

Broxbourne Borough Council Pre-Submission Core Strategy **Sustainability Appraisal Report Non-Technical Summary (NTS)**

Final Report
July 2010



Prepared for
Broxbourne Borough Council

Revision Schedule

Sustainability Appraisal Non-Technical Summary: Pre-Submission Core Strategy July 2010

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1 Non-Technical Summary (NTS)

1.1 Introducing the NTS

- 1.1.1 This is the Non-Technical Summary (NTS) of the Sustainability Appraisal (SA) of the Broxbourne Core Strategy. The Core Strategy has reached the Pre-Submission stage.
- 1.1.2 The purpose of the NTS is to explain in non-technical language all of the likely and significant social, economic and environmental effects that the Core Strategy might have. It also suggests ways of avoiding or reducing any adverse impacts arising from the plan as well as ways of maximising its positive impacts.
- 1.1.3 SA is a statutory requirement for Core Strategies and other Development Plan Documents (DPDs) under the Planning and Compulsory Purchase Act 2004. SA incorporates a Strategic Environmental Assessment (SEA) as required under EU legislation. This requires that an NTS is provided.

1.2 Objectives of the Core Strategy

- 1.2.1 The Pre-Submission document is the final stage in the preparation of the Broxbourne Core Strategy. The Core Strategy sets out the vision and objectives for the area and the location and direction of development for the Borough until 2026 (or even 2031 for some issues). The Core Strategy links closely to community needs and local infrastructure requirements.
- 1.2.2 The Core Strategy is based around the following main components:
- Introduction,
 - Spatial Portrait, Main Challenges and Drivers of Change,
 - A Spatial Vision and Key Diagram,
 - Nine Strategic Objectives, and
 - Ten Policies.
- 1.2.3 The Broxbourne Core Strategy seeks to deliver the objectives of the Borough's Sustainable Community Strategy, which sets a vision *"to continue to be a pleasant, prosperous, safe, healthy and green place where people want to live, work, spend leisure time and do business"* and nine themes for the Borough. According to the Core Strategy, it reflects the policies of local transport plans, waste and mineral plans, planning documents of other councils and the service delivery plans of statutory bodies.
- 1.2.4 To help the Council and the public better understand the potential implications of the Core Strategy for the economy, the environment and community, Strategic Objectives, the Spatial Vision, and Policies have undergone SA. The results of the SA (alongside other technical studies, community engagement and public consultation, and professional expertise) are then used by the Council to develop the most appropriate policies for Broxbourne.

1.3 Summary of the SA process

- 1.3.1 The role of Sustainability Appraisal (SA) is to assess how the key principles of sustainable development are incorporated into the plan-making process. SA is used to systematically test the effects that the plan may have on economic, environmental and community-related issues.
- 1.3.2 The first stage of the SA process is known as the scoping stage. In this stage the other plans, policies, programmes and initiatives that influence the Core Strategy are examined. This is set out as **policy context** in the main report.
- 1.3.3 Following this data on the different characteristics of the borough are collected. It is by comparing the expected effects of the plan against this **baseline** that we are better able to understand what is important and what is not.
- 1.3.4 Next, **key issues** that need specific attention in the appraisal are identified. The information that is gained from these steps is then documented in a Scoping Report. The Scoping Report was published in January 2008 and can be found on the Council's website. An Addendum to update the Scoping Report was published in July 2010.
- 1.3.5 Based upon the baseline and key issues it is possible to identify **what the situation will be without the plan**, aka the effect of business-as-usual in the borough without a Core Strategy to guide development.
- 1.3.6 Then the **likely significant effects** of the Core Strategy are appraised. The process should also highlight any **cumulative effects** of the Core Strategy as a result of the Spatial Vision and Policies.
- 1.3.7 The appraisal process itself is systematic and the likely effects of the Core Strategy (e.g. policies) are considered against SA Objectives developed in response the borough's key issues and as agreed with the Council. The SA Objectives are:
- | | |
|----------------------------|-----------------------------------|
| 1. Biodiversity | 9. Built and historic environment |
| 2. Pollution | 10. Sustainable waste management |
| 3. Water resources | 11. Health |
| 4. Sustainable transport | 12. Safe, inclusive communities |
| 5. Climate change | 13. Housing |
| 6. Sustainable consumption | 14. Inequality |
| 7. Resources | 15. Skills |
| 8. Landscape | 16. Economy |
- 1.3.8 Any **difficulties** whilst undertaking the appraisal need to be highlighted in the SA report.
- 1.3.9 The appraisal suggests measures that the Council can take in eliminating or minimising the negative effects and improving the beneficial ones, aka **mitigation**. The SA process also involves **monitoring** the adopted plan including its sustainability impacts; this is done through the LDF Annual Monitoring Report (AMR).
- 1.3.10 These elements of the main SA report are summarised in the sections below.

1.4 Policy Context

- 1.4.1 It is important to understand that the Core Strategy document has been prepared within a much wider context. This means that there is a wide range of European, national, sub-regional and local policies that the Strategy must be consistent with.
- 1.4.2 At the national level, the Government's planning objectives are set out in a series of topic-based Planning Policy Guidance notes (PPG), Planning Policy Statements (PPS) and Planning Circulars. These set out the broad principles and objectives that the planning system should seek to achieve and they must be reflected in planning policies produced by each Local Planning Authority (LPA).
- 1.4.3 The policy context has moved on since the original Scoping Report in January 2008 and there have been some notable changes as documented in the July 2010 Scoping Report Addendum. In particular, until July 2010 the Core Strategy was expected to deliver targets and policy objectives set out in the East of England Plan (this sets out the spatial strategy and planning framework for the entire region). However, in a letter dated 06 July 2010, the Chief Planning Officer for Local Planning Authorities in England announced the Secretary of State's decision to revoke all Regional Spatial Strategies with immediate effect. Accordingly, the targets and policies of the Core Strategy are now based upon national guidance, local evidence and the views and desires of the community.
- 1.4.4 Another key policy update has been the publication of Broxbourne's Sustainable Community Strategy. The Core Strategy seeks to deliver the objectives of this Strategy. The Strategy covers the period 2010-2021 and replaces the Community Plan. It covers the issues that will impact on the local community and will represent the strategic plan for all public and voluntary services in Broxbourne. The vision is for the Borough to continue to be a pleasant, prosperous, safe, healthy and green place where people want to live, work, spend leisure time and do business, and for the sense of place and community to be enhanced. Reducing congestion and encouraging sustainable transport, increasing the range of housing available and increasing the vitality of the Borough's town centres, are key aims additional to the Community Plan.

1.5 Summary of the existing baseline

- 1.5.1 The Borough of Broxbourne, located in south east Hertfordshire, covers an area of 20 square miles and has a population of approximately 90,000 people. The Borough is predominantly rural in character and protected by a Green Belt policy with a more densely developed urban corridor along a north-south axis roughly following the route of the A10. Along this axis are located Broxbourne's main towns of Waltham Cross, Cheshunt, Broxbourne and Hoddesdon. The Lee Valley Corridor runs along the eastern edge of the Borough. Industrial areas are predominantly located in Cheshunt, Waltham Cross and Hoddesdon. The M25 motorway runs adjacent to the southern boundary of the Borough. The Borough is served by a railway line with connections to London Liverpool Street, Cambridge and Hertford, and the Borough provides good access to both Stansted and London City Airports. Broxbourne is located to the north of London and is part of the London Arc, an area defined as comprising the areas closest to and most strongly influenced by London.
- 1.5.2 Evidence base updates since the Scoping Report in January 2008 are documented in the July 2010 Scoping Report Addendum and summarised in Table 1.

Table 1: Evidence base updates

Evidence base topic	Evidence base updates
Economic	<ul style="list-style-type: none"> • Broxbourne is a lower-value, low-knowledge economy, with lower earnings and higher unemployment), specialising in industry and the kinds of services that tend to operate in industrial areas, including logistics and construction. It follows that higher-skilled higher-earning residents are likely to work outside the Borough. • Main market opportunities are in the industrial and warehouse sectors, where demand is high yet land is in short supply. Potential to become a major office location is limited. • The retail centres within Broxbourne (Waltham Cross, Hoddesdon, Brookfield and Cheshunt) are ranked well below many competing centres in neighbouring areas. Within the Borough, Waltham Cross is the highest ranked centre. The different retail centres face different challenges and meet different needs • There is “significant leakage” of trade to competing shopping destinations in the wider Sub-Region. The wider impacts of this include unsustainable travel patterns, high carbon emissions and an ‘outflow’ of jobs and wider economic benefits. • Major town centre enhancements to all competing retail destinations require that corresponding improvements to the Borough’s facilities are made. • Greater Brookfield is identified as a key site for Broxbourne’s retail improvements. • There are leisure gaps within the Borough. • There is a diversity of employment across the Borough (size and scale of business and mix and type of different business sectors) and employment in Broxbourne is increasing at rates that outperform growth in neighbouring Hertfordshire districts. • The borough has an official venue for the London 2012 Olympic and Paralympic Games and there is potential to capitalise upon this economically.
Environmental	<ul style="list-style-type: none"> • The Borough has diverse landscapes and this diversity is reflected in the historical settlement, development and use of the landscape. This is a major environmental asset and offers a local distinctiveness and a higher quality of life to Borough residents. • Participation in sport and physical activity in Broxbourne is below the national and regional average. • There are 246 open space sites that have been identified within Broxbourne. Accessibility to parks, garden sites and the Lee Valley Regional Park, and linkages between large areas of open space, could be improved. • The Borough has a number of natural and semi natural open spaces that are valued by local residents, contribute towards local character and support biodiversity and habitats. • Although there is a good spread of amenity greenspace within the Borough there are shortfalls in terms of quantity and quality of existing sites could be improved. E.g. deficiency for children and teenagers and of outdoor sports facilities. • There is an uneven distribution of cemeteries and churchyards across the borough. • Accessibility to, and maintenance of, allotments could be improved. • Water supply infrastructure capacity is not expected to constrain growth, although Rye Meads WWTW will require substantial upgrades in the future. • The water quality in the Rye Meads area is generally compliant with objectives set by the EA, although water quality concerns exist for the majority of watercourses. • The River Lee is a complex river system and, along with its tributaries, has been subjected to flooding in recent years. Groundwater flooding has been observed in a limited number of borough locations. However, proposed growth within the Rye Meads catchment is unlikely to create a significant increase to flood risk in Broxbourne. • Broxbourne is currently considered to be under serious water stress. • The drinking water for the Thames region has been tested and assessed as being of ‘good quality’, however, consumer contact rates per 1,000 population for ‘discoloured’ water (brown, black or orange water), are the high in the area. • Broxbourne has the lowest per capita emissions within the county and emissions are also below the regional and national average. Existing residential buildings are responsible for a significant volume of total emissions. • The Borough is in close proximity to London and the M25. The main access road is the

Evidence base topic	Evidence base updates
	<p>A10. There are frequent rail services between London and Cambridge, but improvements to station access would support increased rail use. Bus services are in place but contrast with those in Transport for London's area to the south of Waltham Cross. Much of the transport activity is aligned north-south in the London to Cambridge corridor with east-west journeys being comparatively difficult.</p> <ul style="list-style-type: none"> • Congestion is a major challenge even in the absence of development. • The Borough doesn't demonstrate sustainable transport activity. More comprehensive transport links are needed including sustainable transport routes. • Average distance travelled to work is less than that for Hertfordshire, but this is expected given the proximity of London. • Changing land use and expected growth will result in increased pressure on the established transport networks. • Greater Brookfield development is hindered by poor access arrangements. • There has been a 4.3% increase in the community's recycling rate to 39.4% (2009). • Total residual waste collected per household fell by 3.2% from 159 kg to 154 kg (2009).
Community	<ul style="list-style-type: none"> • The health of Broxbourne Borough is generally better than the England average and accessibility of health services is good. Male life expectancy in the East of England is the second highest of any English region and female life expectancy is the third highest of the English regions. Statutory homelessness and adult physical activity are no longer worse and teenage conceptions are now better than the England average. However heart attack rates and the percentage of smoking attributable mortality remain higher than in the county (2006). • The health picture within the Borough reveals a large amount of variation. • There is good accessibility to GPs within Broxbourne and a sufficient number of dental surgeries and dentists in the Borough. • Based on 2004 population estimates, the sub-region's population is expected to rise by 11% rise between 2004-2029. • Between 2001 and 2006, Broxbourne lost population through migration to all other authorities in the sub-region, but gained over 9,470 people from London. • Broxbourne is a pleasant place to live and an area of high demand, with a high level of privately owned housing stock and a dramatic increase in house prices in recent years. • High levels of homelessness and a shortage of affordable housing are issues. • Broxbourne and Harlow contain a high proportion of flats. • Broxbourne has the second highest social rent housing requirement in the sub-region. • Between 1st April 2001 and 31st March 2009 2,675 dwellings were built in the Borough, a development rate of 334 dwellings per year. • At current market values and costs it would be possible to sustain a target of 30% affordable housing. There is scope for reducing the threshold for site sizes to which affordable housing targets apply. • The level of home ownership in Broxbourne is the highest in Hertfordshire. • Within Hertfordshire, Broxbourne is the only local authority that has seen a percentage increase in overall perceptions of anti-social behaviour. Town centres are a focal point for anti-social behaviour. • When compared to county levels some types of crime are particularly high e.g. vehicle crime and dwelling burglary. • Levels of CGSE and A level achievement in the Borough are below the national and county levels, and levels of absence from school are high. • Unemployment in Broxbourne is relatively high and has increased. Long-term unemployment is a particular concern. • The qualifications of Borough residents are below county averages. • Although the Borough is generally clean and tidy, there are pockets of poor air quality, especially near to the M25, and the River Lee has poor water quality which is affected by run-off from land. • Within the Borough there are issues of deprivation and areas where the borough ranks badly compared to Hertfordshire, particularly in Waltham Cross, Wormley and Turnford

Evidence base topic	Evidence base updates
	and Flamstead End. <ul style="list-style-type: none"> • Broxbourne is projected to have a considerably slow decline in household size between 2006 and 2031. • The Council can demonstrate that there is a 5 year supply of ready-to-develop sites in the district. It is making progress in identifying long-term housing land supply. (2009) • 81% of housing completions were built on previously developed land (2009).
Spatial	<ul style="list-style-type: none"> • Hoddesdon is a picturesque market town with good accessibility, an attractive shopping market, a mix of shops, businesses and community facilities, and a popular large outdoor market. However there are issues relating to retail, safety, parking deficiency, historic environment constraints, and signage. • The Green Belt of Broxbourne prevents unrestricted sprawl of built up areas and / or neighbouring distinct settlements from merging into one another at a number of locations: towards the north-west; to the mid-west; to the south; to the south-west; to the east. • There are a small number of Green Belt sites that do not perform a clear purpose in preventing urban sprawl • Overall the Green Belt plays a 'moderate' role in terms of countryside value. The Broxbourne Green Belt contains a number of local wildlife sites, a few protected trees and areas of ancient woodland, and a large amount of greenfield land. The majority of the Green Belt sub areas are of moderate agricultural value. • The strength of the Green Belt boundary in the inner Green Belt is variable.

1.6 Summary of the key issues

1.6.1 Table 2 lists the economic, social and environmental problems facing the Borough of Broxbourne together with sources of supporting evidence. It provides a consolidation of what sustainability issues should be a particular focus for the appraisal as identified in the Scoping Report Addendum.

Table 2: Issues for particular focus in the appraisal

SA Framework	Key sustainability issues
<ul style="list-style-type: none"> • Skills • Economy 	<ul style="list-style-type: none"> • Broxbourne does not fit the general profile of the Hertfordshire London Arc. It generally has a low-value, low-knowledge economy, with low earnings. The Borough has diverse employment in terms of size, scale and mix of business; however there are high levels of workforce mobility and thus competition with other authorities in the north east sub region. In addition, whilst the industrial warehouse sector continues to flourish and the Borough remains good at attracting relatively low-value, low-knowledge employment in retail and wholesale activity, logistics, construction and industry; growth in the office sector continues to flag and there remains a bias against higher skilled, higher value jobs. It is therefore important that the LDF does not constrain economic growth and, given the wider policy expectation of knowledge-based and high-value activities, considers that the Borough's core economy tends to be industry-focused and that there are challenges in competing with higher-skilled jobs elsewhere. The skills and education base of the local population and access to employment opportunities could be strengthened. In particular, the mix of industrial warehouse space is a critical planning issue within Broxbourne. Waltham Cross and Hoddesdon town centres, and Park Plaza North and South have potential for employment growth (including a hotel at Park Plaza South), and a Business Park of a regional/national scale may be suitable in other M25 locations. The 2012 Olympic Games also

SA Framework	Key sustainability issues
	represents an important economic opportunity although it is important to remember that opportunities are limited and require planning to unlock full potential. Employment development could also aim for BREEAM standards.
<ul style="list-style-type: none"> • Health 	<ul style="list-style-type: none"> • It is considered that there is sufficient health care provision within the Borough – particularly in the west of the Borough where there was previously an identified deficiency – although for hospital treatment and specialist treatment, residents still need to travel outside of the Borough and this should be supported through transport policy. The health profile of the Borough is generally good.
<ul style="list-style-type: none"> • Sustainable transport • Biodiversity • Landscape • Climate change 	<ul style="list-style-type: none"> • The Borough is not considered to demonstrate sustainable transport activity, with high proportions of journeys made by car and poor rates of walking, cycling and bus use. Bus services and rail station access could be improved in the Borough, and walking and cycling opportunities enhanced e.g. through supporting green corridors and networks.
<ul style="list-style-type: none"> • Sustainable consumption • Built and historic environment • Sustainable transport 	<ul style="list-style-type: none"> • Key retail centres within the Borough provide essential needs for residents and local employment opportunities, attracting visitors to the Borough and demanding good accessibility and a good shopping experience (e.g. an appropriate range of shops and an attractive environment). Improvements to these centres – Hoddesdon, Waltham Cross, Cheshunt and Brookfield – should be supported through the LDF. Hoddesdon and Waltham Cross have particular issues in relation to being ‘inwards looking’, poor rail accessibility and historic environment constraints.
<ul style="list-style-type: none"> • Sustainable consumption • Economy • Sustainable transport • Climate change 	<ul style="list-style-type: none"> • There is a need for improvements to the Borough’s retail facilities to counteract loss of trade to out-of-borough destinations and planned/implemented improvements to these. Associated with this are unsustainable travel patterns, high carbon emissions and an ‘outflow’ of jobs and wider economic benefits. There is a need for retail growth “of a critical mass” in Broxbourne, both to recapture lost expenditure and to ensure investment of a sufficient scale for jobs and improved perceptions. Greater Brookfield is an important site for this purpose, supported by Waltham Cross, Hoddesdon and Cheshunt. It will be important to address this issue and support the role of town centres and retail centres within the Borough and the employment and recreational opportunities that these centres offer, through the LDF Core Strategy and supporting documents.
<ul style="list-style-type: none"> • Safe, inclusive communities • Inequality 	<ul style="list-style-type: none"> • There are issues relating to deprivation in Broxbourne, particularly in terms of indicators for crime, education skills and training, living environment and employment. Pockets of deprivation also exist within Broxbourne Borough, with particular deprivation and perception issues in Waltham Cross, Cheshunt Flamstead End, Wormley and Rye Park.
<ul style="list-style-type: none"> • Health 	<ul style="list-style-type: none"> • Participation in sport and physical activity in Broxbourne is below the national and regional average, although the Borough has a range of open spaces and a rich and diverse landscape that could support improvements in this area.
<ul style="list-style-type: none"> • Climate change 	<ul style="list-style-type: none"> • The LDF will need to take in to account areas of flood risk within the Borough, the availability of water resources and the treatment of water, particularly in light of the Strategic Flood Risk Assessment (SFRA) and the Rye Meads Waste Water Treatment Works (WWTW) study.
<ul style="list-style-type: none"> • Housing 	<ul style="list-style-type: none"> • The projections and findings of the Borough’s Strategic Housing Land Availability Assessment (SHLAA) and sub-regional Strategic Housing Market Assessments (SHMA) will need to be taken into account when planning for the Borough. Particular issues within the Borough include high house prices, high housing demand, homelessness and affordability issues, overcrowding, and high levels of out-migration. The Borough should be able to sustain a target of 30% affordable housing, although the economic downturn and other sources of unpredictability suggest the need for an adjustable target. Property prices across the Borough vary, with more expensive properties to the west and south west.

SA Framework	Key sustainability issues
	<ul style="list-style-type: none"> • An increased housing demand is expected as a result of smaller average household sizes. An ageing population demographic is also likely to impact on specialist housing and healthcare. • The Borough has a large number of flats but a lack of larger family homes.

1.7 Situation without the plan

1.7.1 It may be expected that, without a plan, ‘business-as-usual’ will continue – the baseline situation will be maintained and key sustainability issues may become more apparent. However the fundamental geography of the borough should remain the same (excluding some landscape and Green Belt impacts). The situation without the plan may include the following:

- Housing unsustainably delivered. E.g. Enough dwellings to meet demand; an appropriate housing mix; enough affordable housing and dwelling types; and high quality housing. This could have implications for meeting the challenges of climate change and social well-being.
- Limited progress towards developing a high skilled economy and a continuation of the borough’s low skill and low knowledge economy with a high volume of out-commuting.
- Potential deterioration in the quality of local centres and a failure to meet borough needs for services and facilities such as retail and leisure. A particular concern that Greater Brookfield won’t be delivered to a high standard that meets the particular needs of Broxbourne, whilst minimising impact on resources and other environmental variables, transport capacity and infrastructure capacity.
- Exacerbation of congestion and a continued reliance on the car, making it harder to encourage a modal shift to more sustainable forms of transport. Poor linkages between key areas of the borough may continue or worsen. This would have negative repercussions for accessibility, the economy, health and well-being and environmental interests.
- The historic and natural environment may suffer without a plan to guide the location and quality of development.
- Difficulty in mitigating and adapting to climate change, including susceptibility to flood risk.
- The release and use of Green Belt land may be inappropriate.
- Community needs may be overlooked, including access to open space.

1.8 Summary of the likely significant effects of the Core Strategy Spatial Vision and Policies

1.8.1 The appraisal of the Spatial Vision and Core Strategy Policies are set out in detail in the main report. This section more specifically focuses on negative impacts and whether recommendations for the SA undertaken at an earlier stage of the plan-making process (the ‘Preferred Options stage) have been taken into account by the Council for the Pre-Submission plan.

Spatial Vision

- 1.8.2 The Spatial Vision is generally expected to have a mixture of positive and negative impacts that will depend upon implementation. In particular, a positive impact on the economy is anticipated. Negative environmental impacts will result due to development but could be mitigated in the Vision by measures that include protecting sites, addressing climate change and increasing sustainable transport options. However, there is a concern that issues such as waste and renewables, the importance of water courses and their quality, the importance and protection of wildlife sites, and linkages between residential and employment areas and facilities and services; have not been addressed. In addition, although the Vision scores well against community safety, equality and skills objectives, it does not mention health and well-being and housing objectives.

Core Strategy Policies

Policy CS1 - Sustainable Neighbourhoods

- 1.8.3 The Sustainable Neighbourhoods policy (CS1) should have a number of positive effects against the sustainability objectives, although it could include clarification on construction policies and local sourcing of resources and impacts on the historic environment (the historic environment appears to be under-represented in a number of policies). Truly sustainable neighbourhoods will require sustainable behaviour of residents and how sustainable behaviour will be promoted – to include community engagement in the process – is unclear. It is noted that the policy takes in to account recommendations for sustainable travel and generally broad criterion, although detail on the criterion and exact minimum standards to be achieved are not given within the text.

Policy CS2 - Housing Development and Policy CS3 - Housing Mix

- 1.8.4 Policies CS2 and CS3 outline the approach to housing development and mix. Additional housing is expected to have economic and social benefits and negative impacts on the environment. However, due to a shortfall between housing need and requirement for housing completions over the plan period the benefits are questionable and the following are of concern: it will be more difficult for the Borough to meet unmet need in the future, the creation of social tensions, more people may move out of the area due to the lack of housing and there will be less capacity for affordability and labour mobility. Although the policy refers mitigation measures that include a range of issues to be considered in masterplanning, there is less clarity on minimum requirements and – in particular – on site/location selection criteria. Crime and community safety (a previous recommendation), for example, are overlooked; and location in terms of renewable energy. Previous recommendations on phasing and issues such as infrastructure capacity and flood risk have been taken into account. The housing mix policy should increase positive impacts for housing against a number of sustainability objectives (economic, social and environmental) and previous recommendations have largely been taken into account; setting a target for affordable housing and design standards. The policy, however, does not provide detail on access to greenspace linked to dwellings; this is a recommendation set out under the previous SA that is still relevant. The design guidance should allow for positive impacts however these are assumed but not given in detail. A previous SA recommendation stated that guidance on the application of this policy should ensure that development especially on larger sites is truly mixed, through the distribution of affordable housing throughout, and minimise the separation of private and affordable housing (though, on occasion it may be prudent to group the housing in order to assist its

management). In addition, the commuted payment channel of delivering social housing has risks in terms of social cohesion, equality and well being, and the dispersal of housing types should be considered. Reference and linkage to the Sustainable Neighbourhoods policy may be beneficial.

Policy CS4 - Travelling Community

- 1.8.5 The Travelling Community policy (CS4) has a number of uncertain or negative impacts. Negative impacts are largely against the environmental objectives based upon impacts from additional pitch provision, although. There is a lack of clarity over how (and whether) impacts could be mitigated as a result of either new or existing sites and, indeed, whether there is an approach to be taken to existing sites. There is also no consideration of contributions to the economy and how to support employment needs or community implications, and generally how these issues link to the borough. Engagement previously recommended (travelling community and wider community) does not appear to have been taken into account.

Policy CS5 - Employment

- 1.8.6 The Employment policy (CS5) should have a number of positive impacts on the economy and social objectives, but similarly to CS2 and CS3, additional development will place pressure on environmental objectives. As with CS2 and CS3, mitigation measures are suggested which could minimise negative impact; however detail is lacking and this again misses the opportunity for onsite enhancements e.g. environmental quality, biodiversity value, truly sustainable locations for waste management, etc. It is unclear whether 'improvements' to employment sites are purely for economic, or also environmental and social, gains. Moreover, it is unclear whether high standards of improvement will apply to existing, in addition to new, employment sites. Key traditional employment sectors and associated strengths for the borough should not be overlooked in terms of the essential and reliable support they have consistently provided to the borough; for example, there is no reference to glasshouses and nurseries. Phasing of delivery (e.g. access, jobs, training) is important and should be addressed. Work at home opportunities and live-work units are not considered. Importantly, the recommendation to consider sustainable travel, modal shift and accessibility has been taken into account.

Policy CS6 – Retail and Town Centres

- 1.8.7 Policy CS6 Retail and Town Centres is expected to have positive impacts on social and economic objectives, although social benefits will depend upon whether inequalities are accounted for during implementation. Training and smaller independent retailers, however, are also not addressed within the policy. As with other policies delivering development (CS2, CS3, CS5), negative impacts on environmental objectives may be expected but there is an uncertainty dependent upon implementation and mitigation measures set out. For example, it is implied but not specified that strategies will build to high sustainability standards, with sustainable transport options and accessibility. Efforts to minimise the environmental impact and increase the sustainability of activity amongst retailers, as for businesses in the Employment policy CS5, have not been considered. These were previous recommendations that do not appear to have been taken into account.

Policy CS7 – Greater Brookfield

- 1.8.8 The policy for Greater Brookfield (CS7) faces similar issues to policy CS6, however it sets out more mitigation measures that perhaps could also be adopted under policy CS6 in order to address environmental concerns. One particular difference, however, is that a strategy is not

referred to for Greater Brookfield and yet an opportunity exists to create a sustainable or 'eco' development; this could address sustainability concerns highlighted in this appraisal by enhancing the environment through development and the long-term practices of residents, retailers and businesses. It is noted that recommendations for masterplanning principles addressing local constraints, traffic constraints and efficient land use, have been taken in to account. The travelling community is not referred to in the policy (as recommended) but perhaps Policy CS4 could be signposted.

Policy CS8 - Environment

- 1.8.9 Unsurprisingly there are a number of positive impacts on the environmental objectives under Environment Policy CS8. Links and signposting to this policy could mitigate some of the negative impacts and uncertainties highlighted under other policies. There is room to broaden this policy to consider more detail on areas e.g. looking not just to offset, but to enhance biodiversity; and to clarify with detail where this appraisal made assumptions relating to what is covered. In particular, to address waste and pollution which appear to be over-looked yet are important environment considerations. The water quality of water courses is also an important issue that might be overlooked, although the previous SA recommended that the Strategy should seek opportunities to enhance and restore river corridors, reduce surface water run-off from all new development, safeguard the floodplain and areas for future flood alleviation schemes, and improve flood awareness and emergency planning. Sustainable construction principles are over-looked in all the policies but could be alluded to at least under this policy. The economic and social advantages of the environment could also be referred to under this policy. Recommendations taken into account include rewording of green infrastructure partnership-working, enhancements and including open space provision. However, other recommendations have less clearly been taken in to account, relating to: expanding upon wildlife sites included for protection; defining or signposting guidance on flood risk; enhancement of landscape, biodiversity and earth heritage more generally; and outlining a more integrated approach to green infrastructure (including outlining its values within the policy).

Policy CS9 - Infrastructure

- 1.8.10 The Infrastructure (CS9) policy is expected to have negative environmental impacts in line with other policies regarding additional development, including issues with clarification on locational criteria and high design standards that could mitigate if included/clarified in policy wording or signposted in another policy. Other issues, such as the omitting of waste infrastructure (recycling, location in proximity to sites, waste from energy, etc.), and improved transport infrastructure increasing car reliance and longer-distance trips thus emissions, also arise under this policy. Developer proposals and car parking provision could counteract efforts to support a modal shift to sustainable forms of transport, the promotion of sustainable patterns of consumption and efforts to retain high skilled workers (also recommended in the previous SA). The definition of 'sensible' car parking provision could be outlined. Clear linkages to green infrastructure under Policy CS8 could be provided however it is unclear in the policy whether a joined-up network of sustainable transport to key locations will be supported (this was also recommended in the previous SA). There are concerns for social objectives regarding lack of professional and vocational skills coverage and the standard of car parking.

Policy CS10 – Planning Contributions

- 1.8.11 Environmental impacts of Policy CS10 Planning Contributions, will depend on where contributions are directed in Broxbourne and whether the policy seeks contributions that

enhance sustainability and improvements. Recommendations for contributions e.g. retail and sustainable transport, have comprehensively been taken into account. The broad search strategy for infrastructure surpluses/deficits could have a positive effect in ensuring good coverage, however it might miss out on a focused approach to key issues.

Cumulative effects

- 1.8.12 Many of the negative, or potentially negative, environmental impacts – on biodiversity, pollution, water resources, resources, landscape and historic environment – are as a result of development that must be delivered through the Core Strategy. The lack of available land for development is a key issue for the borough and the Core Strategy acknowledges that, in the long term, green belt may need to be released in order to meet demand. This will increase the pressure on environmental objectives, although measures set out within the policies promote efficient land use. The extent of the impact will depend upon implementation and the detail of design standards in terms of whether standards will mitigate or offset negative impacts, or go beyond mitigation to enhance and in turn have a positive effect. Cumulatively, design standards could allow the borough to have a positive impact against the climate change objective, depending upon implementation.
- 1.8.13 There is a potential for quite a large or unknown impact against the waste objective, as it is not referred to within the objectives or spatial vision. Waste is expected to increase as a result of development and increased economic activity and its sustainable management should be considered. Similarly pollution – reducing its levels – is not referred to within the text, leaving several uncertainties and potential negative impacts as a result of development and increased economic activity. Although water consumption should be covered under design standards and thus should be afforded some conservation despite development, it can only be assumed that water courses will be covered under measures to protect green space, given that they are not referred to within the policies and could be affected by pollution.
- 1.8.14 The policies generally improve the accessibility of facilities and services within the borough, through measures to improve transport – including more sustainable options – and improving facilities and services in local centres. Cumulatively this should result in a number of positive impacts against sustainable transport and sustainable consumption patterns, which should help address transport – a key issue for the borough.
- 1.8.15 Collectively, the Core Strategy should result in the most positive effects against the economy policy, particularly in terms of employment and retail. Policies overall should prevent leakage of high skills and increase inward investment, creating numerous jobs including high skills, that will be supported by infrastructure and accessibility. These measures, in addition to supporting employment sites (including at Greater Brookfield) should encourage businesses to invest and start-up in the borough. An improved housing mix and improvements to the borough as a place to live and work will also attract employees and increase retention of higher skills.
- 1.8.16 From the information provided in the SHMA, the Core Strategy and AMR housing completion figures, it seems that Broxbourne’s overall housing need (4,800 homes between 2007 and 2026) will not be satisfied by the Core Strategy. The Core Strategy outlines 3,840 homes to be delivered between 2010 and 2026, in comparison taking into account housing need minus housing completions in 2007/08 and 2008/09 to bring dates in line with around the plan period there is a shortfall of 500 homes between 2009 and 2026 (does not include housing completions in 2009/10). A shortfall may have the following implications: it will be more difficult for the Borough to meet unmet need in the future, the creation of social tensions, more people

may move out of the area due to the lack of housing and there will be less capacity for affordability and labour mobility.

- 1.8.17 The appraisal highlights the following trends which may precipitate greater inequality:
- Emphasis on high quality design family homes in green areas, implicitly targeted at high skilled highly paid professionals.
 - The overall emphasis on changing retail patterns, with a major focus on implicitly higher end shopping, leisure and indoor recreation.
 - The intention to collect commuted payments for the provision of off-site affordable housing and community facilities.
 - Target housing completions for the plan period shortfall of housing need.
- 1.8.18 All three factors working together could lead to a scenario (in the worst case) where the future community of Broxbourne is divided along socio-economic lines. This could happen if as a result of these policies, affordable housing occurs in large concentrations, or is kept at a distance from market housing. Or, if independent shops, newsagents, pound stores and takeaways are replaced at a large scale by clothing brands and leisure goods, accessible only to higher paid sections of the community.
- 1.8.19 To prevent this scenario, large concentrations of social housing must be avoided, and retail provision should account for all parts of the community, including low skilled workers. Skills training and employment support for the unemployed and those looking to move up the skills ladder should be a high priority for the Council, cutting across nearly all policies in the Core Strategy.
- 1.8.20 Also, in general, community engagement has been emphasised only in Greater Brookfield masterplan policy. Other policies should also encourage community engagement in the planning process.

1.9 Assumptions and / or difficulties undertaking the appraisal

- 1.9.1 SA – under the SEA Directive – requires that any difficulties whilst undertaking the appraisal are outlined. There were a number of uncertainties identified regarding the impact of the Core Strategy against the SA framework. In particular, there is an inherent challenge in assessing strategic policies and they have to be taken at face value to some extent, i.e. it is assumed they will be implemented in practice.
- 1.9.2 It was assumed that design guidance referred to within the policies covers a full range of sustainability concerns, setting high targets for both delivery and construction. This is covered to some degree within supporting text for the policies. It is also assumed that the supporting text will be used in conjunction with / enforced alongside the policies and that the policies are inter-connected and that concerns under one policy will be covered /mitigated by another. Similarly, a lack of detail within the Strategic Objectives is assumed to be covered within the policies and supporting text. A further assumption is that strategies for local centres will cover sustainability concerns relevant to the respective centres that they cover.

1.10 Significant effects, mitigation and monitoring

- 1.10.1 The main report sets out mitigation measures for any negative effects arising from the Spatial Vision and each of the policies. It is important that key significant effects are addressed in the SA and key mitigation and monitoring measures outlined. This is set out in Table 3.

Table 3: Core Strategy spatial vision and policy recommendations aiming to mitigate specific predicted effects

Spatial vision / Policy(s) reference	Significant effect	Mitigation	Monitoring
Policy CS2 – Housing Development	Impacts on biodiversity and landscape, increased pollution, waste and water consumption, and use of non-renewables, as a result of new housing development.	<ul style="list-style-type: none"> • Sustainability criteria should be used for areas of search and the selection of sites. This could include minimising the use of scarce of non-renewable resources, landscape and open space impacts, built and historic environment impacts, waste management, flood risk • Links to policies that should mitigate negative impacts from housing development should be signposted • Prioritise urban sites and use the sequential approach • Avoid biodiversity loss and seek to enhance biodiversity or at least compensate for its loss at housing sites • Consider the remediation of land where appropriate • Ensure the risk of pollution (noise, air, ground, water, etc.) is minimised at all housing sites • Consider water storage and saving methods as part of sustainability and design standards • Consider sustainable construction principles (or signpost links to relevant policies for this) 	<p>Suggest using a combination of indicators proposed to monitor policies CS1 and CS8 in the Implementation and Monitoring Chapter of the Core Strategy. In addition to these we would also suggest the following:</p> <ul style="list-style-type: none"> • Change in condition of areas of landscape character. • Change in areas of biodiversity importance (core output indicator E2) and change in priority habitats and species. Tie in with HRA monitoring recommendations and Local BAP indicators. • Adapting to climate change (NI 188). • Number of listed buildings, areas of archaeological interest and scheduled ancient monuments at risk. • Total water consumption and per capita water consumption. If possible monitor consumption in relation to available water resources. • The number of developments meeting targets above minimum BREEAM or CSH. • Environmental effects of increased water use e.g. condition of sites of international and national significance within and outside (only those sites considered for the HRA) the Borough. • Air Pollution Levels (including NO_x and particulates) in town centres and on the A10, and other key routes. • Percentage of waste recycled.
Policy CS4 – Travelling Community	It is inevitable that additional pitches and plots will result in additional waste and it is unlikely that policy will encourage sustainable waste management.	<ul style="list-style-type: none"> • Consider the sustainable management of waste arising from additional and existing pitches and plots 	<ul style="list-style-type: none"> • Percentage of waste recycled at travelling community sites.

Spatial vision / Policy(s) reference	Significant effect	Mitigation	Monitoring
Policy CS7 – Greater Brookfield	Increased pollution, water consumption and waste arisings, as a result of development at Greater Brookfield.	<ul style="list-style-type: none"> • Consider inserting policy text for high sustainability standards and encouraging sustainable practices by retail businesses and/ or signposting policies that encourage this. This could include consideration of creating an ‘eco-development’. • Consider land remediation, where appropriate at the Greater Brookfield site, and measures to limit the risk of pollution (land, water, air and soil) both during and following construction. • Consider how sustainable practices and sustainable behaviour will be encouraged and delivered in the long term at the Greater Brookfield site and/ or signpost policies that encourage this. This should increase environmental awareness and response amongst residents and businesses, to include addressing: water consumption, potential water pollution, waste management including reduce, reuse and recycle principles, energy use, the likely impacts of climate change, minimising non-renewable resource use. • Apply sustainable construction principles. • Consider improved location of the recycling facility and how waste from Greater Brookfield will be sustainably managed. • Investigate the viability of energy from waste. • Consider ‘an improved location’ as a part of the successful relocation of any existing employment uses. 	<ul style="list-style-type: none"> • Suggest using a combination of indicators proposed to monitor policies CS1 and CS8 in the Implementation and Monitoring Chapter of the Core Strategy, but relevant to the Greater Brookfield development. In addition to these we would also suggest the following: • Development in Greater Brookfield meeting targets above minimum BREEAM or CSH. • Total area of land remediated and brought back into use at Greater Brookfield. • Total water consumption and per capita water consumption at Greater Brookfield. If possible monitor consumption in relation to available water resources. • Air Pollution Levels (including NOx and particulates) in Greater Brookfield. • Percentage of waste recycled. • Adapting to climate change (NI 188).
Policy CS9 – Infrastructure	Infrastructure placing pressure on biodiversity and sites of biodiversity value, landscape and the historic and built environment.	<ul style="list-style-type: none"> • Infrastructure should alleviate pressure, where possible • The location of new infrastructure should be chosen bearing in mind sustainability criteria, which could include: biodiversity and green space, the need to minimise trip distances and improve accessibility etc, minimise the use of non-renewable resources, minimise impact on the landscape, the historic and built environment to include impact on its character, 	<ul style="list-style-type: none"> • Change in areas of biodiversity importance (core output indicator E2) and change in priority habitats and species. Tie in with HRA monitoring recommendations and Local BAP indicators. • Change in condition of areas of landscape character. • Number of listed buildings, areas of archaeological interest and scheduled ancient

Spatial vision / Policy(s) reference	Significant effect	Mitigation	Monitoring
		<p>and waste management.</p> <ul style="list-style-type: none"> • Deliver infrastructure built to high standards (or signpost policies that cover this) that take in to account climate change mitigation and adaptation, will maximise efficiency of water use, minimise pollution, protect and enhance biodiversity and green space, protect and enhance the historic and built environment, and minimise waste arisings. • Signpost / provide a link to green infrastructure in CS8 Environment. • Infrastructure should alleviate pressure on environmental assets, where possible • Mitigate or offset any impact on biodiversity and green space as a result of additional infrastructure. • Mitigate pollution associated with additional infrastructure and its construction. • Consider how long-term behavioural change will be encouraged towards more sustainable consumption patterns and lifestyles, to include the uptake of sustainable transport options. 	<p>monuments at risk.</p>
Policy CS9 – Infrastructure	The lack of emphasis on higher education, professional education and skills training as part of the education section of the supporting text, is a significant gap.	<ul style="list-style-type: none"> • Consider emphasising professional or vocational skills as part of educational infrastructure provision. 	<ul style="list-style-type: none"> • Participation of 16-18 year-olds in education or training. • Young people from low income backgrounds progressing to higher Education (NI 106). • Skills gaps in the current workforce reported by employers (NI 174).

1.10.2 The SA report also makes a number of general recommendations for improving the sustainability of the Core Strategy. These are outlined in Table 4.

Table 4: General Core Strategy Recommendations

Core Strategy spatial vision / policy	Recommendation
Spatial Vision	<ul style="list-style-type: none"> Consider the following issues within the Vision: waste and renewables, the importance of water courses and their quality, the importance and protection of wildlife sites, linkages between residential and employment areas and facilities and services; health and well-being and housing objectives.
CS1 – Sustainable Neighbourhoods	<ul style="list-style-type: none"> Clarify whether sustainable construction policies and local sourcing of resources will be used (relevant to other development policies) Provide further detail on design standards criterion and other impacts that will be considered for mitigation, to Include on the historic environment (relevant to other development policies) Consider how long-term behavioural change will be achieved (relevant to other development policies) Include community engagement in the process
Policy CS2 – Housing Development	<ul style="list-style-type: none"> Provide more detail and clarity on minimum requirements for masterplanning and on site/location selection criteria, including crime and community safety and renewable energy (relevant to other development policies) Housing completions for the plan period should meet housing needs.
Policy CS3 – Housing Mix	<ul style="list-style-type: none"> Provide detail on access to greenspace linked to dwellings Provide further detail on design guidance measures and how they mitigate negative impacts against the SA framework objectives and enhance benefits Thought should be given to the risks of the commuted payment channel of delivering social housing in terms of social cohesion, equality and well being The dispersal of housing types should be considered in terms of reducing inequalities and poor design Reference and linkage to the Sustainable Neighbourhoods policy may be beneficial
Policy CS4 – Travelling Community	<ul style="list-style-type: none"> Clarify how (and whether) impacts could be mitigated as a result of either new or existing sites and, indeed, whether there is an approach to existing sites Consider travelling community contributions to the economy and how to support employment needs or community implications, and generally how these issues link to the borough Consider engagement with both the travelling community and wider community
Policy CS5 – Employment	<ul style="list-style-type: none"> Provide detail on mitigation measures for impacts of employment on environmental objectives and consider onsite enhancements e.g. environmental quality, biodiversity value, truly sustainable locations for waste management, etc. Clarify whether 'improvements' to employment sites are purely for economic, or also environmental and social, gains. Clarify whether high standards of improvement will apply to existing, in addition to new, employment sites. Key traditional employment sectors and associated strengths for the borough should not be overlooked in terms of the essential and reliable support they have consistently provided to the borough; for example, there is no reference to glasshouses and nurseries. Phasing of delivery (e.g. access, jobs, training) is important and should be addressed. Work at home opportunities and live-work units could be considered Consider efforts to minimise the environmental impact and increase the sustainability of activity amongst businesses

Core Strategy spatial vision / policy	Recommendation
Policy CS6 – Retail and Town Centres	<ul style="list-style-type: none"> • Consider training and smaller independent retailers • Outline – or link to policies that outline – how negative impacts on environmental objectives (from development and unsustainable retail practices and visitor pressure) will be mitigated e.g. it is implied but not specified that strategies will build to high sustainability standards, with sustainable transport options and accessibility • Consider efforts to minimise the environmental impact and increase the sustainability of activity amongst retailers
Policy CS7 – Greater Brookfield Strategic Allocation	<ul style="list-style-type: none"> • Consider adopting (or refer to one that may currently exist) a strategy for Greater Brookfield and the opportunity to create a sustainable or ‘eco’ development; this could address sustainability concerns highlighted in this appraisal by enhancing the environment through development and the long-term practices of residents, retailers and businesses. • The travelling community is not referred to in the policy (as recommended) but perhaps Policy CS4 could be signposted
Policy CS8 – Environment	<ul style="list-style-type: none"> • Links and signposting to this policy could mitigate some of the negative impacts and uncertainties highlighted under other policies. • There is room to broaden this policy to consider more detail on areas e.g. looking not just to offset, but to enhance, biodiversity; and to clarify with detail where this appraisal made assumptions relating to what is covered. In particular, to address waste and pollution which appear to be over-looked yet are important environment considerations. • Sustainable construction principles are over-looked in all the policies but could be alluded to at least under this policy. • The economic and social advantages of the environment could also be referred to under this policy. • Expand upon the list of wildlife sites included for protection • Define or signpost guidance on the definition of flood risk • Seek to enhance landscape, biodiversity and earth heritage more generally • Outline a more integrated approach to green infrastructure (including outlining its values within the policy).
Policy CS9 – Infrastructure	<ul style="list-style-type: none"> • Clarify locational criteria and the detail of high design standards that could mitigate negative environmental impacts if included/clarified in policy wording or signposted in another policy. • Consider waste infrastructure (recycling, location in proximity to sites, waste from energy etc) • Consider minimising the risk that improved transport infrastructure will increase vehicle and longer-distance trips • Clear linkages to green infrastructure under Policy CS8 could be provided. • There are concerns for social objectives regarding lack of professional and vocational skills coverage • Improvements to air quality should be sought as part of the review of the M25 and Junction 25 and the A10 Route Management Strategy. • Outline whether park and ride is an option. • Consider flood risk as a result of additional infrastructure (and development more generally), SUDS and drainage infrastructure. • Accessibility, transport infrastructure, developers proposals and the location of car parking spaces, should encourage sustainable consumption patterns and lifestyles and discourage car reliance. A joined-up network of sustainable transport infrastructure should be provided and should serve key locations.
Policy CS10 – Planning Contributions	<ul style="list-style-type: none"> • Environmental impacts depend on where contributions are directed in Broxbourne and whether the policy seeks contributions that enhance sustainability and improvements • During implementation, emphasise cooperation between Council and private sector.

Core Strategy spatial vision / policy	Recommendation
	<ul style="list-style-type: none">• The broad search strategy for infrastructure surpluses/deficits could have a positive effect in ensuring good coverage, however it might miss out on a focused approach to key issues.

1.11 Next steps

- 1.11.1 The SA process also involves consulting on the 'pre-submission' version of the plan and the accompanying SA Report. This SA Report has been prepared for the Core Strategy pre-submission consultation in August to September 2010.
- 1.11.2 Following receipt of comments from the public and statutory consultation bodies, the comments and the findings of the appraisal will be further taken into account by the Council in drawing up the final Core Strategy. This will be submitted to government and at this point will undergo independent examination by a planning inspector.
- 1.11.3 If the Plan is approved and accepted by the government, it will be formally adopted by the Council. The Council is then required to publish an SEA / SA Statement setting out how environmental considerations and consultation responses are reflected in the plan or programme and how its implementation will be monitored in the future.