	?
The Green Belt				
9	Minimising the impact on and maintaining the aims and purposes of the Green Belt	xx	xx	xx
10	Establishing the permanence of the Green Belt	✓	✓	✓
11	Improving the Green Belt and the countryside	✓✓	✓	✓
Sustainable Place-making				
12	Place creation – unique, beautiful and safe with a sense of place, community and belonging	✓	✓	xx
13	Strong connection to existing place and/or creation of new place	✓✓	✓✓	x
14	Strong mix of uses and facilities	✓✓	✓✓	x
15	Inclusion of and/or accessibility to shops	✓	✓	x
16	Inclusion of and/or accessibility to school(s)	✓✓	✓	x
17	Inclusion of and accessibility to sports, recreation, open space and countryside	✓✓	✓✓	x
18	Inclusion of other services and/or accessibility to other services	x	x	x
Design, Landscape and Biodiversity				

Criteria		Rosedale Park North	Rosedale Park South	Between St James Road and Crouch Lane
19	Respecting heritage and landscape assets	✓✓	✓✓	?
20	Exceptional design	✓✓	✓✓	?
21	Sustainable design and construction	✓✓	✓✓	?
22	Exceptional landscaping and biodiversity	✓✓	✓✓	?
Transport				
23	Minimising the need to travel by car	x	x	x
24	Inclusion of and/or accessibility by public transport to a variety of destinations	✓	✓	?
25	Walking and cycling connections	✓✓	✓	✓
26	Accessibility to countryside	✓✓	✓✓	✓✓
CONCLUSION – YES OR NO		YES	YES	NO

- ✓✓✓ Largely positive
- ✓✓ Moderately positive
- ✓ Slightly positive
- xxx Largely negative
- xx Moderately negative
- x Slightly negative
- n/a Not applicable

Table B5. Bury Green

Criteria		East of Dark Lane	V and E Club	Theobalds Brook Field	Former St Mary's Playing Fields
Local Plan Strategy					
1	Consistency with the Local Plan strategy and objectives	✓	✓	✓	✓
2	Meeting identified requirements for sustainable development (emerging policy PM1)	✓✓	✓✓	✓	✓
3	Housing provision to meet objectively assessed needs	✓	✓	✓	✓✓
4	Inclusion of jobs and access to employment opportunities	xx	xx	xx	xx
5	Supporting town centres and the retail hierarchy	x	x	x	x
6	Restoration of derelict or underused land/buildings	x	x	x	✓
7	Minimising the impact on roads	x	x	x	x
8	Sustainable transport solutions	x	x	x	x
The Green Belt					
9	Minimising the impact on and maintaining the aims and purposes of the Green Belt	xx	x	x	x
10	Establishing the permanence of the Green Belt	✓✓	✓✓	✓✓	✓✓
11	Improving the Green Belt and the countryside	x	✓	x	x
Sustainable Place-making					
12	Place creation – unique, beautiful and safe with a sense of place, community and belonging	✓	✓	✓	✓
13	Strong connection to existing place and/or creation of new place	✓	✓	✓	✓
14	Strong mix of uses and facilities	x	✓	x	x
15	Inclusion of and/or accessibility to shops	x	x	x	
16	Inclusion of and/or accessibility to school(s)	✓✓	✓✓	✓	x
17	Inclusion of and accessibility to sports, recreation, open space and countryside	✓	✓	x	✓
18	Inclusion of other services and/or accessibility to other services	xx	xx	xx	✓
Design, Landscape and Biodiversity					

Criteria		East of Dark Lane	V and E Club	Theobalds Brook Field	Former St Mary's Playing Fields
19	Respecting heritage and landscape assets	x	✓	✓	✓
20	Exceptional design	✓	✓	✓	✓
21	Sustainable design and construction	✓	✓	✓	✓
22	Exceptional landscaping and biodiversity	✓	✓	✓	✓
Transport					
23	Minimising the need to travel by car	x	x	xx	x
24	Inclusion of and/or accessibility by public transport to a variety of destinations	✓	✓	✓	✓
25	Walking and cycling connections	✓	✓	✓	✓
26	Accessibility to countryside	x	xx	✓	xx
CONCLUSION – YES OR NO		YES	YES	YES	YES

- ✓✓✓ Largely positive
- ✓✓ Moderately positive
- ✓ Slightly positive
- xxx Largely negative
- xx Moderately negative
- x Slightly negative
- n/a Not applicable

Table B6 Hoddesdon/Broxbourne

Criteria		High Leigh Garden Village	Cuthroat Field, Roselands House	Piggery Site, Rye Road	303/305 Ware Road	Broxbourne Landfill site	Broxbourne School
Local Plan Strategy							
1	Consistency with the Local Plan strategy and objectives	✓✓	xx	xx	✓	xxx	✓✓
2	Meeting identified requirements for sustainable development (emerging policy PM1)	✓✓	xx	x	✓	xx	✓✓
3	Housing provision to meet objectively assessed needs	✓✓	✓	✓	✓	✓	✓
4	Inclusion of jobs and access to employment opportunities	✓	x	✓	x	✓	✓
5	Supporting town centres and the retail hierarchy	x	x	x	x	x	x
6	Restoration of derelict or underused land/buildings	x	✓	✓?	✓✓✓	✓	x
7	Minimising the impact on roads	✓	x	✓	✓	✓	✓
8	Sustainable transport solutions	✓✓	x	✓✓	✓✓	✓	✓
The Green Belt							
9	Minimising the impact on and maintaining the aims and purposes of the Green Belt	✓	x	x	✓✓	xx	✓
10	Establishing the permanence of the Green Belt	✓✓	xx	x	x	x	✓
11	Improving the Green Belt and the countryside	x	x	x	✓	xxx	✓
Sustainable Place-making							
12	Place creation – unique, beautiful and safe with a sense of place, community and belonging	✓✓	x	x	?	?	✓
13	Strong connection to existing place and/or creation of new place	✓✓	xx	xx	✓	xx	✓
14	Strong mix of uses and facilities	✓✓	xxx	xx	x	x	✓
15	Inclusion of and/or accessibility to shops	✓	xx	xx	✓	✓	✓
16	Inclusion of and/or accessibility to school(s)	✓✓	x	xx	✓	✓	✓✓✓
17	Inclusion of and accessibility to sports, recreation, open space and countryside	✓	✓	✓	✓	✓	✓✓

Criteria		High Leigh Garden Village	Cuthroat Field, Roselands House	Piggery Site, Rye Road	303/305 Ware Road	Broxbourne Landfill site	Broxbourne School
18	Inclusion of other services and/or accessibility to other services	✓	xx	xx	x	✓	x
Design, Landscape and Biodiversity							
19	Respecting heritage and landscape assets	✓	✓	x	x	xxx	✓
20	Exceptional design	✓	x	?	?	?	✓
21	Sustainable design and construction	✓	?	?	?	✓	✓
22	Exceptional landscaping and biodiversity	✓	?	?	?	?	✓
Transport							
23	Minimising the need to travel by car	✓	xx	x	x	✓	✓
24	Inclusion of and/or accessibility by public transport to a variety of destinations	✓	xx	✓	✓	✓	✓
25	Walking and cycling connections	✓	xx	✓	✓	✓	✓
26	Accessibility to countryside	✓	✓✓	✓	✓	✓	✓
	CONCLUSION – YES OR NO	YES	NO	NO	NO	NO	YES

- ✓✓✓ Largely positive
- ✓✓ Moderately positive
- ✓ Slightly positive
- xxx Largely negative
- xx Moderately negative
- x Slightly negative
- n/a Not applicable

Table B7 Waltham Cross

Criteria		Britannia Nurseries, Bryanstone Road
Local Plan Strategy		
1	Consistency with the Local Plan strategy and objectives	✓✓
2	Meeting identified requirements for sustainable development (emerging policy PM1)	✓✓
3	Housing provision to meet objectively assessed needs	✓
4	Inclusion of jobs and access to employment opportunities	✓
5	Supporting town centres and the retail hierarchy	x
6	Restoration of derelict or underused land/buildings	✓✓✓
7	Minimising the impact on roads	✓
8	Sustainable transport solutions	✓
The Green Belt		
9	Minimising the impact on and maintaining the aims and purposes of the Green Belt	✓
10	Establishing the permanence of the Green Belt	✓
11	Improving the Green Belt and the countryside	✓✓
Sustainable Place-making		
12	Place creation – unique, beautiful and safe with a sense of place, community and belonging	✓✓
13	Strong connection to existing place and/or creation of new place	✓✓
14	Strong mix of uses and facilities	✓✓
15	Inclusion of and/or accessibility to shops	✓
16	Inclusion of and/or accessibility to school(s)	✓
17	Inclusion of and accessibility to sports, recreation, open space and countryside	✓✓✓
18	Inclusion of other services and/or accessibility to other services	✓
Design, Landscape and Biodiversity		
19	Respecting heritage and landscape assets	✓✓
20	Exceptional design	✓
21	Sustainable design and construction	✓
22	Exceptional landscaping and biodiversity	✓✓
Transport		
23	Minimising the need to travel by car	✓
24	Inclusion of and/or accessibility by public transport to a variety of destinations	✓

Criteria		Britannia Nurseries, Bryanstone Road
25	Walking and cycling connections	✓✓
26	Accessibility to countryside	✓✓✓
	CONCLUSION – YES OR NO	YES

- ✓✓✓ Largely positive
- ✓✓ Moderately positive
- ✓ Slightly positive
- xxx Largely negative
- xx Moderately negative
- x Slightly negative
- n/a Not applicable

Appendix C – Core Strategy Inspector’s Report (extracts) – December 2011

“I have attached significant weight to the need to secure economic growth and employment, particularly with regard to my support for the areas of search for proposed business parks in the green belt at Park Plaza West and Maxwells Farm West, both of which should generate significant employment growth.” (Paragraph 7)

“the evidence base, particularly the Employment Opportunities Study (Derrick Wade Waters, 2010) supports the need to change the Borough’s employment profile through development of ‘higher end’ jobs at new business parks that would also involve release of green belt land (Paragraph 11).

“Given the history of erosion of gaps between settlements along the A10, the concentration of more housing, jobs and services along this corridor generally follows established principles of local planning policy.” (Paragraph 12)

“The proposals for employment development on the west side of the A10 at Park Plaza West and Maxwells Farm are planned for development after the remaining allocations on the east side of the A10 have been completed. In the absence of any other comparable sites, the CS gives a sufficiently clear indication that releases of green belt are needed to widen the Borough’s employment base ... the allocation of both sites can be justified on grounds of employment need.” (Paragraph 14)

Is the release of green belt at Park Plaza West justified? Will the mechanism for release from the green belt be effective? Can transport effects be mitigated satisfactorily? Is the proposal viable and deliverable?

This proposal is for a major employment site on the west side of A10, opposite Park Plaza North, an established location for a business park in accordance with saved Policy 15 of the Herts Structure Plan. Policy E3 of the EEP requires strategic employment sites to be provided at a number of locations, including Hertfordshire where they would support regeneration of the Lee Valley. The site provides an important opportunity to extend Park Plaza North to create enough critical mass for ‘high end’ jobs. The Council acknowledged the value of the green belt in providing separation of Enfield/M25 from Cheshunt. But there is nowhere else in the Borough where the necessary critical mass can be achieved, with such good transport links. The loss of green belt can be justified by the exceptional circumstances of a highly constrained urban area and consequent limited opportunity to achieve a step change in employment profile without release of such land. The EEP provides for a review of the green belt in Broxbourne to accommodate all needs. The employment justification of the government’s growth agenda, carried forward as a clear policy direction in the NPPF, weighs heavily in favour of the proposal.” (Paragraph 33)

Is the Maxwells Farm West proposal justified? Will the mechanism for release from the green belt be effective? Can cumulative transport effects be mitigated satisfactorily? Is the proposal viable and deliverable?

36. Similar considerations apply to Maxwells Farm West. From past experience, a major employer is needed to anchor such a scheme, in the way that the News International building was intended to underpin Park Plaza North. In present economic circumstances, a number of parties gave evidence that a speculative proposal would not come forward. Although the policy wording allows for a different type of development, more focussed on industrial uses, similar arguments about the need to encourage employment growth apply to this site. A defensible green belt boundary would be formed by the river to the west and there are exceptional circumstances for its release, to create critical mass with Park Plazas North and West.

Is the allocation of housing in the green belt [at Brookfield] justified?

67. The proposed housing would in effect be a stand-alone estate separated from the main retail and leisure area by a busy access to car parking. The dwellings would not be mixed in with other uses in a traditional way. Clearly the housing element would provide a substantial benefit towards the viability of the whole scheme, through its contribution to some infrastructure costs, such as new highways. On its housing merits, I see no real justification for the release of this part of the green belt for housing in advance of other sites, such as West of Hoddesdon, for example. Despite its proximity to new retail development, the site is not more sustainable in terms of access to a range of town centre and community facilities, including education. While the link road would create a new defensible boundary for the green belt, there are no exceptional circumstances for its release. The site should be considered for release in comparison with other areas of the green belt that will be required to meet local housing needs.

Appendix D: Local Plan Second Review 2001-2011 – extracts from Inspectors report, 31 March 2005

The following extracts from section 2 of the inspectors report (Green Belt and Countryside) are referred to in the Strategic Land Availability Assessment (June 2017).

Land North of Hertford Road, Hoddesdon

2.3.1 This triangular parcel of land, extending to about 10.7 ha, is located between Hertford Road and the north-western edge of Hoddesdon. Although the land suffers from problems of trespass and activity normally associated with the urban fringe, it nevertheless retains a predominantly rural character, comprising areas of grazing land and a wooded former gravel pit, albeit with two suburban features of a covered reservoir and car park in the central area of the site.

2.3.2 The site adjoins the urban area and abuts, but lies outside, the Accessibility Corridor shown on the Proposals Map. Two schools at Westfield Road and Roselands lie within 500m of the site boundary, but other facilities such as local shops are about 1km away from the main part of the site. I note that the development potential of the site is constrained by a TPO on the woodland in the former quarry and that development on the western part of the land would be highly visible from higher ground to west. I acknowledge that the line of the A10 would create a clear firm boundary to the green belt but applying the principle of that argument could lead to pressure for significant further development alongside the A10 elsewhere to south.

2.3.3 None of the factors discussed above need preclude the site from future consideration should releases of green belt be required when the Plan is reviewed as part of the LDF process. However, I consider that neither they, nor the problems of vandalism and public access to which the objector refers, in themselves create the very special circumstances needed to justify removing the site from the green belt. I have concluded that allocating this site for housing or as an ASR at the present time would be in clear conflict with local and national policies to secure the long term protection of the green belt.

Land at 305 Ware Road

2.4.1 I have dealt with another objection concerning land at 303 Ware Road below, where I concluded that there were no exceptional circumstances to justify the release of the land from the green belt. In summary, I recognised that the Council has provided more than enough housing land to meet strategic requirements to the end of the plan period, beyond which future needs remain uncertain.

2.4.2 Similar arguments apply to this site, and the others in this section of my report. The objectors themselves think that the site should be considered with the land at 303 Ware Road. Both sites have been part of the green belt for many years. I note that the inspector reporting on the 1993 Local Plan inquiry confirmed this designation.

2.4.3 Looking at the nature and density of development on the ground, the single storey nursing home is already quite well-developed. The Council's figures of 1200m² of building on a site of 0.54ha do not take account of other hard surfaces for parking and circulation. I consider therefore that the objectors' argument that the site contributes little to the openness of the green belt has some force. Nevertheless, the buildings on site are single storey, and there are some trees and shrubs which help the site to provide a transition to land at Belmont View care home to the north, and the Hailey Hall School to the west; these are both institutions in relatively large grounds with a rather different, more open character. However, while I note the objectors' comments about the obsolescence of the buildings, neither this point, nor the physical characteristics of the land are sufficient to justify release of the land from the green belt at this time, in the absence of any strong housing need. In such circumstances I consider there are no exceptional circumstances to justify release of green belt land.

However, the Council now say that the Plan provides enough housing land to meet Structure Plan requirements to 2011, a conclusion with which I agree (see Chapter 3). In these circumstances there are no exceptional circumstances to justify changing green belt boundaries, as required by PPG2 and Structure Plan Policy 7. The Council has agreed to review the suitability of this and other green belt sites to meet longer term needs when it undertakes an early review of the Plan, following approval of strategic guidance in RSS14.

Land at Admirals Walk Lake, Hoddesdon (pages 21-22)

2.6.1 The site forms part of an extensive area of open land which runs along much of the eastern side of the Borough. This wider area, much of which lies within the Lea Valley Regional park, provides a clear break between the settlements on either side of the valley. Green belt designation prevents the urban area from encroaching into the countryside. While the railway line forms a well-defined boundary to the green belt in many places, some parts of this important open land, including the objection site, extend further west. Any residential development here would breach the primary green belt policy objective of retaining openness.

2.6.2 I note that the land lies just outside, but very close to, the 1 in 100 year floodplain. I share the Council's concerns that the land may be susceptible to flooding, in the absence of a full risk assessment. The development of the site would undoubtedly have some impact on the setting of the New River and the proposed green chain. However, I accept that these detailed matters may be capable of resolution if the principle of release from the green belt were to be agreed at some future date.

2.6.3 The site has reasonable, but not exceptional, access to public transport and a variety of services. Any enhancement of recreational facilities on the greater part of the site formed by the lake and its surroundings could be achieved without other development. As with all other such sites, the Council has agreed to review the position once future housing requirements are clarified by RSS14. In the absence of any Borough-wide housing need (see section 2.1 above) I consider there are no exceptional reasons to release this land from the green belt.

Land at Limes Nursery (pages 22-23)

2.7.2 Limes Nursery lies to the north of Hammondstreet Road between two residential estates developed after release from the green belt in the 1994 Local Plan. The land contains a number of glasshouses, some vacant but some still in horticultural production. It performs the green belt functions of separating the built up areas of Cheshunt and Hammondstreet, and although partly developed with glasshouses and some small outbuildings, prevents these settlements from encroaching into the countryside.

2.7.3 I appreciate the difficulties that the Council faced in preparing the 1994 Local Plan in deciding which areas of derelict nurseries to address first. I accept that circumstances have changed since; the financial position of previously viable production areas may have deteriorated and new problems may have arisen. However, the Council has agreed to review all green belt land in determining its future housing strategy when revised requirements are known once regional guidance in the form of RSS14 is approved. I consider that how to address current problems in the glasshouse industry should be one of the key tasks in such a review, which would include a revised sustainability analysis of all sites. In the meantime, despite the unsightly appearance of some parts of the site, there are no exceptional circumstances to warrant removing it from the green belt.

Land at Laurel Park, Newgatestreet Road (pages 23-24)

2.8.2 The site comprises about 5ha of land immediately west of the furthest extremity of residential development at the Hammondstreet estate. There is a clear edge to the housing area and I consider there are no strong reasons to alter the green belt boundary here on grounds of physical features in the landscape. The site does not lie close to a wide range of facilities and in my view is certainly not in a particularly sustainable position. In the absence of housing need, I have found no other exceptional reasons to justify releasing the site from the green belt.

Land at Smallacre Nursery, North of Crouch Lane (pages 25-6)

2.11.2 Turning to this specific site, much of Smallacre Nursery is covered with vacant glasshouses in various states of dereliction, and some other outbuildings, together with a dwelling house. The adjoining site appears to be used for storage and some car breaking. Although some of the buildings and storage areas do not contribute much to the openness of the green belt, the site and its surroundings remain essentially rural in character. While substantial further development in the vicinity may improve the availability of services, at present the site does not represent a particularly sustainable location for new housing compared to other parcels of green belt land. In the absence of housing need, I have found no other exceptional reasons to justify releasing the site from the green belt.

Cross Nursery, Newgatestreet Road (pages 29-30)

2.16.2 A substantial part of the objection site is covered with vacant glasshouses in various states of dereliction, and some other outbuildings. Although some of the buildings and storage areas do not contribute much to the openness of the green belt, the site and its surroundings remain essentially rural in character. It fulfils the green belt functions of preventing Cheshunt from sprawling into the countryside, and maintaining the gap between Goffs Oak and Hammondstreet. The site does not constitute PDL as defined in PPG3 and at present it does not represent a particularly sustainable location for new housing compared to other parcels of green belt land. In the absence of housing need, I have found no other exceptional reasons to justify releasing the site from the green belt.

Land at Twelve Acre Poultry Farm (pages 34-35)

2.21.2 The land is predominantly open farmland and fulfils the green belt functions of preventing St James from sprawling into the countryside and joining up with Hammondstreet to the north. I consider inclusion of the site within St James would not create any more logical green belt boundary than that shown on the Plan.

2.21.3 The site does not constitute PDL as defined in PPG3. At present it does not represent a particularly sustainable location for new housing compared to other parcels of green belt land. In the absence of housing need, I have found no other exceptional reasons to justify releasing the site from the green belt.

Land at Pendine and St James' Nursery

2.19.2 The land fulfils the green belt functions of preventing St James from sprawling into the countryside. Pendine is more open, whereas St James nursery is now mainly covered by coppiced woodland. Both sites play a vital role in maintaining the fragile gap between the built up areas of Goffs Oak and St James. I consider inclusion of the sites within St James would not create any more logical green belt boundary than that shown on the Plan.

2.19.3 Neither site constitutes PDL as defined in PPG3. Although the sites are within reasonably close distance of the facilities at Goffs Oak they do not represent particularly sustainable locations for new housing compared with some other parcels of green belt land. In the absence of housing need, I have found no other exceptional reasons to justify releasing the site from the green belt

Land at Pylon Farm, Laurel Bank Farm and Longmead to the north of St James Village (pages 33-4)

2.20.3 I acknowledge from the survey material produced at the hearing that the quality of agricultural land at Longmead Nursery is moderate to poor in parts. However, that does not justify releasing green belt land on its own, since the argument could be applied to a number of sites, and the openness of substantial areas of the green belt prejudiced as a result. The problems of security mentioned by the objector are not uncommon on the urban fringe and are certainly not exceptional

circumstances. The site fulfils the green belt purposes of preventing the encroachment of the built up area of St James into the countryside, and is part of a gap which stops the coalescence of the settlement with the housing estates at Hammondstreet to the north. There is little evidence of former buildings on the site, which was used for horticulture in the past; it does not therefore constitute PDL as defined in PPG3.

2.20.4 Very similar arguments apply to Pylon Farm, which contains one dwelling and some outbuildings but is largely open land in the gap between St James and Hammondstreet. The site of Laurel Bank Farm contains more buildings and hard surfaced storage areas but I have no evidence that the land has an established use for anything other than agriculture; the site is therefore not PDL as defined in PPG3. Although not particularly prominent, any release of land from the green belt and subsequent development would not in my opinion lead to any more defensible green belt boundary than exists at present; it would merely add to the encroachment of built form into the countryside. I consider inclusion of the site within St James would not create any more logical green belt boundary than that shown on the Plan.

303 Ware Road (objection to deletion from first draft Local Plan)

2.31.1 All the objections to the 1st deposit would be met by the deletion of the site as a housing allocation from the 2nd deposit.

2.31.2 Originally the site was included in the residential allocation of land known as the Hailey site (previously owned by MAFF) to the south. This land is being developed in accordance with government policy in PPG3 at a relatively high density compared with surrounding housing areas to the east and south. Given significant change that has taken place on the adjoining site, and the relatively well-developed nature of the land at 305 Ware Road (which is not really built at a low density typical of rural areas, see 2.4.2) I can appreciate the logic behind an argument in favour of a re-aligned boundary at this location. From my inspection, the footpath that separates these two sites would form no more logical a boundary than the northern fence/hedge of the garden to the bungalow on 303 Ware Road.

2.31.3 There is no real dispute that the site lies in a sustainable location, as acknowledged by the allocation of the adjoining MAFF site for a substantial number of new dwellings. If any green belt land were needed, this site would appear to have several advantages, and in those circumstances could be said to meet requirements of Structure Plan Policy 7. There is no reason why the site could not provide a small amount of affordable housing.

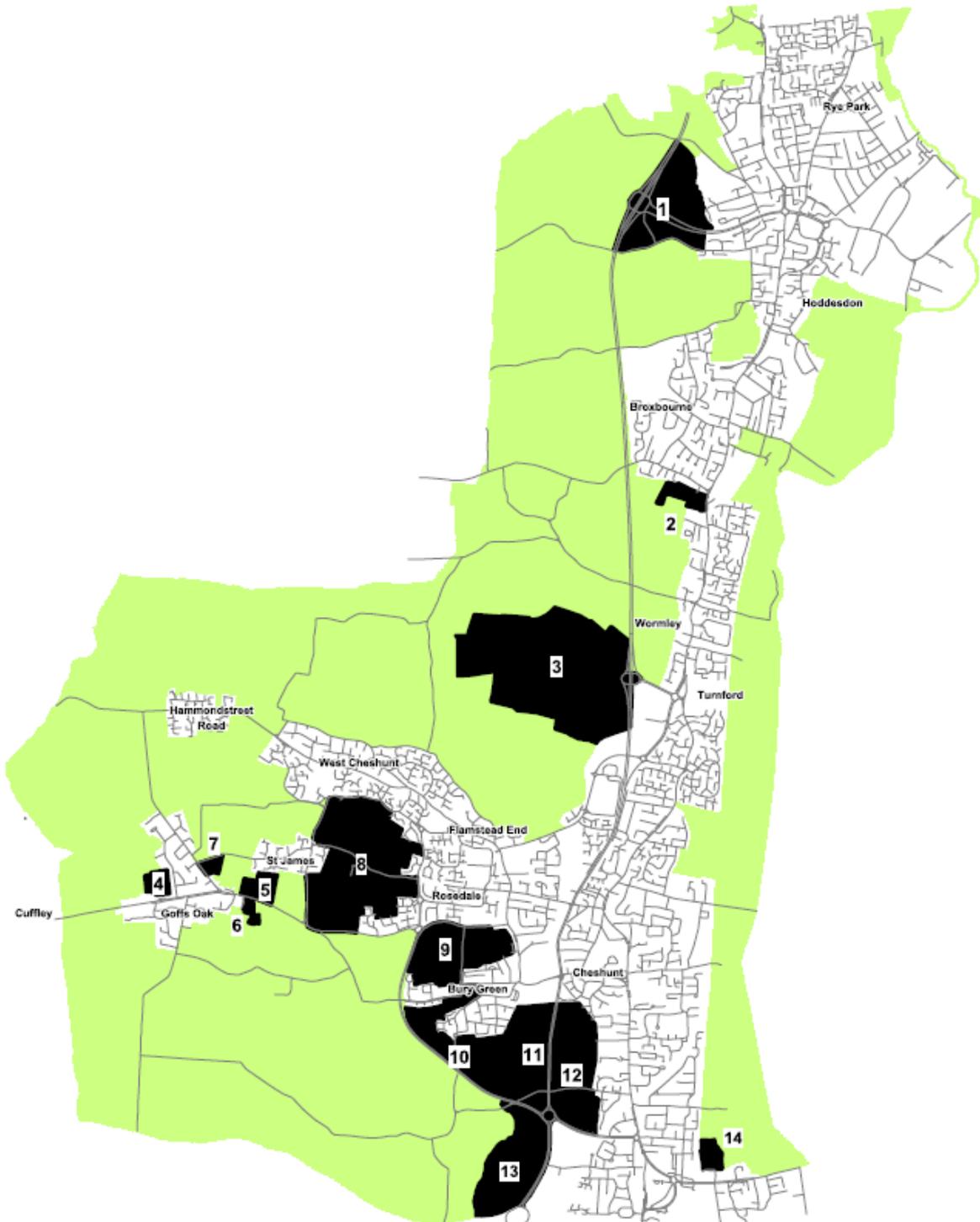
2.31.4 On other matters, I can appreciate the Council's initial desire to service the site via the land to the south. However, it has been agreed that satisfactory access can be obtained independently. At present there is no access to the public, so no land used for general recreation would be lost. I consider that the site would be a logical extension to the developed area of Hoddesdon, given its sustainable position.

However, the Council now say that the Plan provides enough housing land to meet Structure Plan requirements to 2011, a conclusion with which I agree (see Chapter 3). In these circumstances there are no exceptional circumstances to justify

changing green belt boundaries, as required by PPG2 and Structure Plan Policy 7. The Council has agreed to review the suitability of this and other green belt sites to meet longer term needs when it undertakes an early review of the Plan, following approval of strategic guidance in RSS14.

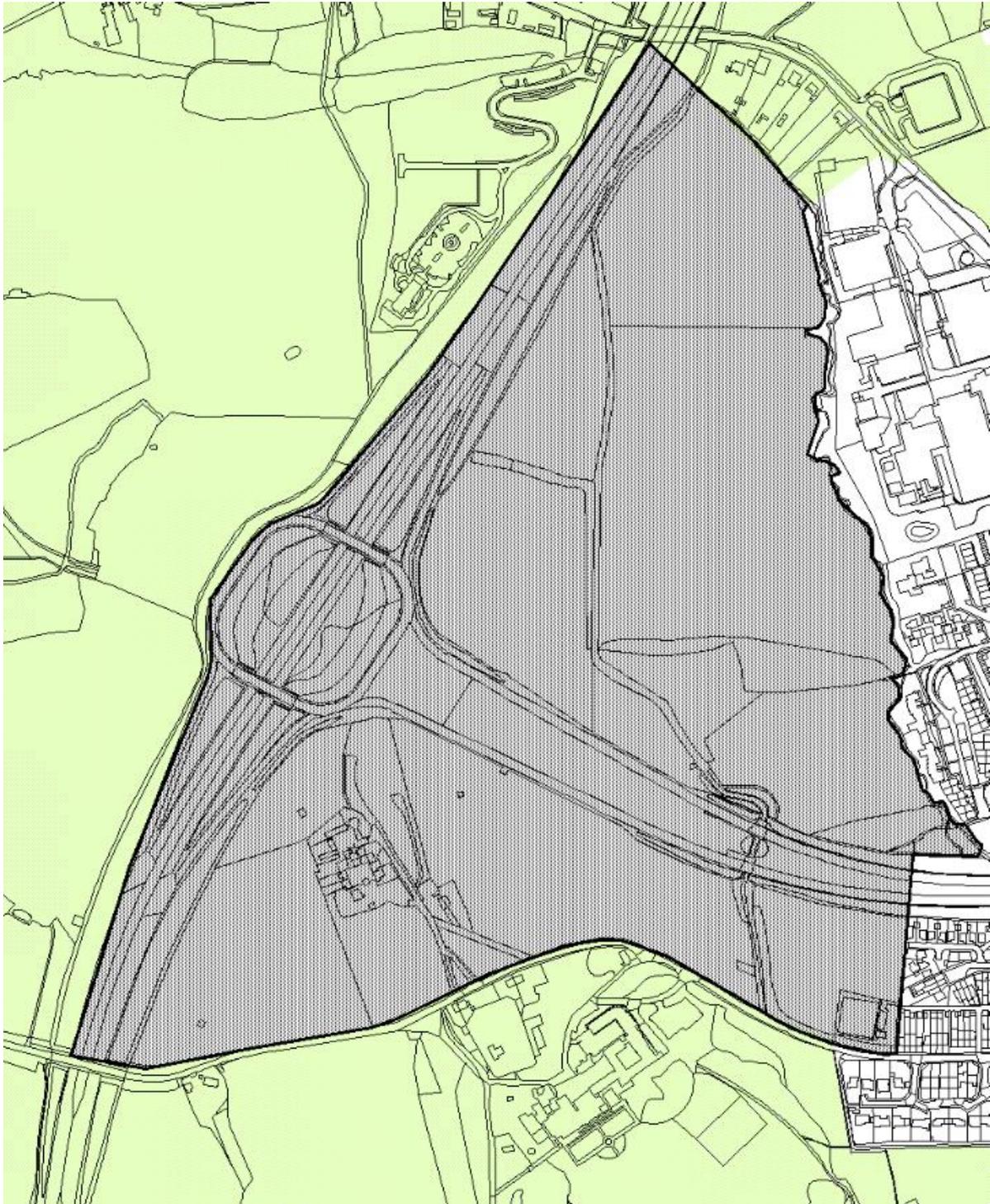
Appendix E
Maps of areas proposed for
release from Green Belt

Location Plan (numbers refer to detailed area plans below)



Crown Copyright Borough of Broxbourne LA100023526

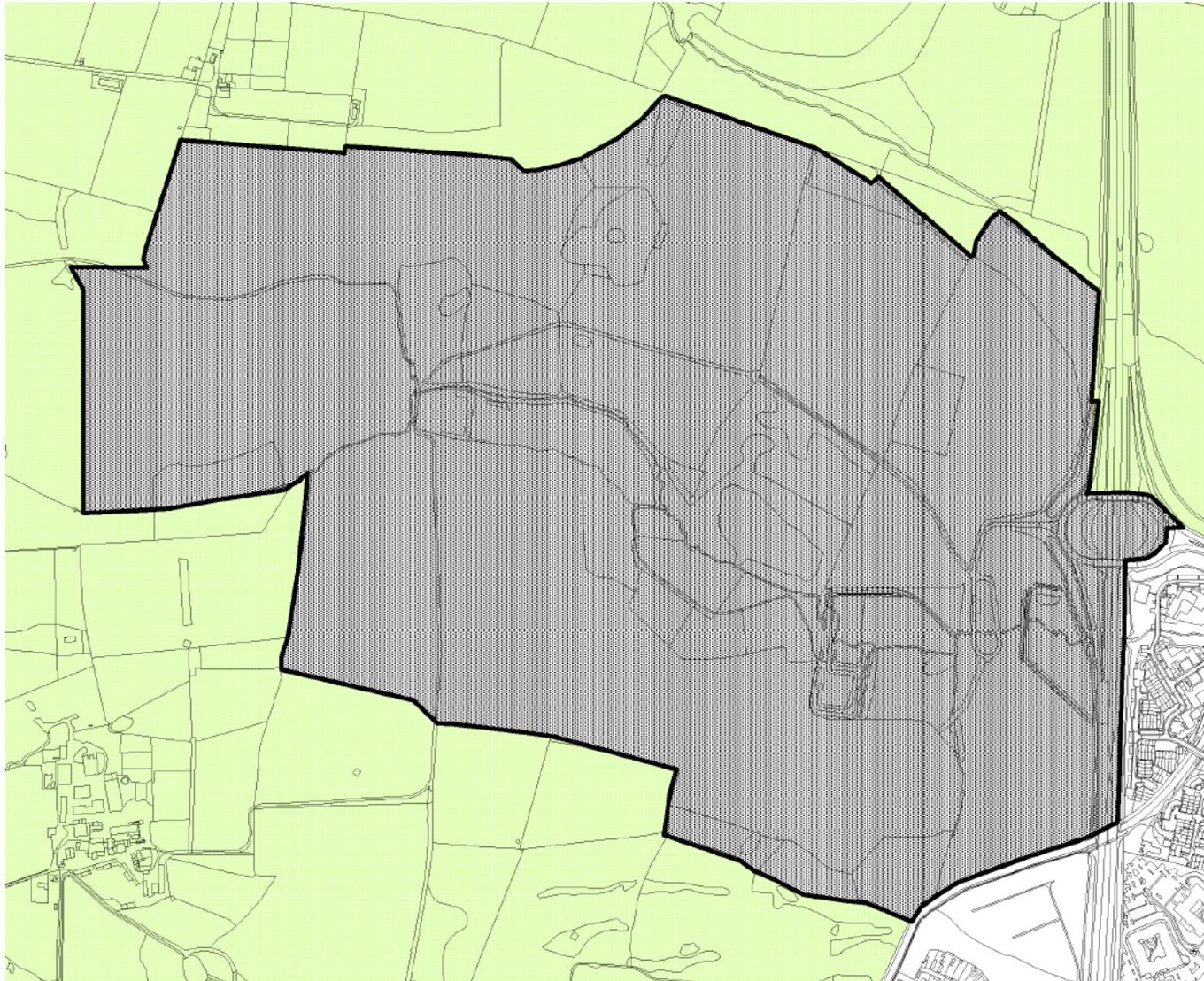
Area 1: High Leigh Garden Village



Area 2: Broxbourne school (residential area only)



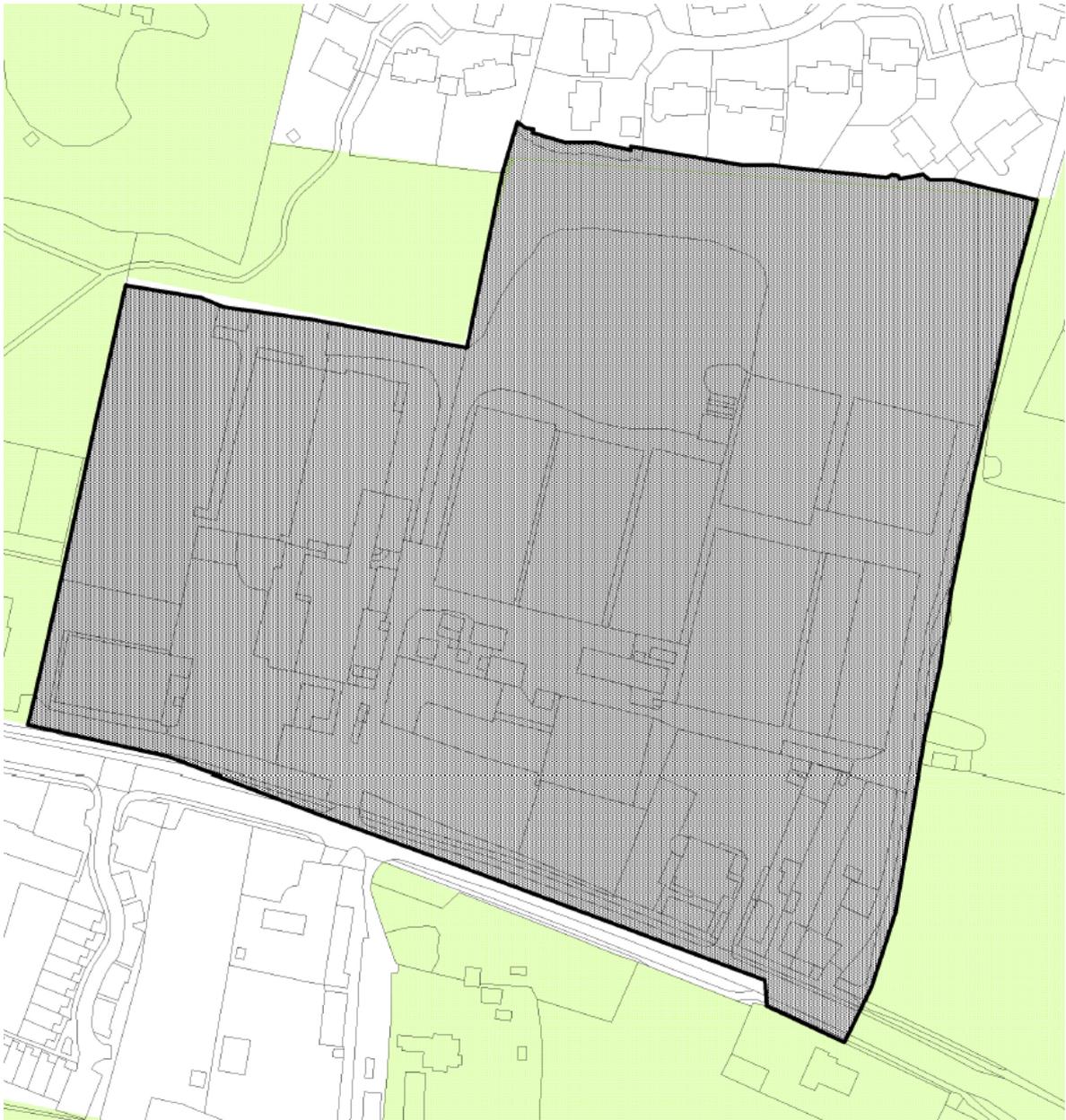
Area 3: Brookfield Garden Village and Brookfield Riverside



Area 4: North of Cuffley Hill



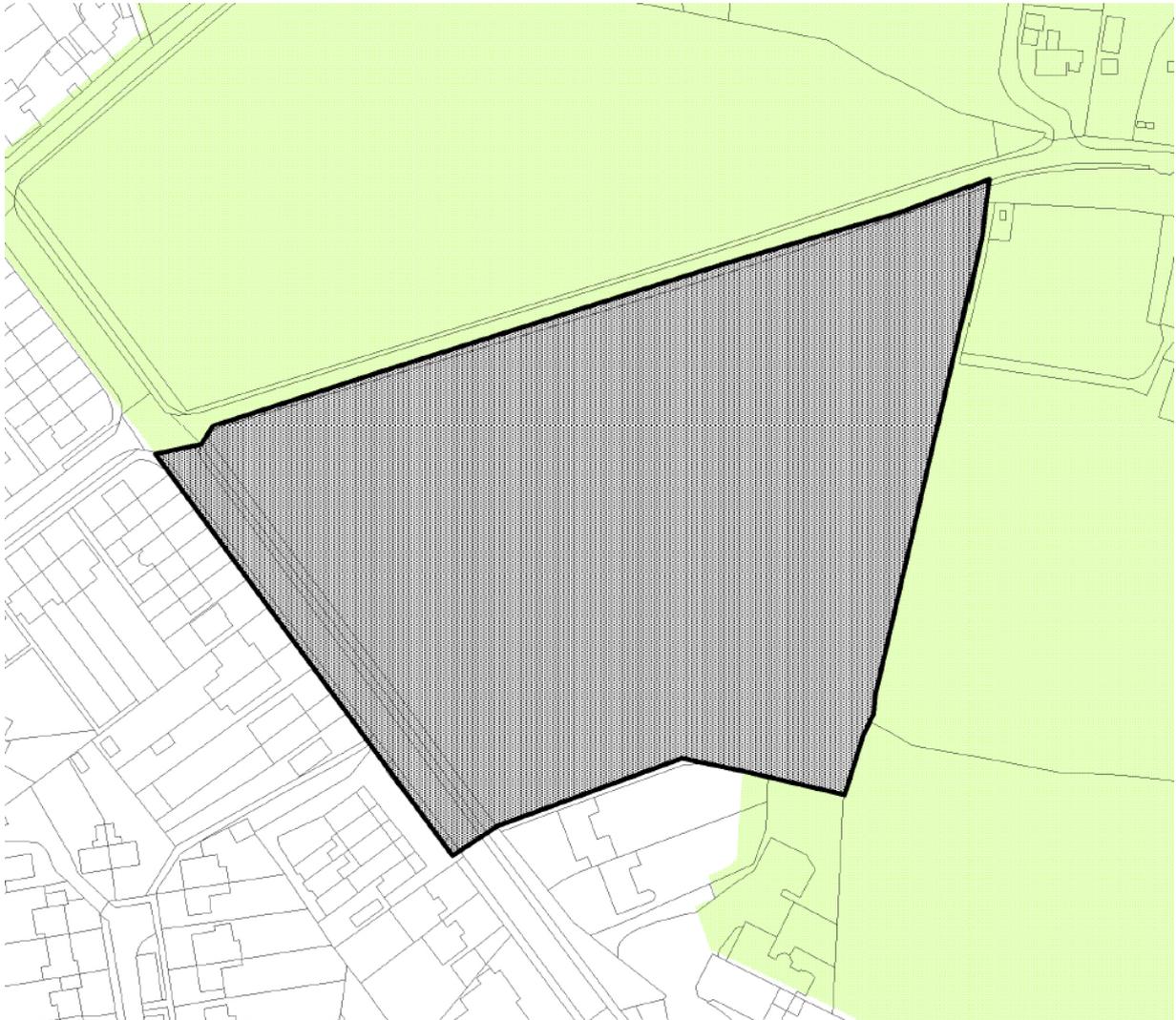
Area 5: North of Goffs Lane



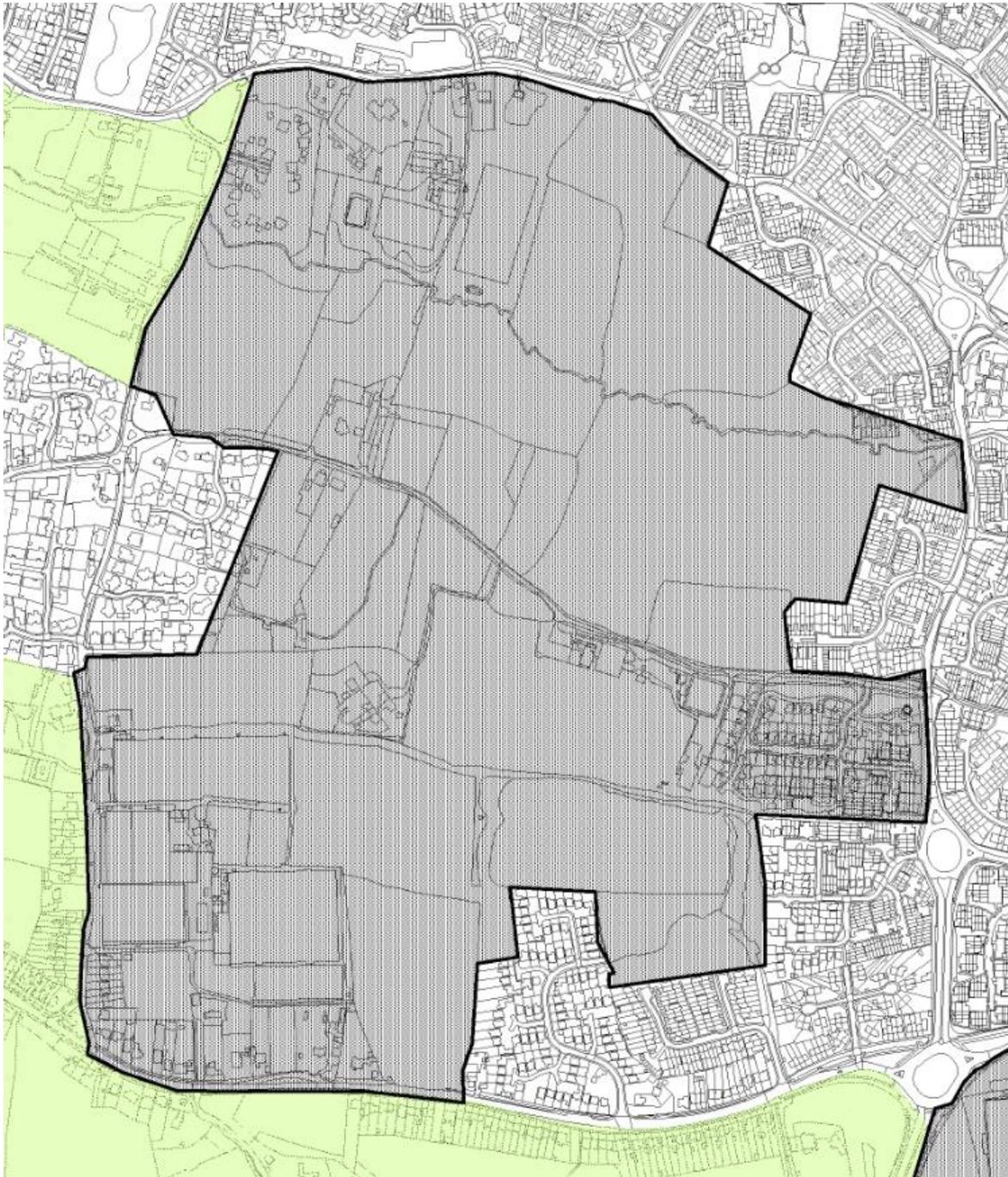
Area 6: South of Goffs Lane



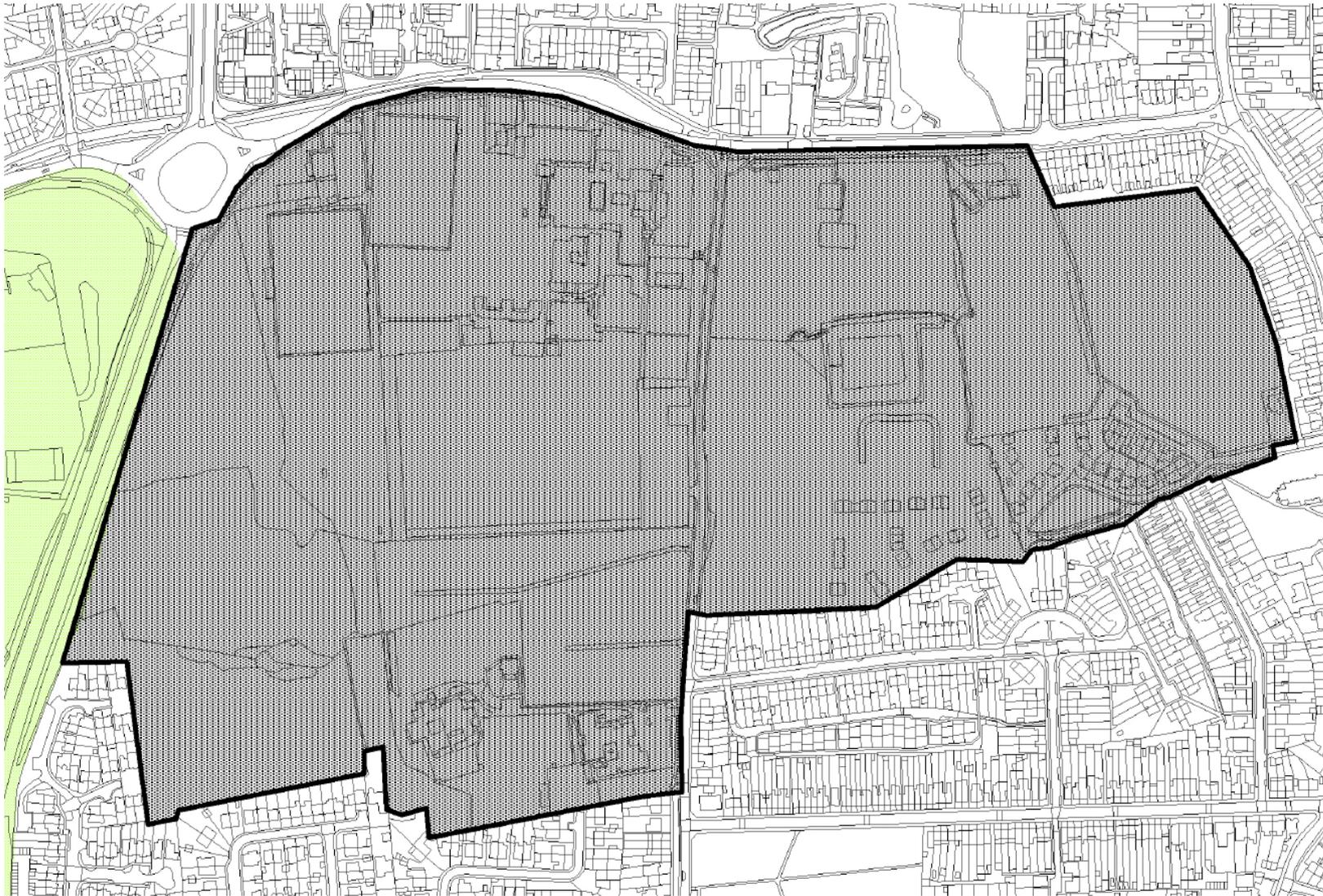
Area 7: Newgatestreet Road, Goffs Oak



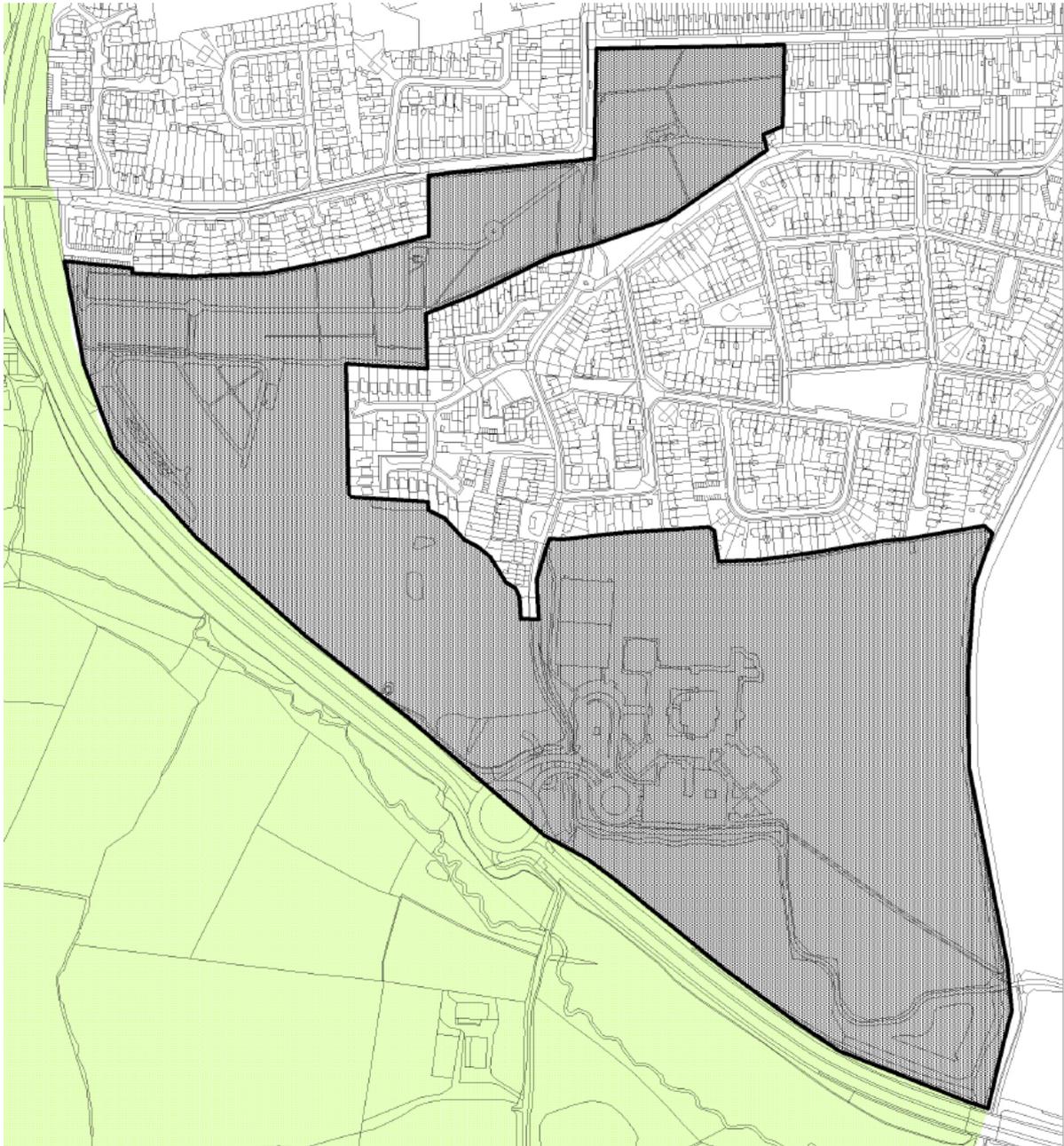
Area 8: Rosedale Park, West Cheshunt



Area 9: Bury Green – North



Area 10: Bury Green – south



Area 11: Maxwell Farm West and Rush Meadow



Area 12: Albury East of A10



Area 13: Park Plaza West



Area 14: Britannia Nurseries, Waltham Cross

