



THE HODDESDON SOCIETY

Charity No 234800

24 March 2022

Dear Broxbourne Council

Lea Valley Regional Park Authority (LVRA) proposals for the Broxbourne Leisure Pool Site

We understand that the LVRA is currently in discussions with Broxbourne Council about its plans for the former Leisure Pool Site, and that the LVRA's proposal will be to sell off some of the land for residential housing.

This is a change from previous proposals. Previously (and as per paragraphs 13.7 and 13.8 of the Local Plan), the proposals discussed between Broxbourne and the LVRA were for any development on the Leisure Pool Site to relate to "*improved leisure and recreation*" for the local community, as the site was seen to offer a unique opportunity in the Borough for leisure facilities and other community uses. Policy LV3 in the Local Plan provides for Broxbourne and the LVRA to update the *Broxbourne Leisure Pool Development Brief*¹ (the "2008 Brief") but we are not aware that it has been updated yet. The Spitalbrook area opposite is the subject of Policy LV4, with the plan to reclaim this land, restore habitats, improve public access and connectivity including a network of foot and cycle paths (including the "missing link" between Nazeing New Road and Dobbs Weir Road, which would be of great benefit to the local community) and put in place leisure and recreation facilities including a visitor hub.

The Hoddesdon Society welcomes both Policy LV3 and LV4, which have the potential to offer real benefits to the local community as well as restoring and preserving invaluable natural habitats on sensitive areas of land.

Although we are yet to see the LVRA's proposals for the Leisure Pool Site, we hope that Broxbourne will consider these in light of the matters set out in the 2008 Brief. Broxbourne's stated objectives for the site were to protect the landscape of the LVRA and to regenerate and replace the leisure facilities and a degree of employment. The 2008 Brief concluded in relation to housing that:

¹ [Microsoft Word - Adopted version Dec 08.doc \(broxbourne.gov.uk\)](#)

“The site is highly constrained with a large area of the site falling within Flood Zones 3a and 3b which have a higher risk of flooding. The site is also within the Metropolitan Green Belt and therefore an area highly constrained for housing development. It is considered that a residential development would not act as a reasonable substitution for the loss of a community leisure use which also generated a degree of employment. Due to this housing is considered unacceptable on this site.” [Original emphasis]

We mention below some of the considerations identified as key issues in the 2008 Brief:

- (i) Due to the Flood Zone 3A and 3B areas, any development proposals would need to be accompanied by a Flood Risk Assessment and a sequential test to determine if development would be better suited to alternative locations (as per Policy W5 in the Local Plan). Policy W5I also provides that the functional floodplain be protected from development and Flood Zone 3b areas should if possible be returned to greenfield status with an enhanced level of biodiversity.
- (ii) Any future development must ensure that it does not compromise access provision or biodiversity interests in the watercourse buffer zones.
- (iii) A majority of the site is in an area of archaeological interest (Stone Age remains are referred to), which the Brief notes should be a material consideration for any planning application.
- (iv) The entire site is in the Metropolitan Green Belt and so national policy requires that boundaries should only be altered in exceptional circumstances.
- (v) Part of the site is in a Hertfordshire Key Diversity Area, protected species are likely to be present (Wildlife Site 72/010 sits just outside the area), and any proposal needs to take into account the river corridors and waterside habitats (including the need to maintain unlit corridors for bats).

We look forward to hearing more from Broxbourne about the proposals for the Leisure Pool Site and Spitalbrook.

Yours faithfully



Nicola Cowan
Secretary
On behalf of The Hoddesdon Society