

Broxbourne Borough Council Pre-Submission Core Strategy **Sustainability Appraisal Report**

Final Report
July 2010



Photos courtesy of Broxbourne Borough Council



Prepared for

Broxbourne Borough Council

Revision Schedule

Sustainability Appraisal Report: Pre-Submission Core Strategy July 2010

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1 Introduction

1.1 This report

- 1.1.1 Scott Wilson has been commissioned by Broxbourne Borough Council ('the Council') to carry out the Sustainability Appraisal (SA) of the Broxbourne Core Strategy for pre-submission consultation. The Core Strategy forms part of the Broxbourne Local Development Framework (LDF).
- 1.1.2 SA involves identifying and evaluating the impacts of a plan on the economy, the community and the environment – the three dimensions of sustainable development. It also suggests ways of avoiding or reducing any adverse impacts arising from the plan as well as ways of maximising its positive impacts. SA is a statutory requirement for Core Strategies and other Development Plan Documents (DPDs) under the Planning and Compulsory Purchase Act 2004.
- 1.1.3 In order to undertake the appraisal of the Core Strategy and other DPDs, it is first necessary to establish a methodology or framework for undertaking the appraisal as well as an evidence base to inform the identification and evaluation of impacts. The framework and evidence base are documented in a Scoping Report published in January 2008 and in a Scoping Report Addendum prepared in November 2009 and updated in June 2010.
- 1.1.4 It should be noted that the SA incorporates a Strategic Environmental Assessment (SEA) as required under EU legislation¹.

1.2 Broxbourne Core Strategy

- 1.2.1 The Broxbourne LDF, which is currently in preparation, will replace the Borough of Broxbourne Local Plan Second Review, which was adopted on the 8 December 2005. The LDF will provide a spatial strategy for the Borough and will, for example, set out where new economic and housing development will be located and where the protection of the landscape and the environment will be prioritised. The Core Strategy DPD is a key LDF document, setting out the vision and objectives for the area, the location and direction of development for the Borough until 2021 (or even 2031 for some issues). The Core Strategy links closely to community needs and local infrastructure requirements.
- 1.2.2 The Council commenced preparing their Core Strategy in early 2007. The Council have now prepared the Core Strategy for pre-submission consultation. This report documents the SA results for this version of the Core Strategy.

1.3 Report structure

- 1.3.1 This report is structured as follows:
- Chapter 2 sets out the approach to undertaking the appraisal
 - Chapter 3 introduces Broxbourne's Core Strategy document

¹ Directive 2001/42/EC on the assessment of the effects of certain plans and Programmes on the environment (the 'SEA Directive') implemented through The Environmental Assessment of Plans and Programmes Regulations 2004

- Chapter 4 summarises the findings from the Scoping Report
- Chapter 5 tests the compatibility of the Core Strategy objectives against the SA framework
- Chapter 6 sets out the appraisal of the Core Strategy Spatial Vision and Core Strategy policies
- Chapter 7 sets out anticipated cumulative effects
- Chapters 8 – 9 set out general conclusions, suggestions for monitoring the plan and what happens next in the plan-making and SA processes.

2 Approach to the SA

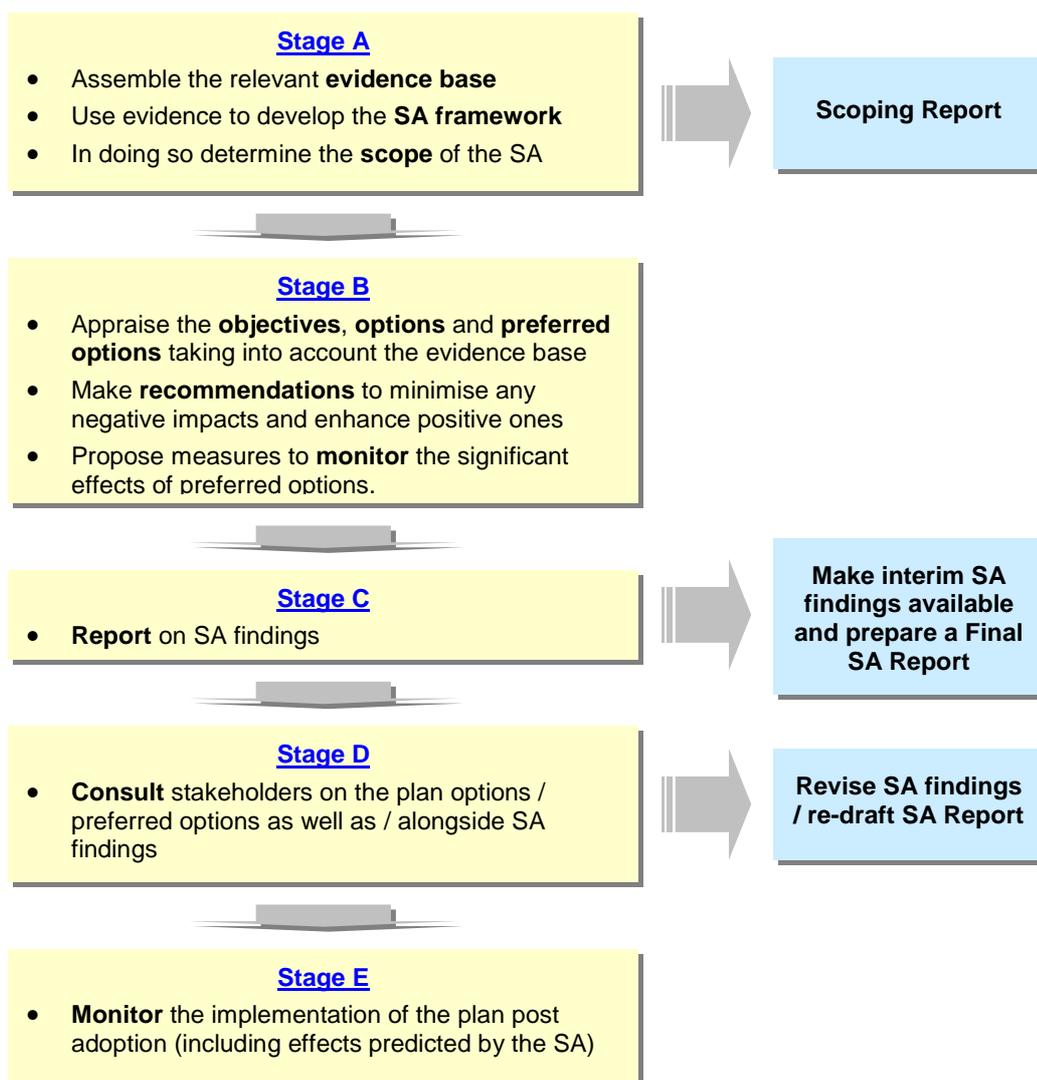
2.1 Introduction

2.1.1 This chapter sets out the approach taken in undertaking the SA.

2.2 SA process

2.2.1 SA is based on a five-stage approach – see Figure 1. At the Pre-Submission stage, SA serves to identify the key sustainability implications of the final Core Strategy. This provides the local authority with additional evidence to take into account in finalising the Strategy.

Figure 1: Five stage approach to SA



Stage A – Framework and evidence base

- 2.2.2 Stage A in the SA process involves developing the framework for undertaking the appraisal – in this case the identification of a series of spatial areas and topics on which the appraisal will focus – together with an evidence base to inform the appraisal. The framework and evidence base are presented in a Scoping Report – which may be accessed from the Council’s website² – for consultation with stakeholders including English Heritage, the Environment Agency and Natural England³ and the public. The evidence base presented in the Scoping Report should include an analysis of the relevant policy context; a description of the current baseline situation; an analysis of how the current situation might evolve in the absence of the plan; and the identification of any problems which the plan may need to address.
- 2.2.3 Consultation on the Scoping Report was undertaken during a five-week statutory period between Monday 22nd October and Monday 26th November 2007. Planning consultants, local groups, land owners and the three statutory environmental consultation bodies (English Heritage, Environment Agency and Natural England) were given an opportunity to take part in the Scoping Report consultation. Following the consultation, comments were taken into account and amendments were subsequently made to the Scoping Report. The Scoping Report was finalised in January 2008.
- 2.2.4 An update to the Scoping Report was prepared as an Addendum in November 2009 with a further review in June 2010. Please refer to Chapter 4 for a summary of the content of the Scoping Report Addendum.

Stage B – Appraisal

- 2.2.5 Stage B in the SA process involves undertaking the appraisal itself. This involves identifying and evaluating the impacts of the spatial vision and the different policies which together comprise the plan. The appraisal is organised around the framework identified in Stage A and informed by the evidence base assembled at Stage A. Mitigation measures for alleviating adverse impacts are also proposed together with potential indicators for monitoring the plan’s implementation. Mitigation measures are generally in the form of recommendations for changes to the plan in order to improve its sustainability performance. Crucially, the appraisal has been undertaken in parallel with development of the plan and the appraisal findings have fed into the emerging plan. In practice, this has meant undertaking several rounds – or iterations – of appraisal at different stages in the plan-making process.
- 2.2.6 The Core Strategy preferred options were appraised in October 2008.

Stage C – Reporting

- 2.2.7 Stage C in the SA process involves documenting the appraisal findings and preparing an SA Report (this incorporates the material required for inclusion in the ‘Environmental Report’ under the ‘SEA Directive’). The full SA Report should be published for consultation alongside the ‘pre-submission’ version of the DPD in question; however, SA reports focusing on the emerging plan may be published earlier in the plan-making process (e.g. at the ‘issues and options’ stage).

² See: http://www.broxbourne.gov.uk/environment_and_planning/planning_policy/local_development_framework/studies.aspx

³ Under the regulations implementing the SEA Directive, the Council has a statutory duty to consult the three SEA Consultation Bodies – English Heritage, Environment Agency and Natural England – on the scope of the appraisal. Government guidance on SA also advises consultation with bodies with economic and social responsibilities.

- 2.2.8 An SA Report for the appraisal of the Core Strategy for preferred options consultation was published in November 2008 and can be accessed from the Council website. This SA Report is for the Core Strategy pre-submission consultation.

Stage D – Consultation

- 2.2.9 Stage D in the SA process involves consulting on the ‘pre-submission’ version of the plan and the accompanying SA Report; however, as stated above, SA reports can be prepared to accompany consultation on earlier versions of the plan.
- 2.2.10 The SA Report prepared for the Core Strategy preferred options consultation was consulted upon in November 2008 to February 2009.
- 2.2.11 This SA Report has been prepared for the Core Strategy pre-submission consultation in August to September 2010.

Stage E – Monitoring

- 2.2.12 Stage E in the SA process involves monitoring the adopted plan including its sustainability impacts; this is done through the LDF Annual Monitoring Report (AMR).

2.3 SA methodology

- 2.3.1 The approach to this appraisal follows the process that was undertaken for the SA of the Core Strategy for preferred options consultation.
- 2.3.2 The methodology that has been adopted for undertaking the SA is based on an objectives-led approach whereby the individual components of the plan are appraised against a number of sustainability objectives that act as a ‘yardstick’ to assess the effects of the plan.
- 2.3.3 This SA has been undertaken on the following main elements of the Core Strategy: strategic objectives, spatial vision and policies. These are set out in Chapter 3 – The Core Strategy.
- 2.3.4 The appraisal was carried out using the SA framework as defined in the SA Scoping Report and set out below. The appraisal was a qualitative exercise based on the professional judgement of Scott Wilson. However, where possible judgements were made taking into account evidence gathered at the Scoping Stage including the more recent Scoping Report Addendum (summarised in Chapter 4). The appraisal against the 16 SA Objectives was also further guided by a number of more specific sub-objectives developed at the Scoping Stage.
- 2.3.5 In appraising this version of the Core Strategy an important point to remember is that it is only the likely significant effects of the plan, not all possible effects that need to be identified. Ultimately, the significance of an effect is a matter of judgement and should require no more than a clear and reasonable justification.
- 2.3.6 In order to retain clarity, the stages of the process that address the requirements of the SEA Directive are clearly highlighted in boxes at the beginning of each section. A breakdown of the SEA Directive requirements and where they are addressed in this report is shown in Table 1.

Table 1: Incorporation of SEA Directive requirements in this report

Environmental Report requirements ⁴	Section of this report
(a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;	Chapter 3
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Chapter 4
(c) the environmental characteristics of areas likely to be significantly affected;	Chapter 4
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC (The Birds Directive) and 92/43/EEC (The Habitats Directive);	Chapter 4
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	Chapter 4
(f) the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Chapters 5 - 7
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Chapters 5 - 8
(h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapters 2 and 3
(i) a description of the measures envisaged concerning monitoring in accordance with Article 10;	Chapter 8
(j) a non-technical summary of the information provided under the above headings.	Non-technical Summary (separate report)

SA Framework

2.3.7 The SA objectives were developed consulting the East of England Sustainable Development Framework (SDF) and the East of England 'toolkit' as the starting point for developing the SA framework for Broxbourne.

2.3.8 However, the scoping process also resulted in the identification of locally specific sustainability issues that differed substantially from the issues identified as important at the regional scale. Therefore some headline criteria and supplementary questions from the regional SA

⁴ As listed in Annex I of the SEA Directive (Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment)

Framework were altered to reflect this, some were 'scoped out' (removed) entirely and some new headline criteria and supplementary questions were 'scoped in' (added). The outcome was a tailored SA Framework for the LDF that will be useful at the assessment stage to highlight only the sustainability effects that are significant in Broxbourne.

2.3.9 Table 2 sets out the SA framework identified for Broxbourne Borough and includes the specific reference to the Core Strategy document, as apposed to the LDF in the generic SA framework.

Table 2: SA Framework for Broxbourne Core Strategy

SA Framework for the Core Strategy	
1	<p>Will the Core Strategy benefit biodiversity?</p> <ul style="list-style-type: none"> protect any SSSIs or other important sites promote land uses or activities that are likely to protect or enhance the ecological health of important sites (including ecological connectivity between important sites) increase physical and/or intellectual access to nature
2	<p>Will the Core Strategy reduce levels of pollution?</p> <ul style="list-style-type: none"> improve local air quality reduce exposure to high noise levels minimise diffuse pollution
3	<p>Will the Core Strategy conserve and / or improve water resources?</p> <ul style="list-style-type: none"> incorporate measures to encourage water efficiency encourage SUDs design and measures to recharge ground water have a negative impact on river quality
4	<p>Will the Core Strategy provide for modal shift to sustainable transport systems?</p> <ul style="list-style-type: none"> reduce the distances people need to travel to access work and leisure reduce reliance on the private car reduce road freight movements encourage the re-orientation of a transport system towards an emphasis on non car modes create a net reduction in local traffic impacts
5	<p>Will the Core Strategy help to prevent and / or reduce any potential adverse impacts from climate change?</p> <ul style="list-style-type: none"> taken account of potential changes brought about by climate change, e.g. flooding, higher temperatures, more storms reduce total or per capita emissions of carbon dioxide or other greenhouse gasses increase efficiency in the use of energy (e.g. increased efficiency standards/better design/improved construction techniques/choice of materials) increase the amount of energy obtained from renewable sources
6	<p>Will the Core Strategy encourage more sustainable consumption patterns and lifestyles?</p> <ul style="list-style-type: none"> encourage people to meet more of their lifestyle and service needs locally discourage use of products not produced in a sustainable manner, or sourced from an unnecessarily long distance away
7	<p>Will the Core Strategy minimise the use of scarce or non-renewable resources such as land, minerals and water?</p> <ul style="list-style-type: none"> minimise the demand for products and raw materials re-use existing materials encourage the use of raw materials from local sustainable sources lead to efficient uses of land encourage development on previously developed/brownfield land
8	<p>Will the Core Strategy encourage the protection and enhancement of landscape?</p> <ul style="list-style-type: none"> protect or enhance the existing character of the natural / cultural landscape including through consideration of the role of rural buildings protect or enhance existing landscape features such as woodlands, hedges and ponds

SA Framework for the Core Strategy	
	<ul style="list-style-type: none"> • make it easier for people wishing to reach and use the countryside as a place for recreation and enjoyment, without creating unsustainable transport patterns • improve access to local green space, including parks • protect or enhance local green spaces, including parks
9	<p>Will the Core Strategy maintain or enhance the character of the built and historic environment?</p> <ul style="list-style-type: none"> • use conservation features and sympathetic materials • reduce the amount of vacant and derelict land and the number of vacant buildings • contribute to the character of town centres and respect their historic context • protect or enhance historic landscapes and streetscapes, historic buildings, archaeological remains, ancient monuments, historic parks and gardens and other conservation areas • create a high quality (designed and built) urban environment • encourage the repair and re-use of buildings
10	<p>Will the Core Strategy reduce waste and encourage sustainable waste management?</p> <ul style="list-style-type: none"> • use or otherwise increase the demand for recycled materials • reduce the generation of hazardous waste (e.g. re/black list) • encourage the re-use or recycling of materials • reduce the amount of waste the Borough produces per household • reduce the amount of waste produced through commerce, industry and construction • reduce the amount of waste being incinerated and/ or going to landfill
11	<p>Will the Core Strategy improve health and/or reduce health inequalities in the Borough?</p> <ul style="list-style-type: none"> • positive impact upon encouraging people to engage in healthier behaviour in all aspects of life (e.g. at home and at work) • promote more active lifestyles, particularly for children • improve access to health and welfare services • address health needs and inequalities in the Borough
12	<p>Will the Core Strategy help to create communities where people feel safe and that they belong, without excluding others?</p> <ul style="list-style-type: none"> • encourage a feeling of more community spirit • help the development of community level activities and organisations • improve mutual understanding of different ethnic and cultural groups • reduce people's fear of crime
13	<p>Will the Core Strategy move the Borough towards a situation where housing is of high quality, and available and affordable for all?</p> <ul style="list-style-type: none"> • provide affordable housing • encourage high density housing in suitable locations • provide more high quality (including sustainable design) and accessible housing • capable of contributing to a range of housing types • reduce homelessness
14	<p>Will the Core Strategy help to reduce inequality within the Borough?</p> <ul style="list-style-type: none"> • ensure that more people can enjoy a good standard of living • decrease the percentage of full-time employees earning below the threshold income (£300/week) • reduce fuel poverty • help disabled people access services and facilities more easily • reduce pensioner poverty • create opportunities for those currently out of work • provide more equal access to opportunities, services and facilities • encourage entrepreneurial activity in disadvantaged areas • contribute towards any regeneration initiatives in disadvantaged areas
15	<p>Will the Core Strategy help to increase skills and support the Borough's requirement for skilled workers?</p> <ul style="list-style-type: none"> • result in people being better trained or more highly skilled • result in those in need being better able to take up training (formal / informal)

SA Framework for the Core Strategy	
	<ul style="list-style-type: none"> improve opportunities for high quality learning and training opportunities relevant to the needs of people in the Borough
16	<p>Will the Core Strategy contribute to the development of a thriving, innovative, high skill economy in the Borough?</p> <ul style="list-style-type: none"> encourage people to meet more of their needs locally encourage additional inward investment encourage innovation encourage business activity from small and medium size businesses, and/or encourage business start-ups (e.g. through making small business premises available and affordable) generate new and lasting full-time jobs for people in the Borough secure existing jobs in the Borough encourage the development of social enterprises (e.g. credit unions, cooperatives, farmers markets) identify and build on existing linkages between communities and businesses to create and support local business clusters tangible economic benefits to local communities from the initiative encourage the diversification of the workforce protect and enhance a mixed character in town centres and high streets

Approach to testing the compatibility of strategic objectives

- 2.3.10 As will be discussed further in Chapter 3, the Borough sets out a number of strategic objectives for the Borough.
- 2.3.11 The Government's *Practical Guide to the Strategic Environmental Assessment Directive*⁵ suggests that it may be useful to test the compatibility of the SA objectives (in this case the SA framework provided by the agreed topics, but not the spatial areas) with the strategic objectives of the plan. This will help to refine the Core Strategy objectives. This appraisal will also help to identify and clarify any tensions between the parts of the SA framework and the strategic objectives of the plan so that subsequent decisions are well informed, and mitigation or alternatives can be considered.
- 2.3.12 The approach adopted in this SA to test the compatibility of the strategic objectives is to identify and comment on areas which are compatible, incompatible and areas where there are no links. An example of how this approach has been used for this SA is shown in Table 3.

Table 3: Testing compatibility between SA framework and strategic objectives (example)

Testing Compatibility				
	Strategic Objective 1	Strategic Objective 2	Strategic Objective 3	Strategic Objective n
SA Objective 1	+	+	0	-
SA Objective 2	-	0	?	0
SA Objective 3	?	-	+	+
SA Objective n	+	+	+	-

⁵ ODPM (2005) *A Practical Guide to the Strategic Environmental Assessment Directive*
<http://www.communities.gov.uk/documents/planningandbuilding/pdf/practicalguidesea.pdf> (accessed 1 July 2010).

Scoring symbol	Meaning
+	Objectives are compatible
0	Neutral or negligible effect on objective
-	Objectives are incompatible
?	The compatibility of the objectives is uncertain or depends on implementation

Approach to appraising the spatial vision and policies

- 2.3.13 As will be discussed further in Chapter 3, in addition to strategic objectives for the Borough, the Core Strategy also includes a spatial vision and a series of policies for the Borough.
- 2.3.14 The performance of the spatial vision and policies against each SA objective was given a score according to the criteria set out in Table 4.

Table 4: Scoring criteria

Scoring symbol	Meaning
+	Policy will result in a significant positive impact on the SA Objective
+?	The impact on the SA Objective is dependant on implementation, but if there were to be an impact it would most likely be positive or minor positive impacts
0	Neutral or negligible effect
-?	The impact on the SA Objective is dependant on implementation, but if there were to be an impact it would most likely be negative or minor negative impacts
-	Policy will result in a significant negative impact on the SA Objective
?	The relationship between the Policy and the SA Objective is unknown, or there is not enough information to make an assessment.

- 2.3.15 The appraisals were documented using proformas. The proformas included space for commentary on significance and uncertainty of predicted effects, as well as suggestions for mitigation of negative effects and enhancement of positive effects. Table 5 shows an example of the proformas used for the assessment. The completed proformas are provided in Appendix 1. Chapter 6 provides a summary of the main findings.

Table 5: Assessment Proforma (example)

Policy CSX – Title of Policy			
SA Objective	Score	Predicted effect(s)	Mitigation
SA Objective 1	+	---	---
SA Objective 2	?	---	---
SA Objective n	-?	---	---
Summary:			

Mitigation measures:			

2.3.16 When determining the likely significance of effects, consideration was given to the characteristics of the effects and the sensitivity of the receptors involved. For example, the following can all determine whether effects may be significant:

- Probability, duration, frequency and reversibility of effects;
- Cumulative nature of effects;
- Magnitude and spatial extent of the effects; and
- Value and vulnerability of area likely to be effected.

Assumptions and / or difficulties undertaking the appraisal

2.3.17 There were a number of uncertainties identified regarding the impact of the Core Strategy against the SA framework. For example, 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.

2.3.18 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.

3 The Core Strategy

- 3.1.1 The statutory spatial development plan for Broxbourne is called the LDF and is made up of a portfolio of documents, including the Core Strategy DPD. The Core Strategy is the principal document in the LDF and, once adopted, will set out the Borough’s future development over the next 15 years. In particular, it will be used to identify and propose development of strategic importance to the Borough. Importantly, the other documents contained in the LDF must be in general conformity with the Core Strategy.
- 3.1.2 The Borough has reached the pre-submission consultation stage in the development of the Core Strategy. The Core Strategy is based around the following main components:
 - Introduction,
 - Spatial Portrait, Main Challenges and Drivers of Change,
 - Spatial Vision and Key Diagram,
 - Strategic Objectives, and
 - Policies.
- 3.1.3 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.
- 3.1.4 The components for appraisal are found in the Spatial Vision, Strategic Objectives and Policies components of the Core Strategy for pre-submission consultation, and are outlined below.

3.2 Spatial Vision

- 3.2.1 The spatial vision is intended as a description of how Broxbourne will change by 2026 and beyond (see Table 6). It is also illustrated in Figure 2.

Table 6: Vision for Broxbourne

Vision for Broxbourne
<p>Broxbourne will continue to be a pleasant, prosperous, safe, healthy and green place where people want to live, work, spend their leisure time and do business.</p> <p>The sense of community will be enhanced by delivering high quality development and attractive open spaces and the sense of place will be enhanced by promoting unique assets such as the Olympic Lee Valley White Water Centre, Lee Valley Regional Park, attractive market towns and Brookfield borough centre.</p> <p>Broxbourne will be a desirable community for about 97,000 residents with a mix of apartments, family homes and larger properties to buy or rent, a mix of jobs to suit all skill levels, a range of services and facilities and well maintained public spaces, roads, utilities. Better access to jobs and skills/training will raise prosperity and encourage more people to live and work in the borough.</p> <p>Hoddesdon and Waltham Cross town centres, Cheshunt Old Pond and the network of local centres will be enhanced as popular destinations for shopping and leisure.</p> <p>Transport improvements will help to manage traffic congestion on the A10 and other main roads,</p>

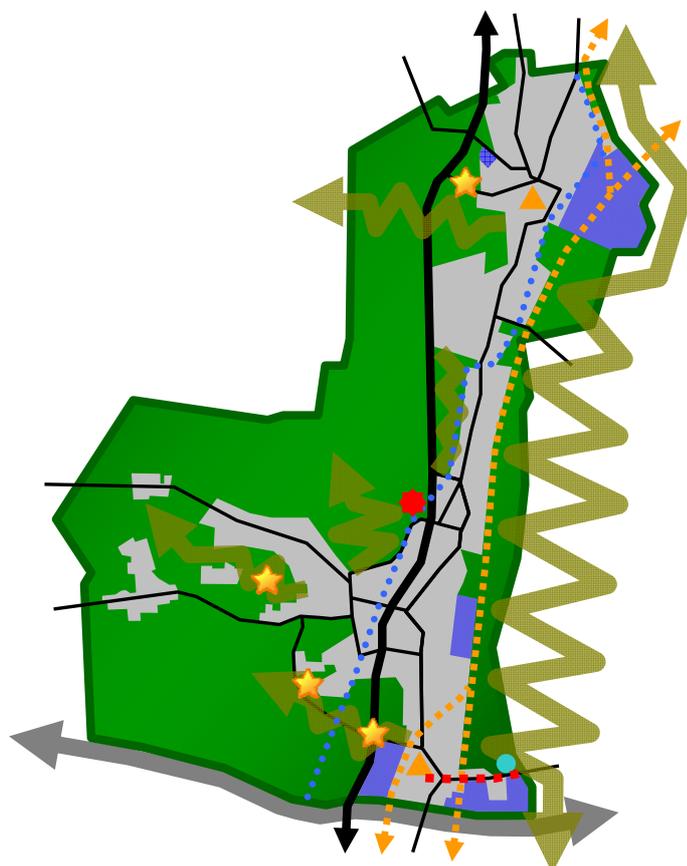
improve rail and bus services and make it easier and safer to walk and cycle.

In the short-term, development will focus on suitable urban sites to make best use of land and help achieve neighbourhood regeneration. The presence and legacy of the 2012 Olympic Games will be used to raise prosperity in Waltham Cross and elsewhere. Land at Greater Brookfield will be developed as a Borough Centre for high quality shopping and leisure floorspace and housing development.

In the medium and long term, suitable urban sites will be complemented by green belt sites in order to deliver more family and larger homes. Land may be released at West of Hoddesdon, Goff's Oak, Bury Green and/or Albury Farm East for new housing and at Park Plaza West and/or Maxwells Farm West for new employment opportunities. Proposals will be brought forward in accordance with comprehensive masterplans to help secure appropriate services and facilities.

All development will be designed to enhance its surroundings and to reduce its impact on climate change. The green belt, Lee Valley Regional Park and other important open spaces, landscapes and historic areas will continue to be protected.

Figure 2: Key Diagram and graphic representation of the Broxbourne spatial vision



3.2.2 Please note that the Core Strategy Preferred Options included Green Belt Spatial Options that considered eight strategic options for development in the Green Belt in the Borough as it was determined even with intensification in urban areas, that it would be necessary to release some Green Belt land for development, in order to meet both present and future needs. Two of the locations that were considered, were rejected at an early stage (Options 7 and 8). Options 1 to 6 were appraised and reported on in the previous SA Report.

- Option 1: Greater Brookfield
- Option 2: Land east and / or west of the A10 south of Cheshunt School / Albury Farm

- Option 3: Land west of Hoddesdon and east of the A10
- Option 4: Land west of Cheshunt and north of Goffs Lane
- Option 5: Land east of the A10 and north of Turnford
- Option 6: Southern A10 corridor
- Option 7: Extension to the west of Goffs Oak
- Option 8: Land south of Goffs Lane, Silver Street and Lieutenant Ellis Way

3.2.3 This version of the Core Strategy mentions:

- up to 11 hectares of land will be released from the green belt as part of Greater Brookfield strategic allocation (Policy CS7); and
- four Areas of Search where there is scope for green belt sites to come forward to meet future housing and other development needs (west of Hoddesdon, Goff's Oak Area, Bury Green Area and Albury Farm East Southern A10 Corridor).

3.2.4 The Core Strategy does not provide details on inclusion or rejection of green belt sites however it states that the merits of each site will be considered through a Site Allocation DPD with the best sites will be brought forward for allocation.

3.3 Strategic Objectives

3.3.1 The Core Strategy identifies nine Strategic Objectives to set out the directions that will be pursued in order to achieve the Spatial Vision and those themes of the Broxbourne Sustainable Community Strategy with a spatial aspect. It therefore allocates the objectives under the four 'spatial' Sustainable Community Strategy Themes. These themes and the Strategic Objectives are shown in Table 7.

Table 7: Themes and strategic objectives of the Core Strategy

Sustainable Community Strategy Themes	Strategic objectives
Theme 4: Jobs, Prosperity and Skills	<ul style="list-style-type: none"> • SO1 Prosperity: Ensure that physical, social and economic regeneration improves prosperity for all residents and that the presence and legacy of the Olympic Games benefits the borough as a whole and the Waltham Cross area in particular. • SO2 Jobs: Strengthen the local economy by creating a range of job opportunities in town centres, existing employment areas and at Greater Brookfield and seek to create higher-value jobs at new employment areas in the Southern A10 Corridor. • SO3 Town Centres: Sustain and improve Hoddesdon and Waltham Cross town centres, Cheshunt Old Pond and the network of local centres as popular destinations for shoppers, visitors, traders and businesses. • SO4 Greater Brookfield: Deliver Greater Brookfield for in the order of 50,000 sq.m. of retail floorspace, 15,000 sq.m. of leisure floorspace and about 300 dwellings plus associated transport improvements.
Theme 5: Places to Live	<ul style="list-style-type: none"> • SO5 Neighbourhoods: Ensure that neighbourhoods are safe, attractive and served by a range of good quality services and facilities and that new development is well designed, well built and well related to its surroundings. • SO6 Housing: Provide a range of market, affordable and special needs housing in

Sustainable Community Strategy Themes	Strategic objectives
	existing towns, edge-of-town sites and larger green belt sites.
Theme 6: Transport and Access	<ul style="list-style-type: none"> • SO7 Transport: Manage traffic congestion on the A10 and improve public transport, walking and cycling opportunities so that people do not always rely on their cars.
Theme 7: The Environment	<ul style="list-style-type: none"> • SO8 Sustainability: Deliver development which meets Broxbourne’s current and future needs and contributes to global, national and local sustainability objectives. • SO9 Environment: Protect and enhance Lee Valley Regional Park, other green spaces and the wider countryside for their visual, wildlife, recreation and tourism value.

3.4 Policies

3.4.1 The Pre-Submission Core Strategy sets out ten policies and identifies which Strategic Objectives each policy contributes to. These policies are summarised in Table 8 and are outlined in more detail in the Core Strategy document.

Table 8: Pre-Submission Core Strategy Policies

Policy	Policy description	Strategic Objective this policy contributes to																				
Policy CS1 – Sustainable Neighbourhoods	<p>Planning for beneficial growth and regeneration in and around urban areas. Development will provide high quality housing and job opportunities protect open spaces, design out crime and anti-social behaviour, provide habitats for wildlife and exhibit high standards of design which enhance local surroundings and protect distinctiveness.</p> <p>To achieve a close relationship between homes, jobs and services. Development will be directed to urban sites in existing towns, Greater Brookfield strategic allocation, small edge-of-urban sites that can be delivered without major infrastructure investment and/or large green belt sites supported by investment in roads, public transport, utilities, open spaces and community facilities.</p> <p>Improving accessibility. Development proposals will reduce the need to travel, improve public transport, walking and cycling opportunities and be accessible to all members of the community.</p> <p>Improving the sustainability of homes and other buildings, all development proposals will accord with national climate change, energy, waste, water and flood risk policies, achieve the relevant Code for Sustainable Homes standard and/or a high BREEAM rating and take account of guidance in the Hertfordshire Building Futures programme. Larger development proposals must explain how sustainability objectives will be implemented.</p>	SO1 SO2 SO3 SO4 SO5 SO6 SO7 SO8 SO9																				
Policy CS2 – Housing Development	<p>Provision will be made for 3,840 dwellings in the period 2010-2026. Delivery will focus on urban sites and through a strategic allocation at Greater Brookfield for comprehensive mixed use development including up to 300 dwellings in the short/medium term and will be complemented by small edge-of-urban sites and/or large green belt sites in the medium/long term.</p> <p>Housing development will be brought forward by:</p> <table border="1" data-bbox="443 967 1608 1177"> <thead> <tr> <th></th> <th>Short-Term 2010-2016</th> <th>Medium-Term 2016-2021</th> <th>Long-Term 2021-2026</th> </tr> </thead> <tbody> <tr> <td>Commitments</td> <td>900</td> <td></td> <td></td> </tr> <tr> <td>Urban sites</td> <td>475</td> <td>620</td> <td>520</td> </tr> <tr> <td>Greater Brookfield</td> <td>65</td> <td>235</td> <td></td> </tr> <tr> <td>Green Belt sites</td> <td></td> <td>345</td> <td>680</td> </tr> </tbody> </table> <p>Housing development will be brought forward to ensure a continuous housing land supply by:</p> <ul style="list-style-type: none"> Approving development proposals and allocating and phasing suitable urban sites in a Site Allocation DPD based on design and density considerations, infrastructure capacity and deliverability merits. A strategic allocation at Greater Brookfield for comprehensive mixed use development including about 300 dwellings. Based upon the wording of this objective Allocating and phasing small edge-of-urban sites in a Site Allocation DPD based on housing trajectory information, local infrastructure and environmental capacity, deliverability merits and the ability to define defensible new green belt boundaries. Sites will be brought forward for development in the short term if needed. 		Short-Term 2010-2016	Medium-Term 2016-2021	Long-Term 2021-2026	Commitments	900			Urban sites	475	620	520	Greater Brookfield	65	235		Green Belt sites		345	680	SO1 SO4 SO5 SO6 SO8 SO9
	Short-Term 2010-2016	Medium-Term 2016-2021	Long-Term 2021-2026																			
Commitments	900																					
Urban sites	475	620	520																			
Greater Brookfield	65	235																				
Green Belt sites		345	680																			

Policy	Policy description	Strategic Objective this policy contributes to
	<ul style="list-style-type: none"> Allocating and phasing large green belt sites in Areas of Search in a Site Allocation DPD based on housing trajectory information, infrastructure and environmental capacity, deliverability merits, impact on the borough's leafy suburban character and the ability to define defensible new green belt boundaries. Sites will be brought forward for development in the short term if needed. The Council will work with developers, landowners, utility companies, statutory bodies and the local community to prepare comprehensive masterplans for large green belt sites. These should address the full range of issues which are likely to inform a major development proposal, including road access, public transport, walking and cycling, utilities, affordable housing, housing mix, job creation, education, healthcare, community facilities, open spaces, flood risk and sustainable drainage, landscape, wildlife, sustainability standards, high quality design and planning contributions. 	
Policy CS3 – Housing Mix	<p>Development proposals will provide a balanced mix of housing types and sizes.</p> <ul style="list-style-type: none"> A 40% affordable housing target will be applied flexibly to development proposals of more than 0.5 hectares or 15 dwellings to allow on-site provision where desirable or commuted payments for off-site provision where this is considered more appropriate. Commuted payments will be sought from smaller development proposals to help fund affordable housing provision and other community objectives The proportion of social rented and intermediate properties that will be sought will be established in the Housing Strategy. The type/size and density of development proposals, particularly those in and around urban areas, will be informed by design considerations, local surroundings and infrastructure capacity. Larger family properties will be favoured on small edge-of-urban sites and/or large green belt sites. The Council will prepare design guidance to inform development proposals and to help incorporate Lifetime Homes and other standards to help accommodate changing needs and lifestyles. The Council will promote the provision of specialist accommodation for the elderly and people with physical and learning disabilities, mental health issues and drug and alcohol problems and other specialist problems where they is an identified need. 	SO1 SO4 SO5 SO6 SO8
Policy CS4 – Travelling Community	<p>Provision for new gypsy and traveller pitches and new travelling showpeople plots will be allowed within or adjoining the curtilage of existing sites in the borough where it can be conclusively demonstrated that they cater for new households arising from within that site and where new pitches/plots accord with national guidance, local objectives and site characteristics.</p> <p>If there is a requirement for new pitches/plots they will be well related to the primary road network, have good vehicle access and safe parking, turning and servicing space. They should have or be capable of receiving essential utilities such as power and water. They should ideally be close to local services such as schools, shops, healthcare and public transport. Sites should not be on significantly contaminated land, in high flood risk areas or other protected areas. They may be suitable near motorways, railways, power lines and landfill sites as long as this does not result in unacceptable air, noise or odour pollution. The lack of suitable urban sites means that green belt sites will be considered on their merits.</p> <p>Travelling showpeople plots also should have sufficient space for separate living, vehicle storage and equipment</p>	SO4 SO5 SO6 SO8

Policy	Policy description	Strategic Objective this policy contributes to
	maintenance areas.	
Policy CS5 – Employment	<p>Broxbourne will seek to build on short-term objectives in local economic strategies by supporting proposals which retain and create jobs in existing employment areas and town centres, by supporting new tourism activities and new retail and leisure jobs at Greater Brookfield and by promoting higher-value jobs at Park Plaza North and new employment sites in Areas of Search.</p> <ul style="list-style-type: none"> Retain and improve key employment sites at Essex Road and Merck Sharp Dohme in Hoddesdon, Delamare Road in Cheshunt, Lee Road / Britannia Road in Waltham Cross and Park Plaza South for offices (B1), general industry (B2), warehousing and ancillary activities (B8). Protect smaller employment sites, unless an alternative use is considered to be of greater overall value to the community Work with landowners, developers and other stakeholders to deliver a mix of high-value jobs and associated activities at Park Plaza North. Support new retail, leisure, office and other jobs in town centres in accordance with Policy CS7. Support new retail, leisure and other jobs at Greater Brookfield strategic allocation in accordance with Policy CS8. Support proposals for hotel, tourism and leisure facilities that build on the presence and legacy of the 2012 Olympic Games, the Lee Valley White Water Centre and other unique assets such as Lee Valley Regional Park. Appraise new employment land in the Southern A10 Corridor Area of Search in a Site Allocation DPD in response to employment trajectory information. Subject to these appraisals Park Plaza would be supported for a high quality business park to help achieve a shift towards higher-value jobs and more sustainable forms of development and Maxwells Farm West will be supported for a mix of offices (B1), general industry (B2) and other job-generating activities. The Council will work in partnership with landowners, developers, utility providers, other stakeholders and the local community to A10 Route Management Strategy and prepare a comprehensive masterplans. This should address the full range of issues which are likely to inform a major development proposal, including road access, public transport, walking and cycling, utilities, flood risk and sustainable drainage, landscape impacts and landscaping, wildlife and biodiversity, sustainability standards, high quality design and planning contributions. <p>All employment proposals should seek to reduce unemployment, support skills and training programmes, help to regenerate their surroundings and the wider Lee Valley, reduce out-commuting, minimise vehicle trips and achieve better access by public transport, walking and cycling.</p>	SO1 SO2 SO3 SO4 SO5 SO7 SO8
Policy CS6 – Retail and Town Centres	<p>The retail strategy for Broxbourne will ensure that centres grow and develop relative to their size and status by directing uses to the most appropriate location.</p> <ul style="list-style-type: none"> Greater Brookfield is classified as a “Borough Centre” in order to reflect its primary function as a non-food shopping centre for the borough. Hoddesdon is classified as a “Town Centre”. The Council and its partners will deliver the objectives of the Hoddesdon Town Centre Strategy to increase visitor numbers and spending by supporting a range of food shopping, non-food high street retailers, eating/drinking places, other community facilities, public events and environmental actions. Waltham Cross is classified as a “Town Centre”. The Council and its partners will deliver the objectives of the Waltham Cross Town Centre Strategy to increase visitor numbers and spending by supporting a range of food shopping, non-food high street retailers, eating/drinking places and other community facilities. 	SO1 SO2 SO3 SO4 SO5 SO7 SO8

Policy	Policy description	Strategic Objective this policy contributes to
	<ul style="list-style-type: none"> Cheshunt Old Pond is classified as a “District Centre”. Efforts will be made to preserve its role for local residents by maintaining a balance of food and non-food shops and other community services. Smaller centres and groups of shops are classified as “Local Centres”. Efforts will be made to preserve their role for local neighbourhoods by retaining and attracting food shops and other services. 	
Policy CS7 – Greater Brookfield Strategic Allocation	<p>Greater Brookfield is a strategic allocation for in the order of 50,000 sq.m. gross of new shopping floorspace, 15,000 sq.m. gross of new leisure floorspace and about 300 dwellings. The development will be implemented in accordance with an agreed masterplan.</p> <ul style="list-style-type: none"> Development should accord with the eight objectives established by the Broxbourne Local Plan and deliver the spatial vision and strategic objectives in the Core Strategy. A clear emphasis on non-food shopping and leisure facilities that will not undermine the role or function of existing town centres. New shopping facilities should include a range of department, large and small format stores. New leisure facilities will include a multi-screen cinema, bowling alley and a range of eating and drinking places. Resolve existing traffic and circulation problems and provide suitable transport infrastructure for new development. A new link road is required from the western arm of the A10 Turnford roundabout and a new access lane from the A10 Turnford roundabout onto the southbound lane of the A10. A strong emphasis on attracting workers and shoppers from all parts of the borough by buses, walking and cycling including good connections between new and existing shopping facilities. Successfully relocate New River Trading Estate tenants, Council depot, Turnford household recycling waste centre, Halfhide Lane allotments and Halfhide Lane Gypsy site. Housing development will comprise high quality family homes built at the same time as shopping and leisure floorspace to avoid the creation of an isolated housing area. A strong emphasis on sustainability in the form of statements for landscape, heritage and archaeology, energy, waste and water consumption, low or zero carbon energy generation, flood risk, sustainable urban drainage and transport. A strong emphasis on high quality design in order to create an attractive destination and contribute to borough-wide regeneration ambitions. A package of appropriate planning contributions including affordable housing, transport infrastructure, local services and environmental improvements. 	SO1 SO2 SO4 SO5 SO6 SO7 SO8 SO9
Policy CS8 – Environment	<p>To help conserve and enhance the built, historic and natural environment:</p> <ul style="list-style-type: none"> Green Belt land will be protected from inappropriate development in accordance with national guidance. To help meet medium and long term development needs, a detailed review of green belt boundaries within Areas of Search will be undertaken as part of a Site Allocation DPD to test compliance with national green belt guidance, the sustainability credentials of each site, the deliverability merits of each site and the potential erosion of the borough's leafy suburban character The following green corridors will be protected and enhanced to help link open spaces in towns with surrounding countryside: the Lee Valley Regional Park, New River green chain, Spital Brook valley between Barclay Park and 	SO1 SO3 SO4 SO5 SO8 SO9

Policy	Policy description	Strategic Objective this policy contributes to																											
	<p>Hoddesdon Park Woods, Rags Brook valley between Rosedale and Cheshunt Common, Cheshunt Park, Wormley playing fields and land from Cedars Park into Theobalds Park. The Council will work with the Lee Valley Regional Park Authority to deliver the visions, aims and objectives of the Park Development Framework.</p> <ul style="list-style-type: none"> All sites in and adjoining the borough which are protected by the planning system or of important landscape, wildlife, scientific and/or archaeological value will be conserved and enhanced in accordance with national guidance and local objectives. The Council will seek to maintain and increase the quantity and accessibility of open spaces in the borough in accordance with the standards. <table border="1" data-bbox="519 587 1682 1091"> <thead> <tr> <th></th> <th>Space per 1,000 residents</th> <th>Accessibility</th> </tr> </thead> <tbody> <tr> <td>Parks and Gardens</td> <td>0.28 hectares</td> <td>15 min walk</td> </tr> <tr> <td>Natural and Semi-Natural Space</td> <td>1.26 hectares</td> <td>15 min walk</td> </tr> <tr> <td>Amenity Greenspace</td> <td>0.46 hectares</td> <td>10 min walk</td> </tr> <tr> <td>Provision for Children</td> <td>0.04 hectares</td> <td>10 min walk</td> </tr> <tr> <td>Teenage Provision</td> <td>0.02 hectares</td> <td>15 min walk</td> </tr> <tr> <td>Allotments</td> <td>0.2 hectares</td> <td>15 min walk</td> </tr> <tr> <td>Outdoor Sports Facilities i.e. sports pitches, tennis courts</td> <td>1.88 hectares</td> <td>15 min walk</td> </tr> <tr> <td>Outdoor Sports Facilities i.e. golf courses, swimming pools</td> <td>1.88 hectares</td> <td>20 min drive</td> </tr> </tbody> </table> <ul style="list-style-type: none"> The Council will work with the Environment Agency and others to minimise the risk of flooding in accordance with national guidance and local evidence. All development proposals should exhibit a high quality of design and construction and seek to design out crime and anti-social behaviour. This will be informed by design guidance, Conservation Area appraisal and urban characterisation work. The design and density of urban sites must be informed by local surroundings and the capacity of local infrastructure with Greater Brookfield, small edge-of-urban sites and large green belt sites creating well designed and well landscaped neighbourhoods. 		Space per 1,000 residents	Accessibility	Parks and Gardens	0.28 hectares	15 min walk	Natural and Semi-Natural Space	1.26 hectares	15 min walk	Amenity Greenspace	0.46 hectares	10 min walk	Provision for Children	0.04 hectares	10 min walk	Teenage Provision	0.02 hectares	15 min walk	Allotments	0.2 hectares	15 min walk	Outdoor Sports Facilities i.e. sports pitches, tennis courts	1.88 hectares	15 min walk	Outdoor Sports Facilities i.e. golf courses, swimming pools	1.88 hectares	20 min drive	
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Policy CS9 – Infrastructure	<p>To help bring forward infrastructure items and services that are needed to support housing, employment and retail development the Council will:</p> <ul style="list-style-type: none"> The Council will work with local highways authority to find ways for development to connect to the existing road network and to prepare an A10 Route Management Strategy to ensure that the A10 and other roads and junctions can 	SO1 SO5 SO7 SO8																											

Policy	Policy description	Strategic Objective this policy contributes to
	<p>accommodate future traffic levels. The Council will also work with the Highways Agency to consider the role of the M25 and Junction 25. Developers should submit transport assessments to demonstrate that development proposals can be accommodated.</p> <ul style="list-style-type: none"> • Ensure that a sensible amount of car parking is provided at key destinations such as town centres and railway stations. • Work with transport bodies to ensure that rail, bus, cycle and pedestrian facilities offer a range of transport options. The Council will support and pursue National Express plans to provide more rail services to Broxbourne. The Council will lobby Transport for London to extend bus services and the Oyster card scheme into Broxbourne. • Work with utilities bodies to ensure that all areas of the borough are well served by electricity, gas, water, sewerage and telecommunications. The Council will lobby Thames Water and the Environment Agency to ensure that Rye Meads, Deephams and other sewage treatment works have sufficient capacity to accommodate new development. Developers should submit utility statements to demonstrate that such services can be supplied and have capacity. • Work with Hertfordshire County Council as the local education authority to ensure that all areas of the borough are well served by schools and other education facilities. • Work with health bodies to ensure that all areas of the borough are well served by hospitals and healthcare facilities. • Work with developers and others to maintain and increase the quantity, quality and accessibility of community facilities located around the borough. • Provide sufficient burial space to cater for the needs of local residents. 	
Policy CS10 – Planning Contributions	<p>The Council will seek planning contributions from new development in accordance with national guidance and to help fund policy objectives set out in the Core Strategy, the Sustainable Community Strategy and other planning documents such as town centre strategies and development briefs.</p> <p>The Council will prepare an Infrastructure Schedule covering the items listed below to map existing provision, identify any areas of surplus or deficit and plan for future needs in light of growth and regeneration objectives. This will be combined with viability appraisal work to inform a Planning Obligations SPD.</p> <ul style="list-style-type: none"> • Affordable housing • Open space, sports facilities and green infrastructure • Utilities infrastructure • Flood prevention and sustainable urban drainage measures • Renewable and low carbon energy schemes • Transport infrastructure • Public transport, walking and cycling • Education provision • Healthcare provision • Community facilities • Skills and training programmes • Business support services • Sustainable Community Strategy objectives • Town Centre Strategy objectives 	SO1 SO2 SO3 SO4 SO5 SO6 SO7 SO8 SO9



Policy	Policy description	Strategic Objective this policy contributes to
	<ul style="list-style-type: none">• Development Brief objectives	

4 Summary of the Scoping Report

4.1 Introduction

- 4.1.1 The SA process involves establishing the evidence base for the appraisal and a framework (partly based upon the evidence base) for undertaking the appraisal. Together the evidence base and the framework set the context for the appraisal. The framework and evidence base for the SA of the Broxbourne LDF are documented in a Scoping Report, which was completed in January 2008⁶. A summary of the context and evidence base are also given in the SA Report for the Core Strategy preferred options consultation completed in November 2008⁷.
- 4.1.2 The appraisal framework and background to its development can be found in this Report in Section 2.3.
- 4.1.3 This chapter provides updates the policy context, evidence base and key issues for Broxbourne, taking into account relevant information that has emerged since publication of the original Scoping Report and which is presented in more detail in the Scoping Report Addendum published in July 2010. It also sets out what the situation is now.

4.2 Overview of the Borough of Broxbourne

- 4.2.1 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.
- 4.2.2 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.

4.3 Policy context update

- 4.3.1 The SA should establish the context in which the LDF is being prepared, i.e. the other policies, plans, programmes, strategies and initiatives that influence the content of the LDF (and vice-versa) and the opportunities and challenges they present.

⁶ Scott Wilson on behalf of Broxbourne Borough Council (2008) Broxbourne Sustainability Appraisal Scoping Report [online] available at: http://www.broxbourne.gov.uk/environment_and_planning/planning_policy/local_development_framework/studies.aspx.

⁷ See: www.broxbourne.gov.uk/ldf

4.3.2 The requirement to undertake a context review arises from the SEA Directive:

The 'Environmental Report' required under the SEA Directive should include:

"an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes"

(Annex 1(a))

4.3.3 The policy context for Broxbourne is documented in the Scoping Report and has been updated in the Addendum to the Scoping Report.

4.3.4 The most important development to take into account is the change of national Government in 2010 and the implications of this for regional planning. Until July 2010 the Core Strategy was expected to deliver targets and policy objectives set out in the East of England Plan. The Plan classified Broxbourne as a priority area for regeneration and encouraged urban regeneration, sustainable transport and local distinctiveness. It also set a housing target for the Borough of 5,600 new dwellings and an affordable housing contribution to a regional target of 35%. An employment target for a share of 68,000 new jobs in Hertfordshire was set for the period 2001-2021. Amongst other things, a local green belt review was also required. 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.

4.3.5 With this in mind, 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. The Strategy focuses on nine key themes for the Borough: Health and Wellbeing; Community Safety; Children and Young People; Jobs, Prosperity and Skills; Places to Live; Transport and Access; The Environment; Stronger Communities; Older People. The strategy also identifies a number of cross-cutting themes for the nine themes: Community cohesion; Town centre vitality; Quality of life; Sustainability; Technological advances; Equality and access; and the Olympics.

4.3.6 Other documents relevant to policy context and reviewed in the Addendum include:

- Regional Economic Strategy for the East of England
- London Commuter Belt Sub-regional Housing Strategy
- Draft River Basin Management Plans
- Catchment Abstraction Management Strategies
- Hertfordshire Children and Young People's Plan 2009-11

- Hertfordshire Health and Wellbeing Action Plan 2009-2011
- Hertfordshire Infrastructure and Investment Strategy
- Hertfordshire Draft Economic Development Strategy 2009-2021
- Broxbourne Economic Development Strategy
- Broxbourne Community Safety Plan 2008-2011
- Broxbourne Housing Strategy 2009-14
- Draft Broxbourne Climate Change Strategy 2009-2014
- Hoddesdon Town Centre Strategy
- Waltham Cross and Cheshunt Urban Transport Plan

4.4 Evidence base update

4.4.1 The collection of baseline information is a key component of the SA process and a legal requirement under the SEA Directive. Baseline information helps to provide a basis for predicting and monitoring effects and assembling baseline data helps to identify sustainability problems.

4.4.2 The SEA Directive’s requirements in relation to baseline information are:

The ‘Environmental Report’ required under the SEA Directive should include:

“the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme”

“the environmental characteristics of areas likely to be significantly affected”

(Annex 1(b) and (c))

4.4.3 Headline baseline facts are documented in the Scoping Report. This has since been amended to reflect emerging evidence as presented in the Addendum to the Scoping Report and is now summarised under four headings to reflect the four topic papers of the 2008 SA Scoping Report (economic, environmental, community and spatial) (see Table 9):

Table 9: Evidence base updates

Evidence base topic	Evidence base updates
Economic	<ul style="list-style-type: none"> • Broxbourne is part of the London Arc sub-region and falls within the Hertfordshire London Arc. As an exception to the other authorities within the Arc, it is a lower-value, low-knowledge economy, with lower earnings and higher unemployment). Regionally and nationally, however, it compares favourably except in terms of its lower-skilled resident workforce. • Suggested land provision targets for industry and warehousing within the London Hertfordshire Arc’s districts for 2006-26 are significantly the highest for Broxbourne • In comparison with its neighbours, Broxbourne is a relatively low-value, low-

knowledge economy, specialising in industry and the kinds of services that tend to operate in industrial areas, including logistics and construction.

- Higher-skilled higher-earning residents are especially likely to work outside the Borough due to a lack of suitable local jobs.
- Potential to become a major office location is limited. The local market office floorspace statistics confirm the absence of growth in the sector in recent years.
- Main market opportunities are in the industrial and warehouse sectors, where demand is high yet land is in short supply.
- 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.
- There is “significant leakage” of trade to competing shopping destinations in the wider Sub-Region. Within the core catchment area, major competing centres take a larger proportion (38.2%) of comparison goods to Broxbourne’s centres combined (35.8%). When expanded wider afield, Broxbourne’s centres retain only 16.5% of total comparison goods expenditure compared to the 55.8% expenditure accounted for by competing centres and retail parks.
- The different retail centres face different challenges and meet different needs. The realistic capacity for new town centre type development in the existing centres is likely to be very limited with Brookfield likely to meet additional floorspace requirements.
- The wider impacts of the ‘significant leakage’ of retail to competing centres 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 corresponding improvements to the Borough’s facilities are made.
- Greater Brookfield is identified as a key site for Broxbourne’s retail improvements. The site has the most potential to address loss of shoppers to neighbouring boroughs and should be complemented by Waltham Cross, Hoddesdon and Cheshunt. It should generate significant jobs, contribute to sustained economic growth and support enhanced quality and perceptions of the area, without causing significant harm to other centres within the Borough. All centres are anticipated to realise strategic aspirations and to achieve growth.
- There are leisure gaps and a potential need for cinema, bingo, tenpin bowling and private gyms 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 “Broxbourne White Water Canoe Centre” is an official venue for the London 2012 Olympic and Paralympic Games and there is potential to capitalise upon this economically, particularly in retail and hotel sectors.

Environmental

- 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 for the Borough, offering a local distinctiveness and a higher quality of life to Borough residents. Development planning could impact upon the landscapes.
- 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
- There is room for improvement in terms of accessibility to these parks and garden sites and to Lee Valley Regional Park to the east of the Borough. The 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 the local residents, that make an important contribution towards the character of Broxbourne and that provide opportunities for biodiversity and habitat creation.
- 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.
- Provision for children and teenagers could be improved.
- There is a deficiency 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.
- Broxbourne is within the London resource zone which will have a baseline supply demand deficit of around 20% by 2035
- 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 the majority of watercourses will fail to meet the required water quality set out under the emerging Water Framework Directive (WFD), largely due to excessive concentrations of nutrients.
- Proposed growth within the Rye Meads catchment is unlikely to create a significant increase to flood risk in Broxbourne.
- 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 locations within the Borough and over the last ten years very few properties have experienced flooding from overloaded sewers.
- 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 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.
- The Borough doesn't demonstrate sustainable transport activity.
- 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 has development opportunity but this is hindered by poor access arrangements.
- More comprehensive transport links are needed including sustainable transport routes.
- Even in the absence of any Core Strategy development there are locations where the Borough's highway network is likely to be stressed, particularly at junctions on the A10 and the M25 J25.
- 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. • The heart attack rate is currently above the national, regional and county figures for all ages and the percentage of Smoking attributable Mortality (SAM) was slightly higher in the Borough in 2006 than in the county average. • The health picture within the Borough reveals a large amount of variation and pockets of deprivation.
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- There is good accessibility to GPs within Broxbourne and a sufficient number of dental surgeries and dentists in the Borough.
- Indicators suggest lower levels of deprivation and health inequalities compared to nationally.
- Broxbourne is within the London Commuter Belt (East)/M11 Sub-Region.
- Based on 2004 population estimates, the sub-region's population is expected to rise by 11% rise between 2004-2029.
- Broxbourne as a pleasant place to live and as an area of high demand, with a high level of privately owned housing stock and a dramatic increase in house prices in recent years.
- 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.
- High levels of homelessness and a shortage of affordable housing are issues.
- In comparison to its neighbours, the Borough is particularly short on affordable housing.
- Broxbourne and Harlow contain a much higher proportion of flats than the other local authorities in the sub-region.
- Broxbourne has the second highest (32.7%) social rent housing requirement in the sub-region – notably above the sub-regional average.
- Between 1st April 2001 and 31st March 2009 2,675 dwellings were built in the Borough, a development rate of 334 dwellings per year. There is a need to deliver 2,925 dwellings to 2021 in order to meet the target of 5,600 dwellings set out in the (now revoked) East of England Plan.
- 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.
- Within Hertfordshire, Broxbourne is the only local authority that has seen a percentage increase in overall perceptions of anti-social behaviour, from 22% in 2006 to 28% in 2008. The Borough's town centres are a focal point for anti-social behaviour.
- When compared to county levels some types of crime are particularly high and generally above the average for England and Wales, particularly vehicle crime and dwelling burglary in 2008-09.
- In 2007/08, levels of CGSE and A level achievement in the Borough remained below the national and county levels, and levels of absence from school were the highest for all local authorities within the county.
- Unemployment in Broxbourne is relatively high and increased by 133% between May 2008 and May 2009, and long-term unemployment is above the county average.
- The qualifications of Borough residents are also below county averages.
- The level of home ownership in Broxbourne (79.8%) is the highest in Hertfordshire.
- 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.
- For the Indices of Multiple Deprivation (2004 to 2007), the Borough has a number of SOAs in the bottom ten SOAs of Hertfordshire, however; this number has fallen from five to four. Two of these SOAs are in Waltham Cross, although these SOAs have been replaced by Wormley and Turnford and Flamstead End as the worst within the Borough.
- As the number of one person households is projected to increase between 2006 and 2031 this in turn leads to a reduction in the average household size. The rate of decline will gradually slow toward the end of this period. Broxbourne shows a considerably low decline.
- The Council can demonstrate that there is a 5 year supply of ready-to-develop sites in the district and is making progress in identifying a long-term supply of housing land (2009),
- 81% of housing completions were built on previously developed land (2009).

- Spatial
- 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.

4.5 Situation without the plan

4.5.1 It is important for SEA to identify what the situation would be without the Core Strategy.

The SEA Directive requires plan or programme proponents to identify *“the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme”*.

Annex 1(b)

4.5.2 The baseline identifies, using available data, the current state of the Broxbourne area (in economic, social and environmental terms). The baseline also includes trend data (where available) and the extrapolation of this data can provide clues as to the likely evolution of the Broxbourne area in the absence of the new LDF and the policies and proposals it will include. It may be expected that, without a plan, 'business-as-usual' will continue and these extrapolated trends will transpire, however the fundamental geography of the borough should remain the same (excluding some landscape and Green Belt impacts).

4.5.3 Without the plan (both the Core Strategy and the RSS) it is likely that housing will be delivered unsustainably. This includes enough dwellings to meet demand and an appropriate housing mix, providing enough affordable housing and dwelling types (e.g. to counteract a deficiency in family homes), and housing to a high quality that will meet the challenges of climate change and social well-being.

4.5.4 It is likely that, in the absence of a plan, Broxbourne will continue to have a low skill and low knowledge economy with high numbers of out-commuting to London and neighbouring boroughs. Employment areas would be unlikely to meet the needs of higher skilled jobs and it will be more difficult to draw in new businesses.

4.5.5 Local centres within the Borough may deteriorate in the quality of the service that they provide to borough residents and in terms of the role they play in the local economy. A particular concern relates to Greater Brookfield and whether development at this location would be delivered to a high standard and to meet the particular needs of Broxbourne, whilst minimising impact on resources and other environmental variables, transport capacity and infrastructure capacity.

- 4.5.6 Congestion is a key issue for the district and this may be exacerbated without a plan. There may be a continued reliance on the car and it would likely be 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.
- 4.5.7 The historic and natural environment may suffer without a plan to guide the location and quality of development. Moreover, the ability of the borough to mitigate and adapt to climate change may be challenged, to include susceptibility of new and existing development to flood risk. Green Belt land is expected to be needed to meet demand and, without a plan, the release and use of land may be inappropriately executed.
- 4.5.8 In the absence of the plan community needs may be overlooked. Sufficient facilities and services, to include access to open space, may not be delivered.

4.6 Key issues update

- 4.6.1 Table 10 provides a consolidation of what sustainability issues should be a particular focus for the appraisal as identified in the Scoping Report Addendum. They are drawn from the evidence gathered and were also used to inform the SA framework. These issues will provide prompts throughout the appraisal in order to determine impacts on the SA framework as we consider the Core Strategy objectives and policies.
- 4.6.2 The requirement to identify sustainability problems arises from the SEA Directive:

The 'Environmental Report' required under the SEA Directive should include:

"any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC [the 'Birds Directive'] and 92/43/EEC [the 'Habitats Directive']"

(Annex 1(d))

- 4.6.3 The following table lists the economic, social and environmental problems facing the Borough of Broxbourne together with sources of supporting evidence that were identified in the Scoping Report. This evidence includes findings from the context review since actions for Broxbourne identified in other plans and programmes are likely to be a response to recognised problems.

Table 10: Issues for particular focus in the appraisal

SA Framework	Key sustainability issues
(15) Increase skills and support the Borough's requirement for skilled workers	<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
(16) Contribute to the development of	

SA Framework	Key sustainability issues
a thriving, innovative, high skills economy in the Borough	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 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.
(11) Improve health and/or reduce health inequalities in the Borough	<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.
(4) Provide modal shift to sustainable transport systems (1) Benefit biodiversity (8) Protection and enhancement of landscape (5) Prevent and/or reduce any potential adverse impacts from 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.
(6) Encourage more sustainable consumption patterns and lifestyles (9) Maintain or enhance the character of the built and historic environment (4) Provide modal shift to sustainable transport systems	<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.
(6) Encourage more sustainable consumption patterns and lifestyles	<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

SA Framework	Key sustainability issues
<p>(16) Contribute to the development of a thriving, innovative, high skill economy in the Borough</p> <p>(4) Provide modal shift to sustainable transport systems</p> <p>(5) Prevent and/or reduce any potential adverse impacts from climate change</p>	<p>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.</p>
<p>(12) Create communities where people feel safe and that they belong, without excluding others</p> <p>(14) Reduce inequality within the Borough</p>	<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.
<p>(11) Improve health and/or reduce health inequalities in the Borough</p>	<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.
<p>(5) Prevent and/or reduce any potential adverse impacts from climate change</p>	<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.
<p>(13) Move the Borough towards a situation where housing is of high quality, and available and affordable for all</p>	<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. • 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.

5 Compatibility of the SA framework and Core Strategy Strategic Objectives

5.1 Introduction

- 5.1.1 This section tests the compatibility of the Core Strategy strategic objectives against the SA framework.
- 5.1.2 The strategic objectives are the actions that will be carried out to achieve the Spatial Vision and those themes of the Broxbourne Sustainable Community Strategy with a spatial aspect. It allocates the objectives under the four 'spatial' Sustainable Community Strategy Themes. See Chapter 3 for more detail on the Core Strategy.
- 5.1.3 It is important for the objectives of the Core Strategy to be in accordance with sustainability principles. Government guidance⁸ suggests that it can be useful to test the compatibility of the SA objectives with the strategic objectives of the plan. This will help to refine the Core Strategy strategic objectives. This appraisal will also help to identify and clarify any tensions between the parts of the SA framework and the strategic objectives of the plan so that subsequent decisions are well informed, and mitigation or alternatives can be considered.

'It is important for the objectives of the DPD to be in accordance with sustainability principles. The objectives should be tested for compatibility with the SA objectives.'

Section 3.3.4, Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, DCLG, 2005

5.2 Compatibility test

- 5.2.1 CLG Guidance⁹ suggests using a matrix to compare the plan objectives with the SA objectives and test their compatibility. The Core Strategy sets out nine strategic objectives under four themes, the complete text for which can be found in Chapter 3. The results are illustrated in Table 11 and briefly discussed below.

⁸ ODPM (2005) *A Practical Guide to the Strategic Environmental Assessment Directive* [online] available at: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/practicalguidesea.pdf> (accessed 5 March 2010).

⁹ CLG (no date) *Plan making manual: refining options and assessing effects* [online] available at: <http://www.pas.gov.uk/pas/core/page.do?pageld=156210> (accessed 23 February 2010)

Table 11: Comparison table to test the compatibility of the Core Strategy strategic objectives and SA framework

SA Framework “Will the Core Strategy...”	Core Strategy strategic objectives and corresponding Sustainable Community Strategy Themes								
	Theme 4: Jobs, Prosperity and Skills				Theme 5: Places to Live		Theme 6: Transport and Access	Theme 7: The Environment	
	SO1: Prosperity	SO2: Jobs	SO3: Town Centres	SO4: Greater Brookfield	SO5: Neighbour- hoods	SO6: Housing	SO7: Transport	SO8: Sustain- ability	SO9: Environ- ment
Benefit biodiversity?	?	?	?	?	?	-	+	+	+
Reduce levels of pollution?	?	?	0	?	0	-	+	0	?
Conserve and/or improve water resources?	?	?	0	?	+	-	0	+	+
Provide for modal shift to sustainable transport systems?	?	?	?	?	?	-	+	+	0
Help to prevent and/or reduce any potential adverse impacts from climate change?	?	?	0	?	+	?	+	+	?
Encourage more sustainable consumption patterns and lifestyles?	?	0	+	0	+	?	+	+	0
Minimise the use of scarce or non-renewable resources such as land, minerals and water?	0	?	0	?	?	-	+	+	+
Encourage the protection and enhancement of landscape?	?	?	?	?	+	-	?	?	+

Maintain or enhance the character of the built and historic environment?	?	?	?	0	+	?	0	?	?
Reduce waste and encourage sustainable waste management?	0	?	0	?	?	?	0	+	0
Improve health and/or reduce health inequalities in the Borough?	+	0	0	?	+	+	+	+	+
Help to create communities where people feel safe and that they belong, without excluding others?	+	0	?	?	+	+	0	?	0
Move the Borough towards a situation where housing is of high quality, and available and affordable for all?	+	0	0	+	+	+	0	+	?
Help to reduce inequality within the Borough?	+	+	?	+	+	?	+	+	0
Help to increase skills and support the Borough's requirement for skilled workers?	?	+	?	?	0	0	0	0	0
Contribute to the development of a thriving, innovative, high skills economy in the Borough?	+	+	+	+	0	0	0	0	?

Scoring symbol	Meaning
+	Objectives are compatible
0	Neutral or negligible effect on objective
-	Objectives are incompatible
?	The compatibility of the objectives is uncertain or depends on implementation

5.3 Summary

- 5.3.1 Although there are a number of uncertainties, generally speaking most of the uncertainties represent instances where objectives could be compatible with the SA framework, given a number of assumptions regarding their detail and implementation.
- 5.3.2 There is potential for SO1 Prosperity to be compatible with a number of objectives. However, uncertainty exists largely in relation to the extent and detail of improvements associated with 'physical, social and economic regeneration'. For example, if physical improvements includes the environment (greenspace, bluespace, historic, etc.), transport infrastructure and development design and layout; then it is assumed to be compatible with objectives for benefiting biodiversity, reducing pollution, improving water resources, landscape, encouraging a modal shift towards sustainable transport and climate change abatement. Similarly, dependent upon the extent of economic improvements, this could help to increase skills and support the Borough's requirement for skilled workers. It is unclear whether improved prosperity will be associated with more sustainable consumption patterns and lifestyles, but this could be considered as an important adjunct to achieving this objective.
- 5.3.3 The impact of creating a broader range of jobs (SO2) on urban biodiversity is unclear, however sites of biodiversity value could be affected by the development of employment land to attain this objective and impact should be minimised. Moreover, an opportunity exists to improve greenspace in employment areas and thus also improve the working environment. Similarly, there is an unclear impact of employment in terms of new jobs and the development of land that could be associated with increased water consumption or contamination, impacts on the historic environment (e.g. town centres include a number of historical assets), increased pollution, efficient and effective use of land (e.g. whether development will focus on previously developed land (PDL)), in terms of the generation of waste and in terms of building design to address climate change. An opportunity exists to promote sustainable employment practices e.g. in terms of water, waste and energy efficiency. Although SO2 Jobs refers to employment areas in the southern A10 corridor, it is unclear whether the objective will encourage sustainable forms of transport or whether it will address the importance of accessibility of employment areas to residents and commuters.
- 5.3.4 These uncertainties are also relevant to SO4 Greater Brookfield; similarly with regards to transport, it is unclear how sustainable 'transport improvements' will be and what health provision there may be. Although it should be noted that detail on what 'leisure floorspace' will include, the quality of the 300 homes to be provided and whether a high skill economy and skilled workers will be delivered; should be covered in policy detail within the Core Strategy. Greater Brookfield should improve the Borough Centre and this could translate in to the creation of safer, inclusive communities.
- 5.3.5 Improvements to Town Centres (SO3) could have either negative or positive impacts on urban biodiversity and, particularly in terms of visitor pressure, on historical assets. It is also unclear whether improvements to become popular destinations will include accessibility in terms of sustainable transport options and in terms of reducing inequalities through improved access of local centres (and associated facilities and services) for all Borough residents. If improved accessibility to parks results from objective SO3, there could have be a positive impact against the landscape SA objective. Improvements could also create safer and more inclusive communities, dependent upon the implementation of the objective. Improving the town centres

for shoppers, traders and businesses could also result in an increase of higher skilled jobs and thus workers.

- 5.3.6 It is assumed that well-designed and well-built neighbourhoods (SO5) will serve to reduce water consumption and allow climate change mitigation and adaptation to climate change. It is also assumed that improvements will benefit all residents thus reduce inequalities. Whether design will protect and enhance biodiversity within neighbourhoods is unclear, and whether it will encourage more sustainable forms of transport (e.g. through street and parking design). It is unclear whether good design will include maximising the efficient use of land and resources or reduce waste.
- 5.3.7 The development of new housing (SO6), particularly on new sites, is likely to have a negative impact on landscape and biodiversity (building on greenfield especially) and should increase water consumption and inefficient use of resources, regardless of design measures. It may also result in pollution – for example the impact of construction on soils at greenfield sites – and, depending on location, could have an impact on the historic environment. It is unlikely that edge-of-town sites and building on green belt will encourage modal shift to sustainable transport systems moreover it is unclear whether services and facilities will be locally provided or whether residents will have to travel for certain needs. Compatibility with the climate change SA objective will depend on whether the location and design of housing takes in to account issues such as minimising flood risk and increasing energy efficiency.
- 5.3.8 The exact manner in which congestion is managed and transport infrastructure delivered (SO7 Transport) may have repercussions for landscape, however this could include enhancement e.g. in relation to walking and cycling infrastructure.
- 5.3.9 It is unclear whether SO8 Sustainability will protect landscape and the historic environment in the delivery of development to meet needs, and whether new development will support inclusive and safe communities.
- 5.3.10 With regard to SO9 Environment, there needs to be an awareness of mitigating and managing the impact of increased visitor pressure on biodiversity, landscape and the historic environment. There is also potential to address the remediation of land and sources of pollution under this objective. It is assumed that green spaces include protecting and enhancing blue spaces and water courses more generally. In addition, the environment plays an important role in addressing issues of climate change, such as through natural flood risk management properties. There is a potential conflict of interest with housing need and economy needs (such as employment space).

6 Appraisal findings

6.1 Introduction

6.1.1 This chapter sets out the summary findings from the appraisal of:

- The Spatial Vision, and;
- Core Strategy Policies.

6.1.2 The full appraisal tables can be found in Appendix 1 to this report.

6.1.3 This chapter also sets out the mitigation measures identified during the appraisal. The mitigation of significant effects is a key requirement of the SEA Directive:

The SEA Directive requires *'the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme'* to be included in the environmental report.

Annex 1 (g)

6.1.4 Mitigation measures are identified in detail in this chapter and then summarised further, and presented alongside proposal for monitoring, in Chapter 8. Many of the measures proposed are in the form of general recommendations or points for consideration, rather than measures designed to counter specific impacts.

6.2 Spatial Vision appraisal

6.2.1 This section presents the sustainability implications of the Spatial Vision (see Chapter 3 for more detail on the Spatial Vision).

6.2.2 The Spatial Vision sets out the delivery of new development to include releasing green belt sites which will have a number of negative impacts against environmental objectives. Most notably: the use of non-renewable resources; impacts on the historic and built environment (especially in urban areas such as Hoddesdon and Waltham Cross); impacts on biodiversity (including urban) and water courses; increased water consumption; increased emissions; increased waste arisings and; increased levels and risk of pollution. However, importantly the Vision sets out a number of measures that should mitigate negative impacts. These include the design of development to enhance surroundings, reduce the impact on climate change and protect important sites. In addition, reducing congestion and improving the range of sustainable transport options available, combined with enhancing local centres, the job mix and their accessibility, should overall encourage more sustainable lifestyles and consumption patterns. However, there is a concern that some issues remain unaddressed, 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.

6.2.3 Overall, there should be a number of positive effects on the economy as a result of the Spatial Vision. This includes an overall maintenance and improvement of the borough as place to both

live and work. The Vision also aims to improve the mix of jobs and accessibility to jobs and skills/training opportunities – transport improvements should assist in this, although linkages between residential and employment areas are not explicitly mentioned. It also considers how benefits from the Olympic Lee Valley White Water Centre will be maximised.

6.2.4 The spatial vision largely scores well against community safety, equality and skills objectives. It does not, however, mention health and well-being and housing objectives.

6.2.5 Mitigation measures that could improve the sustainability of this policy include:

- Protect sites of wildlife importance.
- Protect and enhance biodiversity under measures outlined in the Spatial Vision.
- Seek to remediate contaminated land and reduce levels of pollution.
- Protect and enhance the borough's water courses for their quality and enjoyment.
- Promote water efficiency through design measures.
- Address flood risk e.g. in development and by enhancing the natural environment.
- Consider and seize upon spatial opportunities for renewable forms of energy and improved waste management, including potential for district heating and energy from waste.
- The Spatial Vision should be delivered sustainably and should minimise inefficient resource use.
- The Spatial Vision should protect the character of the historic and built environment.
- Consider how the Spatial Vision might deliver the sustainable management of waste.
- Consider linkages between residential areas and employment areas, facilities and services.
- Extend the spatial vision to cover alleviation of health inequalities.
- Extend the spatial vision to cover affordability and accessibility of housing.

6.3 Core Strategy policies appraisal

6.3.1 This section presents the sustainability implications of the Core Strategy policies (see Chapter 3 for more detail on the Core Strategy policies).

Policy CS1 – Sustainable Neighbourhoods

6.3.2 Given the overall aim to achieve 'sustainable neighbourhoods', it is unsurprising that this policy should have a number of positive impacts against the SA framework. In order to truly deliver a significant positive impact – e.g. in terms of water, waste, sustainable design, etc. – it is important that behavioural change is promoted alongside improvements to development and associated policies. It is possible that this policy will minimise the risk of pollution however this is only an assumption and the impacts of construction could be considered alongside this. Moreover, materials could be sourced locally and sustainable construction principles could be adopted. Although the policy should enhance the built environment, it is unclear whether there could be potential negative impacts on the historic environment as a result of regeneration and growth.

6.3.3 This policy should have a positive impact on the economy by encouraging additional inward investment, improvements to town centres and high streets, job opportunities, improved accessibility and a closer relationship between homes and jobs. Overall, it should improve the borough as a place to both live and work. However it is not expected that policy will necessarily promote high skilled jobs or encourage innovation.

6.3.4 The impact of this policy on health, housing and equalities depends largely on implementation, but is likely to be positive on the whole. The omission of community engagement in a sustainable neighbourhood's policy is a significant gap which should be addressed, in order to truly achieve sustainability at all levels.

6.3.5 Mitigation measures that could improve the sustainability of this policy include:

- Avoid negative impacts on existing urban biodiversity.
- Consider green corridors for transport that promote biodiversity.
- Consider the remediation of land.
- Seek improvements to improve the water quality of water courses.
- Promote behavioural change towards more sustainable lifestyles.
- Provide adequate facilities and services to meet local needs.
- Seek to sustainably and locally source products and raw materials.
- Promote sustainable construction.
- Improvements to the built environment should also protect the historic environment.
- Specifically mention health services for older people (including intermediate, preventative and social care), mental health service, support programmes for childhood obesity and smoking.
- Consider starting with the wards that have higher 'health deprivation' levels, worst off of which are Bury Green and Waltham Cross.
- Encourage community engagement in development planning.
- Consider programmes and campaigns for raising public awareness of realistic crime and ASB figures.
- Consider mentioning affordability and housing mix alongside environmental sustainability.
- Emphasise support services for people out of work, particularly long-term unemployed.
- Consider up-skilling programmes, potentially in collaboration with existing or incoming employers who need high-skilled workers.

Policy CS2 – Housing Development

6.3.6 Inevitably this policy has a number of negative impacts given that the delivery of housing and housing sites (particularly on greenfield and green belt) will have negative impacts against a number of environmental objectives (e.g. land, water, biodiversity, landscape, climate change, etc.). Although measures to mitigate such impacts are referred to within the policy, some of these measures could be made clearer and may already be outlined in other policies that are relevant to this policy. Thus it should be made clear whether policies for high design and

sustainability standards (e.g. CS1 Sustainable Neighbourhoods) apply for all new development. Moreover, areas of search and site selection criteria are alluded to within the text but whether this will have positive impacts against SA objectives is unclear from the lack of detail regarding this.

- 6.3.7 The economy should benefit from supported local shops and job opportunities, although it is not expected that the policy will encourage innovation and a high skill economy. It does not appear as though linking residents to employment areas is considered as part of areas of search and site selection criteria.
- 6.3.8 From a social perspective, the policy focuses on housing provision and should therefore have a positive impact against the housing objective in particular as well as community safety, cohesion and equality objectives. Specifically, the commitment to engage communities in masterplanning should deliver a significant positive impact on social sustainability. However, in terms of Broxbourne's skills gap and economic inequalities, the policy has scope for improvement. Broadening the understanding of housing provision to include socio-economic indicators could improve the sustainability of this policy.
- 6.3.9 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.
- 6.3.10 Mitigation measures that could improve the sustainability of this policy include:
- Sustainability criteria should be used for areas of search and the selection of sites. This could include minimising the use of scarce or non-renewable resources, landscape and open space impacts, built and historic environment impacts, waste management and flood risk.
 - Links to policies that should mitigate negative impacts from housing development should be signposted.
 - Prioritise development on 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 transport options and the location and accessibility of employment areas as part of areas of search for potential housing sites.
 - Consider the potential for low carbon energy sources, include district heating and renewables.

- Location of housing sites could suggest opportunities to promote sustainable consumption patterns and lifestyles.
- Consider sustainable construction principles (or signpost links to relevant policies for this).
- Consider masterplan requirements to protect the historic environment and enhance the built environment.
- Minimise construction waste and consider waste management at developments.
- Mention crime and community safety issues associated with dense housing development in Greenfield and brownfield sites.
- Provide entrepreneurship support and training along with social housing, especially in areas with particularly low income group residents, or long term unemployed people.
- Include a review of skills and training needs during community engagement around masterplans. Planning gain can be one of many sources of funding for relevant and targeted training programmes.
- Housing completions required for the plan period should align with overall housing need.

Policy CS3 – Housing Mix

6.3.11 Housing mix can have a number of sustainability impacts. Informed by specialist studies and design guidance, the impacts under this policy are potentially positive depending upon implementation and the detail of design guidance. For example, it could promote sustainable use of water, land and energy use, the management of waste and flood risk, and promote enhancements to the built environment. Larger homes may attract high-skilled workers and thus associate high-value jobs, which could assist in addressing the key Broxbourne issue of a low-value, low-knowledge economy. The policy, however, does not provide detail on access to greenspace linked to dwellings. In addition, while the policy is aimed at improving housing conditions, Broxbourne's acute housing affordability gap makes it impossible to score it positively without reservations, especially as the adopted affordability target is 12% below the SHMA recommended target. The introduction of design standards, Lifetime Homes and emphasis on those with special needs are all positive elements that contribute to sustainability. However the commuted payment channel of delivering social housing has risks in terms of social cohesion, equality and well being.

6.3.12 Mitigation measures that could improve the sustainability of this policy include:

- Consider the benefits of, and targets for, private greenspace and access to other open space.
- Design guidance should cover a number of topics, to include:
 - minimise water consumption
 - incorporate measures to address climate change and energy efficiency
 - promote sustainable consumption patterns and lifestyles
 - minimise the use of scarce or non-renewable resources such as land, minerals and water
 - how the built and historic environment will be maintained and enhanced

- address waste management
- private greenspace and access to other open space.
- Avoid large concentrations of social housing. Encourage ‘pepper-potting’ of suitable housing types on the same sites and neighbourhoods as much as possible.
- Invest in social cohesion programmes, such as festivals and events, possibly in collaboration with schools.
- Raise public awareness of realistic crime levels and measures to prevent crime.
- Consider organising support programmes for the homeless, such as soup kitchens, clothing and further information.
- Incorporate assistance for those who may want to move out of the area into the housing application process.

Policy CS4 – Travelling Community

- 6.3.13 Overall any environmental impacts resulting from this policy are anticipated to be minor, given that although it supports the need for additional sites, it also sets out strategic criteria for site selection that should mitigate larger impacts. However, some negative impact on biodiversity, pollution, water consumption, land use and landscape may be inevitable from supporting additional pitch provision. Improvements in access to utilities, etc. could also mitigate some of the negative impacts likely to occur. Behavioural change is unlikely as a result of this policy e.g. towards sustainable transport and sustainable consumption. The role of the travelling community with regards to the borough's economy and employment is not explored within the policy text and could be considered. In addition, this policy does not consider existing pitches, potential impacts and improvements (mitigation and enhancement) that may be needed at these locations.
- 6.3.14 The policy is not expected to have significant impacts on health, housing, equality or skills. Its impact on community safety and cohesion could be positive or negative, entirely depending on implementation. Travelling communities, while they live in self-imposed isolation from other people, may be an asset to a neighbourhood or town, if they are positively linked into the community's fabric.
- 6.3.15 Impacts are expected to be minor and in some cases it is not possible to suggest mitigation, however some measures have emerged that could improve the sustainability of the plan:
- Consider existing pitches (potential impacts and improvements).
 - Ensure that biodiversity impact by the travelling community (new and existing sites) is minimised; consider biodiversity and ensure it is protected as part of site selection criteria and policies.
 - Set out measures to minimise potential pollution resulting from additional pitches and plots and existing sites.
 - Set out measures to minimise potential impacts on the historic environment resulting from additional pitches and plots and existing sites; consider the built and historic environment as part of site selection criteria.
 - Consider the sustainable management of waste arising from additional and existing pitches and plots.

- Consider the employment needs and contributions made to the economy by the travelling community.
- Consider the travelling community when accounting for health, welfare and local service needs.
- Improve mutual understanding between communities, through means like:
 - Supporting fairs and circuses so as to promote local people's access to them
 - Working with schools, especially those which may have pupils from travelling communities
 - Public awareness programmes to dispel superstitions and to unpick any common negative beliefs about travelling communities.
- Offering assistance to travelling communities in managing their local environmental impact which may otherwise lead to issues with neighbours - i.e. waste production, pollution, any local biodiversity impacts.

Policy CS5 – Employment

- 6.3.16 Given the focus of this policy it should have a number of positive impacts for the economy, such as through the minimisation of out-commuting of residents in search of higher-skilled jobs, improved accessibility of jobs, improved skills and training, meeting borough employment needs and broadening borough employment capacity and range of opportunities. New employment areas and job opportunities (range and number) could have a negative impact against a number of environmental objectives; however this policy sets out a number of measures to mitigate impact, such as through design measures, transport considerations and efficient land use.
- 6.3.17 Although improvements to existing employment sites is mentioned, the detail of the improvements is unclear; in particular, whether this is in terms of improvements purely for economic gain and possibly to the detriment of environmental objectives. The policy largely focuses on high standards for new employment proposals and could consider improvements to existing employment areas (their impacts, mitigation and enhancement opportunities). 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. In addition, to reduce out-migration and employee retention the policy could emphasise the borough as a high quality place to both live and work.
- 6.3.18 Given the long term unemployment situation in Broxbourne, this policy, aiming to create 3,700 new jobs in the short term, scores highly against health, equality and skills objectives in general. However, while there is sufficient emphasis on skills training, the delivery of new jobs should be well timed with the delivery and completion of training for local people. The focus on high skilled jobs may otherwise create further inequalities in Broxbourne by introducing a large number of high skilled jobs that are largely taken up by non-local people, which may in turn generate a new set of issues around in-commuting workers.
- 6.3.19 Mitigation measures that could improve the sustainability of this policy include:
- Adopt sustainability criteria as part of search for new employment sites (and for improvements to existing sites), consider: the location of water courses, biodiversity, good

accessibility and sustainable transport options, flood risk, efficient land use, landscape, historic environment and waste management.

- Masterplans and improvement to existing employment areas could include: conserving and/or improving water resources, supporting and enhancing onsite biodiversity and greenspace, accessibility and sustainable transport options, mitigation of climate change impacts, mitigate pollution risk and any sources of pollution, improvement to waste management, mitigate non-renewable resource impacts (land, minerals, water) and mitigate impacts on the historic environment.
- Consider work at home opportunities and live-work units.
- Consider improvements to existing employment areas to include addressing wasteful business activities.
- Adopt sustainable construction principles to include locally sourced labour.
- Identify opportunities to improve business activities e.g. waste, energy and water use.
- Do not overlook key traditional employment sectors and the strengths and reliability they bring to Broxbourne economy.
- Emphasis on the borough as a high quality place to both live and work.
- Encourage healthy activity programmes as part of work, e.g. gym memberships, running and team sports as part of work culture.
- Ensure a good mix of jobs across skill levels.
- Avoid marginalising lower skilled workers in public life. Ensure that a range of leisure and support services exists for all sections of the society regardless of economic situation and socio-economic background.
- Ensure that the local skills profile changes at the same rate as that of job creation.
- Ensure that there is a full range of jobs, including mid level or transition jobs, not just extremes of highly skilled and low skilled jobs..
- Work with employers to run training and up-skilling programmes.

Policy CS6 – Retail and Town Centres

6.3.20 The most significant positive impact of this policy is expected for the economy, by meeting the retail needs of the borough based upon detailed studies, and by setting out strategies for key centres and a local centre hierarchy that builds on key strengths and needs. In addition, this policy should reduce out-commuting for retail needs or 'leakage' which is a key issue for the borough and, particularly through flagship retail centres like Greater Brookfield, the policy should increase the number of shoppers visiting the borough and encourage investment from larger retail outlets. It is unclear, however, whether the policy will support smaller retail businesses e.g. single independent shops.

6.3.21 The impact against many of the environmental objectives, however, is less clear and will depend upon implementation. An expanded retail industry with more outlets, shop types, jobs and locations; is likely to increase waste arisings, water consumption and pressure on historical assets that are located in local centres. By taking into account appropriate locations and by supporting local centres, there could be overall be a positive impact on efficiency of resource use and sustainable consumption patterns, although other factors make the outcome less

certain. The exact impact on landscape, climate change, biodiversity and transport objectives is even less clear. However, although not in the policy detail, supporting text and references to strategies implies that sustainable standards, transport options and accessibility will be delivered for retail. It is important that the policy also considers improving the sustainable practices of retailers, which could mitigate impact and result in a more sustainable retail policy overall.

6.3.22 From a social perspective, this policy may help reduce health inequality and other forms of inequality (age, cultural background, socio-economic background), but this likely to depend on whether such inequalities are accounted for during implementation. No significant impacts are expected in terms of community safety, housing and skills.

6.3.23 Mitigation measures that could improve the sustainability of this policy include:

- Consider inserting policy text to improve the shopping environment – this could both enhance the attractiveness of centres and have benefits for biodiversity.
- Consider inserting policy text to address congestion resulting from retail, growth and increased visitors, and to consider waste and potential pollutants arising from changing and expanding retail activities.
- Consider inserting policy text for high sustainability standards and encouraging sustainable practices by retail businesses and/ or signposting policies that encourage this. The awareness of, and response to, environmental issues by retailers should be encouraged to address: water consumption and potential water pollution, sustainable waste management and principles for reduction, reuse and recycling, and the likely impacts of climate change.
- Consider accessibility and sustainable transport options within the policy text.
- Aim to source products locally, where possible, to meet the demand of locals.
- Minimise landscape impacts resulting from retail growth and seek improvements to mitigate current impacts.
- Consider the historic and built environment and mitigating the impact of retail and increased shopper numbers particularly at key locations.
- Support independent and smaller retailers.
- Promote local food markets.
- Consider extending accessible design standards to shops and other retail units.
- Encourage retailers to provide part-time jobs to support people in skills training.

Policy CS7 – Greater Brookfield Strategic Allocation

6.3.24 The development of the Greater Brookfield site under this policy should have a significant positive impact on the economy. In particular, it should act as a catalyst to generate a range of jobs to include high-knowledge jobs and also training to raise skills, lower unemployment, provide good access to jobs, encourage inward investment, address wages in the borough that are lower compared to the rest of Hertfordshire, and significantly reverse leakage rates. It is not clear in the policy, although it may be assumed, that the policy will also encourage business start-ups and innovation. It is important that existing employment uses – such as the New River Trading Estate – are successfully relocated as stipulated in the policy, but also result in a positive gain if possible against the sustainability objectives.

- 6.3.25 The policy does not refer to a strategy for Greater Brookfield, although such a strategy could increase the overall sustainability of the development and promote joined-up thinking for an 'eco-development'. From an environmental perspective, such a large scale development (construction and operation of the development itself with regards to homes and businesses, etc.) is inevitably going to have a number of negative impacts associated with increased vehicle trips, higher waste arisings, water and energy consumption and pollution. However, the policy sets out mitigation measures including sustainability standards that could minimise impacts depending upon implementation and overall use land as efficiently as possible. Adequate phasing – of transport, infrastructure, housing, service and facilities, etc. – is also not specifically mentioned within the policy but will be essential to success. In addition, it is not clear whether biodiversity has been sufficiently considered, in particular whether biodiversity will be considered as part of sustainability statements. Green infrastructure and open space can overall improve the development for wildlife and as a place to both live and work. Moreover, sustainable construction principles and long-term behavioural change towards sustainable practices are not clearly encouraged in this policy; and the importance of phasing is not mentioned but will be vital to the sustainability during construction and delivery. If this will be covered by other policies, it would be useful to highlight this and to signpost the relevant policy(ies).
- 6.3.26 From a social perspective, the policy scores highly against health, housing, equality and skills objective in general. However the nature of the proposed development risks creating a rift between the existing community of Broxbourne and the new mixed-use neighbourhood of Greater Brookfield, potentially through the domination of higher end retail, the introduction of high end single-tenure family housing and through the relocation of community allotments.
- 6.3.27 Mitigation measures that could improve the sustainability of this policy include:
- 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'.
 - Add wildlife and biodiversity to statements/assessments for sustainability.
 - Consider green space provision and the protection, enhancement and creation of habitats and associated biodiversity.
 - 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 Greater Brookfield and/or signpost to 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 and minimising non-renewable resource use.
 - Apply sustainable construction principles.
 - Aim to source products locally, where possible, to meet the demand of locals.
 - Consider local labour and materials for construction.
 - Seek proposals that minimise landscape impact and, where possible, protect and enhance and/or complement the landscape.

- Identify and minimise any potential negative impacts on the historic environment.
- 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.
- Develop a strategy for the development to maximise benefits to the economy against high sustainability standards, including supporting business start-ups and encouraging innovation.
- Consider referring to phasing within the policy.
- Channel planning contributions into areas with the highest health deprivation levels.
- Balance indoor leisure activities and junk food provision with healthy outdoor sports and healthy food shops.
- Ensure a range of retail facilities accessible to all.
- Relocate allotments carefully, mindful of the convenience of current users, depending on local demand.
- Apply accessible design standards to the homes on Brookfield.
- Consider introducing other types and tenures, according to specific need in the local area.
- Apply accessible design standards to architectural design of Brookfield facilities.
- Consider introducing other types and tenures, according to specific need in the local area.
- Ensure a range of retail facilities accessible to all.

Policy CS8 – Environment

- 6.3.28 This policy is intended to conserve the environment and therefore should have a number of positive impacts against environmental objectives e.g. by protecting environmental resources, protecting and enhancing landscape, protecting and enhancing habitats and biodiversity, encouraging cycling and walking, mitigating climate change to include directly addressing flood risk, and protecting the built environment. In some cases there is room for clarification to ensure a significant positive effect, for example whether design guidance and high quality design includes protecting and enhancing biodiversity, mitigating adverse impacts of climate change, conserving water and minimising waste and energy use. Blue spaces and water courses are an important asset to the borough and should be considered in open space and greenspace. Pollution and waste could perhaps be given more consideration within this policy given the large impact they can have on the environment.
- 6.3.29 There is a large opportunity under this objective to encourage awareness and appreciation of the environment both to residents and the economy, and in doing so assist in its protection and enhancement and achieve long-term behavioural change towards patterns of sustainable consumption and lifestyles. The environment has large economic benefits that could be acknowledged in this policy, not least in terms of sport and opportunities associated with the 2012 Olympics. Overall, it could be acknowledged within the policy that conserving and

enhancing the natural, historic and built environment plays a key role in improving the borough as a place to both live and work.

6.3.30 Open space provision is linked closely to health benefits, community spirit and identity, as well as equality. The policy generally scores well against all these objectives.

6.3.31 Mitigation measures that could improve the sustainability of this policy include:

- Masterplans should safeguard and enhance the environment.
- Consider the creation and enhancement of green space and biodiversity as part of the high quality design of all development proposals.
- Acknowledge the benefits of green corridors e.g. habitat for wildlife and wildlife corridors.
- Identify biodiversity value at all development sites (aka not just areas that are formally designated or protected) e.g. urban biodiversity and wildlife on brownfield sites.
- Consider improvements to existing, in addition to new, development.
- Consider for inclusion the reduction of levels of pollution and the minimisation of pollution risk.
- Acknowledge the benefits of green corridors and green space for improving environmental quality more generally e.g. encouraging cycling and walking.
- Consider the importance of water courses in the borough and how they might be protected and enhanced.
- High quality design should: encourage the use of sustainable transport, install water conservation methods and sustainable drainage and storage, maximise efficient resource use, consider landscape impacts, maximise biodiversity benefits and minimise waste.
- Green corridors should encourage sustainable forms of transport and consider linkages and travel patterns e.g. residential areas to employment areas
- Consider how long-term behavioural change towards sustainable lifestyles and patterns of sustainable consumption could be achieved. This could be part of a more general initiative to encourage an awareness and appreciation of the environment and its protection and enhancement amongst residents and businesses. It could include resource efficiency (waste, water, energy) and minimising use of non-renewables, sustainable transport and biodiversity.
- Identify and outline how the natural and built environment could be enhanced to mitigate adverse impacts of climate change.
- Apply sustainable construction principles.
- Landscape impacts on non-protected sites could be considered.
- Development should complement and, where possible, enhance the landscape.
- Consider how waste will be managed and environmental impact minimised.
- Acknowledge the significance of the environment for the economy and why it must be safeguarded by economic practices and for the economic benefits it brings.
- Encourage the use of Lea River Park as an opportunity for sports and active recreation.

- Encourage community focused events and programmes in parks.
- Invest in public awareness programmes to disseminate realistic crime and crime prevention figures.
- Assess and if necessary, monitor safety in parks and other open spaces.
- Investigate usage patterns, focusing on non-users, to maximise accessibility in the long term.

Policy CS9 – Infrastructure

- 6.3.32 The provision of infrastructure should have a significant positive impact on the economy, allowing businesses to continue functioning optimally, with improved accessibility and reliable infrastructure encouraging investment that will support high skilled jobs and workers. However the delivery of additional infrastructure is likely to have a number of negative environmental impacts in terms of the pressure it places on resources (land, water and energy), biodiversity, landscape, the historic environment; in addition to an increase in waste arisings and emissions. Although infrastructure is likely to be on a strictly ‘as needed’ basis based upon informed studies, the policy does not set out mitigation measures or provide links to other policies that will ensure the mitigation of negative impacts. For example, it is unclear how and whether infrastructure will be appropriately located and what factors location will take in to account (e.g. impact on environmental assets or accessibility or functionality), whether it will be built to high design standards, which standards and whether this will be under sustainable construction principles. Such standards, if covered by another policy, could be clearly referenced or signposted.
- 6.3.33 Waste infrastructure is not referred to in the policy and its location and capacity can have important implications for residents and businesses and against targets for pollution, waste and climate change. It is noted that waste should be dealt with at the county level in a Waste Development Framework, however energy from waste, recycling and other strategic issues could also be considered at a more local level.
- 6.3.34 Although transport can relieve congestion, improve accessibility and promote more sustainable transport choices; it can also result in more vehicle trips and longer distance trips. Green infrastructure is an important sub-set of infrastructure and, although it is covered under a different policy, this is not made clear. Whether sustainable transport will promote a joined up network that provides accessibility to key borough locations is also unclear from the policy, moreover developer proposals are expected to assess transport capacity but whether this will encourage less reliance on the road network and cars is unclear.
- 6.3.35 The policy has a positive emphasis on better health provision, community facilities and improved connectivity, especially with regard to non-car modes. However, educational provision focuses on primary and secondary education; professional and vocational skills do not appear to be adequately covered. This may have significant negative impacts against this objective, given the emphasis in other policies on introducing high skilled jobs into the borough. The standards of car parking outlined under this policy are unclear, however they could have an equalities impact and, moreover, it is uncertain what is meant by a ‘sensible’ amount of additional spaces. There is a concern that the policy could support a continued reliance on car travel in spite of also supporting sustainable forms of transport e.g. from the standards of car parking and developer proposals.
- 6.3.36 Mitigation measures that could improve the sustainability of this policy include:

- 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, and waste management.
- Deliver infrastructure built to high standards (or signpost to policies that cover this) that take into 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.
- 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.
- Apply sustainable construction principles.
- Outline whether waste infrastructure will be included and the borough's capacities for sustainable waste management.
- Consider energy from waste and outline its viability.
- Consider how additional waste arisings will be managed.
- Target areas with high levels of health deprivation.
- Service provision should be targeted towards areas of higher overall deprivation levels.
- Consider emphasising professional or vocational skills as part of educational infrastructure provision.
- Improvements to air quality should be sought as part of the review of the M25 and Junction 25 and the A10 Route Management Strategy.
- As a part of transport assessments, development proposals should maximise sustainable transport options and provide measures to ensure their success in order to minimise congestion and the impact on air quality.
- Expand on sustainable travel options in order to suggest how a joined-up network will be created that will minimise reliance on cars even for partial journeys to key destinations (e.g. rail, employment areas and town centres).
- Provide detail on how a 'sensible' amount of car parking will be quantified / defined.
- 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 and transport infrastructure, including the location of car parking spaces, should encourage sustainable consumption patterns and lifestyles.
- Car parking should be provided to high standards that take into account equalities issues.

Policy CS10 – Planning Contributions

- 6.3.37 By identifying surplus and deficits in infrastructure, this policy will allow the economy to continue functioning optimally. Whether or not it has a positive impact on the environment depends on where contributions are directed in Broxbourne and whether the policy seeks contributions that enhance sustainability and improvements e.g. of water use efficiency and quality, waste management, biodiversity protection and enhancements, landscape, sustainable transport options and built and historic environment character. The policy scores highly against health, housing, equality, community safety and skills objectives. The inclusion of the Sustainable Community Strategy (2010) objectives is a positive element and should not be lost in implementation.
- 6.3.38 Mitigation measures generally refer to clarity in the standard of contributions expected:
- Seek contributions that enhance biodiversity and ensure that any biodiversity loss is at least mitigated and offset.
 - Seek contributions to protect and improve water resources (lower consumption, efficiency and improved water quality).
 - Seek contributions that increase the range and accessibility of transport options and encourage their use.
 - Seek contributions that mitigate potential adverse impacts from climate change and support adaptation.
 - Seek contributions that promote accessibility and encourage more sustainable consumption patterns and lifestyles.
 - Contributions should not result in a negative impact on the landscape and should instead seek to complement or enhance it.
 - Seek contributions that enhance and protect the historic and built environment.
 - Seek contributions that support sustainable waste management e.g. the provision of recycling services.
 - Take the above into account for future planning.
 - During implementation, emphasise cooperation between Council and private sector.

7 Cumulative effects

7.1 Introduction

- 7.1.1 One of the principal rationales for undertaking SEA (and SA) is the opportunity it presents, to identify and evaluate cumulative impacts. The SEA Directive specifically requires the consideration of cumulative impacts.

The 'Environment Report', required under the SEA Directive should include:

“the likely significant effects (1) on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors

(1) These effects should include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects”.

Annex 1 (f)

7.2 The Core Strategy's cumulative effects

- 7.2.1 This section sets out the cumulative effects of the Spatial Vision and the Core Strategy policies. Cumulative effects are considered against each of the 16 SA objectives; however, it should be noted that the discussion of potential cumulative effects is to some degree hypothetical since the nature of development that could emerge is unclear. This uncertainty is reflected in Table 12 through the high number of appraisal cells where impacts are either unknown or dependent on implementation.

Table 12: Cumulative effects of the spatial vision and Core Strategy policies

Core Strategy	Spatial Vision	Core Strategy Policies									
		CS1 – Sustainable Neighbourhoods	CS2 – Housing Development	CS3 – Housing Mix	CS4 – Travelling Community	CS5 – Employment	CS6 – Retail and Town Centres	CS7 – Greater Brookfield Strategic Allocation	CS8 – Environment	CS9 – Infrastructure	CS10 – Planning Contributions
Biodiversity	?	+	-	+?	-?	-?	?	-?	+	-	?
Pollution	?	+?	-	0	-?	-?	?	-	?	?	0
Water resources	?	+	-	+?	-?	-?	-?	-	+	?	+?
Sustainable transport	+	+	?	0	?	+?	?	?	+	+?	+
Climate change	?	+	?	+?	+?	?	?	?	+?	+?	+
Sustainable consumption	+	+	?	+?	+?	+	+?	+?	+?	?	+
Resources	-?	+?	-	+?	?	?	+?	?	+?	-?	0
Landscape	+?	+	-	+?	-?	?	?	-?	+	-	?
Built and historic environment	-?	?	?	+?	?	?	-?	+?	+	-	?

Sustainable waste management	-?	+	-	+?	-	-?	?-	-	?	?	?
Health	?	+?	0	+?	0	+?	+?	+?	+	+?	+
Safe, inclusive communities	+?	0	+?	-?	?	+?	0	-?	+?	+?	+
Housing	?	+?	+?	+?	0	0	0	+?	+?	0	+
Inequality	+?	+?	+?	+?	0	+?	+?	+?	+?	+?	+
Skills	+?	0	0	?	0	+	0	+	0	-	+?
Economy	+	+	+	+?	?	+	+	+	+?	+	+

Scoring symbol	Meaning
+	Policy will result in a significant positive impact on the SA Objective
+?	The impact on the SA Objective is dependant on implementation, but if there were to be an impact it would most likely be positive or minor positive impacts
0	Neutral or negligible effect
-?	The impact on the SA Objective is dependant on implementation, but if there were to be an impact it would most likely be negative or minor negative impacts
-	Policy will result in a significant negative impact on the SA Objective
?	The relationship between the Policy and the SA Objective is unknown, or there is not enough information to make an assessment.

Summary of cumulative effects

- 7.2.2 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.
- 7.2.3 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.
- 7.2.4 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.
- 7.2.5 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.
- 7.2.6 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.
- 7.2.7 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.
- 7.2.8 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.
- 7.2.9 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.
- 7.2.10 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.

8 Conclusions and monitoring

8.1 Introduction

8.1.1 This chapter aims to bring together the main findings of the SA. Firstly, some concluding thoughts are made regarding the sustainability of the Core Strategy. This may be useful to some readers but is not intended to be the main outcome of the SA. More important is the identification of significant potential sustainability effects, and setting out measures to mitigate and monitor these effects. Table 13 sets out mitigation measures that must be considered in order to mitigate key effects, and also sets out a range of indicators to monitor significant effects.

8.1.2 Monitoring significant effects is a key requirement of the SEA Directive:

The SEA Directive states that ‘member States shall monitor the significant environmental effects of the implementation of plans and programmes’.

Article 10, the SEA Directive

‘Monitoring allows the actual significant effects of implementation of the SPD to be tested against those predicted in the SA.’

Section 4.3.21, Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, DCLG, 2005

8.1.3 The appraisal has also resulted in a range of other, more general recommendations to improve the sustainability performance of the plan. These are not concerned with mitigating potential significant effects, and so do not represent priorities for monitoring. Table 14 sets out a range of other recommendations to improve the sustainability performance of the Plan.

8.1.4 The Council must prepare an Annual Monitoring Report (AMR) setting out, amongst other things, the extent to which the policies set out in the DPDs and SPDs are being achieved.

8.1.5 The significant effects indicators (for monitoring important effects identified by the SA) identified in light of the SA process should be monitored as part of the AMR process, which monitors the performance of the plan.

8.2 Conclusions and review of previous recommendations

8.2.1 The conclusions for the Spatial Vision and Core Strategy Policies are set out in detail in sections 6.2 and 6.3 and the summary of cumulative effects in Chapter 7 gives an overview of how sustainable the Core Strategy is overall and how well the Core Strategy performs against the sustainability framework. This section will more specifically focus on negative impacts and whether previous recommendations made for the Core Strategy Preferred Options have been taken into account by the Council. However, many of the policies in this version of the Core Strategy have dramatically changed since the Preferred Options stage; indeed, Core Strategy Policies have been condensed from 19 to 10.

Spatial Vision

- 8.2.2 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

- 8.2.3 The Sustainable Neighbourhoods policy (CSP1) 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.
- 8.2.4 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.

- 8.2.5 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.
- 8.2.6 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.
- 8.2.7 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.
- 8.2.8 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.
- 8.2.9 Unsurprisingly there are a number of positive impacts on the environmental objectives under Environment Policy CS9. 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).

- 8.2.10 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.
- 8.2.11 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.

8.3 Significant effects, mitigation and monitoring

- 8.3.1 Suggested mitigation measures for the Spatial Vision and Core Strategy Policies are detailed in Chapter 6.
- 8.3.2 Based upon this, Table 12 sets out the key *significant* negative effects that have been predicted through this appraisal. The Council should take onboard the recommendations set out to mitigate and monitor these significant effects. In the case of the monitoring recommendations it is important to note that these are initial and in some cases aspirational idea. It will be up to the Council to consider the practicalities of monitoring and what might be achievable.

- 8.3.3 Table 13 sets out a range of other recommendations to improve the sustainability performance of the plan. These recommendations should also be addressed by the Council.

Table 13: 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 NOx 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.
Policy CS7 – Greater Brookfield	Increased pollution, water consumption and waste arisings, as a result of development at Greater	<ul style="list-style-type: none"> • Consider inserting policy text for high sustainability standards and encouraging sustainable practices by 	<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

Spatial vision / Policy(s) reference	Significant effect	Mitigation	Monitoring
	Brookfield.	<p>retail businesses and/ or signposting policies that encourage this. This could include consideration of creating an 'eco-development'.</p> <ul style="list-style-type: none"> • 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. 	<p>Strategy, but relevant to the Greater Brookfield development. In addition to these we would also suggest the following:</p> <ul style="list-style-type: none"> • 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	• Infrastructure should alleviate pressure, where possible	• Change in areas of biodiversity importance (core output indicator E2) and change in priority habitats

Spatial vision / Policy(s) reference	Significant effect	Mitigation	Monitoring
	<p>value, landscape and the historic and built environment.</p>	<ul style="list-style-type: none"> • 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, and waste management. • 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>and species. Tie in with HRA monitoring recommendations and Local BAP indicators.</p> <ul style="list-style-type: none"> • Change in condition of areas of landscape character. • Number of listed buildings, areas of archaeological interest and scheduled ancient monuments at risk.

Spatial vision / Policy(s) reference	Significant effect	Mitigation	Monitoring
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).

Table 14: 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.

	<ul style="list-style-type: none"> • 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
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

	<p>impacts if included/clarified in policy wording or signposted in another policy.</p> <ul style="list-style-type: none"> • 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.
<p>Policy CS10 – Planning Contributions</p>	<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. • 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.

9 Next steps

9.1 Consultation

9.1.1 A pre-submission consultation will be held for six weeks in August/September 2010 for the Core Strategy. The SA Report will be available for consultation alongside the Core Strategy. It is the intention of the SA that it should aid consultation on the Core Strategy by allowing for more informed consultation responses.

9.1.2 Responses should either be sent:

By email to: planningpolicy@broxbourne.gov.uk

By fax to: 01992 627183

By post to:

Broxbourne Borough Council
Environmental Services Department
Planning Policy Team
Bishops' College
Churchgate
Cheshunt
Hertfordshire
EN8 9XB

9.2 Taking the appraisal and consultation findings into account

9.2.1 Following the 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.

9.2.2 The SEA Directive states that:

“The environmental report...[and] the opinions expressed [through consultation] shall be taken into account during the preparation of the plan or programme and before its adoptions...”

Article 8

9.3 Final Core Strategy

9.3.1 Following this the Core Strategy will be finalised by the Council and submitted to government. At this point the Strategy will undergo independent examination by a planning inspector.

9.3.2 If the Plan is approved and accepted by the government, it will be formally adopted by the Council. The SEA Directive requires those responsible for preparing it – in this case the Council - to provide the public and the Consultation Bodies with information on how

environmental considerations and consultation responses are reflected in the plan or programme and how its implementation will be monitored in the future. The Directive states that:

“Plan or programme proponents should ensure that, when a plan or programme is adopted, the Environmental Consultation Bodies and the public “are informed and the following items are made available to those so informed:

- (a) the plan or programme as adopted;*
- (b) a statement summarising how environmental considerations have been integrated into the plan or programme...[including] the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with, and*
- (c) the measures decided concerning monitoring [of the plan]”*

(Annex 9(1))

9.3.3 In light of this requirement, the Council will prepare a SEA / SA Statement setting out the above information (reporting on how sustainability considerations have been taken into account rather than environmental considerations only).

Appendix 1 – Appraisal tables

Spatial Vision			
SA Objective	Score	Predicted effect (s)	Mitigation
1. Will the Core Strategy benefit biodiversity?	?	By maintaining the borough as a green place, protecting the Lee Valley Regional Park and other important spaces, and focusing development on suitable urban sites in the short-term; this policy should protect biodiversity. However, it is important to note that urban sites can also contain biodiversity and that important areas for protection do not explicitly include sites of importance for their wildlife. Moreover, in the long-term green belt sites will be released for development (noted as a necessity) which will have a negative impact on biodiversity. It would be important to ensure that new development, regeneration and the maintenance of public spaces, as outlined in the Spatial Vision; conserves and enhances biodiversity.	<ul style="list-style-type: none"> Protect sites of importance for their wildlife Protect and enhance biodiversity under measures outlined in the Spatial Vision
2. Will the Core Strategy reduce levels of pollution?	?	It is unclear whether measures to ensure Broxbourne is maintained as a safe, healthy and pleasant place – including regeneration - will include reduced levels of pollution and remediation of any sites of pollution. Additional development supported under the policy could increase the risk of pollution, although easing traffic congestion should improve air quality as should promoting more sustainable forms of transport.	<ul style="list-style-type: none"> Seek to remediate contaminated land and reduce levels of pollution
3. Will the Core Strategy conserve and / or improve water resources?	?	The borough contains a number of important water courses. However, the Spatial Vision does not specifically refer to the conservation and / or improvement of water resources. However, it might be assumed that maintaining the borough as a healthy and green place and protecting landscapes and open spaces, will protect water courses. Increased development will increase pressure on water resources – both consumption of water and potential pollution of water courses. It is unclear whether promoting the Olympic Lee Valley White Water Centre will also include protecting the water courses.	<ul style="list-style-type: none"> Protect and enhance the borough's water courses for their quality and enjoyment Promote water efficiency through design measures
4. Will the Core Strategy provide for modal shift to sustainable transport systems?	+	Access to public transport is a key issue for the borough. Transport improvements should have a positive impact by relieving congestion and encouraging more sustainable forms of transport by improving rail and bus services and making it easier and safer to walk and cycle. Discouraging out-commuting by providing better access to a mix of jobs and enhancing	

Spatial Vision			
SA Objective	Score	Predicted effect (s)	Mitigation
		services and facilities should also relieve transport pressure.	
5. Will the Core Strategy help to prevent and / or reduce any potential adverse impacts from climate change?	?	The Spatial Vision states that all development will be designed to reduce its impact on climate change. Improving accessibility to services and facilities within the borough and to more sustainable forms of transport, should also help address climate change. It should be noted that new development and increased dwellings will overall increase emissions and the potential for flood risk, and it is important that flood risk is taken in to account. The natural environment can help buffer the effects of climate change and in mitigating flood risk.	<ul style="list-style-type: none"> Address flood risk e.g. in development and by enhancing the natural environment.
6. Will the Core Strategy encourage more sustainable consumption patterns and lifestyles?	+	The Spatial Vision sets out enhanced local centres, improved facilities and services within the borough and better accessibility for local needs, which should encourage more sustainable consumption patterns and lifestyles. It does address the use of sustainably-produced products.	
7. Will the Core Strategy minimise the use of scarce or non-renewable resources such as land, minerals and water?	-?	The Spatial Vision acknowledges the need for additional development that will place pressure of non-renewable resources including the need to release land from the green belt. The Vision does consider renewable forms of energy and waste management which can be relevant spatially, nor does it set out the use of renewable products or the application of sustainable construction principles for the achievement of the Vision. However, it encourages the use of urban sites in the short-term (a sequential approach) and the efficient use of land, and all development is expected to reduce its impact on climate change.	<ul style="list-style-type: none"> Consider and seize upon spatial opportunities for renewable forms of energy and improved waste management, including potential for district heating and energy from waste. The Spatial Vision should be delivered sustainably and should minimise inefficient resource use
8. Will the Core Strategy encourage the protection and enhancement of landscape?	+?	Additional development is likely to have a negative impact on the landscape. However, by stating that landscapes will be protected and ensuring that development is designed to enhance its surroundings, the Spatial Vision should mitigate negative impacts.	
9. Will the Core Strategy maintain or enhance the character of the built and historic environment?	-?	Additional development is likely to increase pressure on the historic environment and on the character of the built environment. In addition, there are a number of Conservation Areas and listed buildings focused in urban areas which the Spatial Vision could increase pressure upon. However, it is assumed that urban sites selected for development in the short term will be 'suitable' in terms of minimising risk of a negative impact on the built and historic environment. Moreover, it is also expected that the	<ul style="list-style-type: none"> The Spatial Vision should protect the character of the historic and built environment

Spatial Vision			
SA Objective	Score	Predicted effect (s)	Mitigation
		design of development to enhance its surroundings should also mitigate negative impacts.	
10. Will the Core Strategy reduce waste and encourage sustainable waste management?	-?	Waste is not mentioned within the Spatial Vision, however additional development will increase waste arisings (construction, residents, businesses) and the location of development will have an impact on the way in which waste is managed.	<ul style="list-style-type: none"> Consider how the Spatial Vision might deliver the sustainable management of waste
11. Will the Core Strategy improve health and/or reduce health inequalities in the Borough?	?	No particular focus in the spatial vision on health infrastructure or alleviating health deprivation in affected areas. Providing more open space and increasing access to open spaces should have health and well-being benefits.	Extend spatial vision to cover alleviation of health inequalities.
12. Will the Core Strategy help to create communities where people feel safe and that they belong, without excluding others?	+?	The spatial vision emphasises community safety, sense of place, and a unique identity for the borough, all of which should have a positive impact against this objective.	
13. Will the Core Strategy move the Borough towards a situation where housing is of high quality, and available and affordable for all?	?	No particular focus in the spatial vision on affordability and accessibility of housing, though high quality is covered.	Extend the spatial vision to cover affordability and accessibility of housing.
14. Will the Core Strategy help to reduce inequality within the Borough?	+?	Emphasis on job creation, a mix of jobs, open space provision and sustainable design should all have a positive impact against this objective.	
15. Will the Core Strategy help to increase skills and support the Borough's requirement for skilled workers?	+?	The spatial vision adequately emphasises skills and training, which should have a positive impact against this objective.	
16. Will the Core Strategy contribute to the development of a thriving, innovative, high skill economy in the Borough?	+	There should be a number of positive effects on the economy as a result of the Spatial Vision. This includes an overall maintenance and improvement of the borough as place to both live and work. The Vision also aims to improve the mix of jobs and accessibility to jobs and skills/training opportunities – transport improvements should assist in this, although linkages between residential and employment areas are not explicitly	<ul style="list-style-type: none"> Consider linkages between residential areas and employment areas, facilities and services.

Spatial Vision			
SA Objective	Score	Predicted effect (s)	Mitigation
		mentioned. It also considers how benefits from the Olympic Lee Valley White Water Centre will be maximised.	
Summary			
<p>The Spatial Vision sets out the delivery of new development to include releasing green belt sites which will have a number of negative impacts against environmental objectives. Most notably, the use of non-renewable resources, impacts on the historic and built environment (especially in urban areas such as Hoddesdon and Waltham Cross), impacts on biodiversity (including urban) and water courses, increased water consumption, increased emissions, increased waste arsing and increased levels and risk of pollution. However, importantly the Vision sets out a number of measures that should mitigate negative impacts. These include the design of development to enhance surroundings, reduce the impact on climate change and protect important sites. In addition, reducing congestion and improving the range of sustainable transport options available, combined with enhancing local centres, the job mix and their accessibility, should overall encourage more sustainable lifestyles and consumption patterns. 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.</p> <p>Overall, there should be a number of positive effects on the economy as a result of the Spatial Vision. This includes an overall maintenance and improvement of the borough as place to both live and work. The Vision also aims to improve the mix of jobs and accessibility to jobs and skills/training opportunities – transport improvements should assist in this, although linkages between residential and employment areas are not explicitly mentioned. It also considers how benefits from the Olympic Lee Valley White Water Centre will be maximised.</p> <p>The spatial vision largely scores well against community safety, equality and skills objectives. It does not, however, mention health and well-being and housing objectives.</p>			
Mitigation measures:			
<p>Mitigation measures that could improve the sustainability of this policy include:</p> <ul style="list-style-type: none"> • Protect sites of importance for their wildlife • Protect and enhance biodiversity under measures outlined in the Spatial Vision • Seek to remediate contaminated land and reduce levels of pollution • Protect and enhance the borough's water courses for their quality and enjoyment • Promote water efficiency through design measures • Address flood risk e.g. in development and by enhancing the natural environment. • Consider and seize upon spatial opportunities for renewable forms of energy and improved waste management, including potential for district heating and energy from waste. • The Spatial Vision should be delivered sustainably and should minimise inefficient resource use • The Spatial Vision should protect the character of the historic and built environment • Consider how the Spatial Vision might deliver the sustainable management of waste • Consider linkages between residential areas and employment areas, facilities and services. • Extend spatial vision to cover alleviation of health inequalities. 			

Spatial Vision			
SA Objective	Score	Predicted effect (s)	Mitigation
<ul style="list-style-type: none">Extend the spatial vision to cover affordability and accessibility of housing.			

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Policy CS1 – Sustainable Neighbourhoods			
SA Objective	Score	Predicted effect (s)	Mitigation
1. Will the Core Strategy benefit biodiversity?	+	Provision of wildlife habitats and protection of open spaces should have a positive impact on biodiversity. Walking and cycling opportunities can also offer wildlife enhancement opportunities through green corridors. However, it should be noted that urban biodiversity could also be at risk from plans to regenerate and develop urban areas.	<ul style="list-style-type: none"> • Avoid negative impacts on existing urban biodiversity • Consider green corridors for transport that promote wildlife
2. Will the Core Strategy reduce levels of pollution?	+?	Improving the sustainability and design of development should minimise the risk of pollution (e.g. waste and water policies) and although not specifically considered under this policy, regeneration could include the remediation of land	<ul style="list-style-type: none"> • Consider remediation of land
3. Will the Core Strategy conserve and / or improve water resources?	+	Introducing water saving policies and stringent building design should act to conserve water resources and regeneration allows for improvements to existing buildings which should have a substantial positive impact. Although it is not referred to in the text, the water quality of water courses may benefit from this policy in terms of protecting open spaces	<ul style="list-style-type: none"> • Seek improvements to the water quality of water courses
4. Will the Core Strategy provide for modal shift to sustainable transport systems?	+	A closer relationship between homes, jobs and other services should create shorter commuting distances and promote more sustainable forms of transport. The policy also sets out measures for improved accessibility to include public transport, walking and cycling opportunities, all of which should have a significant positive effect against this objective.	
5. Will the Core Strategy help to prevent and / or reduce any potential adverse impacts from climate change?	+	Stringent sustainability measures – e.g. buildings and transport – under this policy should have a significant positive effect in addressing adverse impacts from climate change	
6. Will the Core Strategy encourage more sustainable consumption patterns and lifestyles?	+	A closer relationship between homes, jobs and other services should encourage and assist residents in meeting their needs locally. However, it will also be important to secure a behavioural change towards these lifestyle changes. In addition, it is important that facilities and services are adequate to meet all needs locally.	<ul style="list-style-type: none"> • Promote behavioural change towards more sustainable lifestyles • Provide adequate facilities and services to meet local needs
7. Will the Core Strategy minimise the use of scarce or non-renewable	+?	This policy should promote use of urban and previously developed land (PDL) and should have a positive impact in	<ul style="list-style-type: none"> • Seek to sustainably and locally source products and raw materials

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Policy CS1 – Sustainable Neighbourhoods			
SA Objective	Score	Predicted effect (s)	Mitigation
resources such as land, minerals and water?		terms of non-renewable resources through energy, waste and water objectives amongst others. However, it does not specifically mention local sourcing of products and raw materials e.g. for building purposes.	<ul style="list-style-type: none"> Promote sustainable construction
8. Will the Core Strategy encourage the protection and enhancement of landscape?	+	This policy should have a positive impact on the landscape objective because it seeks to enhance local surroundings and protect distinctiveness and also to avoid potentially harmful development to meet the objective of supporting a closer relationship between homes, jobs and other services which could otherwise result in potential negative impacts on the landscape.	
9. Will the Core Strategy maintain or enhance the character of the built and historic environment?	?	It is not clear in the policy whether or not the historic environment will be protected, particularly given that there are significant historic assets in urban areas of Broxbourne (e.g. Waltham Cross and Hoddesdon town centres), although it is assumed that regeneration will protect and enhance the built environment given that it aims to 'enhance local surroundings'.	<ul style="list-style-type: none"> Improvements to the built environment should also protect the historic environment
10. Will the Core Strategy reduce waste and encourage sustainable waste management?	+	Waste policies under this policy and an aim for sustainable neighbourhoods should have a positive impact towards reducing waste and encouraging sustainable waste management. As previously mentioned, it will also be important to promote behavioural change towards more sustainable approach to waste – reduction, reuse and recycling.	<ul style="list-style-type: none"> Promote behavioural change towards more sustainable lifestyles Promote sustainable construction
11. Will the Core Strategy improve health and/or reduce health inequalities in the Borough?	+?	<p>Planning for growth in an around existing urban areas should have a positive impact on public health, by bringing health and welfare services closer to the people who need them. Alongside this, improved accessibility should benefit people who need to use health services further afield.</p> <p>However, this would go towards reducing health inequalities only if service provision is targeted to address Broxbourne's specific health inequalities, and focuses on the geographical areas that are worse off.</p> <p>Increasing walking and cycling opportunities is likely to</p>	<ul style="list-style-type: none"> Provide health services for older people (including intermediate, preventative and social care), mental health service, support programmes for childhood obesity and smoking Consider starting with the wards that have higher 'health deprivation' levels, worst off of which are Bury Green and Waltham Cross.

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Policy CS1 – Sustainable Neighbourhoods			
SA Objective	Score	Predicted effect (s)	Mitigation
		<p>encourage healthier behaviour. Protecting open spaces and nurturing wildlife in their natural habitats would contribute to healthy leisure and recreational opportunities for local people and children.</p> <p>Designing out crime at street level would also Again, the impact on health inequalities would depend on the geographical spread of public realm and open space improvements</p>	
12. Will the Core Strategy help to create communities where people feel safe and that they belong, without excluding others?	0	<p>As the policy makes no mention of community engagement, its impact on this SA Objective has been scored as negligible. There may be some positive impacts linked to community facility provision, which may encourage community spirit and support community level organisations. Protecting local distinctiveness may assist understanding and ultimately cohesion between different cultural or ethnic groups. Efforts towards designing out crime and anti-social behaviour may contribute to lower levels of perceived crime, although this would need to be supported strongly by public awareness-raising activities.</p>	<ul style="list-style-type: none"> • Encourage community engagement in development planning. • Consider programmes and campaigns for raising public awareness of realistic crime and ASB figures.
13. Will the Core Strategy move the Borough towards a situation where housing is of high quality, and available and affordable for all?	+?	<p>The policy should have a positive impact on this SA Objective in terms of high quality, high density, accessible and environmentally sustainable housing. However its contribution to reducing Broxbourne's housing affordability gap and alleviating homelessness will depend on the emphasis put on housing mix in other policies and during implementation.</p>	<ul style="list-style-type: none"> • Consider mentioning affordability and housing mix alongside environmental sustainability.
14. Will the Core Strategy help to reduce inequality within the Borough?	+?	<p>The policy should have minor positive impacts on this SA Objective in terms of greater job opportunities, greater physical access for all to jobs and other services through public transport. Situating development in urban areas may have a regenerative effect on disadvantaged areas, depending on specific locations of developments. Environmentally sustainable buildings are likely to reduce fuel poverty, if these are accessible by lower income groups.</p>	<ul style="list-style-type: none"> • Emphasise support services for people out of work, particularly long-term unemployed. • Consider mentioning affordability and housing mix alongside environmental sustainability.
15. Will the Core Strategy help to	0	While better public transport and dense mixed use development	<ul style="list-style-type: none"> • Consider up-skilling programmes,

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Policy CS1 – Sustainable Neighbourhoods			
SA Objective	Score	Predicted effect (s)	Mitigation
increase skills and support the Borough's requirement for skilled workers?		may make it easier for some people to access any training opportunities available, this policy is largely unlikely to have any significant impact on skills and training.	potentially in collaboration with existing or incoming employers who need high-skilled workers.
16. Will the Core Strategy contribute to the development of a thriving, innovative, high skill economy in the Borough?	+	This policy should have a positive impact on the economy by encouraging additional inward investment, improvements to town centres and high streets, job opportunities, improved accessibility and a closer relationship between homes and jobs. Overall, it should improve the borough as a place to both live and work. However it is not expected that policy will promote high skilled jobs or encourage innovation.	
Summary			
<p>Given the overall aim to achieve 'sustainable neighbourhoods', it is unsurprising that this policy should have a number of positive impacts against the SA framework. In order to truly deliver a significant positive impact – e.g. in terms of water, waste, sustainable design etc – it is important that behavioural change is promoted alongside improvements to development and associated policies. It is possible that this policy will minimise the risk of pollution however this is only an assumption and the impacts of construction could be considered alongside this. Moreover, materials could be sourced locally and sustainable construction principles could be adopted. Although the policy should enhance the built environment, it is unclear whether there could be potential negative impacts on the historic environment as a result of regeneration and growth.</p> <p>This policy should have a positive impact on the economy by encouraging additional inward investment, improvements to town centres and high streets, job opportunities, improved accessibility and a closer relationship between homes and jobs. Overall, it should improve the borough as a place to both live and work. However it is not expected that policy will promote high skilled jobs or encourage innovation.</p> <p>The impact of this policy on health, housing and equalities depends largely on implementation, but is likely to be positive on the whole. The omission of community engagement in a sustainable neighbourhood's policy is a significant gap which should be addressed, in order to truly achieve sustainability at all levels.</p>			
Mitigation measures:			
<p>Mitigation measures that could improve the sustainability of this policy include:</p> <ul style="list-style-type: none"> • Avoid negative impacts on existing urban biodiversity • Consider green corridors for transport that promote wildlife • Consider remediation of land • Seek improvements to the water quality of water courses • Promote behavioural change towards more sustainable lifestyles • Provide adequate facilities and services to meet local needs • Seek to sustainably and locally source products and raw materials 			

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Policy CS1 – Sustainable Neighbourhoods			
SA Objective	Score	Predicted effect (s)	Mitigation
		<ul style="list-style-type: none"> • Promote sustainable construction • Improvements to the built environment should also protect the historic environment • Specifically mention health services for older people (including intermediate, preventative and social care), mental health service, support programmes for childhood obesity and smoking • Consider starting with the wards that have higher 'health deprivation' levels, worst off of which are Bury Green and Waltham Cross. • Encourage community engagement in development planning. • Consider programmes and campaigns for raising public awareness of realistic crime and ASB figures. • Consider mentioning affordability and housing mix alongside environmental sustainability. • Emphasise support services for people out of work, particularly long-term unemployed. • Consider mentioning affordability and housing mix alongside environmental sustainability. • Consider up-skilling programmes, potentially in collaboration with existing or incoming employers who need high-skilled workers. 	

Policy CS2 – Housing Development			
SA Objective	Score	Predicted effect (s)	Mitigation
1. Will the Core Strategy benefit biodiversity?	-	Overall this policy will have a negative impact on biodiversity given the housing delivery targets and associated land requirements to include green belt, although the policy implies that urban sites will be prioritised and states that biodiversity will be accounted for in masterplans and environmental capacity considered in the allocation of small edge-of urban and large green belt sites. Although it is alluded to in the policy and substantiated in supporting text, there is potential to clarify that urban sites will be prioritised and a sequential approach adopted. It would be of benefit to consider biodiversity loss on any housing sites (including urban biodiversity) and its compensation or enhancement.	<ul style="list-style-type: none"> • 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
2. Will the Core Strategy reduce levels of pollution?	-	The delivery of housing could potentially result in pollution (e.g. of water courses, of soil and from noise) from construction and new activities as a result of new development (e.g. residential activities, associated facilities and services etc), although it is noted that the policy states that masterplans should address sewerage, drainage and other measures that should minimise pollution etc.	<ul style="list-style-type: none"> • Consider the remediation of land where appropriate • Ensure the risk of pollution (noise, air, ground etc) is minimised at all housing sites
3. Will the Core Strategy conserve and / or improve water resources?	-	New development will increase water consumption and place additional pressure on water resources. Development could also pollute water courses. However it is noted that the policy states that masterplans will consider utilities, sewerage, sustainable drainage and sustainability standards. It is unclear whether such design measures will include water storage and saving methods.	<ul style="list-style-type: none"> • Ensure that the risk of pollution of water courses is minimised at all housing sites • Consider water storage and saving methods as part of sustainability and design standards
4. Will the Core Strategy provide for modal shift to sustainable transport systems?	?	The location of additional housing may not facilitate a modal shift to sustainable transport systems, for example it is outlined in supporting text for the policy that West of Hoddesdon Area of Search already has a restriction in terms of local highway authority opposition to new road links. It is assumed that 'infrastructure considerations' for new sites includes transport, although this is unclear and it does not take in to account sustainable options. It is, however, noted that masterplanning will take in to account public transport and walking and cycling.	<ul style="list-style-type: none"> • Consider sustainable transport options as part of areas of search for potential housing sites

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Policy CS2 – Housing Development			
SA Objective	Score	Predicted effect (s)	Mitigation
5. Will the Core Strategy help to prevent and / or reduce any potential adverse impacts from climate change?	?	Although masterplanning takes in to account sustainability standards and flood risk, it is not clear from the policy whether areas of search for potential housing sites takes in to account climate change issues such as flood risk although it takes in to account 'local environmental capacity'. It is assumed, although unclear, whether sustainability standards includes energy efficiency and the potential for renewable and low carbon energy could be considered for master planning and site selection (for example, different sites may have greater potential for different forms of renewable energy and district heating is not considered under this policy).	<ul style="list-style-type: none"> • Consider flood risk as part of areas of search for potential housing sites • Consider the potential for low carbon energy sources, include district heating and renewables.
6. Will the Core Strategy encourage more sustainable consumption patterns and lifestyles?	?	Although masterplanning takes in to account providing for local facilities and good accessibility, it is not clear from the policy whether areas of search for potential housing sites takes in to account areas that will provide for needs locally and that will promote sustainable consumption patterns and lifestyle more generally. The policy also does not account for sustainable construction to source material locally or areas where promoting behavioural change may be better facilitated.	<ul style="list-style-type: none"> • Location of housing sites could suggest opportunities to promote sustainable consumption patterns and lifestyles
7. Will the Core Strategy minimise the use of scarce or non-renewable resources such as land, minerals and water?	-	Inevitably housing delivery and additional sites will have a negative impact against this objective, particularly given that green belt and green field land will need to be used; this includes a significant number of homes to be delivered on green belt land. Although it is acknowledged that policy sets out measures to minimise impact. However, it does not specify a sequential approach to prioritising PDL/brownfield land in areas of search. It also does not refer to sustainable construction and site selection principles.	<ul style="list-style-type: none"> • Stipulate that urban sites will be prioritised and that the sequential approach to searching for housing areas will be applied • Consider sustainable construction principles (or signpost links to relevant policies for this) • Consider site selection criteria to include minimising the use of scarce or non-renewable resources
8. Will the Core Strategy encourage the protection and enhancement of landscape?	-	Inevitably housing delivery will have a negative impact on landscape, although it is acknowledged that in the policy green belt is considered for areas of search and site allocation and landscape impacts and open spaces are considered for masterplanning. However it is unclear whether landscape impacts and open spaces are considered as part of areas of search and site allocation.	<ul style="list-style-type: none"> • Consider site selection criteria to include landscape and open space impacts

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Policy CS2 – Housing Development			
SA Objective	Score	Predicted effect (s)	Mitigation
9. Will the Core Strategy maintain or enhance the character of the built and historic environment?	?	Policy measures for 'comprehensive masterplans' should have a positive impact against the objective of enhancing the character of the built environment, although it is not specifically mentioned within policy text. In addition, 'managing impact on the borough's leafy suburban character' as part of green belt site allocation is assumed to also minimise negative, and enhance positive, impacts on the built environment. However it is unclear in the policy whether or not the historic environment will be considered as a constraint in terms of site selection and impacts mitigated as part of delivery.	<ul style="list-style-type: none"> • Consider site selection criteria to include built and historic environment impacts • Consider masterplan requirements to protect the historic environment and enhance the built environment
10. Will the Core Strategy reduce waste and encourage sustainable waste management?	-	Inevitably housing delivery and additional sites will increase waste during the construction phase and following delivery. The policy could introduce waste management design principles and sustainable construction principles to minimise impact as part of 'sustainability standards', although this is not clearly stated within the policy. How waste will be managed could also be considered as part of site selection criteria.	<ul style="list-style-type: none"> • Minimise construction waste and consider waste management at developments • Consider site selection criteria to include how waste could be managed
11. Will the Core Strategy improve health and/or reduce health inequalities in the Borough?	0	<p>This policy is likely to have a neutral impact on health inequalities in Broxbourne.</p> <p>The quantum of development and the percentage of Greenfield (35%) may have health and well-being related risks in terms of access to open space, urbanisation of rural places valued for tranquillity and deteriorating air quality.</p> <p>However the emphasis on brownfield (65%) and edge-of-urban development may bring health and welfare services closer to people who need them.</p> <p>The policy aims to promote walking and cycling, especially in green belt sites.</p> <p>Therefore the potential positive and negative impacts are likely to balance each other out.</p>	<ul style="list-style-type: none"> •
12. Will the Core Strategy help to create communities where people feel	+?	This policy commits the council to engage the community in masterplanning for Greater Brookfield and large green belt	<ul style="list-style-type: none"> • Mention crime and community safety issues associated with dense housing

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Policy CS2 – Housing Development			
SA Objective	Score	Predicted effect (s)	Mitigation
safe and that they belong, without excluding others?		sites. Depending on involvement levels, this is likely to oster a sense of belonging among future residents. The provision of community facilities as part of housing development is likely to empower community level organisations and support social cohesion.	development in Greenfield and brownfield sites.
13. Will the Core Strategy move the Borough towards a situation where housing is of high quality, and available and affordable for all?	+?	The main aim of this policy matches the thrust of this SA Objective. The emphasis on affordability and proposed flexible approach to meet affordable housing targets is likely to result in better housing in terms of community benefits. Broad selection of sites is likely to allow for a variety of housing types. However, housing completion targets shortfall of housing needs by 500 homes over the period (2009-2026 – does not include housing figures for 2009/10). 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.	<ul style="list-style-type: none"> Housing completion targets for the plan period should meet housing needs.
14. Will the Core Strategy help to reduce inequality within the Borough?	+?	The policy aims to provide options for people in inappropriate homes, which should contribute to reducing inequality in Broxbourne. The emphasis on sustainable homes should help reduce fuel poverty. The proportion of brownfield development and edge-of-urban should have an indirect impact on disabled people, in terms of access to services and facilities. Wormley, Turnford and Bury Green, areas with high deprivation levels, are likely to gain regeneration benefits through the housing stated to be developed there. On the whole, the policy is likely to have a minor positive impact on this SA Objective, which may be reinforced through careful implementation.	<ul style="list-style-type: none"> Provide entrepreneurship support and training along with social housing, especially in areas with particularly low income group residents, or long term unemployed people.
15. Will the Core Strategy help to increase skills and support the Borough's requirement for skilled	0	This policy is largely unlikely to have a significant impact on skills and skills training. The proportion of brownfield development and edge-of-urban sites may have an indirect	<ul style="list-style-type: none"> Include a review of skills and training needs during community engagement around masterplans. Planning gain can be

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Policy CS2 – Housing Development			
SA Objective	Score	Predicted effect (s)	Mitigation
workers?		impact on access to any existing training facilities in town centres.	one of many sources of funding for relevant and targeted training programmes.
16. Will the Core Strategy contribute to the development of a thriving, innovative, high skill economy in the Borough?	+	The policy should support local shops and job opportunities, although it is not expected that the policy will encourage innovation and a high skill economy. It does not appear as though linking residents to employment areas is considered as part of areas of search and site selection criteria.	<ul style="list-style-type: none"> Consider the location and accessibility of employment areas as part of site selection criteria
Summary			
<p>Inevitably this policy has a number of negative impacts given that the delivery of housing and housing sites (particularly on greenfield and green belt) will have negative impacts against a number of environmental objectives (e.g. land, water, biodiversity, landscape, climate change etc). Although measures to mitigate such impacts are referred to within the policy, some of these measures could be made clearer and may already be outlined in other policies that are relevant to this policy. Thus it should be made clear whether policies for high design and sustainability standards (e.g. CS1 Sustainable Neighbourhoods) apply for all new development. Moreover, areas of search and site selection criteria are alluded to within the text but whether this will have positive impacts against SA objectives is unclear from the detail regarding this.</p> <p>The economy should benefit from supported local shops and job opportunities, although it is not expected that the policy will encourage innovation and a high skill economy. It does not appear as though linking residents to employment areas is considered as part of areas of search and site selection criteria.</p> <p>From a social perspective, the policy focuses on housing provision and should therefore have a positive impact against the housing objective in particular as well as community safety, cohesion and equality objectives. In particular, the commitment to engage communities in masterplanning should deliver a significant positive impact on social sustainability. However, in terms of Broxbourne's skills gap and economic inequalities, the policy has scope for improvement. Broadening the understanding of housing provision to include socio-economic indicators could improve the sustainability of this policy.</p>			
Mitigation measures:			
<p>Mitigation measures that could improve the sustainability of this policy include:</p> <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 transport options and the location and accessibility of employment areas as part of areas of search for potential housing sites 			

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Policy CS2 – Housing Development			
SA Objective	Score	Predicted effect (s)	Mitigation
		<ul style="list-style-type: none"> • Consider the potential for low carbon energy sources, include district heating and renewables. • Location of housing sites could suggest opportunities to promote sustainable consumption patterns and lifestyles • Consider sustainable construction principles (or signpost links to relevant policies for this) • Consider masterplan requirements to protect the historic environment and enhance the built environment • Minimise construction waste and consider waste management at developments • Mention crime and community safety issues associated with dense housing development in Greenfield and brownfield sites. • Provide entrepreneurship support and training along with social housing, especially in areas with particularly low income group residents, or long term unemployed people. • Include a review of skills and training needs during community engagement around masterplans. Planning gain can be one of many sources of funding for relevant and targeted training programmes. 	

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Policy CS3 – Housing Mix			
SA Objective	Score	Predicted effect (s)	Mitigation
1. Will the Core Strategy benefit biodiversity?	+?	The exact housing mix and density will have repercussions for private greenspace and other greenspace associated with dwellings. Promoting a housing mix and larger properties on edge-of-urban and large green belt sites should encourage private green space and gardens thus support biodiversity to a certain extent. However, although it is referred to in supporting text, the policy does not provide detail on greenspace.	• Consider the benefits of, and targets for, private greenspace
2. Will the Core Strategy reduce levels of pollution?	0	This policy is unlikely to have a significant impact against this SA objective.	
3. Will the Core Strategy conserve and / or improve water resources?	+?	Density of housing and dwelling size can have an impact on water consumption. It is assumed that, as average household size decreases, average per capita water use within households increases. The exact significance of dwelling mix under this policy is unclear, although it does support larger properties and design guidance should minimise water consumption.	• Design guidance should minimise water consumption
4. Will the Core Strategy provide for modal shift to sustainable transport systems?	0	This policy is unlikely to have a significant impact against this SA objective.	
5. Will the Core Strategy help to prevent and / or reduce any potential adverse impacts from climate change?	+?	Dwelling densities and housing mix can have an impact on the viability of climate change and energy efficiency measures (e.g. district heating, renewable energy technology, flood proofing measures etc). The exact significance of this policy against climate change objectives is unclear. However, design guidance should support such measures.	• Design guidance should incorporate measures to address climate change and energy efficiency
6. Will the Core Strategy encourage more sustainable consumption patterns and lifestyles?	+?	The policy states that size/type and density will be informed by design considerations, surroundings and infrastructure capacity. This suggests a potentially positive impact towards sustainable consumption patterns and lifestyles. Policy text for design guidance states that it will help to accommodate changing needs and lifestyles.	• Design guidance should promote consumption patterns and lifestyles that are sustainable
7. Will the Core Strategy minimise the use of scarce or non-renewable resources such as land, minerals and	+?	The dwelling densities and housing mix set out in the policy is based upon calculated need and specialist studies thus should use land efficiently. The policy also states that it will be	• Design guidance should set out standards to minimise the use of scarce or non-renewable resources such as land,

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Policy CS3 – Housing Mix			
SA Objective	Score	Predicted effect (s)	Mitigation
water?		informed by design considerations which should promote efficiency. Design guidance could also prompt sustainable design practices to include minimising demand for raw materials and products, re-use of existing materials, locally sourced materials, efficient land use etc.	minerals and water
8. Will the Core Strategy encourage the protection and enhancement of landscape?	+?	Given that size/type and density of development proposals will be informed by local surroundings, it is expected that this policy should protect the landscape. Accessibility of dwellings to local open space, such as parks and private greenspace, is not detailed within the policy although it could be a consideration covered under design guidance.	<ul style="list-style-type: none"> Consider accessibility of private greenspace and other open space depending upon housing mix. This could be considered as part of design guidance.
9. Will the Core Strategy maintain or enhance the character of the built and historic environment?	+?	Housing mix – size, type and density – will have repercussions for the built environment. It is expected that this policy should have a positive impact given that it is informed by design considerations and local surroundings. Design guidance could also bring benefits to the built environment, although it is not clear how much the policy will cover the existing built environment and dwellings.	<ul style="list-style-type: none"> Design guidance should consider how the built and historic environment will be maintained and enhanced
10. Will the Core Strategy reduce waste and encourage sustainable waste management?	+?	Density of housing and dwelling size can have an impact on the amount of waste produced and the ability to reduce, recycle and generally sustainably manage waste. The exact significance of this policy against waste objectives is unclear. However, design guidance should support such measures.	<ul style="list-style-type: none"> Design guidance should incorporate measures to address waste management
11. Will the Core Strategy improve health and/or reduce health inequalities in the Borough?	+?	<p>The provision of specialist accommodation for the elderly, the disabled, those with mental health issues and addictions should have a significant positive impact on health inequality. The adoption of Lifetime Homes design standards is should also benefit people with major lifestyle changes as a result of age or health concerns.</p> <p>However, the policy may also have some negative impacts on health inequalities. The 40% affordable homes target is ambitious, but still less than the SHLA recommended proportion of 52% affordable. As a result, over the plan period, a large number of people are still likely to be homeless or in</p>	<ul style="list-style-type: none"> Avoid large concentrations of social housing. Encourage ‘pepper-potting’ of suitable housing types on the same sites and neighbourhoods as much as possible.

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Policy CS3 – Housing Mix			
SA Objective	Score	Predicted effect (s)	Mitigation
		<p>inappropriate accommodation, which may lead to stress or other health and well being related complications.</p> <p>Using commuted payments from the development of market properties for off-site provision of social housing may lead to large concentrations of socially rented accommodation on some sites. Common social, behavioural or reputational issues linked to such concentrations (e.g. tower blocks, could have a negative impact on residents' health and well-being.</p> <p>On the whole, the significant positive impacts Lifetime Homes standards and specialist accommodation for the elderly, ill and disabled, are likely to be balanced by the negative impacts stated above, making the overall impact of the policy on this SA Objective a minor positive.</p>	
12. Will the Core Strategy help to create communities where people feel safe and that they belong, without excluding others?	-?	<p>Using commuted payments from the development of market properties for off-site provision of social housing may lead to large concentrations of socially rented accommodation on some sites. This may lead to social exclusion issues for these residents, which are also linked to worsened social cohesion and increased fear of crime.</p> <p>However the use of these payments to support housing association activities may contribute to supporting community level organisations.</p>	<ul style="list-style-type: none"> • Avoid large concentrations of social housing. Encourage 'pepper-potting' of suitable housing types on the same sites and neighbourhoods as much as possible. • Invest in social cohesion programmes, such as festivals and events, possibly in collaboration with schools. • Raise public awareness of realistic crime levels and measures to prevent crime.
13. Will the Core Strategy move the Borough towards a situation where housing is of high quality, and available and affordable for all?	+?	<p>The policy should encourage high density housing in some locations, provide environmentally sustainable housing, increase the choice of housing types, and also help cater to the needs of older, ill and disabled people.</p> <p>The 40% affordable homes target is ambitious, but still less than the SHLA recommended proportion of 52% affordable. As a result, over the plan period, a large number of people are still likely to be homeless or in inappropriate accommodation</p>	<ul style="list-style-type: none"> • Consider organising support programmes for the homeless, such as soup kitchens, clothing and further information. • Incorporate assistance for those who may want to move out of the area into the housing application process.
14. Will the Core Strategy help to reduce inequality within the Borough?	+?	Through the provision of 40% affordable housing, the policy should help a section of people on to the housing ladder,	<ul style="list-style-type: none"> • Avoid large concentrations of social housing. Encourage 'pepper-potting' of

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Policy CS3 – Housing Mix			
SA Objective	Score	Predicted effect (s)	Mitigation
		<p>thereby improving their standard of living. The implied focus on socially rented over intermediate housing in the supporting text should reinforce this.</p> <p>The design standards planned are likely to reduce fuel poverty as well as pensioner poverty by providing environmentally sustainable, affordable and adaptable homes.</p> <p>However, off-site provision of social housing linked to new developments or regeneration may concentrate economic and social inequalities geographically, which would have a significant negative impact against this SA Objective.</p>	suitable housing types on the same sites and neighbourhoods as much as possible.
15. Will the Core Strategy help to increase skills and support the Borough's requirement for skilled workers?	?	<p>Large family homes in pleasant green neighbourhoods as planned for edge-of-urban sites, green belt sites and Greater Brookfield should improve the attractiveness of Broxbourne to people in higher-paying high skilled jobs. This could have an indirect impact on the economic structure over the longer term, by bringing employers needing high skilled workers into the frame, which may start off a chain of up-skilling, training and better employment opportunities for those in need.</p> <p>However, it is impossible to make these assumptions at this point and therefore to score the policy against this SA Objective.</p>	
16. Will the Core Strategy contribute to the development of a thriving, innovative, high skill economy in the Borough?	+?	Supporting text to the policy suggests that more family and larger homes will attract higher-value jobs. This should have a positive impact towards developing a high skill economy. The location of employment in relation to residential areas could impact on housing mix and it is assumed that considering 'local surroundings and infrastructure capacity' should allow needs to be taken in to account for a positive impact on the economy.	
Summary			
Housing mix can have a number of sustainability impacts. Informed by specialist studies and design guidance, the impacts under this policy are potentially positive depending upon implementation and the detail of design guidance. For example, it could promote sustainable use of water, land and energy use, the management of waste and flood risk, and promote enhancements to the built environment. Larger homes may attract high-skilled workers and thus associate			

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Policy CS3 – Housing Mix			
SA Objective	Score	Predicted effect (s)	Mitigation
<p>high-value jobs, which could assist in addressing the key Broxbourne issue of a low-value, low-knowledge economy. The policy, however, does not provide detail on access to greenspace linked to dwellings. In addition, while the policy is aimed at improving housing conditions, Broxbourne's acute housing affordability gap makes it impossible to score it positively without reservations, especially as the adopted affordability target is 12% below the SHMA recommended target. The introduction of design standards, Lifetime Homes and emphasis on those with special needs are all positive elements that contribute to sustainability. However the commuted payment channel of delivering social housing has risks in terms of social cohesion, equality and well being.</p>			
Mitigation measures:			
<p>Mitigation measures that could improve the sustainability of this policy include:</p> <ul style="list-style-type: none"> • Consider the benefits of, and targets for, private greenspace and access to other open space • Design guidance should cover a number of topics, to include: <ul style="list-style-type: none"> • minimise water consumption • incorporate measures to address climate change and energy efficiency • promote consumption patterns and lifestyles that are sustainable • minimise the use of scarce or non-renewable resources such as land, minerals and water • how the built and historic environment will be maintained and enhanced • address waste management • private greenspace and access to other open space • Avoid large concentrations of social housing. Encourage 'pepper-potting' of suitable housing types on the same sites and neighbourhoods as much as possible. • Invest in social cohesion programmes, such as festivals and events, possibly in collaboration with schools. • Raise public awareness of realistic crime levels and measures to prevent crime. • Consider organising support programmes for the homeless, such as soup kitchens, clothing and further information. • Incorporate assistance for those who may want to move out of the area into the housing application process. 			

Policy CS4 – Travelling Community			
SA Objective	Score	Predicted effect (s)	Mitigation
1. Will the Core Strategy benefit biodiversity?	-?	Additional pitches could have a negative impact on biodiversity, particularly given that the policy concedes that green belt sites will also be considered. The policy does, however, set out limitations relating to when additional provision will be considered, where it can be located in relation to national guidance and local objectives, and restrictions on important protected areas – although it can only be assumed that these measures are set out with biodiversity interests in mind.	<ul style="list-style-type: none"> • Ensure that biodiversity impact by the travelling community (new and existing sites) is minimised; consider biodiversity and ensure it is protected as part of site selection criteria and policies
2. Will the Core Strategy reduce levels of pollution?	-?	Although the policy states that sites will avoid areas of pollution, it does not set out measures to avoid pollution that may result as a consequence of additional pitches and plots. This is not expected to be a significant impact.	<ul style="list-style-type: none"> • Set out measures to minimise potential pollution resulting from additional pitches and plots and existing sites
3. Will the Core Strategy conserve and / or improve water resources?	-?	Additional pitches will place increased pressure on water resources and potentially could increase the risk of water course pollution. Although the policy states that sites will be capable of receiving essential utilities and overall the impact is not expected to be significant.	<ul style="list-style-type: none"> • Set out measures to minimise potential pollution resulting from additional pitches and plots and existing sites
4. Will the Core Strategy provide for modal shift to sustainable transport systems?	?	Plots should have good accessibility and 'ideally' be close access to local services, however the policy is not anticipated to significantly increase the use of sustainable transport or translate into long-term behavioural change.	
5. Will the Core Strategy help to prevent and / or reduce any potential adverse impacts from climate change?	+?	Although a significant impact by this policy towards preventing/reducing adverse impacts of climate change is not anticipated, the policy does state that sites must seek to address flood risk.	
6. Will the Core Strategy encourage more sustainable consumption patterns and lifestyles?	+?	Plots should 'ideally' be close access to local services and receive essential utilities thus there should be some encouragement of more sustainable consumption patterns, although the policy is not anticipated to translate into long-term behavioural change.	
7. Will the Core Strategy minimise the use of scarce or non-renewable resources such as land, minerals and	?	Although the policy sets out strategic criteria by which to select appropriate sites which may have some beneficial values in promoting efficient land and water use etc, it is unlikely to have	

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Policy CS4 – Travelling Community			
SA Objective	Score	Predicted effect (s)	Mitigation
water?		a significant effect and there is still potential for pitches on green belt sites.	
8. Will the Core Strategy encourage the protection and enhancement of landscape?	-?	Overall additional sites are likely to result in a landscape impact, particularly given that green belt sites will be considered, although the policy does set out strategic criteria by which to select appropriate sites which may have some beneficial value in protecting landscape.	
9. Will the Core Strategy maintain or enhance the character of the built and historic environment?	?	This policy is not anticipated to have a significant impact on the built and historic environment. Although the location of sites could impact on historical assets, it is assumed that national guidance and local objectives should mitigate this.	<ul style="list-style-type: none"> • Set out measures to minimise potential impacts on the historic environment resulting from additional pitches and plots and existing sites; consider the built and historic environment as part of site selection criteria
10. Will the Core Strategy reduce waste and encourage sustainable waste management?	-	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
11. Will the Core Strategy improve health and/or reduce health inequalities in the Borough?	0	The policy may improve access for the travelling community to health and welfare services. However, this may translate into additional pressure on these services. However no significant impact on health inequalities is expected.	<ul style="list-style-type: none"> • Consider travelling community when accounting for health and welfare service needs.
12. Will the Core Strategy help to create communities where people feel safe and that they belong, without excluding others?	?	By default providing pitches for travelling communities means supporting their community level activities and organisations. Ideally, continuing to support the presence of these communities in the midst of Broxbourne's other communities may improve mutual understanding between various cultural groups, through the visibility of different lifestyles. However, the high number of evictions in the area suggests there may be friction between travelling communities and permanent ones in the area, and this may have negative social cohesion and community safety impacts.	<ul style="list-style-type: none"> • Support fairs and circuses so as to promote local people's access to them. • Work with schools, especially those which may have pupils from travelling communities. • Consider public awareness programmes to dispel superstitions and to unpick any common negative beliefs about travelling communities. • Offer assistance to travelling communities in managing their local environmental impact which may otherwise lead to issues with neighbours - i.e. waste production,

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Policy CS4 – Travelling Community			
SA Objective	Score	Predicted effect (s)	Mitigation
			pollution, any local biodiversity impacts.
13. Will the Core Strategy move the Borough towards a situation where housing is of high quality, and available and affordable for all?	0	No significant impact on housing is expected.	
14. Will the Core Strategy help to reduce inequality within the Borough?	0	The policy may improve access for the travelling community to services and facilities. However, this may translate into additional pressure on these services. However no significant impact on equality is expected.	• Consider travelling community when accounting for local service needs.
15. Will the Core Strategy help to increase skills and support the Borough's requirement for skilled workers?	0	No significant impact on skills is expected.	
16. Will the Core Strategy contribute to the development of a thriving, innovative, high skill economy in the Borough?	?	This policy should support the travelling community in providing contributions towards the Broxbourne economy, although the role of the community with regards to the Broxbourne economy are not specified within policy text and impacts are not expected to be significant particularly with regard to innovation and higher skills.	• Consider the employment needs and contributions made to the economy by the travelling community
Summary			
<p>Overall any environmental impacts resulting from this policy are anticipated to be minor, given that although it supports the need for additional sites, it also sets out strategic criteria for site selection that should mitigate larger impacts. However, some negative impact on biodiversity, pollution, water consumption, land use and landscape may be inevitable from supporting additional pitch provision. Improvements in access to utilities etc could also mitigate some of the negative impacts likely to occur. Behavioural change is unlikely as a result of this policy e.g. towards sustainable transport and sustainable consumption. The role of the travelling community with regards to the borough's economy and employment is not explored within the policy text and could be considered. In addition, this policy does not consider existing pitches, potential impacts and improvements (mitigation and enhancement) that may be needed at these locations.</p> <p>The policy is not expected to have significant impacts on health, housing, equality or skills. Its impact on community safety and cohesion could be positive or negative, entirely depending on implementation. Travelling communities, while they live in self-imposed isolation from other people, may be an asset to a neighbourhood or town, if they are positively linked into the community's fabric.</p>			
Mitigation measures:			
Impacts are expected to be minor and in some cases it is not possible to suggest mitigation, however some measures have emerged that could improve the sustainability of the plan:			

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Policy CS4 – Travelling Community			
SA Objective	Score	Predicted effect (s)	Mitigation
		<ul style="list-style-type: none"> • Consider existing pitches (potential impacts and improvements) • Ensure that biodiversity impact by the travelling community (new and existing sites) is minimised; consider biodiversity and ensure it is protected as part of site selection criteria and policies • Set out measures to minimise potential pollution resulting from additional pitches and plots and existing sites • Set out measures to minimise potential impacts on the historic environment resulting from additional pitches and plots and existing sites; consider the built and historic environment as part of site selection criteria • Consider the sustainable management of waste arising from additional and existing pitches and plots • Consider the employment needs and contributions made to the economy by the travelling community • Consider travelling community when accounting for health and welfare service needs. • Consider travelling community when accounting for local service needs. • Improve mutual understanding between communities, through means like - <ul style="list-style-type: none"> ○ Supporting fairs and circuses so as to promote local people's access to them. ○ Working with schools, especially those which may have pupils from travelling communities. ○ Public awareness programmes to dispel superstitions and to unpick any common negative beliefs about travelling communities. • Offering assistance to travelling communities in managing their local environmental impact which may otherwise lead to issues with neighbours - i.e. waste production, pollution, any local biodiversity impacts. 	

Policy CS5 – Employment			
SA Objective	Score	Predicted effect (s)	Mitigation
1. Will the Core Strategy benefit biodiversity?	-?	Although employment is initially supported on existing sites, it is likely that areas of search - which include green belt - could lead to development of employment resulting in a negative impact on biodiversity. However, it is important to note that comprehensive masterplans that cover wildlife and biodiversity are required in the policy, which should mitigate impacts. Although improvements to existing employment areas are stated within the policy, the exact extent of improvements - which could include green space and biodiverse improvements thus improve the borough as a place to both live and work - are not clear (and could simply cover employment/economic purposes only).	<ul style="list-style-type: none"> • Avoid negative impacts on biodiversity in the search for new employment sites and consider as part of search criteria. • Consider improvements to existing employment areas as high quality places to work that support onsite biodiversity.
2. Will the Core Strategy reduce levels of pollution?	-?	Policy to increase employment opportunities (more jobs and new employment areas) is likely to increase the potential for pollution - noise, air, water, soil. However it is assumed that comprehensive masterplans will mitigate some of this risk, although not specifically detailed in the policy text. Although improvements to existing employment areas are stated within the policy, the exact extent of improvements - which could include remediation of sites and mitigating pollution risks - are not clear.	<ul style="list-style-type: none"> • Comprehensive masterplans should mitigate pollution risk and any sources of pollution on existing sites should be addressed.
3. Will the Core Strategy conserve and / or improve water resources?	-?	Policy to increase employment opportunities (more jobs and new employment areas) will result in increased water consumption and could result in the deterioration of water quality in borough water courses. However, it is important to note that comprehensive masterplans that cover utilities, sustainable drainage and sustainability standards, are required in the policy and should mitigate impacts. Although improvements to existing employment areas are stated within the policy, the exact extent of improvements - which could include conserving and/or improving water resources - are not clear.	<ul style="list-style-type: none"> • Avoid negative impacts on water courses in the search for new employment sites and consider as part of search criteria. • Consider improvements to existing employment areas to include conserving and/or improving water resources.
4. Will the Core Strategy provide for modal shift to sustainable transport systems?	+?	The policy states that all employment proposals should seek to reduce out-commuting, minimise vehicle trips and achieve better access by public transport, walking and cycling. In addition to comprehensive masterplans, these requirements	<ul style="list-style-type: none"> • Identify good accessibility and sustainable transport options as part of the search for new employment sites and consider as part of search criteria.

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Policy CS5 – Employment			
SA Objective	Score	Predicted effect (s)	Mitigation
		should provide for modal shift to sustainable transport systems. However it is not clear whether site selection and areas of search take in to account accessibility for residents and sustainable transport options, and it is not clear whether improvements to existing sites includes transport improvements. Work at home opportunities and live-work units are also not considered.	<ul style="list-style-type: none"> • Consider improvements to existing employment areas to include sustainable transport options. • Consider work at home opportunities and live-work units.
5. Will the Core Strategy help to prevent and / or reduce any potential adverse impacts from climate change?	?	Policy to increase employment opportunities (more jobs and new employment areas) will result in increased energy use. However, it is important to note that comprehensive masterplans that address flood risk, sustainable transport, sustainability standards and high quality design, are required in the policy and should have a positive impact towards addressing climate change. Although improvements to existing employment areas are stated within the policy, the exact extent of improvements - which could include measures to address climate change - is not clear. Work at home opportunities and live-work units are also not considered. In addition, it is unclear whether site selection and areas of search take in to account the mitigation of climate change impacts e.g. flood risk and promoting sustainable transport.	<ul style="list-style-type: none"> • Identify opportunities to mitigate climate change impacts and consider locational aspects such as flood risk and sustainable transport options as part of the search for new employment sites and consider as part of search criteria. • Consider improvements to existing employment areas to include sustainable transport options • Consider work at home opportunities and live-work units.
6. Will the Core Strategy encourage more sustainable consumption patterns and lifestyles?	+	By retaining and creating jobs, encouraging a range of employment opportunities and facilities and services, and generally seeking to reduce unemployment, reduce out-commuting, regenerate surroundings, train residents and improve accessibility; this policy should encourage more sustainable lifestyles where resident needs and met locally.	
7. Will the Core Strategy minimise the use of scarce or non-renewable resources such as land, minerals and water?	?	Although employment is initially supported on existing sites, it is likely that areas of search - which include green belt - and additional employment activities could lead to negative impacts in terms of land use and the use of other non-renewable resources. However, it is important to note that comprehensive masterplans with sustainability standards and high quality design are required in the policy, which should mitigate impacts. Improvements to existing employment areas are stated within the policy and therefore have a positive impact in terms of	<ul style="list-style-type: none"> • Identify opportunities to mitigate non-renewable resource impacts (land, minerals, water) and consider locational aspects as part of the search for new employment sites and consider as part of search criteria. • Consider improvements to existing employment areas to include addressing wasteful business activities

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Policy CS5 – Employment			
SA Objective	Score	Predicted effect (s)	Mitigation
		efficiently using land. Although existing employment practices - that could be wasteful - may not necessarily be considered under 'improvements'. Work at home opportunities and live-work units are also not considered but could further mitigate negative impacts. In addition, it is unclear whether sustainable construction principles will be followed that would locally source building material and the labour pool.	<ul style="list-style-type: none"> • Consider work at home opportunities and live-work units. • Adopt sustainable construction principles to include locally sourced labour.
8. Will the Core Strategy encourage the protection and enhancement of landscape?	?	Although employment is initially supported on existing sites, it is likely that areas of search - which include green belt - and additional employment activities could lead to negative impacts on the landscape. However, it is important to note that comprehensive masterplans that consider landscape impacts and landscaping are required in the policy, which should mitigate impacts.	<ul style="list-style-type: none"> • Protect landscape as part of the search for new employment sites and consider as part of search criteria. • Consider improvements to existing employment areas as high quality places to work that support onsite green space.
9. Will the Core Strategy maintain or enhance the character of the built and historic environment?	?	Although employment is initially supported on existing sites, it is likely that areas of search - which include green belt - and additional employment activities could lead to negative impacts on the historic environment. It is assumed, but unclear, whether comprehensive masterplans required under this policy will consider historic assets and seek to mitigate impacts.	<ul style="list-style-type: none"> • Protect the historic environment as part of the search for new employment sites and consider as part of search criteria. • Comprehensive masterplans should mitigate impacts on the historic environment.
10. Will the Core Strategy reduce waste and encourage sustainable waste management?	-?	Additional employment (jobs, employment land, range of business activities) supported under this policy is likely to overall increased waste. However, comprehensive masterplans could consider sustainable waste management and waste reduction, reuse and recycling, although this is not detailed within the text. Although improvements to existing employment areas are stated within the policy, the exact extent of improvements - which could include improved waste management policies and sustainable construction principles - are not clear. In addition, it is unclear whether sustainable construction principles will be followed to minimise waste generation. Selection criteria for areas of search could also consider implications of location for waste management.	<ul style="list-style-type: none"> • Identify opportunities to mitigate wasteful employment practises and maximise sustainable waste management and consider locational aspects as part of the search for new employment sites and consider as part of search criteria. • Consider improvements to existing employment areas to include addressing wasteful business activities • Adopt sustainable construction principles to include minimised waste and maximised reuse.
11. Will the Core Strategy improve	+?	The policy aims to create and retain jobs at town centres,	<ul style="list-style-type: none"> • Encourage healthy activity programmes as

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Policy CS5 – Employment			
SA Objective	Score	Predicted effect (s)	Mitigation
health and/or reduce health inequalities in the Borough?		existing employment areas and Greater Brookfield, and to improve pedestrian and cycle access to these jobs. This is likely to encourage more active lifestyles and healthy modes of travel. Increasing the number of jobs in Cheshunt, Waltham Cross in the short term, and Maxwell's farm and Abury farm in the longer term, may contribute to reducing health deprivation levels in these areas. As the impacts described above are indirect, the benefits will depend on implementation.	part of work, e.g. gym memberships, running, team sports as part of work culture.
12. Will the Core Strategy help to create communities where people feel safe and that they belong, without excluding others?	+?	Bringing people into employment should go a long way towards making them feel included in the community. However, the policy's emphasis on high skills and high value jobs may risk marginalising parts of the community which would still remain in low skilled industrial or ancillary work.	<ul style="list-style-type: none"> • Ensure a good mix of jobs across skill levels. • Avoid marginalising lower skilled workers in public life. Ensure that a range of leisure and support services exists for all sections of the society regardless of economic situation and socio-economic background.
13. Will the Core Strategy move the Borough towards a situation where housing is of high quality, and available and affordable for all?	0	This policy aims to work alongside the housing and housing mix policies, but no direct impact of this policy against the housing objective is expected.	
14. Will the Core Strategy help to reduce inequality within the Borough?	+?	<p>The policy states that jobs will be retained and created in a range of locations, both existing employment centres and new sites. Loss of employment sites will also be resisted. This should have a significant positive impact against this SA Objective.</p> <p>The policy aims to help more people enjoy a good standard of living, decrease the proportion of people with low incomes, and importantly, create opportunities for those currently out of work.</p> <p>There is a risk that the policy's emphasis on high skilled jobs may marginalise lower skilled sections of the community in terms of access services and facilities. Another potential risk is that job opportunities and skills may move towards the high end of the spectrum at different rates – i.e., there may be high skill jobs before there are local people with high skills. In such a scenario, local people who are currently out of work would be unable to take up the opportunities offered by the growing</p>	<ul style="list-style-type: none"> • Ensure that local people's skills profile changes at the same rate as that of job creation. • Ensure that there is a full range of jobs, including mid level or transition jobs, not just extremes of high and low skills.

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Policy CS5 – Employment			
SA Objective	Score	Predicted effect (s)	Mitigation
		economy.	
15. Will the Core Strategy help to increase skills and support the Borough's requirement for skilled workers?	+	The policy places sufficient emphasis on skills training. The use of Planning contributions towards training is likely to have a significant positive impact against this SA Objective.	<ul style="list-style-type: none"> • Work with employers to run training and up-skilling programmes.
16. Will the Core Strategy contribute to the development of a thriving, innovative, high skill economy in the Borough?	+	Employment as a main focus for this policy will translate in to a number of positive impacts it will have in terms of developing a thriving, innovative, high skill economy. This includes employee retention, improved accessibility of jobs, improved skills and training, meeting borough employment needs and broadening borough capacity. However, 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. In addition, to reduce out-migration and employee retention the policy could emphasise the borough as a high quality place to both live and work	<ul style="list-style-type: none"> • Do not overlook key traditional employment sectors and the strengths and reliability they bring to Broxbourne economy. • Emphasis on borough as a high quality place to both live and work
Summary:			
<p>Given the focus of this policy it should have a number of positive impacts for the economy, such as through the minimisation of out-commuting of residents in search of higher-skilled jobs, improved accessibility of jobs, improved skills and training, meeting borough employment needs and broadening borough employment capacity and range of opportunities. New employment areas and job opportunities (range and number) could have a negative impact against a number of environmental objectives; however this policy sets out a number of measures to mitigate impact, such as through design measures, transport considerations and efficient land use.</p> <p>Although improvements to existing employment sites is mentioned, the detail of the improvements is unclear; in particular, whether this is in terms of improvements purely for economic gain and possibly to the detriment of environmental objectives. The policy largely focuses on high standards for new employment proposals and could consider improvements to existing employment areas (their impacts, mitigation and enhancement opportunities). 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. In addition, to reduce out-migration and employee retention the policy could emphasise the borough as a high quality place to both live and work.</p> <p>Given the long term unemployment situation in Broxbourne, this policy, aiming to create 3700 new jobs in the short term, scores highly against health, equality and skills objectives in general. However, while there is sufficient emphasis on skills training, the delivery of new jobs should be well timed with the delivery and completion of training for local people. The focus on high skilled jobs may otherwise create further inequalities in Broxbourne by introducing a large number of</p>			

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Policy CS5 – Employment			
SA Objective	Score	Predicted effect (s)	Mitigation
high skilled jobs that are largely taken up by non-local people, which may in turn generate a new set of issues around in-commuting workers.			
Mitigation measures:			
<p>Mitigation measures that could improve the sustainability of this policy include:</p> <ul style="list-style-type: none"> • Adopt sustainability criteria as part of search for new employment sites (and for improvements to existing sites), consider: the location of water courses, biodiversity, good accessibility and sustainable transport options, flood risk, efficient land use, landscape, historic environment, waste management. • Masterplans and improvement to existing employment areas could include: conserving and/or improving water resources, supporting and enhancing onsite biodiversity and greenspace, accessibility and sustainable transport options, mitigation of climate change impacts, mitigate pollution risk and any sources of pollution, improvement to waste management, mitigate non-renewable resource impacts (land, minerals, water), mitigate impacts on the historic environment. • Consider work at home opportunities and live-work units. • Consider improvements to existing employment areas to include addressing wasteful business activities • Adopt sustainable construction principles to include locally sourced labour. • Identify opportunities to improve business activities e.g. waste, energy and water use • Do not overlook key traditional employment sectors and the strengths and reliability they bring to Broxbourne economy. • Emphasis on borough as a high quality place to both live and work <ul style="list-style-type: none"> • Encourage healthy activity programmes as part of work, e.g. gym memberships, running, team sports as part of work culture. • Ensure a good mix of jobs across skill levels. • Avoid marginalising lower skilled workers in public life. Ensure that a range of leisure and support services exists for all sections of the society regardless of economic situation and socio-economic background. • Ensure that local skills profile changes at the same rate as that of job creation. • Ensure that there is a full range of jobs, including mid level or transition jobs, not just extremes of high and low skills. • Work with employers to run training and up-skilling programmes. 			

Policy CS6 – Retail and Town Centres			
SA Objective	Score	Predicted effect (s)	Mitigation
1. Will the Core Strategy benefit biodiversity?	?	Retail and town centres can contain some biodiversity value and it is possible to enhance this value alongside increasing green space and improving the attractiveness of a centre to shoppers and retail companies. Although environmental improvements are referred to in supporting text, the policy itself only alludes to this e.g. through 'environmental actions' and does not outline a target to improve the environment.	<ul style="list-style-type: none"> Consider inserting policy text to improve the shopping environment – this could both enhance the attraction of centres and have benefits for biodiversity.
2. Will the Core Strategy reduce levels of pollution?	?	Altering retail activities can have an impact on pollution e.g. from noise, transport and waste. It is unclear from the policy detail whether a significant impact could result. Growth and increased visitor numbers can result in increased congestion and, although supporting text and strategies for centres referenced in the policy may address congestion, it is not specifically detailed in the policy.	<ul style="list-style-type: none"> Consider inserting policy text to address congestion resulting from retail, growth and increased visitors, and to consider waste and potential pollutants arising from changing and expanding retail activities.
3. Will the Core Strategy conserve and / or improve water resources?	?-	Changes in retail activities such as additional and different businesses will alter water consumption patterns. It is unclear from this policy what impact there is likely to be, although it may be expected that water consumption will increase and there will be some additional risk of water course pollution. Sustainability measures are not covered under this policy but could mitigate negative impacts, and the policy does not set out measures to improve sustainability practices of the retail industry.	<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 should address water consumption and potential water pollution.
4. Will the Core Strategy provide for modal shift to sustainable transport systems?	?	Growth and increased numbers of shoppers can result in increased congestion and, although supporting text and strategies for centres referenced in the policy may address congestion, accessibility and sustainable transport, it is not specifically detailed in the policy. Thus impacts are uncertain and could result in either negative or positive impacts depending upon implementation.	<ul style="list-style-type: none"> Consider accessibility and sustainable transport options within the policy text.
5. Will the Core Strategy help to prevent and / or reduce any potential adverse impacts from climate change?	?	Changes in retail activities such as additional and different businesses and locational requirements are likely to have an impact against issues relating to climate change such as flood risk, transport, energy use and emissions etc. It is unclear from this policy what impact there is likely to be overall.	<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 should increase

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Policy CS6 – Retail and Town Centres			
SA Objective	Score	Predicted effect (s)	Mitigation
		Sustainability measures and flood risk mitigation are not covered under this policy but could mitigate negative impacts, and the policy does not set out measures to improve sustainability practices of the retail industry.	retail awareness and response to the likely impacts of climate change.
6. Will the Core Strategy encourage more sustainable consumption patterns and lifestyles?	?+	Improvements to local centres should allow Broxbourne residents to meet their needs locally and thus encourage sustainable consumption patterns and lifestyles. Supporting local centres should also have a positive impact with regards to this objective. It would be important to address accessibility and sustainable transport options in parallel with this policy. The exact products retailed, however, may not necessarily be sourced locally. Conversely, if products are provided to meet demand and are sourced locally where possible, it should equally minimise residents travelling further for their specific retail needs.	<ul style="list-style-type: none"> • Consider accessibility and sustainable transport options within the policy text. • Aim to source products locally, where possible, to meet the demand of locals.
7. Will the Core Strategy minimise the use of scarce or non-renewable resources such as land, minerals and water?	?+	Changes in retail activities such as additional and different businesses and locational requirements are likely to have an impact relating to the use of non-renewable resources. It is unclear from this policy what impact there is likely to be overall, however strategies for local centres that are based upon detailed studies should ensure that land is used as efficiently as possible. In addition, the policy states that the ‘most appropriate location’ for retail will be used, and changes could enhance current retail uses. Sustainability measures are not covered under this policy but could mitigate negative impacts, and the policy does not set out measures to improve sustainability practices of the retail industry.	<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.
8. Will the Core Strategy encourage the protection and enhancement of landscape?	?	It is unlikely that there will be significant impact against this objective unless viewed from an urban perspective, in which case it is possible that changes in, and the expansion of, retail will have an impact on the landscape. However, the policy states that the ‘most appropriate location’ for retail will be used which should mitigate impact, and changes could be more sympathetic to local landscape.	<ul style="list-style-type: none"> • Minimise landscape impacts resulting from retail growth and seek improvements to mitigate current impacts.
9. Will the Core Strategy maintain or	?-	Some of Broxbourne’s centres contain significant historical	<ul style="list-style-type: none"> • Consider the historic and built environment

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Policy CS6 – Retail and Town Centres			
SA Objective	Score	Predicted effect (s)	Mitigation
enhance the character of the built and historic environment?		assets that also overlap with retail uses – for example the historic market places of Hoddesdon and Walthamstow, and the Eleanor Cross located in Waltham Cross high street. Therefore an expansion of retail and a higher number of shoppers may increase pressure and the potential for a negative impact on the character of the built and historic environment. However, the policy states that the ‘most appropriate location’ for retail will be used which should mitigate impact.	and mitigating the impact of retail and increased shopper numbers particularly at key locations.
10. Will the Core Strategy reduce waste and encourage sustainable waste management?	?-	Changes in retail activities such as additional and different businesses are likely to have an impact relating to waste arising and waste management. It is unclear from this policy what impact there is likely to be overall, however increased retail should increase overall waste. Sustainability measures are not covered under this policy but could mitigate negative impacts, and the policy does not set out measures to improve sustainability practices of the retail industry.	<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 should encourage sustainable waste management amongst retailers and principles for reduction, reuse and recycling.
11. Will the Core Strategy improve health and/or reduce health inequalities in the Borough?	+?	<p>A greater choice of food shops, especially if this includes healthy, locally sourced and organic foods should have a positive impact against this objective. However whether this reduces health inequalities depends on the level of accessibility of healthy food, in terms of location and pricing.</p> <p>The provision of bus services in Brookfield, as well as improving walking and cycling facilities, should encourage healthier modes of travel for shoppers.</p> <p>The focus on providing more public space and running events at Hoddesdon may contribute to a sense of well being among shoppers and local residents.</p>	<ul style="list-style-type: none"> Promote local food markets
12. Will the Core Strategy help to create communities where people feel safe and that they belong, without excluding others?	0	<p>Busier town or district centres may result in a greater feeling of safety.</p> <p>However, no significant impacts on community safety, cohesion or exclusion are expected.</p>	
13. Will the Core Strategy move the	0	No significant impacts on housing are expected.	

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Policy CS6 – Retail and Town Centres			
SA Objective	Score	Predicted effect (s)	Mitigation
Borough towards a situation where housing is of high quality, and available and affordable for all?			
14. Will the Core Strategy help to reduce inequality within the Borough?	+?	<p>A greater choice of retail should help to provide more equal access to opportunities, services and facilities, for people from different backgrounds and with different needs. This would be a minor positive impact.</p> <p>As the policy emphasises enhancement of existing retail areas, contributions towards regeneration initiatives in disadvantaged areas are not expected.</p>	<ul style="list-style-type: none"> Consider extending accessible design standards to shops and other retail units.
15. Will the Core Strategy help to increase skills and support the Borough's requirement for skilled workers?	0	No significant impacts on skills are expected.	<ul style="list-style-type: none"> Encourage retailers to provide part-time jobs to support people in skills training.
16. Will the Core Strategy contribute to the development of a thriving, innovative, high skill economy in the Borough?	+	<p>By meeting the retail needs of the borough based upon detailed studies, and by setting out strategies for key centres and a local centre hierarchy that builds on key strengths and needs; this policy should have a significant positive impact on the economy. By reducing out-commuting, and particularly through flagship retail centres like Greater Brookfield, the policy should increase visiting shoppers to the borough and encourage investment from larger retail outlets. It is unclear, however, whether the policy will support smaller retail businesses e.g. single independent shops.</p>	<ul style="list-style-type: none"> Support independent and smaller retailers
Summary			
<p>The most significant positive impact of this policy is expected for the economy, by meeting the retail needs of the borough based upon detailed studies, and by setting out strategies for key centres and a local centre hierarchy that builds on key strengths and needs. In addition, this policy should reduce out-commuting for retail needs or 'leakage' which is a key issue for the borough and, particularly through flagship retail centres like Greater Brookfield, the policy should increase the number of shoppers visiting the borough and encourage investment from larger retail outlets. It is unclear, however, whether the policy will support smaller retail businesses e.g. single independent shops.</p> <p>The impact against many of the environmental objectives, however, is less clear and will depend upon implementation. An expanded retail industry with more outlets, shop types, jobs and locations; is likely to increase waste arisings, water consumption and pressure on historical assets that are located in local centres. By taking in to account appropriate locations and by supporting local centres, there could be overall be a positive impact on efficiency of resource use and</p>			

Policy CS6 – Retail and Town Centres			
SA Objective	Score	Predicted effect (s)	Mitigation
<p>sustainable consumption patterns, although other factors make the outcome less certain. The exact impact on landscape, climate change, biodiversity and transport objectives is even less clear. However, although not in the policy detail, supporting text and references to strategies implies that sustainable standards, transport options and accessibility will be delivered for retail. It is important that the policy also considers improving the sustainable practices of retailers, which could mitigate impact and result in a more sustainable retail policy overall.</p> <p>From a social perspective, this policy may help reduce health inequality and other forms of inequality (age, cultural background, socio-economic background), but this likely to depend on whether such inequalities are accounted for during implementation. No significant impacts are expected in terms of community safety, housing and skills.</p>			
Mitigation measures:			
<p>Mitigation measures that could improve the sustainability of this policy include:</p> <ul style="list-style-type: none"> • Consider inserting policy text to improve the shopping environment – this could both enhance the attractiveness of centres and have benefits for biodiversity. • Consider inserting policy text to address congestion resulting from retail, growth and increased visitors, and to consider waste and potential pollutants arising from changing and expanding retail activities. • Consider inserting policy text for high sustainability standards and encouraging sustainable practices by retail businesses and/ or signposting policies that encourage this. The awareness of, and response to, environmental issues by retailers should be encouraged as a part of this, and should address water consumption and potential water pollution, sustainable waste management and principles for reduction, reuse and recycling, and the likely impacts of climate change. • Consider accessibility and sustainable transport options within the policy text. • Aim to source products locally, where possible, to meet the demand of locals. • Minimise landscape impacts resulting from retail growth and seek improvements to mitigate current impacts. • Consider the historic and built environment and mitigating the impact of retail and increased shopper numbers particularly at key locations. • Support independent and smaller retailers • Promote local food markets • Consider extending accessible design standards to shops and other retail units. • Encourage retailers to provide part-time jobs to support people in skills training. 			

Policy CS7 – Greater Brookfield			
SA Objective	Score	Predicted effect (s)	Mitigation
1. Will the Core Strategy benefit biodiversity?	-?	The development of Greater Brookfield is likely to have a negative impact on biodiversity and associated habitats, particularly given that it will include green belt land. However measures do exist to mitigate impact and 'strong sustainability standards' could mitigate loss and enhance or create habitat – although it is noted that wildlife and biodiversity are not listed in the policy. In addition, there is potential for the creation of new, and the enhancement of existing, habitat; although green space is not referred to specifically within policy text.	<ul style="list-style-type: none"> • Add wildlife and biodiversity to statements/assessments for sustainability. • Consider green space provision and the protection, enhancement and creation of habitats and associated biodiversity for the Greater Brookfield development.
2. Will the Core Strategy reduce levels of pollution?	-	Development at Greater Brookfield could be associated with increased pollution risks during construction and following completion (land, water, air and soil). Although measures seek to address congestion (therefore minimise air pollution), overall increased volumes of traffic may be expected as a result of development. It is noted that the policy requires a 'strong emphasis on sustainability' that could mitigate negative impacts e.g. by addressing sustainable drainage, waste and water. It is unclear what environmental improvements might entail, however land remediation could be considered, where appropriate.	<ul style="list-style-type: none"> • 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. • Apply sustainable construction principles.
3. Will the Core Strategy conserve and / or improve water resources?	-	Development at Greater Brookfield – construction, new homes, new businesses, facilities and services – is expected to increase water consumption and could increase the risk of water course pollution. It is noted, however, that the policy requires a 'strong emphasis on sustainability' that could mitigate negative impacts e.g. by addressing sustainable drainage and water.	<ul style="list-style-type: none"> • 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 address water consumption and potential water pollution.
4. Will the Core Strategy provide for modal shift to sustainable transport systems?	?	Although the development will attract high volumes of traffic to the area to include unsustainable transport such as cars; the policy clearly states that public transport, walking and cycling will be encouraged alongside good connectivity and bus services. The success of these measures will depend upon implementation of schemes and, closely associated to this, the ability to instil behavioural change in the public towards more sustainable modes of transport. A strong emphasis on	<ul style="list-style-type: none"> • Consider referring to phasing within the policy

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Policy CS7 – Greater Brookfield			
SA Objective	Score	Predicted effect (s)	Mitigation
		sustainability in assessments and/or assessments to include transport should also assist with encouraging and supporting modal shift. Phasing of transport with other development aspects will be important to ensure that congestion is truly averted and that accessibility and sustainable transport options are not compromised.	
5. Will the Core Strategy help to prevent and / or reduce any potential adverse impacts from climate change?	?	Development at Greater Brookfield – locational aspects, construction, new homes, new businesses, facilities and services – will have impacts associated with issues relating to climate change such as flood risk, transport, energy use and emissions etc. It is unclear from this policy what impact there is likely to be overall, particularly given mitigation of risks owing to a strong emphasis on sustainability to include flood risk, low or zero carbon energy generation and transport. However, the policy does not set out measures to improve the sustainability practices of homes, services and facilities and businesses.	<ul style="list-style-type: none"> 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 awareness and response to the likely impacts of climate change.
6. Will the Core Strategy encourage more sustainable consumption patterns and lifestyles?	+?	Greater Brookfield is intended as a Borough Centre and thus should have a significant impact towards allowing residents to meet their needs locally. The policy seeks to avoid the creation of an isolated housing area and sets out measures to improve accessibility - including through sustainable transport modes - to the Greater Brookfield site, which should also help to encourage more sustainable consumption patterns and lifestyles. The exact products retailed, however, may not necessarily be sourced locally. Conversely, if products are provided to meet demand and are sourced locally where possible, it should equally minimise residents travelling further for their specific retail needs. It is not clear whether the policy will use local labour and materials for construction.	<ul style="list-style-type: none"> Aim to source products locally, where possible, to meet the demand of locals. Consider local labour and materials for construction.
7. Will the Core Strategy minimise the use of scarce or non-renewable resources such as land, minerals and water?	?	There will be impacts on other land uses as a result of this policy (e.g. travelling community site, waste centre, green belt, allotments) and the impact of this policy will strongly depend on successful relocation of these uses to no net loss and, preferably, to a gain (e.g. enhancements to the land and for borough residents). However, assessments of borough need would suggest that the Greater Brookfield site would be an	<ul style="list-style-type: none"> 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 minimise non-renewable resource use. Apply sustainable construction principles.

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Policy CS7 – Greater Brookfield			
SA Objective	Score	Predicted effect (s)	Mitigation
		efficient use of land in the borough and also that the land use would be optimised. Policy requirements for a 'strong emphasis on sustainability' should also maximise land use efficiency and it is assumed this will also minimise use of other non-renewable resources. However, overall water consumption and energy consumption and resource consumption more generally is likely to increase, and it is unclear whether sustainable construction principles will be followed and sustainable practices encouraged in business and by residents.	
8. Will the Core Strategy encourage the protection and enhancement of landscape?	-?	This policy will develop green belt land and will affect a large area, thus there is a high potential for a negative landscape impact. However, the policy sets out mitigation measures to include statements and/or assessments of sustainability, and there is an opportunity to develop a masterplan(s) that will complement the landscape and protect/enhance existing rural uses.	<ul style="list-style-type: none"> • Seek proposals that minimise landscape impact and, where possible, protect and enhance and/or complement the landscape.
9. Will the Core Strategy maintain or enhance the character of the built and historic environment?	+?	It is not expected that a significant impact on the historic environment will result from this policy, however indirectly there may be increased pressure on assets. The policy should also reduce the amount of vacant and derelict land and buildings and create a high quality urban environment. It states that the role or function of existing town centres will not be undermined and, with a strong emphasis on high quality design and wider regeneration, the policy should overall have a positive impact on the built environment assuming it is implemented accordingly.	<ul style="list-style-type: none"> • Identify and minimise any potential negative impacts on the historic environment
10. Will the Core Strategy reduce waste and encourage sustainable waste management?	-	The development at Greater Brookfield will result in high waste arisings associated with construction and additional businesses, services and facilities and housing. In addition, impacts against the waste objective will depend upon successful relocation of the recycling waste centre. Whether this will be placed in a location that can better service the development and borough more effectively, and whether it can also handle additional waste arising from Greater Brookfield, is unclear. A strong emphasis with regards to waste – as set out in the policy – should mitigate for some negative impacts in terms of additional	<ul style="list-style-type: none"> • 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 how sustainable practices and sustainable behaviour will be encouraged and delivered in the long term at the Greater Brookfield site and/ or signpost

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Policy CS7 – Greater Brookfield			
SA Objective	Score	Predicted effect (s)	Mitigation
		waste arisings. However it is unclear whether energy from waste for the Brookfield site will be considered, and how long-term sustainable practices amongst businesses, retailers, service providers and residents will be encouraged,	policies that encourage this. This should sustainably manage waste; including, reduce, reuse and recycle principles.
11. Will the Core Strategy improve health and/or reduce health inequalities in the Borough?	+?	The emphasis on public transport, walking and cycling facilities should encourage healthier lifestyles. Planning contributions from Brookfield, if channelled into health and welfare facilities, could also contribute to reducing health inequalities. However leisure activities such as multiplex cinemas and bowling alleys, combined with the kinds of junk food usually associated with shopping malls, could become escape routes for people out of work, occupying the time they might otherwise to find work, and further compounding their health and well being issues.	<ul style="list-style-type: none"> • Channel planning contributions into areas with the highest health deprivation levels. • Balance indoor leisure activities and junk food provision with healthy outdoor sports and healthy food shops.
12. Will the Core Strategy help to create communities where people feel safe and that they belong, without excluding others?	-?	The scale and mixed use character of Brookfield has the potential to make it a self-sustained settlement in terms of residents, workers and users. While there is an emphasis in the policy on local connectivity and on local employment, a higher price range may exclude sections of the local community from availing of the new facilities at Brookfield. Allotments are usually a source of community spirit; acquiring these for development purposes may detract from community spirit and a sense of belonging in the area. It may further dissociate local people from the new development.	<ul style="list-style-type: none"> • Ensure a range of retail facilities accessible to all. • Relocate allotments carefully, mindful of the convenience of current users, depending on local demand.
13. Will the Core Strategy move the Borough towards a situation where housing is of high quality, and available and affordable for all?	+?	While Brookfield will provide high quality housing, this will only be of a single type and tenure. Brookfield Riverside includes a residential village for elderly and retired people, which should have a positive impact against this SA Objective on the whole.	<ul style="list-style-type: none"> • Apply accessible design standards to the homes on Brookfield. • Consider introducing other types and tenures, according to specific need in the local area.
14. Will the Core Strategy help to reduce inequality within the Borough?	+?	Introducing new employment into the borough should have a positive impact against this SA Objective. High quality architectural design of homes should reduce fuel poverty.	<ul style="list-style-type: none"> • Apply accessible design standards to architectural design of Brookfield facilities. • Consider introducing other types and tenures, according to specific need in the

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Policy CS7 – Greater Brookfield			
SA Objective	Score	Predicted effect (s)	Mitigation
			local area. • Ensure a range of retail facilities accessible to all.
15. Will the Core Strategy help to increase skills and support the Borough's requirement for skilled workers?	+	The emphasis on part-time employment in the retail sector for low skilled people opportunities for those currently out of work should have a significant positive impact against this SA Objective.	
16. Will the Core Strategy contribute to the development of a thriving, innovative, high skill economy in the Borough?	+	The development of the Greater Brookfield site under this policy should have a significant positive impact on the economy. In particular, it should act as a catalyst to generate a range of jobs to include high skills and training to raise skills, lower unemployment, provide good access to jobs, encourage inward investment, address wages in the borough that are lower compared to the rest of Hertfordshire and significantly reverse leakage rates. It is important that existing employment uses – such as the New River Trading Estate – are successfully relocated as stipulated in the policy, to result in a positive gain if possible. The policy does not refer to a strategy for Greater Brookfield, although such a strategy could increase the overall sustainability of the development, including business start-ups and innovation which are also not referred to within the policy detail. Phasing will ultimately ensure maximum economic benefits, although it is not mentioned within the policy specifically.	<ul style="list-style-type: none"> • Consider improved location of the existing employment uses • Develop a strategy for the development to maximise benefits to the economy against high sustainability standards, including supporting business start-ups and encouraging innovation • Consider referring to phasing within the policy
Summary			
<p>The development of the Greater Brookfield site under this policy should have a significant positive impact on the economy. In particular, it should act as a catalyst to generate a range of jobs to include high-knowledge jobs and also training to raise skills, lower unemployment, provide good access to jobs, encourage inward investment, address wages in the borough that are lower compared to the rest of Hertfordshire, and significantly reverse leakage rates. It is not clear in the policy, although it may be assumed, that the policy will also encourage business start-ups and innovation. It is important that existing employment uses – such as the New River Trading Estate – are successfully relocated as stipulated in the policy, but also result in a positive gain if possible against the sustainability objectives.</p> <p>The policy does not refer to a strategy for Greater Brookfield, although such a strategy could increase the overall sustainability of the development and promote joined-up thinking for an 'eco-development'. From an environmental perspective, such a large scale development (construction and operation of the development itself with regards to homes and businesses, etc.) is inevitably going to have a number of negative impacts associated with increased vehicle trips,</p>			

Policy CS7 – Greater Brookfield			
SA Objective	Score	Predicted effect (s)	Mitigation
<p>higher waste arisings, water and energy consumption and pollution. However, the policy sets out mitigation measures including sustainability standards that could minimise impacts depending upon implementation and overall use land as efficiently as possible. Adequate phasing – of transport, infrastructure, housing, service and facilities, etc. – is also not specifically mentioned within the policy but will be essential to success. In addition, it is not clear whether biodiversity has been sufficiently considered, in particular whether biodiversity will be considered as part of sustainability statements. Green infrastructure and open space can overall improve the development for wildlife and as a place to both live and work. Moreover, sustainable construction principles and long-term behavioural change towards sustainable practices are not clearly encouraged in this policy; and the importance of phasing is not mentioned but will be vital to the sustainability during construction and delivery. If this will be covered by other policies, it would be useful to highlight this and to signpost the relevant policy(ies).</p> <p>From a social perspective, the policy scores highly against health, housing, equality and skills objective in general. However the nature of the proposed development risks creating a rift between the existing community of Broxbourne and the new mixed-use neighbourhood of Greater Brookfield, potentially through the domination of higher end retail, the introduction of high end single-tenure family housing and through the relocation of community allotments.</p>			
Mitigation measures:			
<p>Mitigation measures that could improve the sustainability of this policy include:</p> <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'. • Add wildlife and biodiversity to statements/assessments for sustainability. • Consider green space provision and the protection, enhancement and creation of habitats and associated biodiversity. • 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. • Aim to source products locally, where possible, to meet the demand of locals. • Consider local labour and materials for construction. • Seek proposals that minimise landscape impact and, where possible, protect and enhance and/or complement the landscape. • Identify and minimise any potential negative impacts on the historic environment. • 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. • Develop a strategy for the development to maximise benefits to the economy against high sustainability standards, including supporting business start-ups and encouraging innovation • Consider referring to phasing within the policy • Channel planning contributions into areas with the highest health deprivation levels. 			

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Policy CS7 – Greater Brookfield			
SA Objective	Score	Predicted effect (s)	Mitigation
		<ul style="list-style-type: none"> • Balance indoor leisure activities and junk food provision with healthy outdoor sports and healthy food shops. • Ensure a range of retail facilities accessible to all. • Relocate allotments carefully, mindful of the convenience of current users, depending on local demand. • Apply accessible design standards to the homes on Brookfield. • Consider introducing other types and tenures, according to specific need in the local area. • Apply accessible design standards to architectural design of Brookfield facilities. • Consider introducing other types and tenures, according to specific need in the local area. • Ensure a range of retail facilities accessible to all. 	

Policy CS8 – Environment			
SA Objective	Score	Predicted effect (s)	Mitigation
1. Will the Core Strategy benefit biodiversity?	+	This policy should have a significant positive effect on biodiversity for a number of reasons, including: protecting green belt; enhancing and creating green corridors and additional open space that will support biodiversity; and conserving and enhancing protected wildlife sites. Although it is not specified in the policy, it is assumed that high quality design of all development proposals will take in to account green space and biodiversity creation and enhancement measures. Supporting text refers to development proposals delivered in context with their surroundings, e.g. urban areas focusing on brownfield. It should be noted that urban areas to include brownfield can contain biodiversity value. The policy implies that high quality measures only apply to new development; the potential to retrofit and regenerate existing development to the benefit of biodiversity and green space could also be considered. Wildlife corridors are referred to in supporting text only but should be supported by this policy.	<ul style="list-style-type: none"> • Consider the creation and enhancement of green space and biodiversity as part of the high quality design of all development proposals. • Acknowledge the benefits of green corridors e.g. habitat for wildlife and wildlife corridors. • Identify biodiversity value at all development sites (aka not just areas that are formally designated or protected) e.g. urban biodiversity and wildlife on brownfield sites. • Consider improvements to existing, in addition to new, development. • Consider how long-term behavioural change regarding biodiversity could be achieved. This could be part of a more general initiative to encourage an awareness and appreciation of the environment and its protection and enhancement amongst residents and businesses.
2. Will the Core Strategy reduce levels of pollution?	?	Although the policy sets out to enhance the environment, it does not set out any measures such as the remediation of contaminated land or, more generally, an intention to reduce levels of pollution. High quality design, for example, could minimise risk of pollution. Green corridors can also enhance encourage more sustainable forms of transport, such as cycling, and green space can more generally improve environmental quality.	<ul style="list-style-type: none"> • Consider for inclusion the reduction of levels of pollution and the minimisation of pollution risk. • Acknowledge the benefits of green corridors and green space for improving environmental quality more generally e.g. encouraging cycling and walking.
3. Will the Core Strategy conserve and / or improve water resources?	+	The natural environment plays an important role in regulating water courses and this policy should have a positive impact by protecting it. Although green spaces are referred to, there is no reference to water courses and bluespace within the borough more generally, to include its importance to the borough and its	<ul style="list-style-type: none"> • Consider the importance of water courses in the borough and how they might be protected and enhanced. • High quality design of development should install water conservation methods and

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Policy CS8 – Environment			
SA Objective	Score	Predicted effect (s)	Mitigation
		protection and improvement. It is expected that high quality design measures will conserve water e.g. through sustainable drainage and water storage, and water conservation measures installed in buildings.	sustainable drainage and storage <ul style="list-style-type: none"> Consider how long-term behavioural change regarding water resources could be achieved. This could be part of a more general initiative to encourage an awareness and appreciation of the environment and its protection and enhancement amongst residents and businesses.
4. Will the Core Strategy provide for modal shift to sustainable transport systems?	+	Green corridors can encourage more sustainable forms of transport, such as cycling and walking (this is acknowledged in supporting text to the policy). This policy protects and enhances the links that they provide in the borough. Although this considers links between countryside and town, links between residential areas and employment areas could also be considered. High quality design could also discourage the use of cars (e.g. parking, street design and public transport access), although this is not specifically outlined in the policy.	<ul style="list-style-type: none"> High quality design should encourage the use of sustainable transport Green corridors should encourage sustainable forms of transport and consider linkages and travel patterns e.g. residential areas to employment areas Consider how long-term behavioural change towards sustainable travel could be achieved. This could be part of a more general initiative to encourage an awareness and appreciation of the environment and its protection and enhancement amongst residents and businesses.
5. Will the Core Strategy help to prevent and / or reduce any potential adverse impacts from climate change?	+?	Protecting the natural environment should safeguard and enhance important natural climate change mitigation roles, such as flood risk mitigation through natural drainage and storage, and trees and plants cooling urban areas and improving air quality. Measures are set out in the policy to specifically address flood risk. Enhancing the built environment should also improve climate change mitigation measures e.g. energy efficiency, flood risk mitigation and encouraging the use of sustainable transport, although the policy does not specify that measures should assist to this end. The policy implies that high quality measures only apply to new development; the potential to retrofit and regenerate existing development could also be considered. It is unclear whether sustainable construction	<ul style="list-style-type: none"> Identify and outline how the natural and built environment could be enhanced to mitigate adverse impacts of climate change. Consider improvements to existing, in addition to new, development. Apply sustainable construction principles. Consider how long-term behavioural change towards climate change mitigation could be achieved. This could be part of a more general initiative to encourage an awareness and appreciation of the environment and its protection and

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Policy CS8 – Environment			
SA Objective	Score	Predicted effect (s)	Mitigation
		principles will be followed.	enhancement amongst residents and businesses.
6. Will the Core Strategy encourage more sustainable consumption patterns and lifestyles?	+	Conserving and enhancing green corridors and open space and improving accessibility and links between these features, should encourage more sustainable consumption patterns and lifestyles. High quality design of new development should also make a positive contribution towards this end. It will be important to deliver long-term behavioural change and awareness of environmental limits and benefits amongst residents and businesses, which the policy does not specifically set out measures to encourage sustainable and environmentally-friendly behaviour.	<ul style="list-style-type: none"> • Consider how long-term behavioural change towards patterns of sustainable consumption and sustainable lifestyles could be achieved. This could be part of a more general initiative to encourage an awareness and appreciation of the environment and its protection and enhancement amongst residents and businesses.
7. Will the Core Strategy minimise the use of scarce or non-renewable resources such as land, minerals and water?	+	The policy should ensure that the environmental value of land is taken in to account and safeguarded where necessary, and should overall ensure that land use decision are made towards the most efficient land use. High quality design and design guidance referred to in the policy should also minimise the use of scarce or non-renewable resources during construction and following delivery of development, although this is assumed and not specified. It is unclear whether sustainable construction principles will be followed. It is also unclear whether existing development will be improved to reduce non-renewable resource use and to improve efficiency. The policy does not specifically set out measures to encourage sustainable and environmentally-friendly behaviour (by residents and businesses).	<ul style="list-style-type: none"> • High quality design and design guidance should maximise efficient resource use • Consider improvements to existing, in addition to new, development. • Apply sustainable construction principles. • Consider how long-term behavioural change towards efficient resource use and minimising the use of non-renewables could be achieved. This could be part of a more general initiative to encourage an awareness and appreciation of the environment and its protection and enhancement amongst residents and businesses.
8. Will the Core Strategy encourage the protection and enhancement of landscape?	+	By conserving the natural, historic and built environment, this policy should protect Broxbourne's landscape. The policy specifies that sites in and adjoining the borough protected for their landscape value will be conserved and enhanced. It is unclear whether impacts on landscape will be considered for other sites in the borough, although it is assumed that high quality design and design guidance will take in to account landscape impacts. Development should complement and could enhance the existing landscape, and the policy should support this by considering 'local surroundings'. The policy also	<ul style="list-style-type: none"> • High quality design and design guidance should consider landscape impacts. • Landscape impacts on non-protected sites could be considered. • Development should complement and, where possible, enhance the landscape.

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Policy CS8 – Environment			
SA Objective	Score	Predicted effect (s)	Mitigation
		improves the availability of, and access to, open spaces.	
9. Will the Core Strategy maintain or enhance the character of the built and historic environment?	+	This policy specifically states that it will conserve the historic and built environment, and it takes in to account protected areas and development informed by Conservation Area appraisal and urban characterisation work.	•
10. Will the Core Strategy reduce waste and encourage sustainable waste management?	?	The policy does not specifically consider waste although it will be an important part of protecting the environment. It is assumed, but not specified, that high quality of design and design guidance will consider how waste will be managed (locational implications, reduction, reuse and recycling). Moreover it is unclear whether sustainable construction principles will be followed which should minimise waste and maximise reuse. The policy does not specifically set out measures to encourage sustainable waste practices and behaviour (by residents and businesses).	<ul style="list-style-type: none"> • Consider how waste will be managed and environmental impact minimised. • Apply sustainable construction principles. • Consider how long-term behavioural change towards sustainable waste practices could be achieved. This could be part of a more general initiative to encourage an awareness and appreciation of the environment and its protection and enhancement amongst residents and businesses.
11. Will the Core Strategy improve health and/or reduce health inequalities in the Borough?	+	<p>Positive impact upon encouraging people to engage in healthier behaviour in all aspects of life (e.g. at home and at work)</p> <p>Maintaining and increasing green infrastructure should promote active recreation among adults and children, which has health benefits. In general, access to open green space should contribute to well-being.</p>	<ul style="list-style-type: none"> • Encourage the use of Lea River Park as an opportunity for sports and active recreation.
12. Will the Core Strategy help to create communities where people feel safe and that they belong, without excluding others?	+?	Greater access to public open space may result in greater community spirit and a positive local identity. The emphasis on designing out crime should also contribute to community safety.	<ul style="list-style-type: none"> • Encourage community focused events and programmes in parks. • Invest in public awareness programmes to disseminate realistic crime and crime prevention figures.
13. Will the Core Strategy move the Borough towards a situation where housing is of high quality, and available and affordable for all?	+?	The emphasis on high quality design should have a minor positive impact against the housing objective.	
14. Will the Core Strategy help to reduce inequality within the Borough?	+?	The policy may improve access for all to more open spaces.	<ul style="list-style-type: none"> • Assess and if necessary, monitor safety in parks and other open spaces.

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Policy CS8 – Environment			
SA Objective	Score	Predicted effect (s)	Mitigation
			<ul style="list-style-type: none"> Investigate usage patterns, focusing on non-users, to maximise accessibility in the long term.
15. Will the Core Strategy help to increase skills and support the Borough's requirement for skilled workers?	0	This policy is not expected to have any significant impacts against this SA Objective.	
16. Will the Core Strategy contribute to the development of a thriving, innovative, high skill economy in the Borough?	+?	Although this policy is not set out for a significant positive effect against the economy, enhancing the environment should improve the borough as a place to both live and work, which should entice more businesses and workers to include higher skills. In addition, it should safeguard and create jobs in the environment; the advantage and quality of water courses, for example, have led to economic opportunities in hosting 2012 Olympic Games water sports.	<ul style="list-style-type: none"> Acknowledge the significance of the environment for the economy and why it must be safeguarded by economic practices and for the economic benefits it brings.
Summary:			
<p>This policy is intended to conserve the environment and therefore should have a number of positive impacts against environmental objectives e.g. by protecting environmental resources, protecting and enhancing landscape, protecting and enhancing habitats and biodiversity, encouraging cycling and walking, mitigating climate change to include directly addressing flood risk, and protecting the built environment. In some cases there is room for clarification to ensure a significant positive effect, for example whether design guidance and high quality design includes protecting and enhancing biodiversity, mitigating adverse impacts of climate change, conserving water and minimising waste and energy use. Blue spaces and water courses are an important asset to the borough and should be considered in open space and greenspace. Pollution and waste could perhaps be given more consideration within this policy given the large impact they can have on the environment.</p> <p>There is a large opportunity under this objective to encourage awareness and appreciation of the environment both to residents and the economy, and in doing so assist in its protection and enhancement and achieve long-term behavioural change towards patterns of sustainable consumption and lifestyles. The environment has large economic benefits that could be acknowledged in this policy, not least in terms of sport and opportunities associated with the 2012 Olympics. Overall, it could be acknowledged within the policy that conserving and enhancing the natural, historic and built environment plays a key role in improving the borough as a place to both live and work.</p> <p>Open space provision is linked closely to health benefits, community spirit and identity, as well as equality. The policy generally scores well against all these objectives.</p>			
Mitigation measures:			
Mitigation measures that could improve the sustainability of this policy include:			

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Policy CS8 – Environment			
SA Objective	Score	Predicted effect (s)	Mitigation
		<ul style="list-style-type: none"> • Masterplans should safeguard and enhance the environment. • Consider the creation and enhancement of green space and biodiversity as part of the high quality design of all development proposals. • Acknowledge the benefits of green corridors e.g. habitat for wildlife and wildlife corridors. • Identify biodiversity value at all development sites (aka not just areas that are formally designated or protected) e.g. urban biodiversity and wildlife on brownfield sites. • Consider improvements to existing, in addition to new, development. • Consider for inclusion the reduction of levels of pollution and the minimisation of pollution risk. • Acknowledge the benefits of green corridors and green space for improving environmental quality more generally e.g. encouraging cycling and walking. • Consider the importance of water courses in the borough and how they might be protected and enhanced. • High quality design should: encourage the use of sustainable transport, install water conservation methods and sustainable drainage and storage, maximise efficient resource use, consider landscape impacts, maximise biodiversity benefits and minimise waste. • Green corridors should encourage sustainable forms of transport and consider linkages and travel patterns e.g. residential areas to employment areas • Consider how long-term behavioural change towards sustainable lifestyles and patterns of sustainable consumption could be achieved. This could be part of a more general initiative to encourage an awareness and appreciation of the environment and its protection and enhancement amongst residents and businesses. It could include resource efficiency (waste, water, energy) and minimising use of non-renewables, sustainable transport, biodiversity. • Identify and outline how the natural and built environment could be enhanced to mitigate adverse impacts of climate change. • Apply sustainable construction principles. • Landscape impacts on non-protected sites could be considered. • Development should complement and, where possible, enhance the landscape. • Consider how waste will be managed and environmental impact minimised. • Acknowledge the significance of the environment for the economy and why it must be safeguarded by economic practices and for the economic benefits it brings. • Encourage the use of Lea River Park as an opportunity for sports and active recreation. • Encourage community focused events and programmes in parks. • Invest in public awareness programmes to disseminate realistic crime and crime prevention figures. • Assess and if necessary, monitor safety in parks and other open spaces. • Investigate usage patterns, focusing on non-users, to maximise accessibility in the long term. 	

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Policy CS9 – Infrastructure			
SA Objective	Score	Predicted effect (s)	Mitigation
1. Will the Core Strategy benefit biodiversity?	-	Additional infrastructure is expected to place pressure on biodiversity and sites of biodiversity value. Green infrastructure can benefit biodiversity, however it is covered under Policy CS7 Environment. It is not clear within the policy whether infrastructure will be built to high design standards that take in to account biodiversity protection and enhancement; however this may be covered by another Core Strategy policy.	<ul style="list-style-type: none"> • Provide link to green infrastructure in CS8 Environment. • Infrastructure should alleviate pressure, where possible • Ensure that the location of new infrastructure takes in to account biodiversity and green space. • Build infrastructure to high design standards and mitigate or offset any impact on biodiversity and green space as a result of additional infrastructure.
2. Will the Core Strategy reduce levels of pollution?	?	Additional infrastructure is likely to create potential sources of pollution e.g. transport, construction-related, sewerage etc. However, it also provides a means of mitigating pollution e.g. by ensuring sufficient capacity of utilities. In addition, measures are set out to provide a range of transport options and improve infrastructure so as to reduce vehicle trips and congestion, which should have a beneficial impact on air quality. Green infrastructure can also reduce levels of pollution, however it is covered under Policy CS7 Environment.	<ul style="list-style-type: none"> • Provide link to green infrastructure in CS8 Environment. • Mitigate pollution associated with additional infrastructure and its construction. • Improvements to air quality should be sought as part of the review of the M25 and Junction 25 and the A10 Route Management Strategy. • As a part of transport assessments, development proposals should maximise sustainable transport options and provide measures to ensure their success in order to minimise congestion and the impact on air quality.
3. Will the Core Strategy conserve and / or improve water resources?	?	Additional infrastructure such as facilities and services, will increase water consumption overall and possibly present the risk of pollution to water courses. However, addressing utility capacity and infrastructure (sewerage and water) should improve water efficiency and minimise the risk of sewerage potentially contaminating water courses. It is not clear within the policy whether infrastructure will be built to high design standards that take in to account water conservation and quality; however this may be covered by another Core Strategy	<ul style="list-style-type: none"> • Deliver infrastructure built to high standards that will minimise water consumption, minimise water course pollution and maximise efficient water use.

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Policy CS9 – Infrastructure			
SA Objective	Score	Predicted effect (s)	Mitigation
		policy.	
4. Will the Core Strategy provide for modal shift to sustainable transport systems?	+?	Although the policy acknowledges and supports the need for car travel and road improvements and longer travel distances e.g. commuting to London, the policy should deliver a 'range of transport options' that should encourage the use of more sustainable forms of travel and ensure that these options are available (e.g. accessible, affordable and serving key destinations). This should improve the current proportion of residents using unsustainable transport options, assuming it doesn't encourage a greater proportion of residents to travel unnecessarily. It should also help promote a behavioural modal shift, although a change in behaviour will not be delivered by the policy alone. In addition, providing necessary infrastructure at appropriate locations within the borough, should mean that residents travel smaller distances to essential facilities and services. In addition to showing that development proposals can be accommodated by transport infrastructure, such proposals could also specify a minimum amount of sustainable transport options and measures to promote a modal shift away from reliance on the car. Although improving access to rail transport, additional car parking will encourage continued reliance on cars and improved access by cycle, bus and walking would be desirable. Although a sensible amount of car parking is suggested, how 'sensible' will be defined/quantified is unclear; it would also be beneficial to know whether park and ride will be considered.	<ul style="list-style-type: none"> • Consider how long-term behavioural change will be encouraged towards the uptake of sustainable transport options. • Ensure that the location of new infrastructure takes in to account the need to minimise trip distances and improve accessibility etc. • As a part of transport assessments, development proposals should maximise sustainable transport options and provide measures to ensure their success in order to minimise congestion and the impact on air quality. • Expand on sustainable travel options such as how a joined-up <i>network</i> will be created that will minimise reliance on cars even for partial journeys to key destinations (e.g. rail, employment areas and town centres). • Provide detail on how a 'sensible' amount of car parking will be quantified/ defined. • Outline whether park and ride is an option.
5. Will the Core Strategy help to prevent and / or reduce any potential adverse impacts from climate change?	+?	The provision of transport infrastructure to minimise congestion and promote a wider range of transport options (aka more sustainable options) should reduce emissions, assuming it doesn't encourage a greater proportion of residents to travel unnecessarily. There is a concern that additional car parking spaces could increase car reliance and thus emissions; more detail on a 'sensible amount' could alleviate these concerns. Capacity improvements to utilities should allow for a greater resilience to climate change. It is not clear within the policy whether infrastructure will be built to high design standards that	<ul style="list-style-type: none"> • Provide link to green infrastructure in CS8 Environment. • Ensure that the location of new infrastructure takes in to account biodiversity and green space. • Deliver infrastructure built to high standards that take in to account climate change mitigation and adaptation. • Consider flood risk as a result of

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Policy CS9 – Infrastructure			
SA Objective	Score	Predicted effect (s)	Mitigation
		take in to account likely climate change impacts and incorporate mitigation measures; however this may be covered by another Core Strategy policy. In addition, flood risk and SUDS could be considered as part of drainage infrastructure and the increased risk of flooding as a result of additional infrastructure.	additional infrastructure (and development more generally), SUDS and drainage infrastructure.
6. Will the Core Strategy encourage more sustainable consumption patterns and lifestyles?	?	The policy should deliver infrastructure that reduces the need for residents to travel long distances for key facilities and services and it should improve their accessibility. However it is assumed that more transport doesn't encourage a greater proportion of residents to travel unnecessarily (particularly increasing the number of commuters to/from London) and that facilities and services will be appropriately located. Car parking, for example, should allow easier access to local centres, but also will encourage car reliance and travel outside of the borough (e.g. via rail). More sustainable consumption patterns and lifestyles may be encouraged and supported through infrastructure delivery, although a long-term change in behaviour will not be delivered by the policy alone. In addition to showing that development proposals can be accommodated by transport infrastructure, developer proposals could also specify a minimum amount of sustainable transport options and measures to promote a modal shift away from reliance on car travel.	<ul style="list-style-type: none"> • Consider how long-term behavioural change will be encouraged towards more sustainable consumption patterns and lifestyles. • Ensure that the location of new infrastructure takes in to account the need to minimise trip distances and improve accessibility etc. • Accessibility and transport infrastructure, including car parking spaces, should encourage sustainable consumption patterns and lifestyles. • Expand on sustainable travel options aka how a joined-up <i>network</i> will be created that will minimise reliance on cars even for partial journeys to key destinations (e.g. rail, employment areas and town centres).
7. Will the Core Strategy minimise the use of scarce or non-renewable resources such as land, minerals and water?	-?	Additional infrastructure – its location, delivery and use – will increase the use of non-renewable resources. It is acknowledged, however, that the policy is bringing forward essential infrastructure and thus should seek the most appropriate use and management of resources such as land and utilities (water, gas etc). However, the policy does not specify whether and how infrastructure will be delivered in appropriate locations, which should mitigate unnecessary resource use. It is also unclear whether design standards will minimise resource use and whether sustainable construction principles will be applied.	<ul style="list-style-type: none"> • Infrastructure should be designed and located appropriately so as to minimise the use of non-renewable resources. • Apply sustainable construction principles.
8. Will the Core Strategy encourage the protection and enhancement of	-	Additional infrastructure is expected to place pressure on the landscape and can have a significant negative impact, although	<ul style="list-style-type: none"> • Infrastructure should alleviate pressure, where possible

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Policy CS9 – Infrastructure			
SA Objective	Score	Predicted effect (s)	Mitigation
landscape?		it is acknowledged that infrastructure brought forward will be done on an essential basis to meet need. However, the policy does not specify whether and how infrastructure will be delivered in appropriate locations and designed to complement and be sympathetic towards the landscape.	<ul style="list-style-type: none"> Infrastructure should be designed and located appropriately so as to minimise impact on the landscape.
9. Will the Core Strategy maintain or enhance the character of the built and historic environment?	-	Additional infrastructure is expected to place pressure on the historic environment and possibly on the character of the built environment, for example additional car parking in historic town centres.. It is unclear whether the location and design of infrastructure will take in to account impacts on the historic and built environment, both in terms of altering character and risking physical damage. Transport in particular can have an impact on historic sites depending upon location and whether it generates increased trips to, and pressure on, historic assets.	<ul style="list-style-type: none"> Infrastructure should alleviate pressure, where possible Ensure that the location and design of new infrastructure takes in to account the historic and built environment to include impact on its character.
10. Will the Core Strategy reduce waste and encourage sustainable waste management?	?	The policy should deliver essential infrastructure to include utilities, services and facilities. It is assumed that this will include waste infrastructure, appropriate and as needed; although waste is not mentioned within the policy or supporting text. The location of waste facilities can have an impact on how well waste is managed (aka collected and distributed) and the capacity and type of facility will impact on how waste is processed (aka how efficiently and whether it includes full recycling capabilities); this will reflect on how sustainably waste is recycled in borough. The potential for an energy from waste facility is not discussed in the policy or Core Strategy more generally and it is unclear whether the possibility has been considered and/or ruled out. In addition, construction and delivery of additional infrastructure will create waste and it is unclear how this will be handled and whether the required capacity for this has been considered. The location and availability of waste facilities can affect the waste management of residents and businesses.	<ul style="list-style-type: none"> Consider energy from waste and outline its viability. Outline whether waste infrastructure will be included and the borough's capacities for sustainable waste management. Appropriately locate and design waste infrastructure. Consider how additional waste arisings will be managed. Apply sustainable construction principles.
11. Will the Core Strategy improve health and/or reduce health inequalities in the Borough?	+?	Working with the local PCT to plan future health provision may reduce health inequalities in the borough, depending on implementation.	<ul style="list-style-type: none"> Target areas with high levels of health deprivation.

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Policy CS9 – Infrastructure			
SA Objective	Score	Predicted effect (s)	Mitigation
12. Will the Core Strategy help to create communities where people feel safe and that they belong, without excluding others?	+?	The policy states that loss of community facilities will be resisted, and developments will be incentivised to provide or enhance such facilities. This should have a positive impact against this objective, depending on implementation.	
13. Will the Core Strategy move the Borough towards a situation where housing is of high quality, and available and affordable for all?	0	While there may be benefits in terms of improved pedestrian, cycle and vehicular access between housing areas, no significant impact is expected.	
14. Will the Core Strategy help to reduce inequality within the Borough?	+?	There may be benefits in terms of improved pedestrian, cycle and vehicular access between parts of the borough, thereby improving access to facilities and services. It is not possible to appraise the impact of additional car parking spaces under the level of detail given, however the standards of provision (e.g. disabled spaces, access, etc) could have an equalities impact.	<ul style="list-style-type: none"> • Service provision should be targeted towards areas of higher overall deprivation levels. • Car parking should be provided to high standards that take into account equalities issues
15. Will the Core Strategy help to increase skills and support the Borough's requirement for skilled workers?	-	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, given the low skill levels and the low value of then existing economy.	<ul style="list-style-type: none"> • Consider emphasising professional or vocational skills as part of educational infrastructure provision.
16. Will the Core Strategy contribute to the development of a thriving, innovative, high skill economy in the Borough?	+	Infrastructure is vital to the economy functioning and thus this policy should have a significant positive effect on this objective. It should provide jobs (through construction and at long-term at the site of new infrastructure), improve connectivity for businesses to function and commuters to access employment areas, and encourage high skilled workers from London and other locations and investment from companies in to the borough. Utilities infrastructure allows offices and industrial sites in the borough to continue to function optimally. There is a question, however, over whether increased car parking provision at rail stations and other improvements to transport linking the borough to London, will promote further out-commuting of high skill workers. It is assumed that improvements to the local economy will offset this issue.	
Summary			
The provision of infrastructure should have a significant positive impact on the economy, allowing businesses to continue functioning optimally, with improved			

Policy CS9 – Infrastructure			
SA Objective	Score	Predicted effect (s)	Mitigation
		<p>accessibility and reliable infrastructure encouraging investment that will support high skilled jobs and workers. However the delivery of additional infrastructure is likely to have a number of negative environmental impacts in terms of the pressure it places on resources (land, water and energy), biodiversity, landscape, the historic environment; in addition to an increase in waste arisings and emissions. Although infrastructure is likely to be on a strictly 'as needed' basis based upon informed studies, the policy does not set out mitigation measures or provide links to other policies that will ensure the mitigation of negative impacts. For example, it is unclear how and whether infrastructure will be appropriately located and what factors location will take in to account (e.g. impact on environmental assets or accessibility or functionality), whether it will be built to high design standards, which standards and whether this will be under sustainable construction principles. Such standards, if covered by another policy, could be clearly referenced or signposted.</p> <p>Waste infrastructure is not referred to in the policy and its location and capacity can have important implications for residents and businesses and against targets for pollution, waste and climate change. It is noted that waste should be dealt with at the county level in a Waste Development Framework, however energy from waste, recycling and other strategic issues could also be considered at a more local level.</p> <p>Although transport can relieve congestion, improve accessibility and promote more sustainable transport choices; it can also result in more vehicle trips and longer distance trips. Green infrastructure is an important sub-set of infrastructure and, although it is covered under a different policy, this is not made clear. Whether sustainable transport will promote a joined up network that provides accessibility to key borough locations is also unclear from the policy, moreover developer proposals are expected to assess transport capacity but whether this will encourage less reliance on the road network and cars is unclear.</p> <p>The policy has a positive emphasis on better health provision, community facilities and improved connectivity, especially with regard to non-car modes. However, educational provision focuses on primary and secondary education; professional and vocational skills do not appear to be adequately covered. This may have significant negative impacts against this objective, given the emphasis in other policies on introducing high skilled jobs into the borough. The standards of car parking outlined under this policy are unclear, however they could have an equalities impact and, moreover, it is uncertain what is meant by a 'sensible' amount of additional spaces. There is a concern that the policy could support a continued reliance on car travel in spite of also supporting sustainable forms of transport e.g. from the standards of car parking and developer proposals.</p>	
Mitigation measures:			
<p>Mitigation measures that could improve the sustainability of this policy include:</p> <ul style="list-style-type: none"> • 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, and waste management. • 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 			

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Policy CS9 – Infrastructure			
SA Objective	Score	Predicted effect (s)	Mitigation
		<ul style="list-style-type: none"> sustainable transport options. • Apply sustainable construction principles. • Outline whether waste infrastructure will be included and the borough’s capacities for sustainable waste management. • Consider energy from waste and outline its viability. • Consider how additional waste arisings will be managed. • Target areas with high levels of health deprivation. • Service provision should be targeted towards areas of higher overall deprivation levels. • Consider emphasising professional or vocational skills as part of educational infrastructure provision. • Improvements to air quality should be sought as part of the review of the M25 and Junction 25 and the A10 Route Management Strategy. • As a part of transport assessments, development proposals should maximise sustainable transport options and provide measures to ensure their success in order to minimise congestion and the impact on air quality. • Expand on sustainable travel options aka how a joined-up <i>network</i> will be created that will minimise reliance on cars even for partial journeys to key destinations (e.g. rail, employment areas and town centres). • Provide detail on how a ‘sensible’ amount of car parking will be quantified/ defined. • 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 and transport infrastructure, including the location of car parking spaces, should encourage sustainable consumption patterns and lifestyles. • Car parking should be provided to high standards that take into account equalities issues. 	

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Policy CS10 – Planning Contributions			
SA Objective	Score	Predicted effect (s)	Mitigation
1. Will the Core Strategy benefit biodiversity?	?	It is unclear whether, by reviewing open space and green infrastructure needs, the policy will additionally identify and benefit biodiversity. The policy should secure – or seek to secure, where appropriate – improvements to mitigate and offset biodiversity loss, and preferably enhance it.	<ul style="list-style-type: none"> Seek contributions that enhance biodiversity and ensure that any biodiversity loss is at least mitigated and offset.
2. Will the Core Strategy reduce levels of pollution?	0	The policy is not expected to have a significant impact against this objective.	
3. Will the Core Strategy conserve and / or improve water resources?	+?	The policy could, by reviewing flood prevention and sustainable urban drainage needs, have a positive effect by protecting water resources.	<ul style="list-style-type: none"> Seek contributions to protect and improve water resources (lower consumption, efficiency and improved water quality).
4. Will the Core Strategy provide for modal shift to sustainable transport systems?	+	The policy should, by reviewing transport infrastructure and public transport, walking and cycling needs, have a positive effect by ensuring sustainable transport options are protected and available. It should also ensure accessibility. However it is unclear whether this will secure improvements on the existing range and availability of sustainable transport options and their use.	<ul style="list-style-type: none"> Seek contributions that increase the range and accessibility of transport options and encourage their use.
5. Will the Core Strategy help to prevent and / or reduce any potential adverse impacts from climate change?	+	The policy should, by reviewing needs relating to public and sustainable transport, renewable and low carbon energy, green infrastructure and flood prevention; have a positive effect by ensuring climate change can be mitigated and that adaptation can be supported through contributions.	<ul style="list-style-type: none"> Seek contributions that mitigate potential adverse impacts from climate change and support adaptation.
6. Will the Core Strategy encourage more sustainable consumption patterns and lifestyles?	+	By identifying any deficiencies in infrastructure needs and seeking contributions towards providing these, the policy should work towards ample local services and facilities and increase their accessibility.	<ul style="list-style-type: none"> Seek contributions that promote accessibility and encourage more sustainable consumption patterns and lifestyles.
7. Will the Core Strategy minimise the use of scarce or non-renewable resources such as land, minerals and water?	0	The policy is not expected to have a significant impact against this objective.	
8. Will the Core Strategy encourage the protection and enhancement of	?	The policy could have an impact on the landscape depending upon where contributions are directed / provided, but it is	<ul style="list-style-type: none"> Contributions should not result in a negative impact on the landscape and

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Policy CS10 – Planning Contributions			
SA Objective	Score	Predicted effect (s)	Mitigation
landscape?		unclear whether this will result in a positive or negative impact on the landscape and should, instead, look to complement / enhance it.	should instead seek to complement or enhance it.
9. Will the Core Strategy maintain or enhance the character of the built and historic environment?	?	The policy could have an impact on the built environment depending upon where contributions are directed / provided, but it is unclear whether this will result in a positive or negative impact on the built and historic environment.	<ul style="list-style-type: none"> Seek contributions that enhance and protect the historic and built environment.
10. Will the Core Strategy reduce waste and encourage sustainable waste management?	?	The policy should identify support the provision of waste facilities where needed and identify any deficits or surpluses. It is unclear whether this will encourage sustainable waste management e.g. by identifying a need for more recycling facilities.	<ul style="list-style-type: none"> Seek contributions that support sustainable waste management e.g. the provision of recycling services.
11. Will the Core Strategy improve health and/or reduce health inequalities in the Borough?	+	By mapping and planning for the provision of healthcare, public transport, walking and cycling infrastructure, open space, sports facilities and green infrastructure, this policy should contribute to reducing health inequalities in the borough. The emphasis on affordable housing, education, skills and training should indirectly reinforce the positive impact of the policy against this objective.	<ul style="list-style-type: none"> Investigate areas with high health deprivation levels to establish causality. Take the above into account for future planning.
12. Will the Core Strategy help to create communities where people feel safe and that they belong, without excluding others?	+	As the policy embraces the Sustainable Community Strategy (2010) themes (including community safety, stronger communities, children and young people, older people and places to live, which are particularly relevant), it should have a positive impact against this objective.	
13. Will the Core Strategy move the Borough towards a situation where housing is of high quality, and available and affordable for all?	+	As the policy aims to map and plan for further affordable housing, it should have a positive impact against this objective. The emphasis in the Sustainable Community Strategy (2010) on design quality and alleviating homelessness should reinforce this impact.	
14. Will the Core Strategy help to reduce inequality within the Borough?	+	As the policy aims to embrace the Sustainable Community Strategy (2010) objectives, it should have a positive impact on	

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Policy CS10 – Planning Contributions			
SA Objective	Score	Predicted effect (s)	Mitigation
		equality.	
15. Will the Core Strategy help to increase skills and support the Borough's requirement for skilled workers?	+?	As the policy aims to map skills and training infrastructure, it should have a positive impact against this objective, depending on how any contributions are distributed. Investment in training will need to be matched by good human resource and a growing market of opportunities.	<ul style="list-style-type: none"> During implementation, emphasise cooperation between Council and private sector.
16. Will the Core Strategy contribute to the development of a thriving, innovative, high skill economy in the Borough?	+	This policy should ensure that the economy continues to function optimally by identifying and addressing surplus and deficits in infrastructure provision.	
Summary			
<p>By identifying surplus and deficits in infrastructure, this policy will allow the economy to continue functioning optimally. Whether or not it has a positive impact on the environment depends on where contributions are directed in Broxbourne and whether the policy seeks contributions that enhance sustainability and improvements e.g. of water use efficiency and quality, waste management, biodiversity protection and enhancements, landscape, sustainable transport options and built and historic environment character. The policy scores highly against health, housing, equality, community safety and skills objectives. The inclusion of the Sustainable Community Strategy (2010) objectives is a positive element and should not be lost in implementation.</p>			
Mitigation measures:			
<p>Mitigation measures generally refer to clarity in the standard of contributions expected:</p> <ul style="list-style-type: none"> Seek contributions that enhance biodiversity and ensure that any biodiversity loss is at least mitigated and offset. Seek contributions to protect and improve water resources (lower consumption, efficiency and improved water quality). Seek contributions that increase the range and accessibility of transport options and encourage their use. Seek contributions that mitigate potential adverse impacts from climate change and support adaptation. Seek contributions that promote accessibility and encourage more sustainable consumption patterns and lifestyles. Contributions should not result in a negative impact on the landscape and should instead seek to complement or enhance it. Seek contributions that enhance and protect the historic and built environment. Seek contributions that support sustainable waste management e.g. the provision of recycling services. Investigate areas with high health deprivation levels to establish causality. Take the above into account for future planning. During implementation, emphasise cooperation between Council and private sector. 			