
Independent Examination of the Broxbourne Local Plan

Inspector's Post Hearings Advice

Introduction

This note sets out advice relating to some significant issues following completion of the scheduled hearing sessions that I held during four weeks between 11 September and 8 November 2018.

I do not set out the reasons for my advice; these will be contained in my final report which I will send to the Council at the end of the examination.

Housing

The proposal in policy DS1 to make provision for at least 7,718 homes in the period 2016-2033 is justified and consistent with national policy.

Retail and Leisure

The proposal in policy DS1 to make provision for around 40,000 square metres of new retail development, primarily at Brookfield Riverside, is not justified or consistent with national policy.

Evidence indicates a need for around 22,000 square metres of additional retail floorspace in the Borough by 2033. Of this need, around 17,000 square metres would be for comparison goods¹.

The proposal in proposal DS1 to make provision for around 10,000 square metres of new leisure development is justified.

Offices

The Plan's aim to accommodate around 150,000 square metres of additional office floorspace is not justified or consistent with national policy.

Evidence indicates a need for around 17,500 square metres of "local" office floorspace², and the Plan should make appropriate provision to meet this.

The proposal in policy PP1 for a high quality business campus at Park Plaza West is justified.

¹ Broxbourne Retail and Leisure Study retail capacity/quantitative need correction note September 2018 [RT3B] Figure 1.4.

² Broxbourne Employment Land Study July 2016 [E1] Table 6-6.

Green Belt

There are exceptional circumstances to justify removing land from the Green Belt in the locations proposed in the Plan.

Brookfield

Policy BR1 is not justified, effective or consistent with national policy in a number of respects. The Council should consider how policy BR1, and the associated concept diagram, reasoned justification and policies map, could be modified to reflect my findings above and address a number of other issues:

- To reduce the amount of retail and office floorspace at Brookfield Riverside to reflect the needs that I have identified above.
- To ensure that the main town centre uses proposed at Brookfield Riverside are effectively integrated with the existing shops and would, ultimately, lead to the creation of a new town centre.
- To avoid the need to relocate the existing traveller site, or ensure that relocation would appropriately meet the needs of existing and future residents in an accessible location.
- To provide greater clarity about where the existing allotments, household waste recycling centre and Council depot will be relocated to.
- To preserve or enhance the significance of heritage assets on and near the site and their settings. Further assessment should be carried out, and the layout shown on the concept diagram amended accordingly. This may entail reducing the amount of development and/or including greater separation between those heritage assets and the proposed buildings and roads.
- To safeguard the natural environment and biodiversity of the area, particularly along Turnford Brook and the adjoining woodland. As above, further assessment should be carried out and consideration should be given to amending the layout shown on the concept diagram.
- To include site-specific development requirements relating to scale, layout, design, access, landscaping and mitigation measures to ensure that policy BR1 is effective in safeguarding the historic and natural environment and in other respects.

Next Steps

The Council should consider how the Plan could be modified in light of the above and advise me in writing accordingly. In so doing, they should liaise as far as possible with relevant interested parties.

When I have considered the Council's response to this note, I will set out the subsequent steps in the examination.

William Fieldhouse

Inspector