



# THE HODDESDON SOCIETY

Charity No 234800

13 June 2025

Dear Broxbourne Council

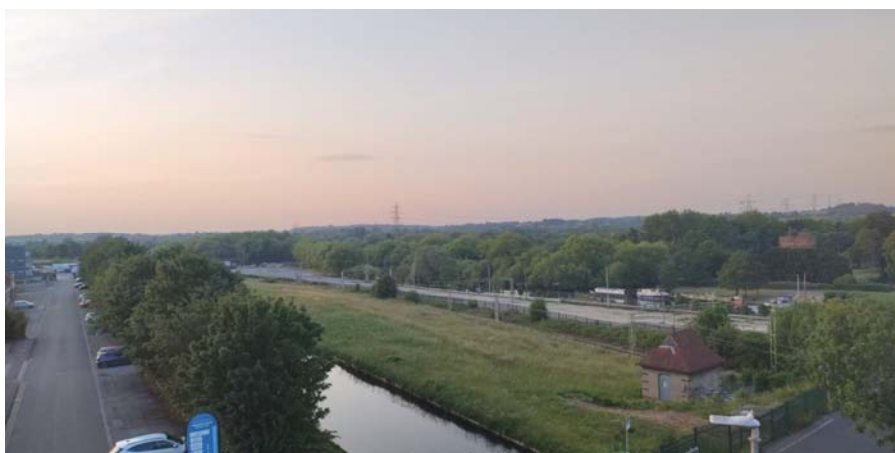
**07/23/0798/F - Turnford Hard Standing/Station Works, Rye Road. Hoddesdon EN11 0GR**  
**Scrapyard for end of life vehicles**

We have previously set out our objections to this application, and write again to do so following the submission of supplemental information.

This application is entirely inappropriate for this particular location and would have a significant detrimental effect on the local area and a large number of local residents. We are genuinely shocked that the Council's planning officer's recommendation is that planning permission be granted, subject to various conditions. There is very significant local feeling about this application.

## 1. Nature of site and area

- 1.1 This site is located in a particularly sensitive area, between the River Lee (acknowledged in the Local Plan as one of the Borough's most important natural assets), and the New River (described in the Local Plan as an important part of the Borough's green infrastructure). Both rivers are popular walking/cycle routes which are used frequently by residents of the Borough (not just Hoddesdon), and are part of the 'natural package' that attracts visitors to the area.
- 1.2 The site is also immediately adjacent to residential areas and will be visible (and audible) from the station, the Rye House Gatehouse, the Rye House pub and a very significant number of houses in the Rye Park area. It is also close to the sensitive wetlands area, including the RSPB site which is part of the Lee Valley Special Protection Area (the SPA) and is a Site of Special Scientific Interest. We comment on the environmental impact at section 2 below.



- 1.3 The image above is taken from an apartment in the relatively new Bridgewater Gardens development on Rye Road. The hard standing area beyond the railway line is the site, which can be seen here in its true context. An end of life car scrapyard with metal shredding activities is entirely inappropriate in this location.

- 1.4 We are concerned by the importance placed in the planning officer's report on the site's historical use/permissions. The report says that as the site has *"lawful use for a process which was noisy, generated strong aromas/fumes and was served by HGVs as a matter of course, it is considered that the current application need not be out of place on this site, subject to assessment of the wider planning impacts"*. We think this is the wrong approach.
- 1.5 In fact, the nature of the area now is very different from the time when the original use was granted, which is entirely ignored. Since the time of historical use referred to there are many more, and closer, houses built both on the Rye Road side and in the Fishermans Way development. The Council recognises this particular site as a "gateway to the Lee Valley Regional Park". This is not an "industrial area" generally. While there are some commercial areas down Plumpton Road, these are tucked away and are not noisy. This is not an area akin to Ratty's Lane or Pindar Road/parts of Normandy Way.
- 1.6 Further, the road surfacing operation ended around 2008. In the last 17 years, the usages of the site (e.g. car parking, car washing, Wren kitchen depot) have been relatively quiet usages. Since 2015, the Council's planning brief has envisaged residential use and a smaller car park for Rye House station.
- 1.7 We would mention also that at this point in time, the importance of our rivers and natural spaces are better understood and the Council gives these the proper recognition in its Local Plan. We all know that some planning decisions made decades ago would not be made today.

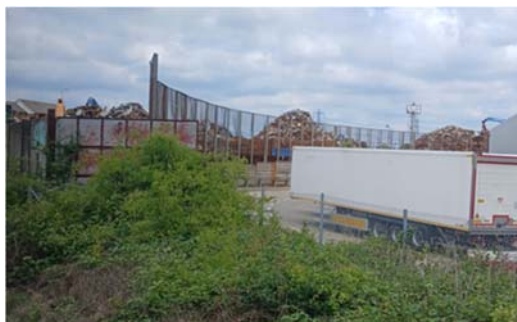
## **2. Unacceptable visual impact which does not "conserve and enhance the setting"**

- 2.1 Policy HOD4 in the Local Plan relates to this site and requires any development to: *"enhance this gateway to the Lee Valley Regional Park and conserve the historic environment. Development should conserve and enhance the setting of the listed assets associated with the Rye House Gatehouse and Rye House public house."*

- 2.2 The Lea Valley Regional Park Authority's (the "LVRPA") Development Plan says the following:

*"High quality sustainable design will be sought for any development proposals put forward for the ex Turnford Surfacing site which lies adjacent to the River Lee Navigation and forms part of an important entrance point into the Regional Park. Development proposals will need to respond to the site's waterside location, adjacent Scheduled Monument and related heritage assets, its ecological potential and especially its proximity to protected sites of national and international sites of ecological significance. Pedestrian accessibility should be improved with a widening of the towpath and enhanced links through to Rye House Station and the relationship with the RSPB Rye Meads reserve enhanced with new interpretation and signage along the Toll Road. The Authority will be seeking benefits, financial or otherwise, to be negotiated as planning obligations in order to secure a development that complements and enhances the Regional Park."*

- 2.3 This application does not satisfy any of the criteria above. It does the opposite of "conserve and enhance" the setting. The two images below show the current scrapyards on Normandy Way (taken from the train) and show what, in reality, a working scrapyards looks like. See in particular the height of the scrap metal and the equipment, with the delivery lorries in front and the roof of the houses behind for a sense of scale.



- 2.4 The planning officer agrees that the proposed use involves industrial plant and machinery which is not visually attractive. He concludes, however, that it is on balance acceptable “*in the context of the site history of heavy industrial use*”. As above, we do not accept that a historical perspective is the appropriate measure. This is not a location where, now, there should be heavy industrial activity and an unsightly industrial site.
- 2.5 The report also says that the site is a “*significant*” and a “*substantial*” distance from the residential areas and that there would be “*limited public views*”. While distance can be relative, this just isn’t the case in practical terms. The two Riverside Gardens apartment blocks (from which the photograph on the first page of this letter has been taken) would have a direct, unscreened (and unscreenable) view of the site.
- 2.6 We do not agree that there will be “*limited public views*”. Many people who live nearby will see it daily. Anyone who uses the station, passes on a train, visits the Gatehouse or the Rye House pub (or the businesses behind), or walks on the towpath along the river, will see this site. What is proposed is a heavily industrial and intrusive site, which cannot be effectively screened, and it will have a significant negative impact on the visual environment (and in an area which has been earmarked for positive change).
- 2.7 The latest drawings added by the applicant show screening by a treeline along the towpath side of the site. Leaving aside the very significant length of time that it would take for trees to grow to that height, this offers limited screening, and only from the River Lea side. There is also no screening on the other side, meaning that the view from Riverside Gardens (and the Rye Road approach) will be entirely unscreened. This does not offer adequate mitigation.

### **3. Unacceptable impact of noise**

- 3.1 This is an inherently noisy business. It is a site where cars will be stripped down and then shredded. There will be noise from vehicles arriving, car carcasses being delivered, tipper lorries (50 movements a day) and then the strip down works, separation of materials, and shredding of the metal.
- 3.2 The planning officer’s report reports that the applicant’s noise assessment says that the 4.2m high acoustic enclosure for the metal shredder would result in a noise level at the site boundary of no more than 52 decibels<sup>1</sup>. We would make the following points:
- (i) The only acoustic protection appears to be around the metal shredder processing unit, and the other areas do not have any such protection. But what about the other activities? In the acoustics report, a representative material handler had a measured sound level of 81dB with an equated sound power level of 109dB. The diesel generator had a measured sound level of 69dB with an equated sound power level of 97dB. The conveyor would have a sound power level of 80dB. The tipper lorries, with 50 loads tipped per day, have an equated sound power level of 108dB. These activities do not appear to be subject to any acoustic protection/mitigation.
  - (ii) While we can see modelling has been carried out, this is impenetrable by the layman. What is clear from a position of pure common sense is that noise will be produced, which will be significant, constant throughout the day, and not all of which is subject to any acoustic shielding. We all know what a tipping lorry tipping out quantities of metal 50 times a day is likely to sound like. We also understand that these acoustic enclosures are relatively untested.
  - (iii) But furthermore, there is a fundamental issue with the site. It is understood that Rye Road/Plumpton Road is c.1.5m higher than the site (which can be seen in the photographs in the planning officer’s report at section 2.2, showing the Western site boundary). The two residential blocks at Bridgewater Gardens are themselves relatively high (their elevation can be seen from the photograph). A 4.2m acoustic barrier around a discrete part of a metal scrapyards is unlikely to have much of an effect, at this location.
  - (iv) Noise travels from this location. From Stanstead Road (some 10 minutes walk away), noise can be heard from the trains and from the karting track (which is further away from the planned site). The fact that

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<sup>1</sup> In fact, the latest report from the noise assessor actually refers to 55 dB at areas just outside the boundary.

there is already some noise in the area from the karting track and from the Plumpton Road sites (both of which only create intermittent noise from time to time), is not a good reason for allowing a noisy, continuous operation to be allowed in this area. From another perspective, this would suggest a reason not to allow further noisy use in an area which, frankly, has had its fair share.

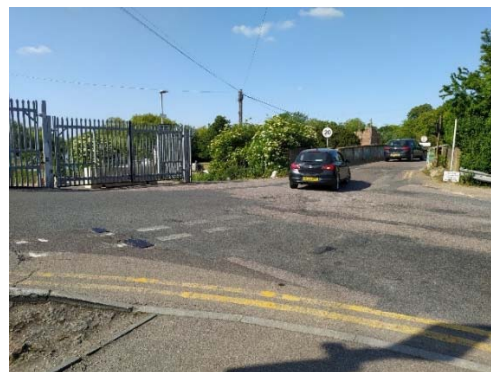
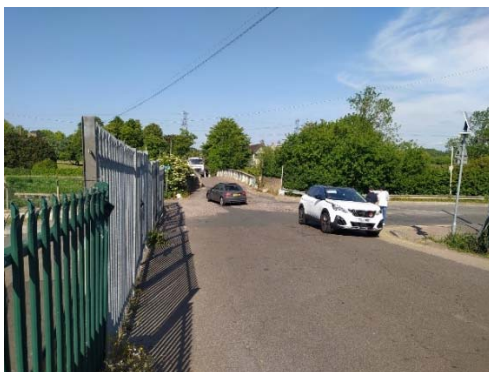
- (v) This will have a very real and ongoing impact on the quiet amenity of the nearby residents, those using the Lea Valley towpath, living on the river, visiting the Rye House Gatehouse, playing at the Old Highway Park. The report says that the site is a “substantial distance” from the residential areas; as above, we disagree - there are houses, flats, caravans and boats in which people live in close proximity to this. Hundreds of residents will be affected by this. This will have an unreasonable and unacceptable effect on all of the people living around here, for a considerable distance. The noise alone – which cannot be sufficiently mitigated in this location – should be reason to reject this application.

#### **4. Concerns about environmental / ecological impact**

- 4.1 In addition to the above, the effect on what is a sensitive local area – the River Lea, the New River and the ecologically important wetland area – has not been given sufficient weight.
- 4.2 We agree with the LVRPA and Canal and River Trust who both objects and raise concerns about pollution and light pollution (the River Lea being an important wildlife corridor, including for bats, which are a protected species under the Wildlife & Countryside Act (1981)) and noise disturbance. The planning officer’s report notes that lighting proposals have not been specified in detail. We are aware that local residents have raised concerns about light pollution from the scrapyard on Normandy Way operated by the applicant.
- 4.3 The Canal and River Trust also raises concerns about pollution to the water environment and that the operation could make the towpath and riverbank unstable. We share these concerns. Some of the site lies within Flood Zone 3, and pollution from vehicles at the end of their life would significantly affect the water sources nearby.
- 4.4 Natural England has also raised concerns about the potential harm to wildlife.

#### **5. Traffic**

- 5.1 Traffic is also a significant concern. This is not a site in the middle of nowhere; there is a flow of pedestrians to and from the station, the residential areas, the towpath, the Rye House Gatehouse, or the pub, and there is a steady flow of traffic past the site. The Rye Road bridges are narrow and single lane. Rye Road is also narrow and inappropriate for large vehicles. It is not an appropriate route for commercial traffic of this nature.
- 5.2 The entrance into the site from Fishermans Way (see below; the entrance to the site is through the metal gates visible in the second image) is also a difficult and unsafe junction. So much so, that the junction is identified as a Hazardous Site in Hertfordshire County Council’s *Hoddesdon and Broxbourne Urban Transport Plan* dated March 2012 (which is the latest iteration). A Hazardous Site is measured by reference to data of actual injury or child collisions.



- 5.3 This is not a site suitable to receive 50 tipper lorry movements a day, plus the additional movements of the 25 full time staff.

**6. Comments on residential / “beneficial” use**

- 6.1 This is a site which has been designated for residential development in the Local Plan, and has been so designated for well over a decade. There clearly an issue with the access road, which currently HCC has said it will not adopt, and so there is an *“absence of a practical path to implement a residential use”*.
- 6.2 This might be the case now – but legal issues with road ownership are common and, no doubt, could be overcome, if there was a will within HCC to do so. For example, bespoke insurance may be available to cover later issues, which could encourage agreement. Have these issues been explored?
- 6.3 The officer’s report says that *“it could be argued with validity that a valuable piece of urban land does need to be put to a beneficial use”*. But who would this particular use be beneficial for?
- 6.4 With respect, and while we have some sympathy with the land owner’s difficulties, this application would not result in a use of land which is of benefit to the Borough, the local residents, and the wider Borough residents who visit the area. Rather, this would be to the detriment of the local community and our local amenity. The applicant has previously used the land for car parking; there are other uses of the land (like that) which are more appropriate and would not have a detrimental effect on the local environment.

We ask that the Council rejects this application. There are a number of planning decisions made in the past which we would all agree would not be made today. We would hope that the Council does not look backwards, at historical usage, but considers whether this application is right today, for the circumstances that exist now, and with reference to the current guidance/motivations, particularly as recent usage of the site has been relatively quiet. Granting an application for this use, in this location would be a retrogressive step for the area, and would be highly detrimental.

The LVRPA has also asked that the scheme be refused, and we note that it has asked to be formally notified if the Council intends to approve the scheme, so that it can consider whether to require referral to the Secretary of State. If the application was to be granted, we would actively support such a referral.

Yours faithfully



Nicola Cowan  
Secretary  
On behalf of The Hoddesdon Society