Broxbourne Local Plan

Goffs Oak Area Development Options

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Planning Policy Team April 2016 Blank page

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Questions on this document should be referred to the Planning Policy Section: planningpolicy@broxbourne.gov.uk 01992 785559 April 2016

Purpose of this report

In preparing its new Local Plan the Council has considered a number of Borough-wide options as set out in the Development Options and Scenarios Report (April 2016). The Council has prepared five local area options studies in order to assess development potential in more detail. These studies have informed the Borough-Wide Options and Scenarios Report and all six studies should be read together in order to understand the development strategy for the emerging Local Plan.

In addition to this study for Goffs oak, Development Options Reports have been prepared for Bury Green, Brookfield, Park Plaza, and West of Wormley. A further study had been proposed for West of Hoddesdon but this was overtaken by the granting of planning permission for strategic scale development at High Leigh in April 2015.

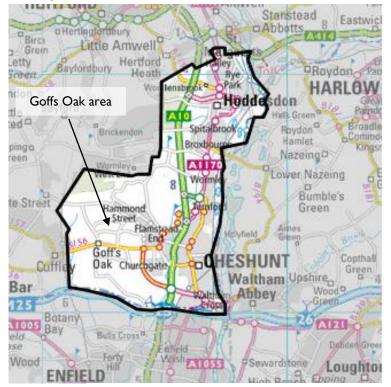
This report sets out and discusses potential development options for the area. Although the report concludes on the performance of each option within the area's local context, it will be the Local Plan which decides on the preferred option in the context of overall Boroughwide considerations and the merits of other potential options for other areas within the Borough. This report is one of a number of evidence studies which have been produced to inform and support the Local Plan decision making process.

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The Goffs Oak area

For the purposes of this report, the Goffs Oak area is that broadly contained by Hammondstreet and West Cheshunt to the north; Rosedale to the east; Goffs Lane and Halstead Hill to the south and Goffs Oak village and Newgatestreet Road to the west, although some additional land has been considered where relevant. The area measures over 3km^2 (300 hectares). The majority of this is Metropolitan Green Belt comprising a mix of farmland, smallholdings, horticulture and public open space. It includes the villages of Goffs Oak, St James and Hammondstreet and within the area there are 2,495 dwellings with 6,445 residents (2011 census) – 7% of the borough's total.



The Goff's Oak area within Broxbourne



The area around Goff's Oak considered by this report

The Goffs Oak area in 2010. Cuffley borders the western side of this view, whilst Cheshunt spreads to the east

Call Start

History and settlement structure

The name of Goffs Oak village comes from a succession of oak trees which have stood in the centre of Goffs Oak village for hundreds of years. However, theories differ on who the 'Goff' in the name was – some suggest he was a follower of William the Conqueror called Sir Theodore Godfrey (hence Geoffrey, Geoff and finally Goff) who planted the first oak tree, whilst others suggest that the Goff family were local landowners. The area historically became part of the Theobalds Palace estate, which in the early 1600s was of national importance as the favoured country hunting retreat of King James I.

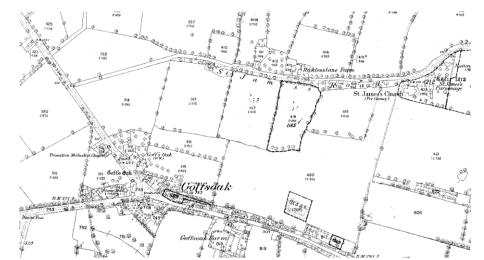
From late 19th century the area became increasingly attractive for nursery gardens and glasshouses producing vegetables, flowers and house plants to sell to London markets. By the 1920s, the Lee Valley had the largest area of glasshouses anywhere in the world. However, over time rising fuel prices and international competition has led to many glasshouses becoming derelict – the vast majority have been demolished, and as Cheshunt has grown westwards many have now been redeveloped for housing.

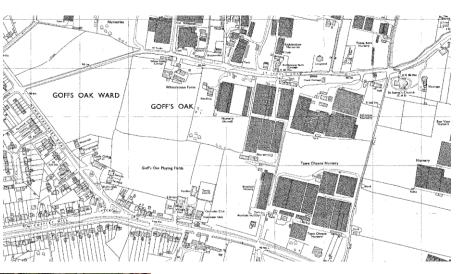


Glasshouses in the Lee Valley, c1930

This has led to the development of four distinct settlements within and around the Goffs Oak area. The main urban area of Cheshunt and the villages of Goffs Oak and Hammondstreet surround a central, predominantly open, bowl with St James siting at the middle of this bowl. Goffs Oak village has gradually expanded over the past 50 years whilst the majority of built development in West Cheshunt and the entirety of St James and Hammondstreet Road built on former glasshouse land. Development of these areas was allowed specifically to address the severe dereliction of the former glasshouses, although this has led to a somewhat dispersed pattern of development. The section on previous Local Plans on page 8 provides further context on how and why this settlement structure has developed, and pages 9-24 set out the key issues which will need to be considered as part of any possible future development.

The maps below show the historic pattern of development around Goffs Oak village and St James (in the south-east of the wider Goffs Oak area), representative of the historic changes which have taken place in the wider area





Top left:

Goffs Oak and St James' Road, 1882. The historic nucleus of the village has been established, and the undeveloped land around the village and St James' Road has been subdivided since its historic function as part of the grounds of Theobalds Palace.

Top right:

Goffs Oak and St James' Road, 1967. The village has boomed to the north and west of its historic core, whilst glasshouses have proliferated to the east of the village along St James' Road and Goffs Lane (as they have elsewhere in the local area)

Below left:

Goffs Oak and St James, 2010. Goffs Oak Village is largely as it was in 1967, although it has experienced some infilling. The large nursery buildings on Goffs Lane remain, although one complex has become a garden centre and the other is now part-derelict. Along St James' Road some nurseries have simply been cleared, but the main group around the parish church have been redeveloped.



Previous Local Plans

The succession of local plans over the past three decades explain how and why the Goffs Oak area has recently developed as it has.

In response to issues of dereliction and uncertainty around the future of the local glasshouse industry, the 1986 Hertfordshire Structure Plan stated that 'a local plan should guide the long-term development of land between Flamstead End and Goffs Oak. Some land will be excluded from the green belt but stretches of open land penetrating the area will be retained.' This guided the future approach to the area.

The 1994 Broxbourne Local Plan, following on from the Structure Plan, attempted to strategically address these issues whilst retaining as much as possible of the core function of the green belt and the physical characteristics of the area. Specifically, it concluded that development at Area I on the map, south of Hammondstreet Road, could round off the built-up area and create a stronger green belt boundary, that new housing and substantial landscaping at Hammondstreet Road (Area 2) would resolve one of the worst areas of dereliction and that concentrating low density housing at Area 3 at St James would tackle an area of vacant and derelict glasshouses without harmfully detracting from the character of that area. More major development was resisted because it would destroy the area's character, and lead to sprawl from the merging of urban areas.

The 1994 Plan also defined green wedges that should be deliberately retained to protect the area's open character and further prevent merging – a wedge to the south of Goffs Lane, another to the west of Rosedale extending north and south of Andrews Lane and also all remaining land between Hammondstreet Road and Goffs Oak village including Cheshunt Common and the area west of Newgatestreet Road. Other policies sought to encourage the retention and refurbishment of the remaining glasshouses and tackle residual areas of dereliction though diversification, restoration and landscaping.



Extract from the 1994 Local Plan map, showing the three former glasshouse areas released from the green belt for development

Although the 1994 plan had objectors arguing that the development areas would still lead to merging and the loss of the area's identity (as well as setting an unacceptable precedent), the inspector ultimately concluded that the plan would deal with most of the derelict glasshouses without removing the entire area from the green belt or resulting in areas of development which were close enough to merge.

The 2005 Local Plan concluded that the 1994 plan's approach had successfully tackled the worst of the dereliction and retained stretches of open land penetrating into the area. It had achieved a suitable balance between development and countryside, and retained a reasonable degree of visual and physical separation which enabled the area's rural character to prevail. It also noted that new woodland had helped to contain the visual impact of the remaining glasshouses.

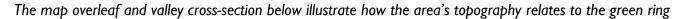
Issues to consider for future development

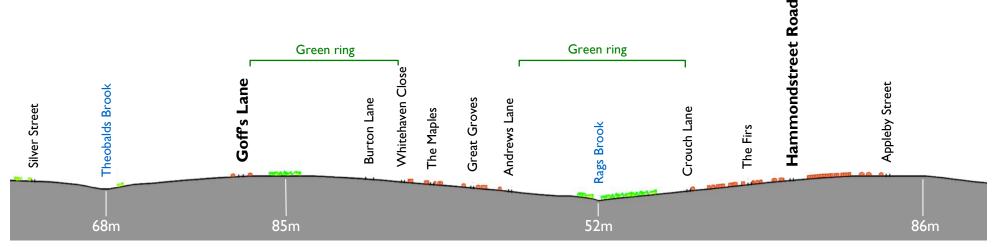
Landscape and character

The Goffs Oak area has a character quite different to that elsewhere within Broxbourne. Around its perimeter it has a mainly suburban feel, but is punctuated by views over more rural land. This is primarily a function of the area's topography – it is defined by three ridges of around 110m above sea level, which fall to around 50m above sea level within the Rags Brook and Theobalds Brook valleys and Cuffley Brook valley to the west.

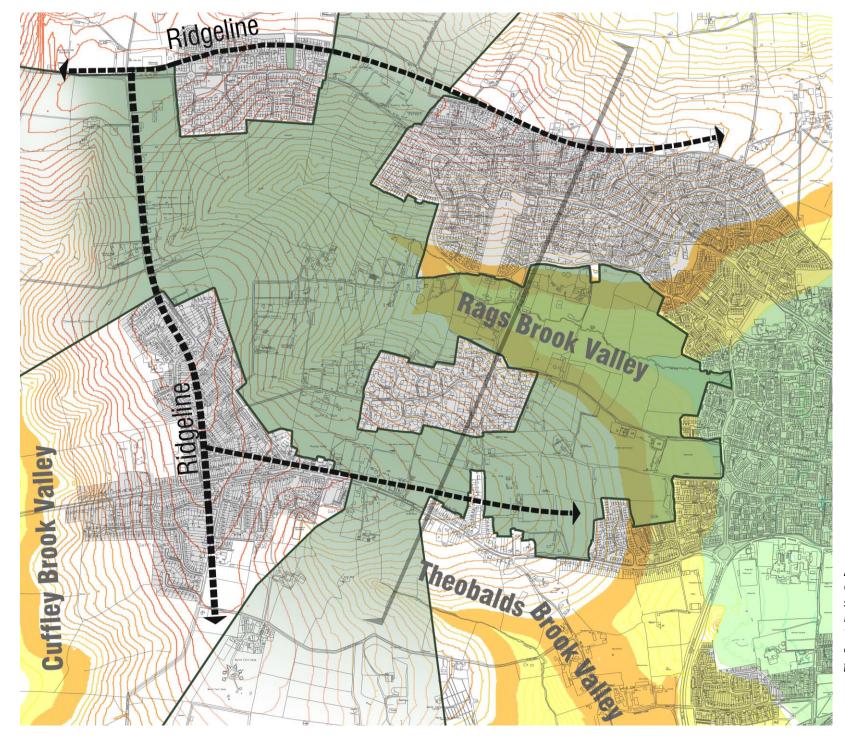
The ring of roads around the area (see Roads and Rights of Way, page 17) and much of the area's built development is on top of the ridges – St James being the notable exception. Between this outer ring of roads and St James is a ring of generally open and rural green belt land. This limits the impression of development within the area, and means that many homes enjoy views over undeveloped fields. The pattern of development of development along the roads around the area also enables regular views through to open countryside, further softening the impression of development within the area. A number of views have been identified as particularly key in establishing this character, and are shown on page 11.

Most development along the more rural lanes in the centre of the area is set back from the highway and screened by trees and high hedges – this helps to reinforce the rural character of the central green ring. Belts of woodland along the Rags Brook valley, bordering fields and around the housing areas help to screen more urban land uses from one another and less attractive activities such as glasshouses. Much of the area, particularly along the Rags Brook valley, is fairly open, despite there being little active agricultural land use in the area. The map on p13 shows that much of the open land around Goffs Oak is either natural or improved grassland, which often provides important habitats for wildlife.



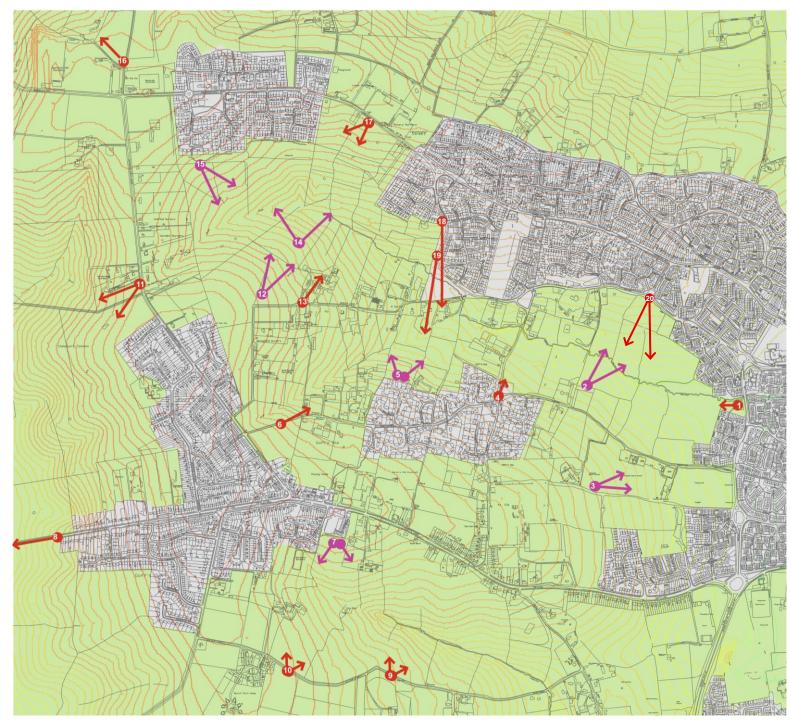


Exaggerated (x2) cross-section through the Goffs Oak area, looking west/north-west towards Hammondstreet and Goffs Oak village as shown on the map overleaf. This shows major roads (bold type), minor roads, Theobalds Brook, Rags Brook, wooded areas (green) and housing (brown) against topography.



Cross-section as shown on the previous page

Map of topography within the Goffs Oak area, showing how roads and settlements generally sit along ridgelines and surround the open 'green ring'. The views this provides over the green ring are an important part of the area's character.



Map of the key views within the Goffs Oak area which will be in particular need of protection as part of any development within the area.

Example views are shown on the next page.

Arrows in red are views into the green ring and/or another valley, and **arrows in purple** are views from the green ring:

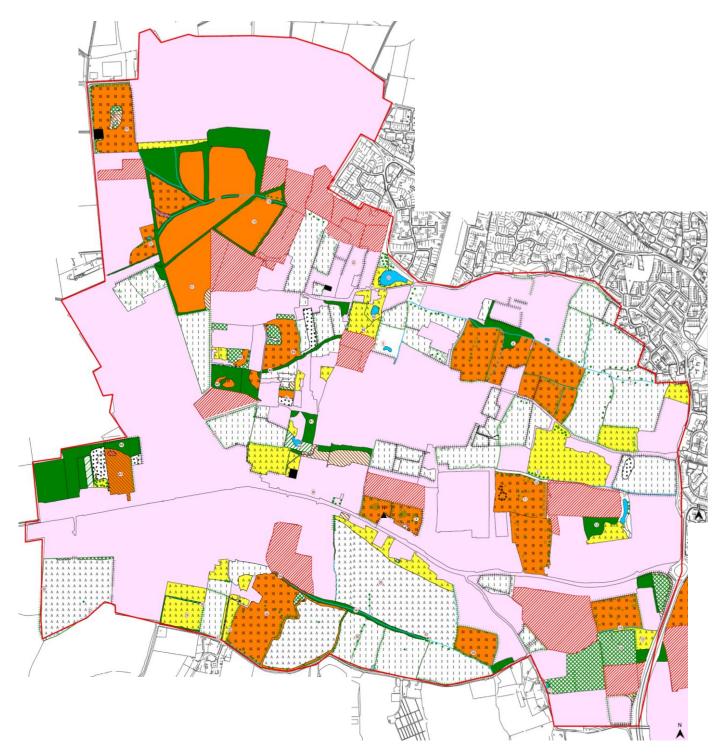
- I West from Rosedale Way Open Space
- 2 North and north-east close to Garryross Farm
- 3 North-east and east within Rosedale Sports Club
- 4 North from the St James crossroads
- 5 North-east and north-west behind Poppy Walk
- 6 North-east along St James Road
- 7 South-east and south-west from Myles Court 8 West down Cuffley Hill
- 9 North and north-east close to 'Bailiff's House'
- 10 North and north-east close to Orchid Close
- 11 West and south-west close to Oak House Farm
- 12 North and north-east from Crouch Lane corner
- 13 North-east from High View Kennels and Cattery
- 14 NE & NW within Cheshunt Common
- 15 South and south-east behind Richardson Cres.
- 16 North-west near Calves Croft Farm
- 17 South and south-west opposite Limes Nursery
- 18 South from opposite Calais Close
- 19 South along Argent Way
- 20 South-SE from the north end of Peakes Way

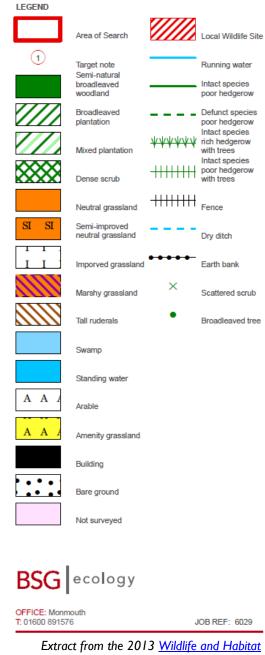






Examples of key views within the Goffs Oak area as shown on the map on the previous page





<u>Survey</u>, showing landscape character types throughout the Goffs Oak area.

Unsurveyed pink areas primarily correspond to urban areas

Environmental designations

The Council has a duty through its local plans to protect the borough's natural and historic environment. The Council must also ensure that residents' homes are safe from issues such as contamination. The environmental designations within the Goffs Oak area are therefore an important consideration.

The 2005 Local Plan Proposals Map designates a number of sites within the Goffs Oak area for their environmental value – these are summarised on the map overleaf. In addition (but not shown), a number of woodland areas and individual trees are protected by tree preservation orders.

To the north of Goffs Oak is Cheshunt Common – a swathe of land which was given by King James I to local people for grazing livestock as compensation for expanding the Theobalds Palace estate. This is now owned and managed by the Cheshunt Common Rights Trust, and is still kept open for similar purposes. Whilst its protection is not strictly a planning consideration, the Trust does not promote it for development and the contribution the Common land makes to the character of the area, dictates that it remains undeveloped.

The map on the previous page is an extract from the 2013 Wildlife and Habitat *Survey*, showing the plentiful, primary grassland habitat throughout the Goffs Oak area. The Survey advises that all existing local wildlife sites in the Goffs Oak area should continue to be protected, that three wildlife sites deleted as part of the 2005 Local Plan (land at Laurel Bank Farm, land at Tudor Villas and land to the south of Rosedale sports club) should be re-instated and that a wide swathe of grassland between Crouch Lane and Hammondstreet Road should be newly designated for protection.

The 2008 Landscape Character Assessment observes that the Goffs Oak area comprises fields, hedgerows, woodland pockets, farm houses and glasshouses encapsulated by suburban and modern housing. Away from urban edges and main roads there is a strong sense of tranquillity with most roads having a predominately rural character. The study concludes that the area may have some capacity to accommodate change without compromising key characteristics, but warns that development would likely require wider roads which would create visual intrusion, noise and additional traffic movements.

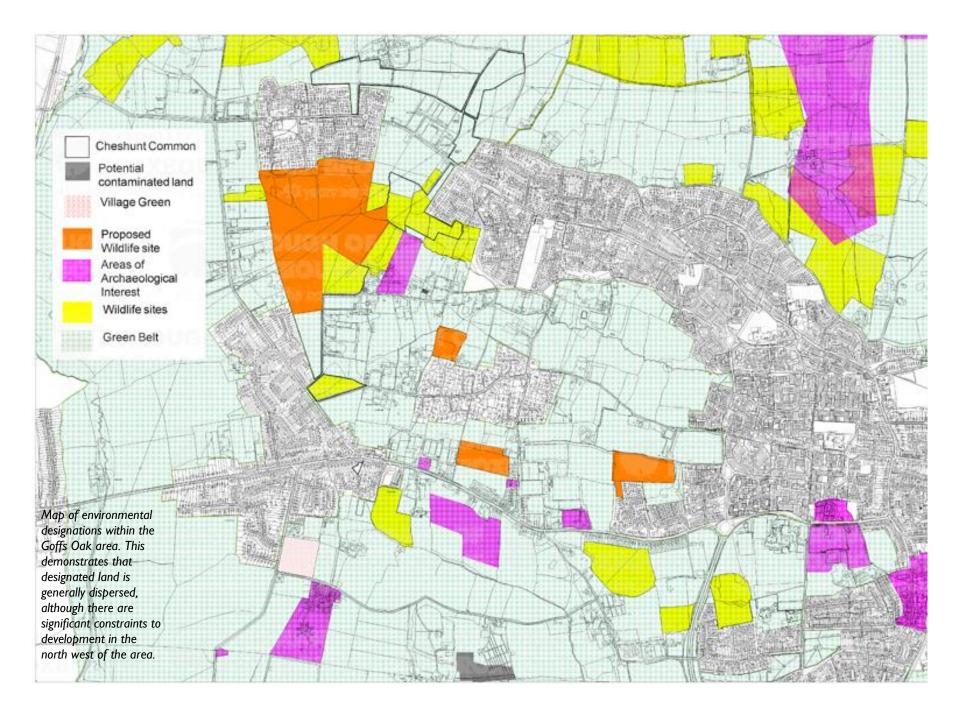
The 2010 Submission Core Strategy identified Rags Brook and Theobalds Brook valleys as green corridors for people and wildlife, and expected them to be protected and enhanced to help link urban open spaces with surrounding countryside. The new Local Plan could take this stance forward.

The Environment Agency's Landfill Maps indicate that the Goffs Oak area is generally free from contamination – the only two sites with any record of historic landfill are to the south of Hammondstreet Road and to the north of Crouch Lane close to Lucas End Farm. Individual sites within the area may nevertheless have other contamination issues as a result of previous land uses, such as glasshouse sites. Where development is supported on any such site, contamination assessments would be required as part of planning applications.

There are a number of identified sites of Archaeological Interest within the Goffs Oak area and a Site of Special Scientific Interest to the north of Hammondstreet Road.

An area of land off Jones Road to the south of Woodside School is designated as a village green. Any development on this land would require its re-provision elsewhere in accordance with Section 16 of the Commons Act 2006

The map on the following page shows how these designations apply within the Goffs Oak area



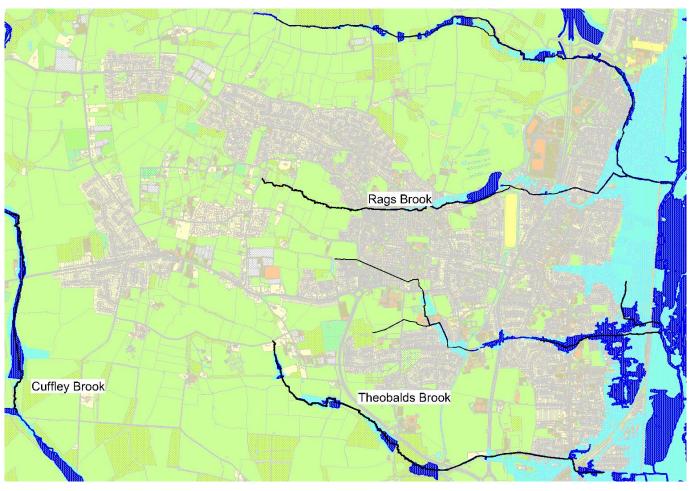
Flooding

The Environment Agency's Flood Maps indicate that the Goffs Oak area generally has a low risk of fluvial (river) flooding. The map shows flood risk as it applies to the southern half of the borough – watercourses are shown in black; dark blue areas have up to a 1% chance of flooding in any given year and light blue areas have up to a 0.1% chance of flooding in any given year. It can be seen that only the very upper reaches of Rags Brook and Theobalds Brook flow through the Goffs

Oak area, with minimal land at flood risk either side.

The topography and geography of the southern half of the borough does however mean that all of the water runoff from the Goffs Oak area will flow east to the River Lee – crucially, through the urban area. It can be seen that there are known areas of fluvial flood risk within the urban area, and any development within Goffs Oak will therefore need to demonstrate that it would not exacerbate this. Development must also not exacerbate any more localised surface water flooding issues.

Any schemes that may be favoured for development will therefore need to include a comprehensive flood risk assessment as part of its planning application. This will be essential for the Council to judge the impact of development on the Goffs Oak area, as well as the downstream implications on the wider Lee Valley catchment. The



policy applied by Hertfordshire County Council as the current flood risk management authority is to replicate greenfield run-off rates and delay water from reaching watercourses during heavy rain events. Any development within Goffs Oak should therefore include a sustainable urban drainage system (or systems) such as green roofs, swales and permeable paving.

Roads and Rights of Way

Primary road access to the Goffs Oak area is via Lieutenant Ellis Way, a dual carriageway road connecting to the A10 close to the M25 in Waltham Cross. The area is then served primarily by a ring of distributor roads – Hammondstreet Road and Argent Way/Rags Lane to the north, Rosedale Way to the east, Goffs Lane to the south and Newgatestreet Road to the west. East of Rosedale Way there are numerous road connections through Cheshunt, and Darnicle Hill and Cuffley Hill run west from the area to Newgatestreet Village and Cuffley respectively. Road connections directly north and south are very limited.

The 2010 Transport Modelling Study concludes that any development in the Goffs Oak area will add congestion to local roads, and stress key A10 junctions. The Council has therefore commissioned a more detailed Transport Study to examine these transport implications as they arise from

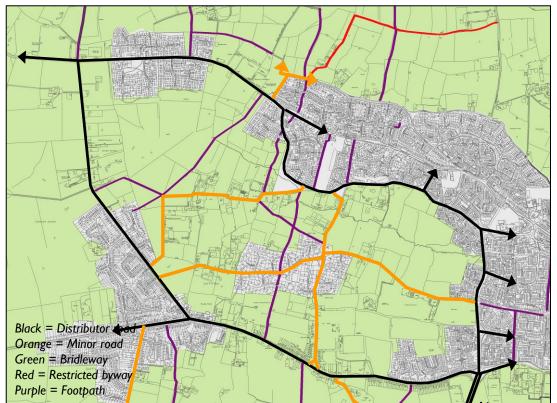
individual sites as part of the preparation of the new Local Plan.

The rural centre of the area and St James is criss-crossed by a network of rural lanes, most of which are narrow and lack road markings. Outside of St James, these roads generally have no pavements. The area does benefit from a network of offroad rights of way, which are primarily used recreationally. Most of these run north-to-south in contrast to the largely east-to-west roads in the area.



Public Transport

Rural crossroads in St James



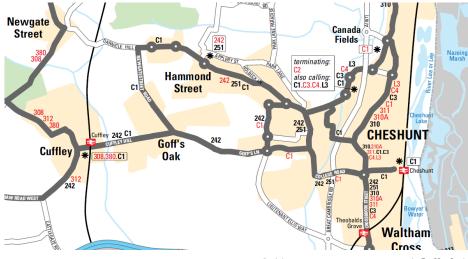
Roads and rights of way in the Goffs Oak area



The Goffs Oak area is served by a number of bus routes on three main 'corridors' (see table) – these connect to local railway stations and town centres. Hammondstreet Road east of Argent Way has up to six buses per hour at peak times, but daytime services are fewer. Elsewhere in the Goffs Oak area services are significantly less frequent and rely on funding from Hertfordshire County Council.

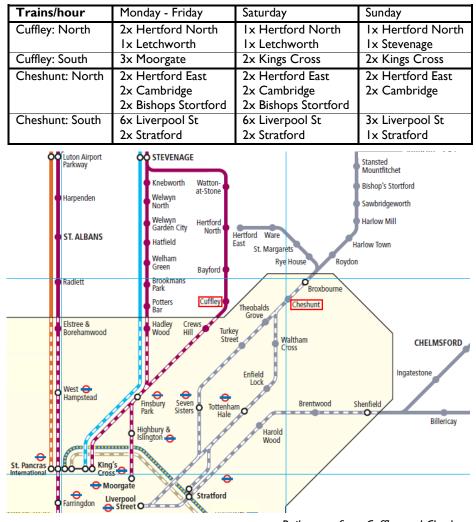
Num	ber of daily bus services by corridor	MF	Sa	Su
CI	Cuffley > Goffs Oak > Hammondstreet > Cheshunt	18	4	0
242	Potters Bar > Cuffley > Goffs Oak > Rosedale, then as below	20	14	6
242	Rosedale > Brookfield > Cheshunt > Waltham Cross	23	21	6
251	Hammondstreet > Cheshunt > Waltham Cross > Waltham	38	27	6
CI	Abbey > Upshire			
242	Hammondstreet > Cheshunt	61	40	6

The nature of these services means that bus transport is unlikely to be attractive for most journeys from any new developments, and so these could be expected to generate a high number of car journeys. However, it might also be expected that major new development could enhance bus use enough for operators to improve services – developments could make appropriate contributions towards public transport to ensure this, something the Local Plan could support.



Public transport routes around Goffs Oak

Although the Goffs Oak area has no railway stations it can be accessed via Cuffley station about I mile to the west, and Cheshunt station about 3 miles to the east. Services from each are shown in the table below. Whilst Cuffley is relatively close to Goffs Oak village, the steep hill between the two generally limits walking. For the rest of the area bus CI provides links to both stations, but its frequency makes it unlikely that even rail commuters could choose to live in the area without a car.



Rail routes from Cuffley and Cheshunt

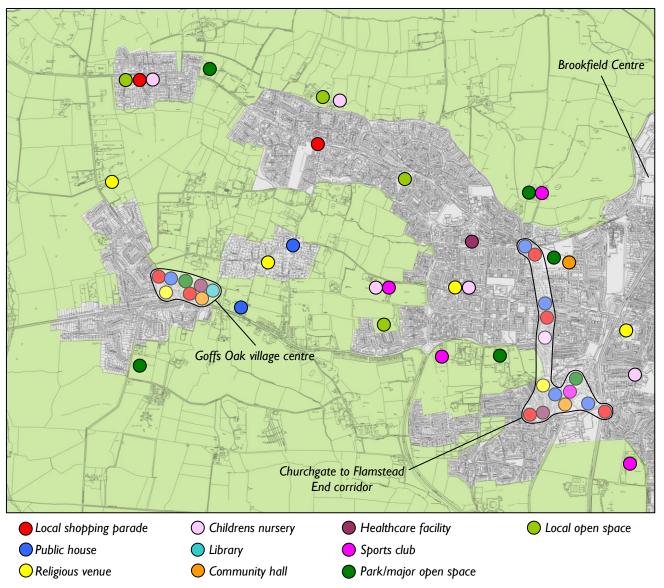
Facilities and Utilities

The Goffs Oak area has a relatively broad range of local facilities – in addition to primary and secondary schools (next page), there are shops, public houses, religious venues, healthcare facilities, children's nurseries, community halls, play areas, sports clubs and a library.

It can be seen from the map that these are generally clustered around Goffs Oak village centre and the Churchgate to Flamstead End corridor in Cheshunt – facilities are more limited around Hammondstreet to the north and the Rosedale area to the south east. There are no higher order facilities within the Goffs Oak area – the nearest supermarkets are at Brookfield (3 miles from Goffs Oak village centre), and there are relatively few employment opportunities.

It is likely that some of these facilities would be quite able to adapt to new residents within the area, and indeed this may aid their viability. Healthcare capacity would be more sensitive to development. Hertfordshire Primary Care TrustNHS indicates that capacity exists for about 5,000 new registrations at Goffs Oak Valley View healthcare surgery. This would be more than sufficient to cater for any new housing development in the area.

In terms of utilities, there is understood to be general capacity in the electricity, gas, water and sewer networks for all growth scenarios in the borough. However, any development scheme that comes forward in the Goffs Oak area will need to demonstrate that local utility capacity exists, and that the development could satisfactorily connect to the network.

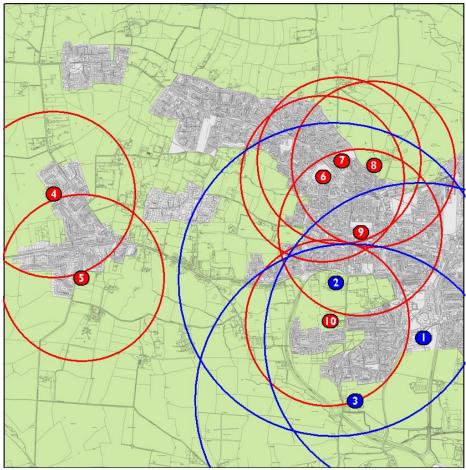


Education

The Goffs Oak area is served by three secondary schools (shown in blue on the map, right): Cheshunt (1), Goffs (2) and St Mary's (3). Goffs School is within a 20 minute walk of the eastern edge of St James and southern parts of West Cheshunt, but otherwise secondary school students are likely to require vehicular means to access school.

Hertfordshire County Council (Herts CC) as local education authority publishes Meeting the Rising Demand for School Places – this uses pupil yields based on housing targets and birth rates to predict a surplus of at least 80 secondary school places to 2024. The new St Mary's School was also designed to allow the addition of a further 2 forms of entry, and the Council is aware of plans for the redevelopment of Goffs School although this will only result in a limited increase in 6th form capacity. The main concern for future development is therefore pupil's distance to school.

Seven primary schools serve the area (shown in red on the map): Goffs (4) and Woodside (5) in Goffs Oak village, Fairfields (6), Flamstead End (7), St Pauls (8), Andrews Lane (9) and Bonneygrove (10) in Cheshunt. However, the areas allocated in the 1994 Local Plan (Hammondstreet Road, St James and West Cheshunt) do not have any schools. This not only means that pupils have to make very long journeys to school, but *Meeting the Rising Demand for School Places* shows that all of the area's existing primary schools are full. HCC advise that the seven existing primary schools have limited scope for expansion within their boundaries, and that where expansion is possible it is purely to cater for growth in the existing population. Other developments, birth rates and parental choice are currently generating a demand for one new form of entry from every 500 new dwellings – Herts CC's general preference is for two form-of-entry schools on 2.5 hectare sites, although



Primary schools (red) and secondary schools (blue) in the Goffs Oak area, showing approximate 10 minute walking distances to primary schools and 20 minute walking distances to secondary schools

it recognises that free schools may also offer a solution. There are plans for a new primary school at St Marys Academy and the expansion of Bonneygrove which may be able to accommodate pupils arising from new development, and potentially free up capacity at other primary schools. However, the remoteness of existing schools from development areas and the need to minimise travel to school by car is a major consideration. The capacity of the two schools in Goffs Oak village is known to be very limited. Any major new development within the Goffs Oak area should therefore provide or contribute towards additional primary school places within a short walking distance of the development. Limited piecemeal development would be difficult to provide for from a primary school perspective. There might be scope to extend Woodside School if the adjoining Village Green can be relocated.

Green Belt

The 2005 Local Plan Proposals Map defined the current extent of green belt land around the borough's urban areas, and the map (right) demonstrates how this area of protection wraps tightly around existing urban areas.

The National Planning Policy Framework states that the essential characteristic of green belt land is its openness and permanence. Most development is therefore inappropriate in the green belt and should only be approved in very special circumstances, and changes to the green belt should only be made in exceptional circumstances through a Council's plan-making process.

The green belt around Goffs Oak is part of the wider Metropolitan Green Belt, characterised in the area to the west of Cheshunt and towards Hatfield and Borehamwood by small villages within picturesque countryside. Its protection therefore also has a strategic regional purpose, as well as just a local one.

Given its need to identify sufficient land for housing and other development needs within the borough, the Council does however anticipate that the new Local Plan will need to remove some land from the green belt. It has therefore commissioned or prepared three pieces of green belt evidence:

The 2008 Green Belt Review judges the performance of green belt land in the Goffs Oak area to be overwhelmingly 'high' – it separates distinct



The current extent of green belt (green) around urban land (grey) in the Goffs Oak area

settlements and prevents sprawl, and provides a barrier between urban areas and more open land to the south and west. The Review identified the area as a 'Long Term Area of Search' which was carried through to the 2010 Core Strategy.

On this basis the area north of Crouch Lane was identified as part of the Goffs Oak Area of Search in the Core Strategy. Whilst it could theoretically accommodate development it would be remote from local services/facilities, only accessible via rural lanes such as Crouch Lane, Hammondstreet Road or Newgatestreet Road and would undermine the purposes of the green belt. The land around St James has a haphazard layout and character with no obvious focal points. Goffs Oak, St James and Hammondstreet Road together offer shops, primary schools, library, community centres and public houses but no higher-order facilities. The only notable road into the area is Goffs Lane. The green belt in this area plays an important role in preventing the sprawl and the coalescence of Rosedale, Hammondstreet, Hammondstreet Road, Goffs Oak village and St James. Merging would undermine the attractiveness of the area for both existing and new residents. It is therefore judged to be an area that forms part of a local gap between urban areas and performs an important role in preventing the merging of those urban areas.

However the area was identified as part of the Goffs Oak Area of Search in the Core Strategy and could theoretically accommodate substantial development, with schemes being promoted for up to 600 dwellings to the west of Cheshunt, the redevelopment of major sites along Goffs Lane and proposals for various glasshouses, farms and business premises. Whilst there may be good reasons for not releasing this land from the green belt, in recognition of the fact that it was identified as an Area of Search in the Core Strategy, and that development pressure exists, it concludes that this sub-area should be considered as part of the Local Plan process.

The 2008 Review of the Inner Green Belt Boundary notes that past development in the area has been haphazard and advises that new development should therefore only be considered on a comprehensive basis.

The glasshouse industry

The 2013 Glasshouse Study identifies 16 sites in the Goffs Oak area which either have or most recently had glasshouses on them. The decline of the industry over the past few decades has been well documented (pages 6&8), as local growers have struggled to compete with rising costs, foreign competition and price pressures from supermarkets. Premises typically have a mixture of first generation wood-framed and second generation aluminium-framed glasshouses of around 2-3 metres in height. These no longer meet the industry's needs. However, growers generally lack the funds needed to invest and compete, and so now only 9 of the 16 sites remain in active production and one site is used as a Garden Centre. However, the significant dereliction issues which were in existence pre the 1995 Local Plan no longer prevail.

The Glasshouse Study does conclude that this area remains well suited to the industry – it has high light levels and good transport links. The current viable industry standard is for a minimum ground coverage of a single glasshouse of over 3 hectares (with 5+ hectares being ideal), and a minimum 6m eaves height (with up to 8m being ideal). Thermal screens, artificial lights, combined heat and power generation, storage sheds and on-site or nearby packing/distribution centres are also recommended – a more industrial style of growing.

The study concludes that many sites are likely to be too small to be revived as viable businesses. However, Darnicle Hill Nursery and Burton Grange Nursery remain active and should continue to be viable, whilst the partially active Tudor Nursery and Limes/



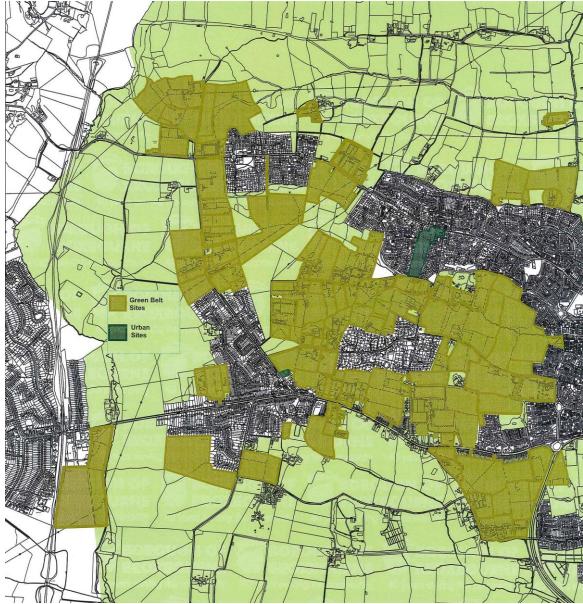
Rosary Nursery complexes have scope to be brought back into use. In-Ex and Tina Nurseries, fully and partially used as garden centres respectively, could be retained in this use. The Council is aware of several growers within the borough, as well as some based outside, who are interested in developing modern sites in the area. This would be subject to supportive planning policies being in place to allow the type of larger and taller premises, packing facilities, renewable energy generation and improved road infrastructure which the industry requires. However, funding support would likely to be needed and other local growers have asserted that the industry has no realistic future in what is, by horticultural and agricultural land use standards, a very densely populated area.

Land ownership and promoted sites

In order to ensure that there has been a "level playing field" between promoted sites when drawing up this and other development options reports, the Council has appraised the developable land in each area in its Strategic Land Availability Assessment (SLAA). Over 100 green belt sites or combination of sites within the Goffs Oak area have been actively promoted for development by owners/land agents, following several 'calls for sites' by the Council. In some cases promoters have prepared detailed documents attempting to set out the capacity and suitability of their site, whilst others have submitted no supporting information. The Council has also assessed a number of other privately-owned sites where they are considered developable, either because the owner has otherwise indicated a wish to develop their site or it would form a logical extension to one of the development approaches set out in the following chapter.

The SLAA also assesses the developability of brownfield or underused land within urban areas. The primarily residential and suburban nature of Goffs Oak means that there are only two such sites.

The assessment exercise in preparing the SLAA looks at a variety of issues such as land use, topography, environmental designations, flood risk, proximity to services/facilities, access opportunities and utilities. The following chapter presents a number of development approaches based around the assessed sites, as well as the issues which have been considered elsewhere in this chapter.



Development options for the Goffs Oak area

Based on the evidence and issues set out in the first half of this document, the Council has identified seven 'development approaches' for the Goffs Oak area.

The use of 'approaches' rather than the clear 'options' in the Council's other development options reports is necessitated by the sheer number of sites which have been promoted in the Goffs Oak area, and the near infinite number of possible combinations of them. The approaches allow some flexibility over the exact sites involved and are not mutually exclusive. They do however explore the issues which would need to be considered if any sites were allocated for development in the Goffs Oak area. The preferable development sites from the seven approaches will ultimately be identified in the Local Plan taking into account high-level borough-wide issues, and this will be subject to public consultation. The following pages and this report's conclusions therefore only explain the possible approaches and summarise the key positive and negative aspects of each approach as it relates to the Goffs Oak area.

The development approaches are set out over the following pages, and cover:

- 1. Committed and infill urban development only (p26)
- 2. Goffs Oak village expansion (p27)
- 3. Developing the Rags Brook valley (p30)
- 4. Infill development around the 'green ring' (p34)
- 5. Development east of Cuffley (p36)
- 6. Development to address dereliction (p37)
- 7. The glasshouse industry (p40)

As part of the SLAA assessment referred to on the previous page, each site has been given a reference number. These are shown within the development approaches.

In addition to the development approaches, and irrespective of the sites chosen by the Local Plan, there are some areas where the green belt boundary would benefit from minor revisions to aid its defensibility. In many cases this would add land to the green belt, such as around Hammondstreet Road where slightly more land was taken out of the green belt by the 1994 Local Plan than was actually needed for development. This will be considered in detail whilst drawing up the Local Plan.

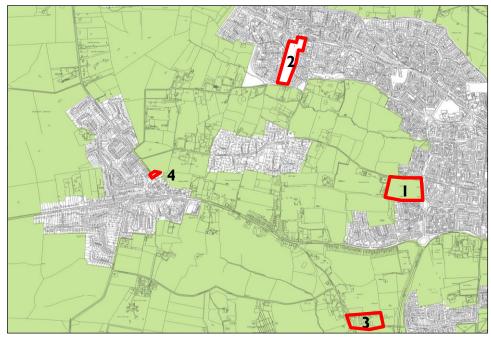


Development Approach I: Committed and infill urban development only

The first approach is to not plan for further development within the area, apart from the two urban sites identified in the SLAA and two green belt sites with existing planning approvals:

4	<u>CG-U-39</u>	Tanglewood and Windrush Total:	5
3	<u>CG-GB-33</u>	Halstead Hill (Approved)	14
2	<u>CG-U-29</u>	Land at Argent Way	40
1	<u>CG-GB-24</u>	Everest Sports Ground (Approved)	96
Map n°	Site Ref	Site Name	N° of homes

Regardless of the sites chosen, it is considered that the Local Plan should redraw the green belt boundary to release <u>CG-GB-24</u> Everest Sports Ground. No other changes to the green belt boundary would stem from this option as <u>CG-GB-33</u> Halstead Hill is an isolated site which should be retained in the green belt. Unless very special circumstances existed the only development which would be permitted outside the urban areas under this option would be schemes allowed by permitted development rights, and works to existing properties and agricultural buildings which are acceptable under the local plan's green belt policies. As the two



urban sites are identified in the SLAA, they have already been judged to be deliverable and broadly suitable for development. Development at $\underline{CG-U}$ -<u>39</u> Tanglewood and Windrush is unlikely to have strategic impacts, but any planning application for $\underline{CG-U-29}$ Land at Argent Way will need to demonstrate that it has no detrimental impact on transport or education.

The positive consequences of Development Approach I are:

- With the exception of the Everest Sports Ground site green belt land would continue to be protected. The tranquillity and suburban/rural balance of the area would remain largely as it is today; the important gaps between Goffs Oak, St James, Hammondstreet Road and the main urban area of the borough would be retained, as would the area's landscape and the key views referred to earlier.
- New infrastructure and facilities would not be required predictions suggest that existing primary schools could cope with any new pupils arising from existing dwellings, and the local road network and busy A10 junctions would not have to cope with additional traffic.

More negatively, Development Approach I would mean that:

- Household growth arising within Goffs Oak area would have to be met in other parts of the borough and the area would not contribute towards the borough's overall development needs;
- New infrastructure and facilities which may improve the area would be much more difficult to fund;
- Derelict or unsightly sites would remain and may require potentially costly and challenging enforcement action to resolve them.

Development Approach 2: Goffs Oak village expansion

The second approach put forward is to allocate some of the small edge-of-urban sites around Goffs Oak village for development. Of the three discrete existing settlements within the Goffs Oak area, the village is considered to be the most sustainable for further development as it already has a good range of shops and services, regular bus services, and is theoretically within walking distance of Cuffley railway station.

In terms of green belt function, the development of some sites around the village would have little impact upon sprawl and merging, and form logical infill which could actually strengthen the defensibility of the green belt boundary. However, because of the primary education issues identified by Hertfordshire County Council (as the local education authority) simply allocating even a couple of the most favourable sites could result in potentially unmanageable demand.

Expansion of Woodside, and particularly Goffs Oak schools would be challenging. However this is felt to be more deliverable than providing a third school within the village, not least because this would require further land. Of the two schools, Woodside is more suited to expansion – it is in a less sensitive residential location, and could either expand onto farmland to the east or the village green to the south. The farmland is not as well related to the school and so Hertfordshire County Council favours the village green option. This would require its re-provision elsewhere in accordance with Section 16 of the Commons Act 2006. CG-GB-14 Whitehouse Farm is considered to be a preferable location for this because it would create an open space link between Cheshunt Common to the north and the playing fields to the south.

The cost of a new form-of-entry at an existing school is estimated at \pounds 4.2 million – this would create capacity for around 500 dwellings. However, because any new housing would be expected to contribute to the cost of providing new education facilities, close to that number of dwellings would be needed to ensure that the shared cost of a new form-of-entry would not make house construction unviable. Fourteen sites around the village (see below) have been identified as developable within this approach, amounting to roughly 385 new dwellings. This number of dwellings would equate to a likely education contribution of around £10,900 per dwelling, which is unlikely to have an undue impact on viability. In addition it would provide education capacity for the further 155 dwellings be provided under Option1.

Sites for development under Development Approach 2

The sites north of Cuffley Hill (<u>CG-GB-02</u>, <u>-48</u> and <u>-65</u>) make up one of the largest potential development areas. Whilst they are suitable in principle, there are a number of protected trees within the site. These should be retained, meaning the site can accommodate an estimated 50 dwellings in a spacious woodland setting with a single access point between 92 and 94 Cuffley Hill. As these sites are not in single ownership, landowners would be required to work together on a suitable proposal. This site might prove suitable to be allocated for a self-build scheme.

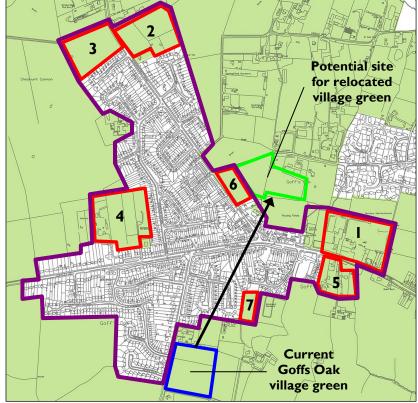
The glasshouse land and garden centre east of the village centre (<u>CG-GB-16, -71</u>, and <u>-98</u>) forms another major site, with capacity for 80 dwellings plus the re-provision of In-Ex garden centre. Existing trees and landscaping would need to be retained, the builders yard remediated and the development used to create a 'gateway' to Goffs Oak village. As the site is within 50m of St James, any scheme should also include a significant open space buffer to prevent merging of the two settlements. As the site is not in single ownership, land-owners would be required to work together on a suitable proposal.

A proposal has also been submitted for a more comprehensive scheme (CG-GB-88) for site I which would involve the relocation of the existing playing fields and community facilities within the overall scheme. This development could include a new village centre and would provide improved facilities for existing residents as well as providing for the needs arising from any new development. It could be difficult to deliver given the multiple landowners and use involved but would provide an opportunity to rationalise uses in this area and the potential to improve facilities for the existing village should not be lightly overlooked.

Land on the opposite side of Goffs Lane (<u>CG-GB-09</u>, <u>-34</u> and <u>-63</u>) includes a local wildlife site and various storage and industrial uses which sit at the top of the Theobalds Brook valley. Development would enable protection and remediation of these, and with suitable landscaping and the retention of existing trees to screen development, around 50 dwellings could be accommodated. Again, the site could be used to create a 'gateway' to Goffs Oak village – and as the site is not in single ownership, landowners would be required to work together on a suitable proposal.

To the south of the village, development of <u>CG-GB-49</u> Oak Field could accommodate up to 15 dwellings, with access provided from Doverfield to the north. Development of this site could provide enhanced access to the allotments to the east, as well as a more traffic-free route to an enlarged Woodside School. To enable the school to be enlarged, relocation of the village green to <u>CG-GB-14</u> Whitehouse Farm east of Newgatestreet Road could be facilitated by the development of around 25 dwellings in a row fronting the road.

The last two sites (CG-GB-51/-64 and CG-GB-79) would extend the village north on either side of Newgatestreet Road, with capacity for around 145 dwellings. Development would need to take account of the existing power lines, and firmer landscaping around the north of the site would be able to better define the extent of the village and create a gateway feature. As the sites are not in single ownership, landowners would be required to work together on a suitable proposal. Site 3 is an open field with no current clearly defined western boundary. It affords views across to Cuffley. Site 2 is rough grazing land which is less attractive in appearance. village Both sites would extend the unduly northwards.



Map n⁰	Site ref	Site name	N° of homes	
1	<u>CG-GB-16</u>	Tina Nursery	80	
	<u>CG-GB-71</u>	In-Ex Garden Centre		
	<u>CB-GB-98</u>	Greenleaf		
2	<u>CG-GB-51</u>	Chase Field	90	
	<u>CG-GB-64</u>	Thorn Nursery		
3	<u>CG-GB-79</u>	Land rear of Chiltern Close	55	
4	<u>CG-GB-02</u>	90a & 102 Cuffley Hill	50	
	<u>CG-GB-48</u>	Land at 104 Cuffley Hill (CG Edward)		
	<u>CG-GB-65</u>	Fairmead Nursery		
5	<u>CG-GB-09</u>	M O'Connor Land	50	
	<u>CG-GB-34</u>	Manning Ground		
	<u>CG-GB-63</u>	Rear of Goffs Lane		
6	<u>CG-GB-14</u>	Whitehouse Farm (Part)	25	
7	<u>CG-GB-49</u>	Oak Field	8	
T	Total (Plus 155 homes from committed/urban sites):			

The positive consequences of Development Approach 2 are:

- An appropriate level of housing could be provided through relatively minor green belt boundary revisions which it is considered would not have a significant impact on the village as a whole;
- In part the green belt boundary around Goffs Oak village could be more logical and hence defensible in future;
- Several fairly unattractive sites (particularly I and 5) would be removed from the green belt, creating potentially more attractive gateways into the village;
- Residents of new development would have good access to services, facilities and transport and development could improve the viability of existing businesses in the village;
- There may be the potential to rationalise and improve existing community facilities as part of a comprehensive scheme for the development of site 1;
- There may be an opportunity to allocate a site for a self-build housing development.

In more negative terms, Development Approach 2 could:

- It could result in Goffs Oak village and St James very close to merging with one another. On the positive side promoting development around Goffs Oak village would afford greater protection to the wider area of green belt between St James, Hammondstreet and West Cheshunt;
- Potentially create a precedent for other glasshouse sites around Goffs Oak if In-Ex Garden Centre and Tina Nursery were accepted for redevelopment;
- Be challenging to deliver, particularly the necessary primary school expansion which requires the relocation of a designated village green.
- Impact on the landscape of the area, particularly along Newgatestreet Road.

Development Approach 3: Developing the Rags Brook valley

The third development approach is to develop within the Rags Brook valley. This broad area covers land along the western edge of the existing urban area of Cheshunt, and east of St James. The valley comprises a significant part of the Goffs Oak area, but has only a small number of relatively large promoted sites. Within approach 3 there are two possible development options – Crest Strategic's Rags Brook Park scheme, and Rags Brook Park alongside Tudor Nursery.

Rags Brook Park

<u>CG-GB-44</u> Rags Brook Park is a large single site being promoted by Crest Strategic. Crest has prepared a masterplan for the site to a relatively advanced level which shows around 500 dwellings, but has also indicated this could be increased to 600 dwellings in a final layout design. The masterplan also includes a new primary school, a community hub with shops and facilities, a care home, and a large linear park to open up public access along the Rags Brook valley. Housing would adjoin the urban area of Cheshunt and St James, albeit as discrete pockets of development separated from each other by landscaped footpaths, roads and open spaces.

The masterplan area includes *Everest Sports Ground* which has already been granted outline approval for 96 dwellings, as well as two sites which are not currently optioned to Crest but which have still been promoted for development as part of the scheme – <u>CG-GB-22</u> Land to the South of Peakes Way (site 2 on the masterplan below) and <u>CG-GB-41</u> Lea Mount (site3). Although the Council refused a separate planning application for Land to the South of Peakes Way in July 2013, this was partly on prematurity grounds and it is still considered deliverable as part of the overall option.

Land parcels would be accessed from a number of different points. Around half of the housing and the community hub would be accessed from Andrews Lane (which would be realigned and widened), with the land north of Rags Brook accessed from Peakes Way and the westernmost land accessed from Rags Lane. There would be no north-south vehicular access across the Rags Brook, but pedestrian routes would criss-cross the valley. A bus route would circulate through the site from Andrews Lane, re-

joining Rosedale Way at a bus-only access.

Beyond the existing approval at Everest Sports Ground, the development of a limited number of the land parcels considered within development approach 3 would not be possible because of a lack of local educational capacity. As with development approach 2, the option therefore needs to consist of enough housing to make the provision of a new school viable. Crest's proposal includes a two form of entry school – whilst this would provide excess capacity, primary school places are stressed throughout Cheshunt and so there may be benefit in doing this.

This option could have implications for the Rosedale Sports Club, which leases 6.2 hectares of land within the overall site. The club is an important community leisure facility; and hosts Cheshunt Rugby Club, Cuffley Rugby Club, Rosedale Cricket Club, Hertfordshire Harriers Cricket Club and Rosedale Bowls Club. Between them, these have close to a thousand members. The club is already having its clubhouse relocated as part of the planning approval for *Everest Sports Ground* for noise reasons, and is concerned that with further development around the site it may be unable to continue to operate in its current location. The club would also suffer if existing landowners discontinue the club's current lease arrangements in anticipation of development. On the positive side there is potential as part of this approach for a land swap which would secure on a permanent basis the club's use of the land south of its existing site which it currently leases on a short term basis.



The positive aspects of Rags Brook Park are that:

- It is being promoted as a comprehensive scheme notwithstanding the land ownership issues at Land to the south of Peakes Way and Lea Mount, it is likely to be more deliverable than other development approaches;
- By providing a two form of entry school, local centre and scope for bus access the development would largely address its own key infrastructure needs, as well as providing new facilities for existing residents close to the site;
- Significant amounts of family housing would be provided making a contribution to the Borough's overall needs;
- The development as promoted appears to be very attractive, with significant landscaped areas along Rags Brook Valley which could be enjoyed by the wider local population as well as residents;
- It could help to secure the future of Rosedale Sports Club through the formal provision of the land to the south of the existing Sports Club for playing pitches.

In negative terms, development at Rags Brook Park:

- Would sit entirely on green fields on either side of the attractive Rags Brook valley these were deliberately retained as green belt in the 1994 Local Plan, and the 2005 plan judged that this had been successful;
- Would leave only a thin landscape belt between Cheshunt and St James;
- Would, by virtue of its scale, add more pressure to the local highway network than development within the other development approaches;
- Would impact significantly on the rural character and landscape of the area.

Approach 3a Rags Brook Park plus Tudor Nursery

A negative consequence of only supporting Crest Strategic's Rags Brook Park scheme would be that <u>CG-GB-26</u> Tudor Nursery becomes close to being surrounded by housing, and the green ring around St James would effectively be cut off. This would weaken Tudor Nursery's defensibility as a green belt site. Developing Tudor Nursery in addition to Rags Brook Park would not reduce these impacts. However, if the Local Plan requires a larger amount of housing in the Goffs Oak area, doing so would present a more coherent way to address these issues and would represent the redevelopment of a largely previously developed site.

Tudor Nursery is still partly in use for horticultural production, but it is also partly derelict (photo right). The site owner's contention is that investing in the current use is unviable, and so is promoting the site for up to 350 homes as part of a comprehensive scheme (see plan below) with site access from both Goffs Lane and Burton Lane. Built development on the site would be concentrated towards the south – this would maintain a thin green buffer between development and



Derelict wooden-framed glasshouses at Tudor Nursery

existing housing within St James, but this would serve primarily aesthetic purposes rather than a strategic planning purpose.



Whilst Tudor Nursery could be developed independently of Rags Brook Park this is not considered to be a suitable approach. The intrusion into the green ring would be significant, and development would effectively create another 'village' with limited facilities which would likely merge with St James and Cheshunt in time.

The indicative masterplan for Tudor Nursery does include a primary school, but with a two form-of-entry school proposed for *Rags Brook Park* this may not be necessary if both sites came forward for development. If the Local Plan proposes that both Rags Brook Park and Tudor Nursery should be developed, comprehensive masterplanning to take forward the best aspects of both site promotions will be essential. This will need to address the relationship between the two sites and adjacent land (principally St James and the green ring around it) and the provision of local community facilities and open space between the two sites.

The positive consequences of developing both Rags Brook Park and Tudor Nursery together are that:

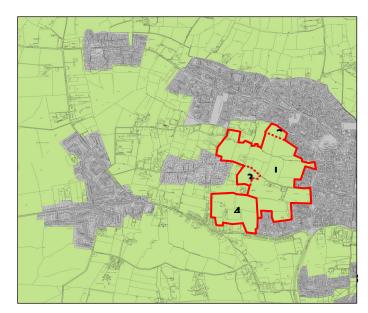
- A significant share of green belt land which the Local Plan will need to identify for housing to meet the borough's needs could be met in one single area;
- Although the assimilation of two distinct existing masterplans could pose some challenges, this is unlikely to be a barrier to deliverability and would maximise the opportunities for synergy between the two developments;
- As with developing just Rags Brook Park, this option would address its own needs and provide facilities for the wider community;

• Redevelopment would offer an opportunity to fully resolve emerging issues of dereliction at *Tudor Nursery* (which may conceivably worsen if the business continues to struggle to invest), as illustrated by the photo on an earlier previous page.

The negative aspects of developing both sites together would be that:

- The green ring around St James would be further severed, completely transforming the character of the area;
- As the separation of St James from both Rags Brook Park and Tudor Nursery would only amount to a landscape buffer in strategic terms, St James would essentially become part of the borough's main urban area losing its current village character;
- The highway impacts would potentially be more severe than just developing Rags Brook Park as more vehicles access the local highway network at a small number of locations and gravitate towards the A10's congested southern junctions;
- Development of Tudor Nursery could set a precedent for other sites around Goffs Oak and prejudice any future for the local glasshouse horticultural industry. Although this has been struggling for some time, evidence from the Glasshouse Study as well as representations from Bidwells (site owner's agents) suggest that with the right investment Tudor Nursery is the site most likely to succeed for horticulture by virtue of its size;
- Several properties fronting Goffs Lane, currently within the green belt, are set in relatively generous plots. To provide a logical and defensible green belt boundary these and other houses fronting the road (and which back onto Tudor Nursery) would need to be removed from the green belt. This is likely to lead to infill development of those plots, and a marked change in the character of Goffs Lane over time.
- There would be a significant impact on the area's rural character/landscape.
- Such a development would impact significantly on the green belt and result in the merging of St James with West Cheshunt to the north and Rosedale to the east. Such a strategic development could though provide certainty for the protection of other green belt areas in the borough including the area around Goffs Oak village thereby retaining its separation.

The plan and table below summarise the proposals for both Rags Brook Park and Tudor Nurseries.



Map n∘	Site ref	Site name	N° of homes	
1	<u>CG-GB-44</u>	West of Cheshunt	500-600	
2	<u>CG-GB-22</u>	Land to the South of Peakes Way	N/A	
3	<u>CG-GB-41</u>	Lea Mount	N/A	
4	<u>CG-GB-26</u>	Tudor Nursery	up to 350	
Tot	Total (Plus 155 homes from committed/urban sites):			

Development Approach 4: Infill around the green ring

Development Approach 4 would aim to develop the maximum possible amount of land for housing without unduly thinning the green ring around St lames enough to mean that it ceased to serve a strategic purpose. The amount of green belt separation required to do this depends very much on the context of the site and its surroundings - however, a separation distance of at least (and wherever possible much more than) 200m would ensure that no part of St James becomes closer to urban development than it is now. The sites considered under this approach are therefore fairly thin edge-of-urban sites, and with the exception of CG-GB-49 Oak Field (site 2 on the map overleaf) all sit on the outer edge of the green ring. In total the sites would provide an estimated 415 dwellings, necessitating one new form-of-entry primary school. Whilst in development approach 2 the expansion of an existing school is preferred, the lack of walkable schools (see page 20) within the green ring itself means that a new school would be required. Part of CG-GB-26 Tudor Nursery would be preferred for this - it is geographically at the centre of the sites contained within approach 4, as well as being furthest from existing schools. In addition, the school could potentially utilise the fields of the adjacent Rosedale Sports Club (subject to agreement), negating the need for further land to be used to provide separate playing fields. The indicative cost of a new one form-of-entry primary school would be about £4.9 million (although potentially less if playing fields are not required) - this would result in an education contribution per dwelling of £11,800, again considered to be viable.

By developing sites around it, Rosedale Sports Club would potentially become more vulnerable to infill development. Within approach 4, the Council could therefore formally designate the club as community open space and provide it with greater protection. It will also be important that development within approach 4 aims to enhance the green ring, as well as protecting it. This will make it more of an asset to the area, giving it greater community 'ownership' and thus greater permanence. This could be achieved by the opening up of the Rags Brook valley as a linear park (as under approach 3), as well as enhancing north/south routes through the green ring. This would also serve the crucial role of providing access to a school within *Tudor Nursery* from the sites on the north of the green ring. This would though require the co-operation and agreement of a number of different landowners/potential developers.

Sites for development under Development Approach 4

The largest site is <u>CG-GB-26</u> Tudor Nursery. However, in order to provide sufficient protection for the green ring far fewer dwellings would be provided than in the promoted scheme for the site discussed under approach 3a. A northern green belt boundary level with the properties to the east on Caldecot Avenue, and with land for a school set aside, would provide space for approximately 150 dwellings with access from either Goffs Lane or Burton Lane. Although less than half of the site would be developed, the whole of the site could, subject to viability, be remediated (removing the increasingly dilapidated glasshouses) and restored to open countryside. West of Tudor Nursery is CG-GB-17 Nockhold Nursery (site 3 on the map below) this was formerly built up with horticultural glasshouses, but is now used as horse paddocks. Like Tudor Nursery it can either be accessed from Goffs Lane or Burton Lane. The entirety of the site has been promoted for 240 dwellings, however this would lead to merging and sprawl with Goffs Oak village and St James, as well as involving building on a local wildlife site. The development of around 40 dwellings at the southern end of the site would follow a consistent building line along Goffs Lane from Tudor Nursery, as well as ensuring that the wildlife site remained protected.

Two sites within Goffs Oak village (<u>CG-GB-14</u> and <u>49</u>) are carried forward from approach 2 – these are the sites which would have a minimal impact upon sprawl and the merging of the settlements, and would see Goffs Oak village growing much more proportionately. Three discrete sites from within approach 3 could be developed, as well as a further adjacent site (8 on the map). Sites 7 and 8 (<u>CG-GB-22</u> and <u>85</u>) together would continue the existing building line south of Peakes Way and Rags Lane, and occupy meadow land north of the more unspoilt countryside in the Rags Brook Valley. Site 6 (part of <u>CG-GB-44</u>) would continue the building line behind Granby Park and north from the Everest Site, providing a more defensible long-term green belt boundary. The development curtilage of site 6 would need to be angled-in at its north end, to ensure that views towards the Rags Brook Valley from the Rosedale Way Open Space were still predominantly open. This would give capacity for around 65 dwellings. Site 5 (another part of <u>CG-GB-44</u>) could accommodate around 5 dwellings in a single row.

Finally, site 9 would form a small northern extension to St James covering existing farm, storage and paddock land. It would follow existing hedge lines to the north to maintain a defensible boundary, with a much lower density (around 12dph) to match the lower density of St James. A comprehensive masterplan for sites within approach 4 would need to ensure that development is well related to its surroundings. In particular, although the map shows arbitrary straight development boundaries around the green ring, an intricate relationship with it would be crucial.

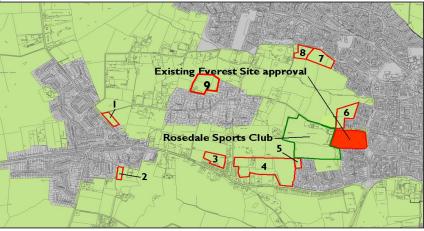
In positive terms, development approach 4 would:

- Provide a significant amount of housing with minimal incursion into the green ring;
- Have a dispersed impact because development would be spread across a large number of sites across a wide area;
- Result in a number of logical revisions to the green belt boundary which could make it more defensible;
- Replace a number of unsightly and declining land uses with high quality development, which would be able to fund the restoration of other sites to open land;
- Provide some development and funding to leverage the 'openingup' of the Rags Brook valley as a space for the wider community.

In negative terms, development approach 4 would:

- Despite only developing on the edge of the green ring, still make it more vulnerable to development by thinning it out;
- Close off many of the glimpses of open and green land which typify the area (page 11), therefore altering its character;

• Like development approach 3, result in existing houses on Goffs



to be removed from the green belt, making their gardens vulnerable to infilling;

- Extend the sprawl along Goffs Lane reducing the separation between Cheshunt and Goffs Oak;
- Be fairly piecemeal with limited opportunities for integration between the development parcels;
- Be relatively challenging to deliver as landowners may resist only being able to develop parts of their promoted sites. Cooperation between different landowners and developers would be required to support the provision of associated infrastructure;
- Increase traffic/potential congestion on local roads and A10.

Map n∘	Site ref	Site name	N° of homes
1	<u>CG-GB-14</u>	Whitehouse Farm (Part)	25
2	<u>CG-GB-49</u>	Oak Field	15
3	<u>CB-GB-17</u>	Nockhold Nursery (Part)	40
4	<u>CG-GB-26</u>	Tudor Nursery (Part)	150
5	<u>CG-GB-110</u>	Land north of Faints Close	5
6	<u>CG-GB-44</u>	Rags Brook Park (Part)	65
7	<u>CG-GB-22</u>	Land to the south of Peakes Way	50
8	<u>CG-GB-85</u>	Burton Grange Nursery (Part)	35
9	<u>CG-GB-18</u>	Longmead/Pylon Farm (Part)	30
	<u>CG-GB-47</u>	Churchview Nursery (Part)	
Total (Plus 155 homes from committed/urban sites):			415

Development Approach 5: East of Cuffley

A proposal has been submitted to both this Council and Welwyn Hatfield Council to develop an area of 16.1 hectares to the east of Cuffley (CG-GB-II3) which straddles the borough boundary. The site is located to the south of Cuffley Hill and to the west of Cuffley Brook. It mainly comprises open fields with a single storey youth and community centre fronting the road.

7.9 hectares is within the borough and comprises 4 parcels of land (see adjoining plan). Fronting Cuffley Hill is site A which is owned by Welwyn Hatfield Council and is leased to Northaw and Cuffley Parish Council. This area is used for community purposes and includes a single storey community centre and car park. The promoters of this site suggest that Sites A and B be developed as phase I to provide 100 homes and a new youth and community centre. They propose that sites C and D be developed as phase 2 to provide a further 300 dwellings of which just under 100 would be located in the borough. As this phase of the development a new pedestrian and cycle bridge over the railway is proposed to provide access to the existing village, school and Cuffley railway station. In total around 200 of the suggested 400 homes would be provided in the borough.

The site is located close to Cuffley Station and local shops and other facilities. However, part of the site is within an area of flood risk from the adjoining Cuffley Brook and this may well limit the potential developable area and the number of homes which could be provided on the site. There are a number of trees on the site some of which, subject to detailed assessment, should probably be retained.

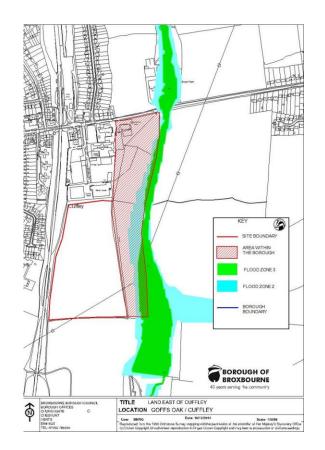
In positive terms, development approach 5 would:

- Provide a significant number of homes in a location close to Cuffley Station and the centre of Cuffley where there is a range of local facilities:
- Have a limited impact on facilities and services within the borough:

• Appear to be deliverable within the Plan period.

In negative terms, development approach 4 would:

- Be partly located within an identified flood risk area. Mitigation measures would probably be needed:
- Be of a scale which in itself would not justify a new primary school but could well impact adversely on existing school provision within Cuffley:
- Erode the green belt gap between Goffs Oak and Cuffley: leading to increased coalescence between the two settlements
- Increase traffic along Cuffley Hill which experiences congestion during peak periods.



Development Approach 6: Building to address dereliction

As noted elsewhere in this report, the Goffs Oak area has a somewhat haphazard pattern of urban development. This and the area's horticultural legacy mean that it now has a relatively high level of unattractive sites, as well as a range of inappropriate land uses.

Development approach I on page 26 presents a 'do minimum' approach to derelict sites, where they would be cleared where possible or left to return to nature over time. The approach, presented here, is to resolve dereliction by building on derelict sites. This in effect is an extension of the approach taken in the 1994 Local Plan which resulted in the development of St James and Hammondstreet Road.

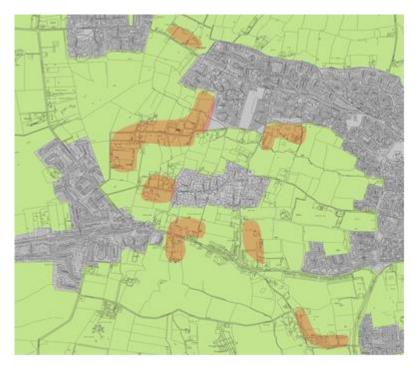
If all sites in the Goffs Oak area with dereliction or undesirable uses were redeveloped at a conventional density (c30 dwellings per hectare (dph)), hundreds of homes could be built to meet a significant part of the borough's future housing land need. Such an approach would however generate a highly dispersed need for new primary schools and create further 'villages' of development isolated from services and transport. In other places it would also result in extensions of existing urban areas into the green ring around St James. Such an approach would result in unsustainable urban sprawl, the likely merging of settlements, and a steady erosion of the character of Goffs Oak. Assessments of the majority of derelict sites have judged most of them not to be preferable for development at conventional densities.

Nevertheless, paragraph 81 of the National Planning Policy Framework places a duty on local planning authorities to plan positively to protect and enhance green belt land. In the case of <u>CG-GB-33</u> Halstead Hill Nursery on Halstead Hill, outline permission has recently been granted for 14 houses over 3.3 hectares. At 4 dph this density is low enough for the site to remain in the green belt, restricting future infill development to retain a predominantly open feel to the site. A fire had



devastated the former glasshouses, and where dereliction is similarly severe and challenging to address, a similar approach could be used. The approved scheme for Halstead Hill is shown above.

Given the identified issues in terms of urban sprawl, settlement pattern, transport, education and services with the Goffs Oak area, the aim of development within development approach 6 should be to fully resolve dereliction whilst providing an appropriate level of housing which will also support provision of the necessary supporting infrastructure. It is therefore important that only genuine and unavoidable dereliction would be addressed. The fundamental issues affecting the horticultural glasshouse industry for example are well known, and glasshouses are an appropriate land use in the green belt. Although some businesses will have been poorly managed (as in any industry), and there is some evidence from the Glasshouse Study that site owners are reluctant to invest in horticulture in the hope of gaining an allocation for housing, it is broadly legitimate that some sites have become derelict. There are also a number of sites in Goffs Oak which accommodate inappropriate green belt land uses. Many of these uses are now lawful and thereby immune from planning enforcement. However they can impact adversely on the character and appearance of the area.



Under approach 6 the Local Plan could therefore choose to address the uses and condition of some of these sites through development as well.

As well as it being important to only address genuine dereliction, it would be important for approach 6 to only address dereliction that has a material impact. The number and varied condition of sites mean that it would be most appropriate to define the sites to be developed through a subsequent masterplanning exercise or development management policy. This would provide a means to ensure that dereliction and inappropriate uses are closely monitored in future, and are addressed as they arise through enforcement action. This would aim to ensure landowners are not encouraged to make their sites derelict in the hope of securing planning permission.

The broad location of sites which are currently derelict or have inappropriate uses on them is shown on the map above. There are particular issues away from the urban areas – this is primarily because those urban areas were themselves built to resolve dereliction in the past. Depending on the sites chosen if development approach 6 is favoured, it is estimated that a development of 4dph would yield 25-50 houses. As development would be thinly spread throughout the area the impact on primary schools would be minor – funding contributions using the *Herts County Council Toolkit* may therefore be sufficient. Given the experience from *Halstead Hill* and subsequent applications on derelict sites, 4dph does appear to offer sufficient financial return for sites to be remediated.

In positive terms, development within approach 5 would:

- Enable as much derelict land and as many inappropriate sites as are judged to have an impact, to be brought forward for housing development;
- With high levels of landscaping and suitable design allow developed sites to be retained in the green belt, minimising the urbanising impact on it;
- Provide a limited amount of development, meaning that the impact on services and infrastructure should be acceptable;
- Depending on the sites chosen, mean that the glasshouse industry would still be able to operate in the area given the right investment.

In negative terms, development within approach 6 would:

- Be very low density, yielding very few houses and a potential pressure to 'infill' gaps over time, particularly if site layouts are poorly planned;
- Would represent a poor use of land in terms of the level of new housing provided;
- Provide a very limited range of housing making a small contribution towards the borough's overall housing needs;

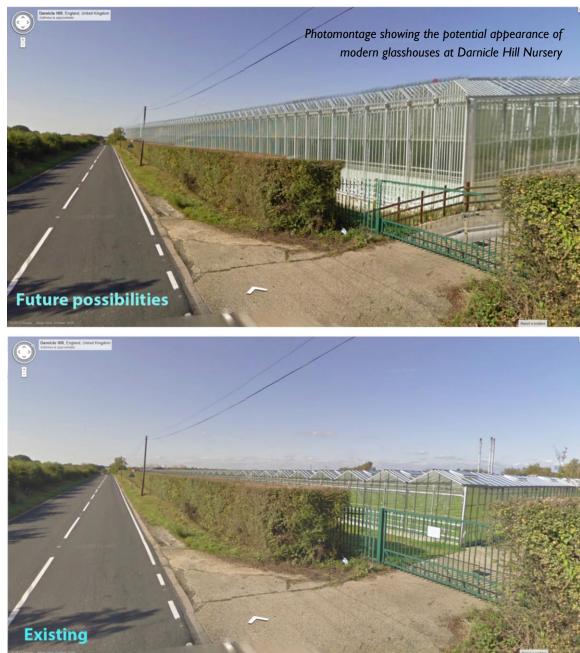
- Depending on the sites chosen, it could mean that the decline of the glasshouse industry in the Goffs Oak area would be accelerated;
- Represent a piecemeal form of development;
- Be potentially challenging to deliver, as landowners may be somewhat resistant to only being able to develop at 4dph.
- Even low density highly landscaped development would potentially erode the green belt leading to the merging of settlements;
- Make no positive contribution towards improving facilities in this area;
- Give the impression of benefitting those who have left sites to fall into dereliction at the expense of those who have continued to use and manage their sites positively;
- Potentially result in the loss small employment sites;
- Risk without appropriate policy controls in the longer term sites being redeveloped at higher densities eroding the green belt.

Development Approach 7: The Glasshouse Industry

Given its legacy in the Goffs Oak area, this report has covered the demise of the glasshouse industry in some detail. The Glasshouse Study (page 23) notes that, despite the issues that local growers have faced because of the generally small size of their sites and historical lack of investment, those glasshouse sites capable of accommodating at least 3 hectares of glass could be viable in the future. This would rely on sufficient investment interest in those sites, funding support as well as the Council taking a wider decision in the Local Plan to support food production in the borough. Whilst the Council has received responses to the Glasshouse Study expressing a view that the borough is not a suitable place for modern industrial-scale food production, there are strong arguments around food security and food prices in favour of local food production. There are also economic arguments in terms of job creation and supporting Ambition Broxbourne, the Council's Economic **Development Strategy**

The work of the Lee Valley Food Taskforce (comprising local growers and local authority partners) provides support for this view and further evidence of grower's requirements. Under development approach 7 the Local Plan could therefore allocate those existing sites which are large enough to be viable specifically for horticulture - these are shown in the table and on the map on the following page. The Local Plan could also include supportive policies or allocations for smaller glasshouse sites elsewhere in the Goffs Oak area if required. The Glasshouse Study notes that concerns about modern glasshouses are often unfounded - traffic would be negligible (around 3 medium-sized lorries per day for a site with no onsite packing) and visual impact could partly be mitigated by landscaping. Nevertheless, modern glasshouse sites would be much larger and more industrial in appearance than those currently seen locally (photo above). Where sites have been promoted for housing, allocating them for glasshouses is likely to be resisted by site owners. This is not least because those owners have very reasonable concerns about how they would

fund the necessary investment in their sites. Realistically, voluntary or



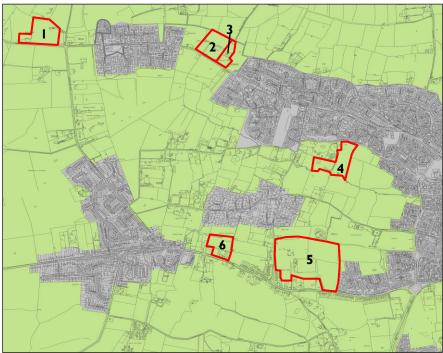
compulsory purchase of these sites is likely to be necessary in order for investment to take place. However, 'hope values' attached by owners to

their sites may well put voluntary purchase beyond the amount buyers are willing to pay, and compulsory purchase is a drastic measure which the Council would prefer not to resort to.

In positive terms:

- Allocating sites specifically for horticulture could provide growers (whether the current owners or potential purchasers) with sufficient certainty and confidence to invest;
- Modern, state-of-the-art glasshouses would make a significant contribution to sustainable local food production;
- A small number of jobs would be created (although some may also be lost through increased automation), boosting the local economy;
- The largest of the existing glasshouse sites, which without investment could fall into decline in the future, could be redeveloped without placing additional demand on stretched local infrastructure such as roads and schools;
- An important part of Goffs Oak's heritage would be retained.

Glasshouse sites which could be viable given the right investment. It should be noted that some sites appear within other development approaches, and that the approaches are not necessarily mutually exclusive.



In more negative terms:

- Modern 'third generation' glasshouses generally need to be 6-8m high and incorporate combined heat and power facilities in order to be efficient enough to be viable. Their visual impact could therefore be significant;
- Larger glasshouses could result in additional HGV movements on local roads;
- Even if some glasshouse sites are allocated for that purpose, implementing development could be a major challenge. Although there are a number of growers known to be ready and willing to invest in the borough, hope values could make site acquisition very challenging.
- It would not address many of the dereliction issues discussed under approach 6.
- In isolation this option would make no contribution to the borough's housing and other development needs.

Other land uses and improvements

As the Goffs Oak area is primarily suburban/rural in nature, six of the development approaches set out in this report relate to the delivery of housing, and the seventh relates to the glasshouse industry. Each development approach has identified advantages and disadvantages, but at a broad level both housing and horticultural development could be appropriate given the existing character of the area. However, other development possibilities also exist.

Large scale commercial development is not considered appropriate given the area's character – such uses are more intensely urban and buildings are likely to appear incongruous. The area is also relatively remote from major transport routes and higher order shops and services to serve businesses and employees. The SLAA has accordingly not identified specific employment

Map nº (p33)	Site ref	Site name	Overall site area	
1	<u>CG-GB-73</u>	Darnicle Hill Nursery	5.9 hectares	
2	<u>CG-GB-61</u>	Limes Nursery	4.8 hectares	
3	<u>CG-GB-104</u>	Rosary Nursery		
4	<u>CG-GB-85</u>	Burton Grange Nursery	3.9 hectares	
5	<u>CG-GB-26</u>	Tudor Nursery	15.3 hectares	
6	<u>CG-GB-16</u>	Tina Nursery	3.5 hectares	
	33.4 hectares			

sites in the Goffs Oak area. A small amount of commercial development already exists around Goffs Oak village and appropriate proportional growth of this could be allowed. Small scale retail provision would also be appropriate within any large development scheme (such as development approach 3), should the Local Plan favour it.

The Council has a duty to plan for the future of the local gypsy and traveller community. Much like the population in 'bricks-and-mortar' housing it is growing, and the Council is also currently dealing with a large, substantiallyillegal gypsy and traveller settlement within the Lee Valley Regional Park in Wormley. There are several sites within the Goffs Oak area which have been promoted as possible gypsy and traveller sites to accommodate this, and these may be appropriate. None of these have been identified within the development options, and given the specialist issues around gypsy and traveller sites the Local Plan will need to consider suitable sites across the borough as a whole.

A need has also been suggested to provide another site within the borough to accommodate travelling showmen. There are already two such sites in the Goffs Oak area off Goffs Lane. There may be an opportunity to provide additional pitches within these sites or provide a new site in this locality. As for gypsies and travellers the need to identify a site(s) to accommodate travelling showmen will be considered across the borough as a whole.

Approach 7 above discusses the potential to support the glasshouse industry in this area. A related opportunity could be to support further garden centres in this area. Nearby at Crews Hill in North Enfield a number of former glasshouses have been converted into garden centres. In Goffs Oak there is already the In-Ex Garden Centre. There may be opportunities to support further such facilities in this area through the partial or complete redevelopment of existing glasshouses. Partial redevelopment could support the diversification of existing glasshouses thereby helping to secure their long term viability.

Garden Centres provide an important retail facility. However, many have become increasingly diverse and sell a wide range of products drawing trade and expenditure away from established centres. They can also generate a significant level of traffic generation which might not be appropriate on the mainly rural roads in the Goffs Oak area and could impact adversely on the local landscape.

There are also non-developmental improvements which the Council can make, irrespective of whether any of the development approaches are favoured by the Local Plan. In that respect regard should be paid to the advice in para. 81 of the NPPF which states:

"Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land."

The lack of east-west off-road routes through the Goffs Oak area means that there would be merit in pursuing the linear park aspect of the *Rags Brook Park* proposal in development approach 3. In practical terms this would necessitate the agreement of all landowners to allow the construction of a route to establish public rights of access, which may be challenging if the development is not favoured. An indicative cost comes from Letchworth's Greenway where it cost about $\pounds Im$ to construct a 22 km path around the town. On this basis the provision of a 950 metre route between Rosedale Way and Rags Lane would cost just under £50,000, potentially more if a fully-fledged park was developed. This could either be identified as a Section 106 requirement, or be set out in the Local Investment Plan.

The ongoing monitoring of dereliction will also be important, particularly in the context of development approach 6 which seeks to resolve dereliction through development. Whether the Local Plan favours this approach or not, the owners of derelict sites are increasingly seeking to argue that their site's condition amounts to the very special circumstances needed to justify green belt development, and so the focus should be on preventing dereliction before it occurs.

An ongoing and evolving masterplan for the Goffs Oak area published as part of the Local Plan would be a means by which the measures above could be monitored and implemented. In addition, this would be used to assist the coordination of the development of any sites which the Local Plan favours, with the necessary infrastructure such as schools and roads. It would also be beneficial to undertake some minor revisions to the green belt boundary irrespective of any development proposals, in order to make it more defensible. A particular example is the land around Hammondstreet Road, where slightly more land was removed from the green belt in the 1994 Local Plan than was actually needed and is increasingly coming under development pressure. This could be undertaken in the detailed preparation of the Local Plan.

Another approach to consider is whether there may be scope within the Goffs Oak area to meet the borough's long term development needs post 2030. The options set out in this Report, and the other Development Options Reports which have been prepared by the Council, have all been written as a basis for consideration on how best to plan for the borough's development needs between 2014-2030. Government advice is that in defining green belt boundaries Council's may have to look at how to accommodate development needs beyond the Plan period and para. 85 states that Local Planning Authorities should:

"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;"

A potential approach for the Council to consider is whether any of the approaches set out in this Report should be considered to meet the borough's potential development needs post 2030. In that respect Approach 3 is probably the most appropriate to be considered if land were to be safeguarded for the longer term.

Green Belt sites which are not favoured

The development approaches set out in this Report present a range of what are considered to be the most feasible potential options to develop within the Goffs Oak area. The wide-ranging nature of the sites promoted via the 'call for sites' process which comprise almost all land within the area, means that the majority of sites cannot easily form part of a logical approach.

This alone does not necessarily mean that these sites are not suitable for development. Indeed, in positive terms some sites (particularly the larger ones) would enable the delivery of what could potentially be very high quality discrete schemes. Several sites within the Goffs Oak area also suffer from the legacy of their historic uses (and subsequent reuse for occasionally unauthorised purposes), and redevelopment could help to remediate any issues with those.

The delivery of high quality housing development would however be equally possible for the other options already set out. The remaining sites do though have some key disadvantages, and generally fall into one of two categories.

The first category comprises a number of edge-of-urban green belt sites that could form a contiguous extension of an existing urban area without extending excessively into the countryside, but which are located in the areas around Hammondstreet Road and Halstead Hill. There are a number of environmental designations in these areas which limit the amount of land available for a coherent option which meets its own needs. Hammondstreet Road is also remote from existing services and facilities and the Halstead Hill area can only realistically be reached via very narrow rural roads, making it hard to access.

The second category comprises green belt sites that do not adjoin or only marginally adjoin urban development, such as those along Crouch Lane, Newgatestreet Road and Halstead Hill. Development of these sites would create unconnected pockets of housing that are totally unrelated to one another or to existing urban areas, and in the case of many sites would only be accessible via narrow rural lanes. An option that favoured such sites would need to provide new services/facilities such as primary schools in an appropriate location(s), collectively and proportionately funded by each scheme. These would be significant challenges to address. There is also a considerable likelihood that the development of such sites would exacerbate the area's already haphazard development pattern, and over time lead to the merging of urban areas. This would erode the character of Goffs Oak.

As a number of potentially coherent approaches have already been suggested for development within the Goffs Oak area, these other green belt sites have been discounted from further consideration for housing. However, the new Local Plan should still consider policies for these sites, particularly where dereliction is a concern. Such policies could deal with appropriate rural reuse and diversification, and set out a clear approach to addressing inappropriate uses. Further information on the sites not chosen can be found within the SLAA.



An example of an inappropriate green belt land use within the Goffs Oak area, now being tackled by Council enforcement action. Although redevelopment might eliminate the problem that does not automatically make redevelopment appropriate.

Conclusions

In order to meet the future needs of the borough, the Council will need to make a number of very challenging decisions as part of the Local Plan process. To help to inform that process, this report has considered a number of factors (summarised within Chapter 3) which are important considerations with respect to the future development of the Goffs Oak area. From information currently available the view is that none of the development approaches discussed in this report would have a wider strategic impact upon and, would not be affected by, environmental contamination, flood risk, utility supplies and (secondary education). Notwithstanding this, should any site come forward for development, the planning application would still need to demonstrate that it has no local detrimental impact upon these factors at that time.

There are though a number of factors which will require very careful consideration if any further development is to be promoted in the Goffs Oak area via the new Local Plan. These have influenced the development and consideration of the 6 broad approaches which have been discussed above. As mentioned at the outset these approaches are not finite and there are a number of various sub-options which could be considered. The approaches discussed are though considered to provide an appropriate representation of the range of development options for the Goffs Oak area which should be assessed in the preparation of the Local Plan. The table below provides a summary of these approaches and their impact upon a number of key factors.

Factors under consideration	Scale of impact of development within each development approach							
	Approach I No additional development*	Approach 2 Goffs Oak Village	Approach 3 Rags Brook Valley	Approach 4 Green ring infill	Approach 5 East of Cuffley	Approach 6 Addressing dereliction	Approach 7 Glasshouse industry	
Number of homes	0	Up to 385	500-950	Up to 415	200 in Broxbourne	25-50	0	
Number of promoted sites considered	0	14	4	10	I	Up to 20 (approx.)	6	
Approximate overall option area	0 hectares	19 hectares	Up to 63 hectares	17 hectares	16 hectares	Up to 15 hectares (approx.)	33 hectares	
Approximate actual development area	0 hectares	18 hectares	Up to 29 hectares	16 hectares	8 hectares in Broxbourne	Up to 15 hectares (approx.)	33 hectares	
Borough-wide housing contribution	Minor negative	Minor positive	Major positive	Minor positive	Minor positive	Minor negative	Minor negative	
The local highway network	Neutral	Minor negative	Major negative	Minor negative	Minor negative	Minor negative	Minor negative	
The strategic highway network	Neutral	Minor negative	Major negative	Minor negative	Minor negative	Neutral	Neutral	
Public transport	Neutral	Minor positive	Minor positive	Neutral	Minor positive	Neutral	Neutral	
Merging of settlements and sprawl	Neutral	Minor negative	Major negative	Minor negative	Minor negative	Minor negative	Neutral	
Safeguard countryside from encroachment	Neutral	Minor negative	Major negative	Minor negative	Minor negative	Major positive	Minor negative	
Addressing dereliction	Minor negative	Minor positive	Minor positive	Minor positive	Neutral	Major positive	Minor positive	
The glasshouse industry	Neutral	Minor negative	Minor negative	Minor negative	Neutral	Could vary	Major positive	
Neighbouring resident's amenity	Neutral	Major negative	Minor negative	Major negative	Neutral	Minor positive	Minor negative	
Landscape and views	Neutral	Minor negative	Major negative	Minor negative	Minor negative	Major positive	Minor negative	
Settlement structure	Neutral	Neutral	Minor negative	Neutral	Neutral	Major negative	Neutral	
Wildlife	Neutral	Neutral	Minor negative	Neutral	Neutral	Minor negative	Neutral	
Primary education provision	Neutral	Minor positive	Major positive	Minor negative	Minor negative	Minor negative	Neutral	
Retail/service provision	Neutral	Minor positive	Minor positive	Minor positive	Minor positive	Neutral	Neutral	
Deliverability and risk	N/A	Moderate issues	Minor issues	Moderate issues	Minor issues	Moderate issues	Major issues	

*Note that under approach 1, as with all approaches, it has been assumed that 155 homes will already be built within the Goffs Oak area from existing planning permissions and on urban sites

Development Approach I would see no development in the Goffs Oak area beyond existing known urban sites and those which already have planning permission. This would force new development elsewhere in the borough but is likely to receive a positive local public reaction. Whilst most impacts are judged to be neutral it would make no positive contribution towards the future planning of the borough.

Development Approach 2 would concentrate a moderate amount of housing around Goffs Oak village across a number of sites. This would minimise its impact, and by adding more residents to the village could strengthen the provision of services and public transport within and to it. There would however be some deliverability issues, and it would make a limited contribution to borough wide needs.

Development Approach 3 would concentrate development along the Rags Brook Valley, either solely through Crest's *Rags Brook Park* scheme or by developing *Tudor Nursery* as well. The well developed masterplans and small number of promoters would make deliverability fairly straightforward, and a significant amount of housing could be provided. However, by concentrating development on a single large and generally undeveloped area approach 3's impacts would be significant, without significant mitigation and would not address dereliction and other local issues.

Development Approach 4 would involve the maximum amount of development possible without unduly compromising the character and role of the green ring. It would provide a moderate amount of housing, but by adjoining the edges of the ring adjacent to the main roads surrounding it, it would break the key visual links between those roads and the green ring. The large number of sites may be a barrier to delivery, particularly of the associated infrastructure and a somewhat negative public reaction could be expected.

Development Approach 5 would deliver a moderate amount of housing in the borough east of Cuffley in a location close to Cuffley railway station and local facilities. Part of the site is in an identified flood risk area which could impact on the number of houses which could be provided and there is as yet an unknown impact on primary school provision. Development would reduce the gap between Cuffley and Goffs Oak, encroach into the countryside and increase traffic on local roads.

Development Approach 6 would seek to resolve as much dereliction as possible, whilst building a minimal number of houses and therefore having a minimal impact on services and facilities. This would enable those sites to remain in green belt. It would however necessitate building on an exceptional amount of land, whilst making very little contribution in overall terms to the borough's housing land need and could result in pressure for infill development over time.

Development Approach 7 would attempt to revitalise the glasshouse industry within Goffs Oak. The largest sites, which are expected to be viable for larger modern glasshouses given the right investment, would be allocated specifically for this purpose. This would have some sustainability and economic benefits, but there are significant viability and deliverability hurdles. In addition, modern glasshouses are larger and likely to have greater impacts than those currently seen locally.

The Goffs Oak area could also accommodate other forms of development, for example gypsies and travellers sites or commercial development. Subject to funding and landowner agreement there would be benefits in opening up public access along Rags Brook Valley and improving rights of way. Parts of the green belt boundary around Goffs Oak would also benefit from slight amendment to aid its defensibility, again regardless of the development sites chosen by the Local Plan. In summary, all of the approaches in this report would have positive and negative effects on the Goffs Oak area and it is clear that none of them are ideal. The final decision on development sites will be taken in the Local Plan, which will balance local and borough-wide considerations and the suitability of other potential development sites discussed in the other Development Options reports.

Planning Policy Team planningpolicy@broxbourne.gov.uk 01992 785555