

**Hertsmere Revised Core Strategy  
Proposed Main Modifications**

**Sustainability Appraisal Note**

**August 2012**

# Hertsmere Revised Core Strategy Schedule of Main Modifications

## Sustainability Appraisal Note

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## Glossary

<b>Abbreviation</b>	<b>Definition</b>
DPD	Development Plan Document
EC	European Commission
MM	Main Modification
NPPF	National Planning Policy Framework
RCS	Revised Core Strategy
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment

# 1. Introduction

- 1.1 This Note sets out the findings of the Sustainability Appraisal (SA) of the Schedule of Main Modifications (MM) to the Revised Core Strategy (RCS) November 2011. Following the Independent Examination into the soundness of Hertsmere RCS, a number of policies contained in the RCS Submission DPD (November 2011) have been modified to address the Inspector's comments.
- 1.2 The Hertsmere RCS Schedule of Modifications August 2012 sets the following main modifications:
- MM/1 - New Policy SP2 on Presumption in Favour of Sustainable Development;
  - MM/2 - Modification to Policy CS1 (The Supply of New Homes and supporting text of Policy CS1);
  - MM/3 - Modification to supporting text of Policy CS1;
  - MM/4 – Amendment to Figure 1 - Key Diagram: remove Strategic Gap designation and Transport corridors;
  - MM/5 – Modification to supporting text of Policy CS2 (The Location of New Homes) and MM/18 modification to Appendix 5;
  - MM/6 - Modification to Policy CS3 (Housing Delivery and Infrastructure) and MM/7 modification to supporting text;
  - MM/8 and 9 – Replacement of Policy CS4 (Affordable Housing) and revised supporting text;
  - MM/10 – Modification to Policy CS6 (Gypsy and Traveller sites);
  - MM/12 – Replacement of Policy CS12 (Green Belt protection and enhancement of the natural environment) by Policy CS12 (a) – The Enhancement of the Natural Environment;
  - MM/13 - New Policy CS12 (b) The Green Belt and MM/11, MM/14 and MM/15 modifications to supporting text;
  - MM/16 – Modification to Policy CS18 (Key Community Facilities);
  - MM/17 - Modifications to text on Implementation and Monitoring Framework (Chapter 9 of RCS);
  - MM/19 – Modification to Paragraph 8.5 (supporting text to Policy CS26 Town Centres and Shopping);
  - MM/20 – Modification to Paragraph 3.41 (supporting text to Policy CS6 Gypsy and Traveller sites);
  - MM/21 – Modification to Paragraph 3.41 and creation of Paragraph 3.42 (supporting text to Policy CS6 Gypsy and Traveller sites);
  - MM/22 – Modification to Paragraph 4.21 (supporting text to Policy CS8 Scale and Distribution of Employment Land);
  - MM/23 – Modification to Paragraph 5.44 (supporting text to Policy CS16 Energy and CO2 Reductions);
  - MM/24 – Modification to Paragraph 5.46 (supporting text to Policy CS16 Energy and CO2 Reductions);
  - MM/25 – Modification to Policy CS23 (Development and Accessibility to Services and Employment);
  - MM/26 – Modification to Paragraph 7.4 (supporting text to Policy CS23 Development and Accessibility to Services and Employment);

- MM/27 – Modification to Policy CS26 (Town Centre Strategy);
- MM/28 – Modification to Paragraph 2.36 (supporting text to Policy SP1 Creating Sustainable Development; and
- MM/29 – Modification to Policy CS16 (Energy and CO2 Reductions).

1.3 Reports and data sources that have been used to inform the assessments of the policies are listed in the references in Section 12 of this report.

1.4 The SA of the policies has been undertaken in compliance with the requirements of the Planning and Compulsory Purchase Act 2004<sup>1</sup> and the European Union Strategic Environmental Assessment (SEA) Directive 2001/42/EC and builds upon earlier SA work undertaken to inform the RCS Submission DPD (November 2011).

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<sup>1</sup> Town and Country Planning (Local Development) (England) Regulations 2004. The Regulations came into force on 28 September 2004.

## 2. Approach to Assessment of the Main Modifications

2.1 As outlined above, the Hertsmere RCS Schedule of Main Modifications August 2012 document sets out revisions to eight policies (with modifications made to the main policy body or to the supporting text or both) and two new policies.

### Modifications requiring further assessment

2.1 SA re-assessments have been undertaken for the modified policies:

- MM/2 - Modification to Policy CS1 (The Supply of New Homes) together with MM/3 and MM/5 modifications to supporting text of Policy CS1 and CS2 respectively, and modifications MM/17 and MM/18;
- MM/7 - Modification to Policy CS3 (Housing Delivery and Infrastructure) together with MM/6 modification to supporting text of Policy CS3;
- MM/9 – Replacement of Policy CS4 (Affordable Housing) together with MM/8 modification to supporting text of Policy CS4;
- MM/10 – Modification to Policy CS6 (Gypsy and Traveller sites) together with MM/20 and MM/21 modifications to supporting text of Policy CS6;
- MM/12 – Replacement of Policy CS12 (Green Belt protection and enhancement of the natural environment) by Policy CS12 (a) – The Enhancement of the Natural Environment;
- MM/29 – Modification to Policy CS16 (Energy and CO2 Reductions) together with MM/23 and MM/24 modifications to supporting text of Policy CS16; and
- MM/27 – Modification to Policy CS26 (Town Centre Strategy) together with modification MM/19 to supporting text of Policy CS26.

2.2 New SA assessments have undertaken for the new policies:

- MM/1 - New Policy SP2 Presumption in Favour of Sustainable Development; and
- MM/13 - New Policy CS12 (b) The Green Belt and MM/11, MM/14 and MM/15 modifications to supporting text plus MM/4 modification to Key Diagram.

2.3 It should be noted that although assessments have been undertaken for each individual policy, they have also taken into consideration all other Core Strategy policies that remain unchanged in the RCS Submission DPD (November 2011) and also the new and modified policies being assessed in this note where appropriate, to ensure a comprehensive assessment.

2.4 In order to ensure consistency with the approach utilised for the production of the SA Report for the RCS Submission DPD (November 2011), the assessments have utilised a seven- point scale as set out in Table 2.1 and were undertaken against the set SA Objectives as shown in Table 2.2.

**Table 2.1 - Assessment Scale**

Assessment Scale	Significance of Effect
+++	Strongly positive
++	Moderately positive
+	Slightly positive

Assessment Scale	Significance of Effect
0	Neutral or no obvious effect
-	Slightly negative
--	Moderately negative
---	Strongly negative

2.5 Moderately and strongly positive and negative effects are considered of significance whereas neutral and slightly positive and negative effects are considered non-significant.

2.6 The approach taken in the assessment of Policy SP2 Presumption in Favour of Sustainable Development has differed from the methodology described above for the reasons explained in section 3.

## Modifications not requiring further assessment

2.7 The following modifications are considered not to require additional SA assessments and a justification is provided below:

- MM/16;
- MM/22;
- MM/25 and MM/26; and
- MM/28.

2.8 It is considered that the modification MM/16 made to Policy CS18 Key Community Facilities does not require additional SA. The modification introduced by deleting “*The conversion or redevelopment of residential properties for healthcare and elderly care will not be considered appropriate unless it can be demonstrated that there are no other suitable sites or buildings within the service provider catchment.*” from the policy does not alter the assessment undertaken of the policy in November 2011, as this particular aspect didn’t receive any specific consideration.

2.9 Equally, modification MM/22 to the supporting text of Policy CS8 Scale and Distribution of Employment Land, in paragraph 4.21, is considered not to require additional SA as it only provides additional clarification as to what the Council’s intentions with regards to the status of safeguarded employment land which are as follows;

“~~This~~~~ese~~ ~~are~~~~is~~ considered to represent the most appropriate location for the provision of additional employment land~~7~~. **In particular, the new safeguarded area has been identified as suitable on account of** given its immediate proximity to existing employment land and to the primary route network, its limited environmental quality, **the extent of existing previously developed land and buildings** and the wider importance of the Elstree Way employment area for Borehamwood, which will be accommodating the greatest proportion of new housing in the borough over the next 15 years. The land would be released to meet any longer term employment needs and to offset any land lost in existing Employment Areas in the shorter term, providing for B class development. **In line with national planning policy, the status of safeguarded land, between the urban area and the Green Belt, is required to meet long term development needs beyond the plan period. It is not allocated for development at the present time. Planning permission for development of safeguarded land will only be granted following a review of the Site Allocations DPD (or any other equivalent document) and, until such time, normal Green Belt policy will apply.** The Council’s preference is for major, new B1(a) office development to be located in or adjacent to town centres, so the focus of any extension of the Elstree Way ~~or Cranborne Road~~ ~~o~~ Employment ~~a~~ Areas would be on a mix of B class activities, including B1(b), B1(c) and B2 development.”



- 2.10 Modification MM/25 to Policy CS23 (Development and Accessibility to Services and Employment) together with modification MM/26 to paragraph 7.4 of supporting text of Policy CS23 are considered not to require additional SA as the removal of specific reference to Transport Corridors and the further clarification of the conditions under which major development will be permitted do not alter the positive results of the previous assessment reported in the November 2011 SAR.

### **MM/25 Policy CS23 Development and Accessibility to Services and Employment**

The Council will work towards Hertfordshire County Council's vision of providing a safe, efficient and affordable transport system that allows access for all to everyday facilities.

To obtain the best use of the existing highway network, major trip generating development should be focused principally on Transport Development Areas, ~~Transport Corridors~~ and town centres as indicated on the Key ~~Map~~**Diagram**. Major ~~non-residential~~ developments ~~over 2,500 sq m or schemes of 25 residential units~~ will only be permitted where:

- i. it does not conflict with the Transport Objectives of the Hertfordshire Local Transport Plan (~~April 2011 as amended~~) **and associated Accessibility Strategy;**
- ii. it is accompanied by a suitable Travel Plan (~~for developments over 2,500 sq m or 80 residential units~~ **where required by the Hertfordshire Local Transport Plan (as amended)**), prepared in accordance with guidance set out in the Parking **Standards** Supplementary Planning Document **and DfT guidance on preparing travel plans;**
- iii. it is in accordance with Hertfordshire County Council guidance and relevant Local Plan / ~~Development Plan Document (as amended)~~ policies relating to the operation of the Highways network and the achievement of vehicular, pedestrian and equestrian safety; **and**
- iv. it contributes, where required, to the provision or funding of new infrastructure or improved public transport services and non-motorised routes; **and**
- iv-v. the cumulative impact on the highways network can be adequately mitigated.**

### **MM/26 Supporting text to Policy CS23**

7.4 The Council acknowledges that there is no single solution to the problem of congestion. However, there is likely to be limited scope for major, trip generating commercial development outside of (1) the identified 'Transport Development Areas' **and associated transport corridors** in Borehamwood and Potters Bar (2) town centres identified in the retail hierarchy or (3) the designated Employment Area on Shenley Road, Borehamwood - unless new or improved public transport, pedestrian and cycle routes can be created or funded and the local environment can accommodate such development. Major trip generating developments are considered **to be those creating over 2,500 sq m of new / additional office, retail or leisure floorspace, have a site area of one hectare or greater, or requiring more than 150 car parking spaces in Policy CS23.**

- 2.11 Modification MM/28 to paragraph 2.36 of the supporting text to Policy SP1 is also considered not to require additional SA, as it intended to clarify the amount of safeguarded employment land that will be identified and how the specific boundaries and area will be clarified:

"The focus for employment will continue to be on town centres and in and adjacent to the Borough's designated Employment Areas **at land safeguarded for employment development**, rather than through the development of new locations for employment generating development. No significant need has been identified to allocate new areas of land for employment purposes and the Council will seek to direct significant new industrial and warehousing development to designated brownfield locations in Borehamwood, Potters Bar and Bushey. Major new office developments will be directed to town centres and other locations with good public transport accessibility and sufficient infrastructure. It is also recognised that some vacant or underused sites within existing employment areas may come forward for residential development during the plan period. Should this arise, the Council will seek to ensure that there is adequate provision for future jobs growth over the next 15 years through a limited, compensatory extension of the Elstree Way employment area in Borehamwood up to the A1, along with a more modest extension of the Cranborne Road industrial estate in Potters Bar, as currently identified in the 2003 Local Plan. **In total, approximately 16.9 hectares of safeguarded land will be**

**identified, comprising 14.5 hectares in Borehamwood and 2.4 hectares in Potters Bar, as indicated in the Employment Site Allocations Report Update (May 2012).** The specific boundaries **and area** will be clarified in the Site Allocations and Development Management DPD. “

Table 2.2 – SA Objectives and Assessment Rationale

	SA Objective	Assessment Rationale
<b>Social</b>		
1	To improve educational achievement, training and opportunities for lifelong learning and employability	Consideration of whether policies will directly provide educational, training and learning facilities for the local population, or indirectly provide opportunities for learning (e.g. nature trails) or improve accessibility to educational or learning facilities.
2	To ensure ready access to essential services and facilities for all residents	Consideration of whether policies will improve directly or indirectly accessibility to services and facilities through siting, improved transport measures, pedestrian and cycle links, specific community facilities, and open space. Secondary effects such as improved community safety and security measures are also considered.
3	To meet identified housing needs and improve the quality and affordability of housing	Consideration of the extent to which policies will increase or decrease the supply and quality of housing appropriate to local needs and affordability.
4	To reduce poverty and social exclusion and promote equality of opportunities	The extent to which policies sought to improve access to essential facilities such as employment and housing to all sectors in Hertsmere. This includes the effects of locational policies on access, as well as the provision of transportation infrastructure in connecting such locations.
5	To reduce and prevent crime, fear of crime and anti social behaviour	The degree to which policies will reduce crime and the fear of crime through indirect measures such as incorporating design features in new development (such as additional lighting, CCTV) were considered. Direct effect on reducing vehicle, burglary and violent crime rates.
6	To improve population's health and reduce inequalities both geographically and demographically	Consideration of whether policies improve access to health facilities, and indirectly improve health for all. Secondary consideration of reducing air pollution, ensuring homes are of a decent standard, and other indirect or longer-term effects upon health. Secondary effect was also considered of improving walking and cycling infrastructure and the positive effect on improving levels of health.
<b>Environmental</b>		
7	To make the most efficient use of previously land developed land and existing buildings before Greenfield sites	Consideration of the extent to which policies will make the best use of land and buildings. Consideration also be given to indirect effects, such as improving accessibility since this can allow more intensive land uses.
8	To reduce contamination and safeguard soil quality and quantity	Consideration of how policies will reduce or increase soil contamination and safeguard soil quality and quantity.
9	To protect and enhance landscape character, historic buildings, archaeological sites and cultural	Consideration given to policies that will have a direct effect on designated Conservation Areas, listed

	SA Objective	Assessment Rationale
	features of importance to the community	buildings, locally listed buildings and their settings. In addition the extent to which there is a sympathetic integration of development on local character will be assessed. Secondary effects will be considered through policies that will reduce the traffic levels in the borough as well as other traffic management measures resulting in positive effects. Assessment of the policies against landscape character areas.
10	To maintain and enhance the quality of countryside and landscape	Consideration of whether policies will seek directly or indirectly, to maintain and enhance the quality of the countryside, greenbelt and open space. Policies will which seek to protect these areas in the short and medium terms will be assessed as having a positive effect. Assessment of the policies against landscape character areas and the extent to which the quality and quantity of the character areas are affected. Potential loss to the quality/quantity of tranquil areas.
11	To reduce dependence on private car and achieve modal shift to more sustainable transport modes	Consideration of the extent to which policies will provide sustainable modes of transport, or promote the use of such modes and restrict the use of cars, by their location, quality of the pedestrian environment, design, or information provision.
12	To protect and enhance wildlife and habitats which are important on an international, national and local scale	Consideration of whether policies may have a positive or negative effect on internationally and nationally designated sites and locally important habitats and species (either through fragmentation or proximity effects). Additional consideration of whether the policies will result in the conservation, enhancement or creation of habitats.
13	To improve the quality of surface and ground waters	Consideration of whether policies will have positive or negative effects on maintaining and improving the quality of surface and ground waters. Consideration will be given to aspects such as surface water run-off from impermeable surfaces and proximity to water courses.
14	To minimise water consumption	Consideration of whether policies will be efficient in their use of water.
15	To minimise the risk of flooding taking account of climate change	Consideration of whether policies will have positive or negative effects on tidal and fluvial flood risk. Consideration of whether policies will result in an increase/decrease of flooding and other climate change effects. Consideration of direct or indirect effects on reducing the risk of flooding and other climate change effects, e.g. by using sustainable drainage systems.
16	To improve local air quality	Consideration of whether policies will result in reductions or increases in traffic- and industry- derived pollutant concentrations and carbon dioxide emissions. Predicted changes in road traffic numbers and the effect on the concentrations of certain pollutants (NO <sub>2</sub> and PM <sub>10</sub> ). Secondary effect of the use of more sustainable modes of transport, reductions in vehicle use, and changes in industrial activities and locations, leading to improvements in air quality.

	SA Objective	Assessment Rationale
17	To reduce greenhouse gas emissions	Consideration of whether policies will result in reductions or increases of greenhouse gas emissions., and to what extent.
18	To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy	Consideration of whether policies will directly reduce energy demand and incorporate renewable energy. Consideration will also be given to indirect effects, e.g. development located to reduce transport distances.
19	To reduce the generation of waste and encourage re-use and recycling of waste	Consideration of whether policies directly reduce the generation of waste and recycling of waste against standard levels expected for development, e.g. by providing recycling facilities within and near to homes. Consideration will also be given to construction waste reduction, re-use and recycling.
<b>Economic</b>		
20	To provide a prosperous, balanced and stable economy	<p>Consideration of whether policies will support maintaining and extending the range of wealth generating activities, including retail, leisure, recreation and tourism in addition to services, facilities and educational activities.</p> <p>A focus on sustainable development, accompanied by strategies for public transport, community infrastructure and a mix of uses</p> <p>Consideration of whether policies will reduce the number of vacant units and/or add to the diversity of the area.</p> <p>The extent to which policies will require development to be focused in existing urban centres and the expected impact of the policies on the overall quality and attractiveness of the area will be primary considerations.</p>
21	To sustain and enhance the viability and vitality of town centres	Consideration of whether policies will aim to reduce the number of vacant units and/or add to the diversity of the town centres.

## 3. Policy SP2 Presumption in Favour of Sustainable Development

- 3.1 The Council proposes the insertion of a new policy expressing how the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF) will be applied locally. The Council's policy has adopted verbatim the model policy which the Planning Inspectorate has developed as an appropriate way for local authorities of meeting this expectation as follows.

### **MM/1 Policy SP2 Presumption in Favour of Sustainable Development**

**When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly, in particular through the pre-application process, to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.**

**Planning applications that accord with the policies in this Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:**

- a) any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or**  
**b) specific policies in that Framework indicate that development should be restricted.**

### **Supporting text**

**2.61 In accordance with the NPPF this Plan is based upon and reflects the presumption in favour of sustainable development. The following policy expresses how the presumption will be applied locally.**

### **Assessment results**

- 3.2 Policy SP1 (Creating Sustainable Development) contained in the RCS is an overarching policy which indicates how development in the Borough is to make a contribution to delivering sustainable development. It aims to deliver sustainable development by ensuring that Brownfield sites are prioritised over Greenfield and that development is targeted especially at Borehamwood. It then sets a list of eighteen key policy points that the Council will look to focus on that would enable a development to be sustainable. This policy has arisen as a direct result of earlier SA work recommendations for such an overarching policy on Sustainable Development to be contained in the Core Strategy.
- 3.3 New Policy SP2 (Presumption in Favour of Sustainable Development) can be viewed as complementary to Policy SP1, as it contains further explanation on how the Council will work proactively with prospective applicants and that planning applications which accord with the policies contained in the Core Strategy will be approved without delay.
- 3.4 However, Policy SP2 introduces exceptions to Policy SP1. The exceptions are planning applications for which there are no local policies of relevance or the relevant local policies are out

of date. In this case the Council is required to grant planning permission, unless the assessment against policies in the NPPF (and not in the RCS) indicates that adverse impacts significantly outweigh the benefits or that development should be restricted.

3.5 It is considered that it isn't the role of this SA Note to attempt to assess the NPPF's sustainability credentials but key aspects of the NPPF are introduced and discussed below.

3.6 The NPPF recognises that there are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

3.7 A number of policies in the NPPF provide the Government's view of what sustainable development in England means in practice for the planning system. The policies are grouped under the following themes:

1. Building a strong, competitive economy
2. Ensuring the vitality of town centres
3. Supporting a prosperous rural economy
4. Promoting sustainable transport
5. Supporting high quality communications infrastructure
6. Delivering a wide choice of high quality homes
7. Requiring good design
8. Promoting healthy communities
9. Protecting Green Belt land
10. Meeting the challenge of climate change, flooding and coastal change
11. Conserving and enhancing the natural environment
12. Conserving and enhancing the historic environment
13. Facilitating the sustainable use of minerals

3.8 A comparison between the NPPF's policies themes and RCS policy objectives (as set below) is deemed appropriate at this stage.

1. To provide the spatial policies necessary to deliver the land use requirements of the Hertsmere Together Community Strategy.
2. To protect the Green Belt and its role in preventing urban sprawl and the coalescence of towns.

3. To maintain an adequate supply of suitable land, focused on brownfield sites within the principal towns, to accommodate expected development needs and supporting community infrastructure.
4. To work towards meeting the community's need for Affordable Housing.
5. To address issues arising from climate change and flooding and to take advantage of water and other natural resources responsibly.
6. To improve environmental and streetscape quality in town centres and protect and enhance the built heritage of Hertsmere.
7. To protect and enhance the environment in Hertsmere by addressing local causes and impacts of pollution.
8. To raise levels of access by seeking development in locations not dependent on access by car and by requiring the provision of physically accessible transport interchanges and other buildings.
9. To promote safe and healthy communities, respecting the diverse needs of the whole Borough.
10. To support businesses of all sizes and to help promote local skills, focusing on areas of deprivation, education and training.
11. To provide a planning framework which promotes sustainable and competitive economic performance, in support of regional jobs growth requirements.
12. To safeguard and enhance the role of the town and district centres in Hertsmere, steering commercial developments which attract a large number of people toward the most accessible locations.
13. To protect and enhance local biodiversity.
14. To secure efficient land use through well-designed development reflecting the size, pattern and character of settlements in Hertsmere.
15. To promote rural diversification and through the Watling Chase Greenways Strategy, sustainable access to the wider countryside.

3.9 It can be concluded that there is a close alignment between both sets of objectives/themes. Indeed, both for the RCS and the NPPF, pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life.

3.10 Therefore, it is considered that following the policies in the NPPF (in the case of planning applications for which there are no local policies of relevance or the relevant local policies are out of date) will also contribute positively to pursuing sustainable development in Hertsmere.



## 4. Policy CS1 The Supply of New Homes and Policy CS2 The Location of New Homes

4.1 The modifications introduced to these two policies (as set below) plan for an appropriate level of housing, in response to Inspector's comments.

### MM/2 Policy CS1 The Supply of New Homes

The Council will make provision for **at least 3550-3990** additional dwellings within the District between 2012 and 2027, a development rate **of a minimum of 237-266** dwellings per year. In providing for the new homes and identifying new locations for development in the Site Allocations DPD, the Council will take account of:

- i) environmental constraints and compliance with the key environmental policies set out in the Core Strategy (including Policies CS12, CS13, CS15 and CS16);
- ii) the character, pattern and density of the surrounding area;
- iii) the need to retain existing housing;
- iv) the need to locate new development in the most accessible locations taking account of local infrastructure capacity;
- v) the settlement hierarchy identified in the Hertsmere Core Strategy; and
- vi) the need to focus development within the boundaries of existing built-up areas.

### MM/3 Supporting text to Policy CS1

2.26 Borehamwood and Potters Bar will remain the two largest centres of employment in the Borough where many homes, jobs and services are located. The Council's Strategic Housing Land Availability Assessment (SHLAA) has identified sufficient land available across the Borough to accommodate **at least 3,550-3,990** homes over the next 15 years without developing on greenfield land in the green belt. The quantum and distribution of development would be in general conformity with the requirements of the East of England Plan, rolled forward beyond 2021. This takes account of the fact that in 2011, there were over **1,200-300** homes with planning permission in the pipeline, which together a significant number of potential development sites which have been identified, is anticipated to avoid a need to release of Green Belt land for housing development.

2.27 The Council considers that planning for **237 at least 266** homes per annum over 15 years following adoption of the Core Strategy (2012 – 2027) is the most appropriate level of growth, taking into account housing needs and what can be delivered in the Borough in a sustainable way.

2.29 The existing infrastructure of the Borough would not be able to support any **any significant additional** significant additional housing development over and above the 15 year housing target set out in paragraph 2.26.

2.31 A proposed 15 year target of at least **3,550-3,990** new homes reflects the requirements of the East of England Plan and seeks to focus this on previously developed sites, taking account of the Green Belt constraints which exist in the Borough.

2.34 ~~Should significant~~ **The emergence of** windfall sites ~~emerge elsewhere~~ for housing will need to be closely monitored, ~~such as Potters Bar Bus Garage, consideration will be given to reviewing the quantum and phasing of sites in Borehamwood. Provision of new housing on large, allocated sites will be made on a phased basis, particularly in Borehamwood,~~ to ensure that the impact of local services and infrastructure can be managed. Clear criteria will need to be provided to ensure that the focus on brownfield land does not lead to development at densities, which harm the character and appearance of established residential areas. In particular, following changes to the definition of previously developed land in **the previous PPS3 and now in**

**the NPPF** in respect of private garden land, it will be necessary to provide greater clarity as to where any 'backland' development will be considered acceptable. A flexible, criteria-based approach, reflecting the different local character and pattern of development across the Borough, is likely to be more appropriate than any single borough-wide policy

## **Policy CS2 The location of new homes (NO MODIFICATIONS)**

Priority will be given to locating the majority of residential development within the main settlements of Borehamwood, Potters Bar and Bushey. Between 2012 - 2027, up to 60% of new housing will be sought in Borehamwood, at least 10% in Potters Bar, up to 25% in Bushey and at least 5% in Radlett and other suitable locations.

Windfall developments will be supported on appropriate sites in all towns, subject to local environmental constraints, the relationship with the surrounding pattern of development and the requirements of Policies SP1, CS12, CS15, CS16 and other relevant planning policies.

Within rural locations and in particular, Shenley, Elstree and South Mimms limited, small scale infilling on suitable sites will be supported.

## **MM/5 Supporting text to Policy CS2**

3.3 The Council envisages that its housing requirements to 2027 will be met by:

- Completions on allocated sites and sites with planning permission (commitments);
- Development on identified urban sites in the SHLAA including within the Elstree Way Corridor;
- Development on unidentified sites within the main settlements
- A limited amount of development on unidentified sites within rural settlements
- **Appropriate previously developed sites in the Green Belt**

3.4 The Council has undertaken a technical **study studies** to assess land suitable and available for housing in the **DistrictBorough**. The Strategic Housing Land Availability Assessment (or SHLAA) involves a detailed review of land promoted or known to the Council in both urban and greenfield areas. It also provides estimates of how land could come forward over time (a housing trajectory). Key stakeholders, including local community groups and developers, were consulted on the methodology and site assessments.

3.5 Following the **Strategic Housing Land Availability Assessment Guidance publication in July 2007**~~in PPS3~~, the **Council's** SHLAA separates the land supply on the basis of their prospects for delivery. In the first five years, it estimates the potential of deliverable sites. Many of these already have planning consent for development. From years 6-10, and beyond, sites are assessed in the SHLAA on the basis of being developable. This means they are considered suitable for housing but may not immediately come forward due to other constraints or infrastructure requirements. The SHLAA was prepared in 2010 and updated in 2011, **a further update note was produced in 2012.**

3.6 ~~The SHLAA also considers the potential~~ of Urban **Broad-large scale windfall locations defined as** Borehamwood, Potters Bar, Bushey and Radlett.~~These can be~~ is counted towards the land supply from years 11-15 as development is supported by Core Strategy policies to promote the re-use of land in these towns. **A rural windfall, and a small scale urban windfall is included for years 6-15 and a reserve allowance for land currently safeguarded for housing to come forward should the Council fail to maintain a five year housing land supply (with the exception of land at Byron Avenue/Vale Avenue in Borehamwood which has since been designated as a village green).** The potential contribution of the different sources of supply is shown in Table 8. This indicates a total potential supply of just **under over 3,740 4,060** dwellings.

3.7 In addition to urban ~~broad locations~~**windfall**, an estimate has also been made for the potential of housing-led regeneration in Elstree Way, west of Borehamwood town centre. This area, which has already seen a number of sites brought forward for residential development in recent years, has been the subject of feasibility and transport studies commissioned by the key

landowners within the Elstree Way Corridor. It is the Council's intention to bring forward an Area Action Plan DPD for this area (see policy CS22) to facilitate the disposal and redevelopment of these sites.

**~~3.8 The SHLAA does not include a general estimate from windfall in Years 1-10. However, windfalls have historically and will continue to contribute to housing numbers in the borough. As such, the assessed urban housing supply above is likely to underestimate the actual housing supply in Hertsmere.~~**

## **MM/17 Implementation and Monitoring Framework (Chapter 9 of RCS)**

9.3 Regular monitoring will assess the effectiveness of policies and whether the Spatial Vision and Strategy are being implemented as originally intended. Future Annual Monitoring Reports (AMR) prepared by the Council will need to indicate the extent to which Core Strategy (and other subsequently prepared DPD) policies are being achieved and whether targets are being met. For example, the implementation of Policy CS3 (**Housing Delivery and Infrastructure Phasing of Housing Development**), will be dependent on regular review to establish whether the number of homes **permitted completed** is **significantly** falling below **the minimum housing rate or exceeding annualised housing requirements**, potentially triggering **a review of land allocation phasing contingency arrangements**.

9.4 The AMR will, therefore, consider the extent to whether revisions to the Core Strategy or other DPDs will be necessary or whether new DPDs are required. Indicators have been developed to provide a consistent basis for monitoring the performance of the Core Strategy. A number of these have been derived from existing AMR indicators and wherever possible they have been chosen to be SMART i.e. Specific, Measurable, Achievable, Realistic and Timely. Changes to the way in which AMRs are prepared are expected as a result of measures set out in the Localism Act and some indicators will also be dependent on external events but the Monitoring Framework in Table 17 is considered to provide the basis for identifying how the Core Strategy should be maintained or amended.

### **Contingency Planning**

**9.5 There are key issues within the Core Strategy that are of significant importance to its successful delivery which include:**

- **Housing delivery and supply**
- **Provision of affordable housing and its mix**
- **Provision of infrastructure and services that support new development.**
- **Location of development**
- **Safeguarded Land**

### **Housing**

**Contingency 1: Where there is a need to increase the overall delivery of housing as well as delivery of affordable housing (Policy CS1 and CS4):**

**9.6 Where housing delivery is more than 20% below the annualised (266 dwellings) housing target over a rolling three year period, and at the same point in time, the expected housing completions for the next five years are subsequently insufficient to compensate for the shortfall of the required annualised rate, a review of housing allocations and consideration of safeguarded land for housing that is presently designated as Green Belt will be undertaken. In line with national planning policy, the status of safeguarded land, between the urban area and the Green Belt, is required to meet long term development needs beyond the plan period. It is not allocated for development at the present time. Planning permission for development of safeguarded land will only be granted following a review of the Site Allocations DPD (or any other equivalent document) and, until such time, normal Green Belt policy will apply.**

~~Should housing delivery still remain more than 20% below the annualised housing target, as set out above, this will trigger a review of the plan and the Council will implement one or more of the following measures in order to increase the delivery of housing, as detailed below:~~

- ~~1. Review the DPDs to bring forward additional sites for housing in locations consistent with the overarching spatial strategy, including a review of housing allocations, affordable housing provision and S106/CIL requirements.~~
- ~~2. In the event that there is still a shortfall in housing delivery, that cannot be addressed through a review of the phasing of sites, then the Council will evaluate employment land and as required Green Belt land with the aim of releasing land for housing development in appropriate locations.~~

9.7 Should housing delivery still remain more than 20% below the annualised housing target, as set out above, this will trigger a review of the plan and the Council will implement one or more of the following measures in order to increase the delivery of housing, as detailed below:

1. Review the DPDs to bring forward additional sites for housing in locations consistent with the overarching spatial strategy, including a review of housing allocations, affordable housing provision and S106/CIL requirements.
2. In the event that there is still a shortfall in housing delivery, following co-operation with neighbouring authorities, then the Council will evaluate employment land and as if required Green Belt land with the aim of releasing land for housing development in appropriate locations.

#### Affordable Housing

*Contingency 2: Where overall housing targets are being met, but affordable housing delivery is not being met (Policy CS4):*

9.8 The delivery of affordable housing is closely linked to overall housing delivery and therefore the above contingency measures are equally as relevant to the delivery of affordable housing as they are to overall housing delivery. Where affordable housing delivery is more than 20% below the annualised affordable housing target (76 dwellings) over a rolling three year period and housing completions for the next five years are subsequently projected to be below the required annualised rate then In addition to the above contingency measures, the Council will also adopt the measures set out below in order to ensure that affordable housing is delivered as anticipated.

1. Review affordable housing threshold, and development viability within Hertsmere and review the Hertsmere Affordable Housing SPD.
2. Review the use of the Council's funds in order to facilitate an increase in the delivery of affordable housing.
3. Consider the potential to increase the delivery of affordable housing on Council owned sites.
4. Evaluate the potential for achieving a higher proportion of affordable housing on an individual basis on allocated sites.
5. Examine the opportunities available through any new Government initiatives to support the development of new affordable housing.

*Contingency 3: Where there is an insufficient affordable housing mix (Policy CS4):*

9.9 Within Hertsmere there is strong need for family sized affordable housing (3 and 4 bed properties). The council will monitor the mix of affordable housing completions. The mix (number of bedrooms) of all Affordable Housing should be within 20% of the equivalent proportions for market housing over a rolling three year period, if this falls below this target then a review of the Affordable Housing SPD will be undertaken. This will consider methods of increasing the supply of family sized affordable housing units. If over the following two years this fails to increase the supply a review of the RCS or allocated sites in the Site Allocations DPD will be considered.

#### Development Location

**Contingency 4: Where housing delivery is inconsistent with the location of development (Policy CS2):**

**9.10 The Council will monitor housing completions in line with Policy CS2 and Table 8 of the RCS. Completion will be monitored annually, at the end of each 5 year period of the Core Strategy (2016/17, 2021/2022, 2026/2027) the cumulative completion will be assessed against CS2, where the percentages for a settlement are 20% above CS2; this will trigger a review of the Policy to ensure that the target is appropriate. The Council will assess infrastructure capacity with infrastructure providers, and housing allocations to ensure sufficient capacity.**

**Contingency 5: Where additional employment land is required/release of safeguarded land is required (Policy CS8):**

**9.11 In line with national planning policy, the status of safeguarded land, between the urban area and the Green Belt, is required to meet long term development needs beyond the plan period. It is not allocated for development at the present time. A planning application for development of safeguarded land will only be granted following a review of the Site Allocations DPD (or any other equivalent document) and, until such time, normal Green Belt policy will apply.**

**Infrastructure**

**Contingency 6: Where infrastructure delivery is not forthcoming (SP1, CS18, CS20):**

**9.12 The progress of infrastructure delivery will be monitored with the AMR against the Infrastructure Schedule, and future iterations within the Infrastructure Topic Paper. In the event that identified infrastructure requirements are not forthcoming and additional facilities necessary to support new development cannot be accommodated in the most sustainable locations on previously developed land within the urban area, (including the extension / intensification / dual use of existing buildings and sites), the Council will work in partnership with infrastructure providers and adjoining authorities in order to ensure that any land requirements necessary to support their delivery are secured. On site provision will be secured through S106 and S38 and wider, off-site requirements through S106, S278 (for highways) and through CIL.**

**Plan Review**

**9.13 The Council commits to undertaking a partial review of the Core Strategy within three years of the adoption of this Development Plan Document. That early review will be undertaken in co-operation with neighbouring authorities taking account of the progress and status of emerging Development Plan Documents in neighbouring authorities. To support the review the Council will commission population and household projections, and consider housing and employment needs, including an updated Strategic Housing Market Assessment within the South West Hertfordshire Housing Market area.**

**9.14 The Council acknowledges that housing need in the authority would not be fully met in the minimum target set in Policy CS1, based on the latest available evidence. Given that the consideration of housing need across a greater than local area requires further engagement with neighbouring authorities, principally in South West Hertfordshire, it will be necessary to continue to co-operate with those authorities.**

**9.15 It is anticipated that this process should be completed within the next three years enabling the Strategic Housing Market Assessment to be updated, related data sources to be considered including the 2011 Census and a partial-review of the Core Strategy to be commenced at the earliest opportunity. An updated Jobs Growth and Employment Land study will also be required as part of an early review. The Council's Local Development Scheme will be updated immediately following the adoption of this Core Strategy setting out the anticipated timescales for the early partial review, including anticipated, informal joint**

**working in the intervening period prior to this review. The Council's planned timescale for undertaking this early review will be set out in an updated Local Development Scheme.**

## **MM/18 Appendix 5**

*Policy H4 moved from the "To replace Local Plan policy" to "complements Local Plan policy" (See Appendix C of the RCS Schedule of Modifications July 2012 document)*

## **Assessment Results**

- 4.2 The results of the detailed assessment of the proposed modifications are presented in Table A.1 in Appendix A. As in previous iterations of assessment, the Policies CS1 and CS2 were assessed together. The discussion below reflects the sustainability performance of the policy group taking into account the performance of the original policy group as reported in the SA Report of the RCS Submission DPD (November 2011).
- 4.3 The proposed modifications set a minimum target of 3,990 additional dwellings within the Borough between 2012 and 2027, which represents a minimum net increase of 440 dwellings when compared to the ceiling figure of 3,550 dwellings set in the RCS 2011. In order to achieve such a minimum increase the Council envisages that appropriate previously developed sites in the Green Belt will be required. The addition of these sites to the RCS at this stage has been made possible due to a relaxation of Green Belt policy in the NPPF which allows limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land) whether redundant or in continuing use which would not have a greater impact on the openness of the Green Belt.
- 4.4 The performance of this policy group continues to be strong against social SA objective 2 (To ensure ready access to essential services and facilities for all residents) as the focus of locating new homes within existing housing areas or in most accessible locations remains.
- 4.5 However, performance against social SA objective 3 (To meet identified housing needs and improve the quality and affordability of housing) is mixed. It has been acknowledged that a minimum target of 3,990 homes over the plan period at a build rate of 266 dwellings per year will not fully meet the housing need in the authority in the long term based on the latest available evidence. The effects of the proposed level of housing development on this objective are likely to be positive (but not significant) in the short term but have the potential to be negative in the medium to long term. Equally, the effects against social SA objective 4 (To reduce poverty and social exclusion and promote equality of opportunities) are likely to follow the same pattern due to the potential shortfall of affordable housing. This will require the Council to put in place a process of monitoring housing delivery in the early years of implementation of the CS in order to establish whether delivery is in keeping with the needs and act accordingly.
- 4.6 Through modification MM/17 to RCS section on Implementation and Monitoring, the Council has undertaken to act by bringing forward further land for housing, should housing delivery monitoring results show that there is a shortfall. This will be made through triggering the implementation of Contingency 1: Where there is a need to increase the overall delivery of housing as well as the delivery of affordable housing; or Contingency 2: Where the overall housing targets are being met, but affordable housing delivery is not being met or Contingency 4: Where housing delivery is inconsistent with the location of development. In addition, the Council has also introduced a commitment to undertaking a partial review of the CS within 3 years of adoption in co-operation with neighbouring authorities to find appropriate land. This combined approach should temper the negative effects predicted for this policy group described above but the exact effects can only be established at a later stage.
- 4.7 In terms of economic objectives, the two policies continue to deliver minor positive effects, as they are likely to stimulate regeneration opportunities such as Elstree Way and help improve the image of the area for potential investors. Locating the majority of residential development within the main

settlements of Borehamwood, Potters Bar and Bushey may also increase footfall in the town centres, increasing their vitality.

- 4.8 In terms of environmental objectives, significant positive effects are no longer identified against SA objective 7 (Making use of previously developed land) in the medium to long term. Although the policy group continues to focus the bulk of development on brownfield sites in Borehamwood, Potters Bar and Bushey and also in previously developed sites in the Green Belt, the acknowledgment that the housing need in the authority would not be fully met by the minimum target of 3,990 homes, makes it possible that Greenfield sites will need to be developed to make up for the shortfall in the medium to long term and therefore the effects on this objective would no longer be significant. The policies are expected to continue to deliver minor positive or negative effects against the rest of the environmental objectives.

## 5. Policy CS3 Housing Delivery and Infrastructure

- 5.1 The modifications to Policy CS3 and its supporting text have arisen out of the need to align the contents of the policy with the NPPF. This applies in particular to the Council's original proposal of phasing housing delivery which could restrict continuous housing delivery over the plan period and also the need for the Council to be explicit that any housing shortfalls would be made up.

### MM/7 Policy CS3

~~To facilitate a sustainable rate of housebuilding within the Borough under the terms of Policies CS1 and CS2, major housing sites will be phased in five year periods from 2011. Based on the findings of Annual Monitoring Reports, allocated land in later phases will be brought forward, if necessary, to maintain the five year supply of land for housing. To prevent the overdevelopment of housing in the Borough ahead of required infrastructure and community facilities, unimplemented residential land allocations and new residential proposals of 50 units (net) or more will not be permitted where the number of projected completions, as detailed in Annual Monitoring Report housing trajectory, is forecast to exceed 20% of the proportion sought in each phase.~~

Where housing delivery has fallen ~~is projected to fall~~ below the ~~proportion sought in each phase required minimum rate over a rolling five year period~~ by at least 20% and at the same point in time the expected completions over the following ~~three~~ five years will be insufficient to compensate for the shortfall of the minimum required annualised rate, a review of ~~the phasing and location of~~ housing allocations will be undertaken including consideration of safergarded land for housing and land presently designated as Green Belt. New housing development will only be permitted if satisfactory arrangements are in place to provide the necessary infrastructure.

### MM6 supporting text to Policy CS3

3.16 Government policy in PPS3 the NPPF emphasises the need to identify land to enable continuous delivery of housing for at least 15 years from the date of adoption of DPDs. The Council will also seek to ensure that the district has a rolling five year supply of developable housing land. ~~It is neither appropriate nor required for all housing land to be made available for development from the outset. Such an approach would compromise the ability to deliver sustainable communities across a local authority area, placing a major burden on infrastructure and community facilities, to the detriment of existing and new householders. The Council proposes to base housing land releases in five year phases: short term (1-5 years), medium term (6-10 years) and long term (11-15 years).~~

3.17 Housing monitoring details, including updates to the Council's housing trajectory, will be published each year in the Annual Monitoring Report. In between the publication of these reports, monitoring will be carried out continuously to ensure that there is up-to-date housing data available to inform the consideration of new planning applications and the adequacy of projected housing supply. **Where housing delivery and projected housing completions falls below the minimum rate, in line with Policy CS3 and the contingency arrangements set out in Chapter 9 (Implementation and Monitoring Framework), it will be necessary to take steps to increase the housing supply.**

3.18 The availability of supporting local infrastructure and community facilities and the need to provide additional capacity in some locations will **be an important consideration in the assessment of also determine the timing of the release of sites for development individual applications for significant new residential development. In addition, options for the coordinated delivery of development within the Elstree Way Corridor, a key focus for housing delivery in the Borough, will be explored by the Council with key stakeholders and their delivery and implementation will be set out in an Elstree Way Corridor Area Action Plan (AAP), in the medium to long term,**

**3.19 Establishing** the requirements and projections of key service providers **across the borough,** where they have not been identified already, **will be a key factor in phasing and distribution in the Core Strategy will be a key factor in determining whether there is adequate supporting infrastructure.** A number of statutory bodies have different strategic planning periods and are unable to plan to 2027 and beyond. This includes the Local Education Authority, whose schools capacity projections have traditionally extended over a seven year timeframe, meaning that it has been difficult to consider the long-term land use requirements of all service providers. In the long term, wastewater and transport infrastructure arising from the wider regional housing requirements across central and southern Hertfordshire will also be an important issue.

~~3.19 To ensure the sustainable phasing of new housing during the Plan period, where housing completions during any three year period are projected to exceed the proportion sought in each phase in Policy CS3 by 20% or more, planning permission will also not be granted for schemes in excess of 50 units. This element of Policy CS3 is only expected to apply in exceptional circumstances where there are a number of very large windfall sites emerging in close succession. Exceptionally, a large brownfield windfall site may emerge and where such proposals are accompanied by the required infrastructure requirements on or within the vicinity of the site, there may be scope to relax the phasing requirements set out in Policy CS3.~~

~~3.20 Similarly, the Council needs to ensure that there is no under-supply of new housing, because of a lack of SHLAA sites coming forward and / or suitable windfall sites being developed. Where housing completions during any following three year period are projected to fall below the proportion sought in each phase by 20% or more, as set out in Policy CS3, it will be necessary to review the phasing of all housing allocations and if necessary, either bring certain allocations forward or undertake a wider review of the Strategy, including consideration of land presently designated as Green Belt. Such a review will need to take account of housing land supply and trends in the wider housing market.~~

## Assessment Results

- 5.2 The results of the detailed assessment of the proposed modifications to Policy CS3 are presented in Table A.2 in Appendix A. The discussion below reflects the sustainability performance of the modified Policy CS3 taking into account the performance of the original policy as reported in the SA Report of the Revised Core Strategy Submission DPD (November 2011).
- 5.3 Modified Policy CS3 aims to ensure that the district has a rolling five year supply of developable housing land over a period of 15 years from the date of adoption of the Core Strategy so that an appropriate level of housing will be delivered throughout the Core Strategy period. In addition,



monitoring conditions are set in the policy which will allow for a review of the housing allocations including the consideration of safeguarded land for housing and land presently in the Green Belt in situations where the housing delivery has fallen below the required minimum rate over a rolling three year period. In this case contingency arrangements will be put into place to increase the housing supply as necessary. As a result the modified policy has enhanced positive effects on SA objective 3 (To meet identified housing needs and improve the quality and affordability of housing).

- 5.4 The policy requirement for new housing development to be permitted only if satisfactory arrangements are in place to provide the necessary infrastructure will prevent placing a major burden on infrastructure and community facilities to the detriment of existing and new householders. Therefore this policy has been assessed as having significant positive effects on SA social objective 2 (ready access to essential services and facilities for all residents) and minor positive effects on SA social objectives 4 and 6 (equality of opportunities and public health).
- 5.5 It has been predicted to deliver significant positive effects on the economic objective 20 (stable economy) by enabling stability in the local construction industry and providing adequate supporting infrastructure. The assessment of the modified policy against the environmental objectives mirrored that of the assessment of revised Policies CS1 and CS2 as reported above.

## 6. Policy CS4 Affordable Housing

- 6.1 The modifications to Policy CS4 and supporting text were made to ensure that maximum viable affordable housing is delivered in the Borough, and that the policy is consistent with the Council's Development Economic Study.

### MM/9 Policy CS4 Affordable Housing

~~To increase the supply of Affordable Housing, developments of 10 self-contained, residential units or more (gross), or residential sites of more than 0.3 hectares, should make provision for an element of Affordable Housing. On sites of fewer than 15 units, this may be delivered through the provision of intermediate housing (including shared ownership and share equity), with sites of 15 units or more containing a mix social rented housing, affordable rent and intermediate housing.~~

~~On qualifying sites, 35% of the housing units should be affordable, equating to an affordable housing target of 995 homes from 2012 to 2027. The Council will seek the maximum level of Affordable Housing on site. A lower level of provision will not be acceptable unless the Council agrees that its Affordable Housing objectives are being met.~~

~~As a guideline, on sites of 15 or more units (gross) or 0.5 hectares, the council expect that 75% of the Affordable Housing units will be delivered as social rented and/or affordable rent housing and the remainder as intermediate housing. The precise tenure and dwelling mix will be agreed with the Council on a site-by-site basis and reflecting current housing needs or updated supplementary guidance.~~

To increase the supply of Affordable Housing, developments of 5 self-contained, residential units or more (gross), or residential sites of more than 0.3 hectares, should make provision for an element of Affordable Housing. On sites of fewer than 15 units, this may be delivered through the provision of intermediate housing (including shared ownership and share equity), with sites of 15 units or more containing a mix social rented housing, affordable rent and intermediate housing.  
The following percentage targets will be sought through negotiation:

- 40% in post code areas EN5 4, WD25 8, WD7 8, WD7 7;

- **at least 35% in all other locations;**

**Appendix 6 provides a map of the post code areas within Hertsmere.**

**The policy equates to an affordable housing target of 1,140 from 2012 to 2027.**

**The Council will seek the maximum level of Affordable Housing on site. A lower level of provision will not be acceptable unless the Council agrees exceptional circumstances are demonstrated. Only in exceptional circumstances, will an alternative to on-site provision be appropriate.**

**As a guideline, on sites of 15 or more units (gross) or 0.5 hectares, the council expect that 75% of the Affordable Housing units will be delivered as social rented and/or affordable rent housing and the remainder as intermediate housing. The precise tenure and dwelling mix will be agreed with the Council on a site-by-site basis and reflecting current housing needs or updated supplementary guidance.**

**Where scheme viability may be affected, developers will be expected to provide full development appraisals to demonstrate an alternative affordable housing provision.**

### **MM/8 Supporting Text to Policy CS4**

3.26 A study was commissioned to examine the impact of Affordable Housing requirements on the viability of development. It highlights that there are significant differences in market values across the area, which together with the density of development and policy requirement, are capable of affecting the viability of providing Affordable Housing. The study assesses that a 35% Affordable Housing requirement on qualifying sites is deliverable in most locations across the district and remains a robust target. It highlights that where grant is available for Affordable Housing, this improves scheme viability, particularly in the lower value areas. Higher value areas such as Radlett and rural Hertsmere could also support a higher target requirement than the previous Local Plan requirement of 25%, with ~~35~~ **40%** Affordable Housing being viable in these locations. The study also reviews the thresholds for affordable housing and suggests that sites down to 5 units and above could provide affordable housing and still be viable.

~~3.27 In setting an Affordable Housing contribution and threshold, the Council have sought to balance the need to maximise provision with deliverability. Its preferred option is to set a consistent district-wide target, as this leaves no room for doubt about the Council's requirements. A 35% requirement would represent a continuation of current local policy, as well as the indicative requirement in the East of England Plan and give some flexibility to take account of potential future costs on development such as sustainable building and community infrastructure charges.~~ Affordable Housing requirements in respect of sheltered, extra and continuing care developments, are considered separately in paragraphs 3.49.

~~3.28 Given the practical implications of delivering affordable housing on small sites, a~~ A local trigger threshold of ~~105~~ **145** units or ~~0.32~~ **0.32** hectares is considered to be viable and deliverable, albeit with a degree of tenure flexibility. This would allow for intermediate rent or shared equity/ownership to be provided instead of social rented housing on smaller schemes of fewer than 15 units or 0.5 hectares, particularly where it would be difficult to practically deliver and manage a small number of social rented homes. In such instances, it is recognised that this may be a better way to accommodate an element of Affordable Housing, rather than through social rented housing being pepper potted across a scheme and across the borough as a whole. Units will need to be provided on site unless there are exceptional circumstances. The Council will not permit proposals involving the under-development or splitting up of large sites to avoid Affordable Housing requirements.

3.29 Based on ~~commitments completions, and~~ sites identified in the SHLAA, ~~and windfall~~ there is the potential to deliver around ~~860~~ **1,140** affordable dwellings over the next 15 years based on a ~~40% and~~ **40% and** 35% affordable housing requirement. ~~Taking into account the delivery of affordable housing on windfall sites, up to 995 homes could be delivered between 2012-2027 (or 66 units per annum).~~ This will form the Council's target for monitoring purposes.

*(no change to paragraphs 3.30 and 3.31)*

### **Delivery of Affordable Housing**

3.32 There are recognised to be a limited number of situations where it may be unviable or physically or logistically impractical to provide such a high proportion of Affordable Housing. This may be the case on some smaller or remote sites, where contaminated land is being developed or in locations where the development density and residual values are restricted. There is therefore considered to be a need for limited flexibility to enable certain sites to provide a slightly reduced level of Affordable Housing where there is evidence, in exceptional circumstances, to demonstrate:

1. that it would be economically unviable to provide 35% or 40% (in high value areas) of housing on the site in the form of Affordable Housing; or
2. that the requirement to provide a reasonable and practicable mix of unit sizes across a site would necessitate a reduction in the number of affordable homes.

## **Assessment Results**

- 6.2 The results of the detailed assessment of the proposed modifications to Policy CS4 are presented in Table A.3 in Appendix A. The discussion below reflects the sustainability performance of the modified Policy CS4 taking into account the performance of the original policy as reported in the SA Report of the Revised Core Strategy Submission DPD (November 2011).
- 6.3 The revised policy increases the affordable housing target from 985 homes to 1140 homes from 2012 to 2017, a net increase of 155 homes over the period.
- 6.4 The modified policy will result in increased levels of affordable housing on all qualifying sites through a lower threshold of over 5 self contained units or residential sites over 0.3ha and an increase in the percentage targets through 40% being affordable in certain post code areas and at least 35% being affordable in all other locations. On-site provision is expected although developers may put forward off-site alternative affordable housing provision where the scheme's viability may be affected. In addition, should the affordable housing delivery rates fall below the minimum affordable housing target or indicate a shortfall of family sized affordable housing, contingency arrangements will be triggered as set in MM/17 modifications to Chapter 9 of the RCS, namely Contingency 2: Where overall housing targets are being met, but affordable housing delivery is not being met and Contingency 3: Where there is an insufficient affordable housing mix. The effects on SA objectives 3 (To meet identified housing needs and improve the quality and affordability of housing) and 4 (To reduce poverty and social exclusion and promote equality of opportunities) are likely to be positive, long term and significant.
- 6.5 Additionally, significant positive effects continue to be predicted against SA economic objective 20 (a prosperous, balanced and stable economy) as the provision of affordable housing may help retain key workers in the area.

## **7. Policy CS6 Gypsy and Travellers sites**

- 7.1 The modifications below were made to clarify how additional pitches will be delivered over time and to ensure that the policy contains appropriate selection criteria for gypsy and traveller sites.

### **MM/10 Policy CS6 Gypsy and Travellers sites**

The Council will provide for the further needs of Gypsies and Travellers on the basis of identified need within south and west Hertfordshire. ~~†~~The Council will ~~seek to~~ identify and allocate ~~up to at least~~ 9 additional pitches to ~~meet~~ 2011 based on the evidence before the East of England Plan

~~requirements to 2011~~ examination and a further ~~10~~ **2** pitches per annum to by 2017 through the identification of land in the Site Allocations DPD.

In identifying **land or determining planning applications for** any required potential sites / **pitches**, consideration will be based on a range of criteria including:

- i) the potential of existing sites to accommodate additional pitches;
- ii) a sequential site selection process with an emphasis on land which has been previously developed;
- iii) safe and convenient access to the **primary** road network, ~~with proximity to the major road network and~~ without blocking or inhibiting use of any existing rights of way; the proximity of a transit site to a major road network;
- iv) the proximity of a transit site to a major road network;**
- ~~iv) avoiding prejudicing adjacent nearby residential or rural amenity as a result of visual intrusion, excessive noise, lighting, traffic generation or activity at unsocial hours;~~
- v) ~~avoiding over-dominating and~~ respecting the size and scale of **and not dominating** the nearest settled community, ~~ensuring that there is not an undue level of Gypsy and Traveller pitches in any one part of the Borough which might result in an~~ and avoiding an adverse impact on ~~the local environment and / or~~ infrastructure **and services**;
- vi) safe and acceptable environmental conditions within the site including the need to avoid air and noise pollution and significantly contaminated land;
- vii) an ability to receive essential services including water, sewerage, drainage and waste disposal;
- ~~viii) an ability for a site with over 5 pitches to be effectively managed for Gypsies and Travellers with local connections;~~
- ~~viii~~ **x**) a location within reasonable proximity to key local services;
- ~~ix~~ **xi**) the potential for a site to be effectively landscaped and where necessary, an adequate buffer between the site and any nearby **housing settled community**;
- ~~x~~ **i**) the potential risk of flooding or the ability to mitigate this risk; and ensuring **any** other adverse effects on the built and natural environment are avoided and / or mitigated including compliance with the key environmental policies set out in the Core Strategy (~~including Policies CS12, CS13, CS15, CS16 and CS17~~); and
- xii) the likely availability of the site to accommodate Gypsy and Traveller pitches.

### **MM/20 and MM21 Supporting text to Policy CS6**

3.41 The Council's preferred option is to retain the target of 18 pitches established in the regional plan to 2011 and for some additional growth to 2016**7**. **Based on the regional plan assessment, this would equate to an additional 2 pitches a year. The Council does not consider there is a robust basis to plan from beyond 2017, as at this point the needs assessment will be more than 10 years out of date and the government has signalled its intentions to review Gypsy and Traveller requirements. This approach demonstrates a commitment to meeting Gypsy and Traveller needs, whilst recognising that a further assessment of need and a review of this aspect of the Core Strategy will be needed by 2017.**

**3.42** Since the regional plan was adopted, a further 9 pitches have been approved – six pitches at the Pylon Site in Potters Bar which have since been implemented and three pitches at Sandy Lane in Bushey, approved in 2011 and for which government grant funding has been received to deliver the pitches. Given that there may be scope for small extensions to or intensification of one or more of the other existing authorised sites, any further provision beyond this, if required, is likely to be limited to no more than one larger site or a limited number of very small sites to accommodate the requirements to 2017. The Council will ~~also~~ consider the potential for extending the existing transit site at South Mimms, **which is recognised by Hertfordshire County Council to be underused for providing some permanent pitches to provide some permanent pitches in addition to the existing transit pitches.**

## Assessment Results

- 7.2 The results of the detailed assessment of the proposed modifications to Policy CS6 are presented in Table A.4 in Appendix A. The discussion below reflects the sustainability performance of the modified Policy CS6 taking into account the performance of the original policy as reported in the SA Report of the Revised Core Strategy Submission DPD (November 2011).
- 7.3 The main modification to the policy is the increase in the number of pitches that Hertsmere is required to provide (at least 9 additional pitches initially followed by a further 2 pitches per annum to 2017). This may compromise the availability of land to meet identified housing needs, particularly if the housing target in Hertsmere is exceeded as there is competition for available land. These negative effects are likely to be felt in the medium to longer term.
- 7.4 The modified policy continues to deliver a number of significant positive social effects in SA Objectives 2 (access to facilities), 4 (social exclusion), 5 (crime and anti social behaviour), 6 (health and health inequalities) due to the criteria of site selection it is planning to implement for the social groups concerned, such as safe and convenient access of the sites/pitches to the road network, the ability to receive essential services including water and waste disposal and reasonable proximity to key local services.
- 7.5 No significant economic or environmental effects have been identified.

## 8. Policy CS12 (a) The Enhancement of the Natural Environment

- 8.1 The original policy CS12 (Green Belt protection and the enhancement of the natural environment) has been split into two – Policy CS12 (a) and Policy CS12 (b) to give each policy component appropriate weight and to ensure that there is no confusion between the Green Belt and Environmental Policies.

### **MM/12 Policy CS12 (a) The Enhancement of the Natural Environment**

~~All development proposals must conserve and enhance the natural environment of the Borough, including biodiversity, protected trees, landscape character, and sites of ecological and geological value, in order to maintain and improve environmental quality. Proposals should provide opportunities for habitat creation and enhancement throughout the life of a development. In the case of the highest quality agricultural land (Grades 1, 2 and 3a) and Preferred Areas of mineral extraction, proposals will only be permitted where there is no likelihood of the land being sterilised.~~

~~There will also be a presumption against inappropriate development, which causes harm to the openness and appearance of the Green Belt, as defined in PPG2 (Green Belts). Strategic gaps in the Green Belt between Bushey and Watford and Bushey and Stanmore will be maintained within which any limited development, deemed acceptable in the Green Belt, should serve to retain the separation between the towns.~~

### **Policy CS12 (a) – The Enhancement of the Natural Environment**

**All development proposals must conserve and enhance the natural environment of the Borough, including biodiversity, habitats, protected trees, landscape character, and sites of ecological and geological value, in order to maintain and improve environmental quality, and contribute to the objectives of the adopted Greenways Strategy and the Hertsmere Green Infrastructure Plan. Proposals should provide opportunities for habitat creation and enhancement throughout the life of a development. In the case of the highest quality agricultural land (Grades 1, 2 and 3a) and Preferred Areas of mineral extraction, proposals will only be permitted where there is no likelihood of the land being sterilised for future agriculture or mineral extraction.**

## Assessment Results

- 8.2 The results of the detailed assessment of the proposed modifications to Policy CS12 are presented in Table A.5 in Appendix A. The discussion below reflects the sustainability performance of the modified Policy CS12 taking into account the performance of the original policy as reported in the SA Report of the Revised Core Strategy Submission DPD (November 2011).
- 8.3 The main modification to the policy is the removal of the paragraph which concerned the protection of the Green Belt, with the focus of the modified policy now being the enhancement of the natural environment in general. This resulted in the significant positive effects originally predicted for SA objective 7 (To make the most efficient use of previously developed land and existing buildings before Greenfield sites) to be downgraded to neutral effects as the policy no longer directs where development may occur.
- 8.4 The modified policy continues to deliver significant positive effects on SA objective 12 (Protect and enhance wildlife habitats) as this remains its focus, with no significant objectives expected on social and economic SA objectives.
- 8.5 In addition, the requirement for development proposals to conserve and enhance the natural environment of the Borough and, in particular to contribute to the objectives of the adopted Greenways Strategy and the Hertsmere Green Infrastructure Plan, is likely to result in significant positive effects on SA objective 10 (To maintain and enhance the quality of countryside and landscape). The creation of enhanced countryside links, car free access to main green infrastructure assets, landscape enhancements through tree planting are some of the possible additional benefits arising out of the revised policy.

## 9. Policy CS12 (b) The Green Belt

- 9.1 The original policy CS12 (Green Belt protection and the enhancement of the natural environment) has been split into two – Policy CS12 (a) and new Policy CS12 (b) to give each policy appropriate weight, to ensure that there is no confusion between the Green Belt and Environmental Policies and to align with the NPPF policies for the Green Belt.

### **MM/13 New Policy CS12 (b) The Green Belt**

**There is a general presumption against inappropriate development within the Green Belt, as defined on the Proposals Map and such development will not be permitted unless very special circumstances exist. Development proposals, including those involving previously developed land and buildings, in the Green Belt will be assessed in relation to the NPPF.**

**Limited infilling within those parts of Elstree, Shenley and South Mimms which are in the Green Belt will be considered appropriate, provided that it is sympathetic to its surroundings, retains and protects features essential to the character and appearance of the village; and complies with other relevant policies in this Plan. Village envelopes for Elstree, Shenley and South Mimms for limited infilling will be identified through the Site Allocations DPD.**

**Key Green Belt Sites (previously known as Major Developed Sites) contain established educational, research and other institutions within the Green Belt and are suitable locations for appropriate infilling; development within defined boundaries for infilling will be considered acceptable and these boundaries will be reviewed through the Site Allocations DPD.**

**The Green Belt will remain unchanged from that shown in the Hertsmere Local Plan (2003) except where the boundary will be redrawn in the Site Allocations DPD around Shenley to**

**reflect the recent development of Shenley Hospital and at Borehamwood, to the east of Rowley Lane, where it will be redrawn to reflect the addition of safeguarded land for employment development..**

### **MM11, MM/14 and MM/15 Supporting text to new Policy CS12 (b)**

**5.5** Within the Green Belt, there is a need to maintain strict controls over the types of development, which can be permitted. The types of uses permitted in the Green Belt are limited by central Government in ~~PPG2 (Green Belts)~~ **the NPPF** to a limited range of ~~'open land'~~ **uses and types of site**, in order to protect its openness and prevent urban sprawl or the merging of towns. These permitted uses ~~extend to include~~ **agriculture, forestry, essential facilities outdoor for sport and recreation, cemeteries, and mineral extraction and local transport infrastructure.** Limited development within **'Key Green Belt Sites' Major Developed Sites', previously permitted through national policy as Major Development Sites, will be supported; can also be permitted and** there ~~are presently~~ **were previously 15 Major Developed Sites in Hertsmere comprising education and medical manufacturing or research facilities and –** ~~The~~ **number of these sites, together with their boundary 'envelope' which clarifies the extent of** ~~or~~ **appropriate infilling and development, will be clarified set out** in the Site Allocations DPD **to enable those sites to plan effectively for their future land use requirements including through the use of masterplans, where appropriate.**

**5.8** **The Green Belt will remain unchanged from that shown in the Hertsmere Local plan except around Shenley where the boundary will be redrawn to reflect the recent redevelopment of Shenley Hospital, and at Borehamwood, to the east of Rowley Lane, where it will be redrawn to reflect the safeguarding of the land for employment use. The Holiday Inn site, at the southern end of this area, is recognized to have a significant amount of previously developed land and buildings and proposals for the infilling, partial or complete redevelopment of the site will, in the interim period, be considered on their individual merits. The new boundaries resulting from these changes, and any minor changes to existing village envelopes, will be determined through the Site Allocations and Development Management DPD.**

~~5.8 In addition, the Council proposes the creation of a one mile wide strategic gap designation within the Green Belt between Watford, Bushey and Stanmore. Much of Bushey remains physically separate from Watford and there is a clear break between Bushey and Stanmore. The importance of maintaining established settlement patterns and a gap between the towns, given development pressures in both Watford and Stanmore – including the Health Campus in Watford and proposals at RAF Bentley Priory, Stanmore – is considered to be particularly pressing. There are a large number of previously developed sites in the Green Belt in and around Bushey and the strategic gap will serve to control the scale of any development in these locations, should proposals emerge during the Plan period~~

### **MM/4 Figure 10 – Key Diagram**

*Remove Strategic Gap designation from map*

## **Assessment Results**

- 9.2 The results of the detailed assessment of new Policy CS12 (b) are presented in Table A.6 in Appendix A. The new policy has effects on social, environmental and economic objectives.
- 9.3 The policy contains a general presumption against inappropriate development within the Green Belt and development will not be permitted in the Green Belt unless very special circumstances exist. However, the policy does allow limited infilling in previously developed sites within those parts of Elstree, Shenley and South Mimms which are in the Green Belt and also in key Green Belt sites. Also, the Strategic Gap designation within the Green Belt between Watford, Bushey and Stanmore has been removed. Therefore this policy could allow the release of certain

greenbelt areas to meet identified housing needs, although subject to strict criteria, and as such could have significant positive effects in the medium and longer term in terms of ensuring that sufficient housing to meet the identified needs is provided in the borough (SA objective 3).

- 9.4 By allowing limited infilling in previously developed sites in the Green Belt and in Key Green Belt Sites, the policy will continue to constrain development to previously developed land to a great extent hence delivering a significant positive effect in the short term, but it will not necessarily do so in the medium to long term (if housing needs require expansion onto Greenfield sites) and therefore the positive effects are likely to be less significant.
- 9.5 To allow infilling, albeit limited, in areas which are in the Green Belt might result in negative effects on the quality of the countryside and landscape character (SA objectives 9 and 10). The policy does outline that development in these areas will only be considered appropriate if certain criteria are met but new development is most likely to result in changes. The extent to which these changes are noticeable will depend upon the particular circumstances associated with each development and the level of development in general.
- 9.6 The general presumption against inappropriate development within the Green Belt will make a significant positive contribution to protecting habitats of national and local importance (SA objective 12) in Hertsmere in the short term. However, because of the acknowledgment that the housing need in the authority would not be fully met by the minimum target of 3,990 homes, it is possible that Greenfield sites in the Green Belt will need to be developed to make up for the shortfall in the medium to long term and therefore the effects on this objective could be negative due to the loss of wildlife and habitats. Overall effects are deemed slightly negative in the medium to long term due to the potential scale of development. However, the increased housing target would meet the requirements of the RSS and the Council have committed (through modification MM/17) to review the plan in the medium to further assess the scale of housing need and how to rectify it with neighbouring authorities.
- 9.7 Protection against inappropriate development within the Green Belt is likely to have a slight positive effect on the local economy (SA objective 20) and viability and vitality of town centres (SA objective 21) by attracting tourism and recreation users of areas of Green Belt to Hertsmere, and resulting in greater concentration of development within existing settlements, which should help to improve their viability through increased demand for services and facilities. The effects are likely to be slightly positive, long term and permanent. In addition, the redrawing of the Green Belt boundaries at Borehamwood, to the east of Rowley Lane to reflect the safeguarding of the land for employment use will provide more certainty to those wishing to develop that land for employment use, potentially adding a further positive effect on the local economy in the medium to long term.

## 10. Policy CS16 Energy and CO2 Reductions

- 10.1 The modifications to this policy have mainly arisen out of recent changes in Government regulations concerning the application of the Code for Sustainable Homes.

### **MM/29 Policy CS16 Energy and CO2 emissions**

All new residential developments will be required to achieve the following levels of the Code for Sustainable Homes (Code) as a minimum as and when successive updates to Part L of the Building Regulations become mandatory:

- 2010 - Code level 3
- 2013 - Code level 4 once updates to Part L come into effect.
- 2016 - Code level **65** once updates to Part L ~~and the national Zero Carbon Homes policy~~ come into effect.



All new non-domestic will be expected as a minimum to achieve CO2 emissions reductions in-line with the Building Regulations Part L. This requirement will not come into effect until successive updates to Part L of the Building Regulations become mandatory:

- 2010 - 25% reduction in the Building Emission Rate compared to the Target Emission Rate defined by **Part L of the Building Regulations (2006)**.
- 2013 - 44% reduction in the Building Emission Rate compared to the Target Emission Rate defined by **Part L of the Building Regulations (2006)** (reductions above 70% can be delivered using allowable solutions).
- 2019 - Zero Carbon - no additional requirement.

The Council will further encourage all new development or major refurbishment to incorporate energy from decentralised and renewable or low carbon sources. All large scale development will be required to incorporate on-site renewable energy generation, unless it is not feasible or viable or alternative decentralised and renewable, low carbon sources can be identified. The Council will also permit new development of sources of renewable energy generation subject to:

- local designated environmental assets and constraints, important landscape features and significant local biodiversity;
- minimising any detriment to the amenity of neighbouring residents and land uses; and
- meeting high standards of sustainable design and construction.

### **MM/23 and MM/24 supporting text to Policy CS16**

5.44 As well as applying Building Regulations, the Council will require standards to be met as set out in the Development Management policies. **In the March 2011 Budget, the Chancellor stated that by 2016 new homes would not have to be fully zero carbon but built in accordance to Level 5 of the Code for Sustainable Homes. Meeting higher carbon reduction standards may require the use of allowable solutions where carbon reduction targets cannot be met onsite. Details of what constitutes allowable solutions are expected in a future government consultation and there may be an opportunity to establish a Community Energy Fund as part of the allowable solutions framework. Following the consultation, the Council will explore the opportunities for establishing a community energy fund and will publish additional guidance, as required.**

5.46 In addition to supporting the broader infrastructure requirements of electricity and gas companies, the promotion of renewable energy technology, subject to adequate mitigation of any adverse impacts, is supported by the Council. ~~The Council requires that larger developments (above 1,000 sq m or 10 new homes) provide at least 10% of their predicted energy requirements on-site.~~ The Council considers that it is preferable for carbon emissions to be reduced through sustainable design and construction, before requirements for on-site renewable energy generation **or allowable solutions** are considered.

## **Assessment Results**

- 10.2 The results of the detailed assessment of the proposed modifications to Policy CS16 are presented in Table A.7 in Appendix A. The discussion below reflects the sustainability performance of the modified Policy CS16 taking into account the performance of the original policy as reported in the SA Report of the Revised Core Strategy Submission DPD (November 2011).
- 10.3 Modified Policy CS16 looks to make sure that all new residential developments will be required to achieve relevant levels of the Code for Sustainable Homes (Code) as a minimum as and when successive updates to Part L of the Building Regulations become mandatory they will also be implemented. It reduces from Code level 6 to Code level 5 the requirements for new residential development in 2016 (as the Chancellor stated that by 2016 new homes would not have to be fully zero carbon but built in accordance to Level 5 of the Code of Sustainable Homes) therefore being less demanding in sustainability terms, at least in the short term. The revised policy does maintain the requirement for zero carbon for all non-domestic buildings by 2019.

- 10.4 In order to ensure consistency of approach, it is recommended that as for all new non-domestic buildings for which Zero Carbon requirement is set for 2019, a date should be set as to when Code Level 6 will be required for new residential developments, or as a minimum an explanation provided as to when this is likely to be expected. It is recognised, however, that the Council may wish to wait until Government policy is clearer in this regard.
- 10.5 The policy also details a number of additional energy and CO2 reduction requirements for new developments, which may now include the use of allowable solutions where carbon reduction targets cannot be met onsite. This introduces some flexibility in terms of where the targets can be met and are likely to result in larger carbon reductions than would be achieved otherwise.
- 10.6 The policy will have a significant positive effect to SA social objective 6 (improve health) through the application of the Code for Sustainable Homes.
- 10.7 The policy will also have a number of environmental benefits specifically as expected against SA environmental objective 17 (greenhouse gas emissions) and objective 18 (energy efficiency) although the benefits against SA objective 17 are now less significant due to the postponement of date for the achievement of zero carbon for new residential developments.
- 10.8 There may also be a significant positive effect against SA economic objective 20 if the green sector is able to support additional employment.

## 11. Policy CS26 Town Centre Strategy

- 11.1 These modifications were introduced to align the policy with the requirements of the NPPF for town centres.

### MM/27 Policy CS26 Town Centre Strategy

Development within the designated town, district or neighbourhood centres of Borehamwood, Potters Bar, Bushey and Radlett will be permitted provided that it maintains their primary retail function and wider role as a focus for business, leisure, cultural and other appropriate town centre uses (as defined within ~~PPS4~~the NPPF). Retail activity elsewhere should be focused within local centres and parades, which will be expected to retain a core of local shopping facilities and accommodate any new retail development, commensurate to their position within the town, district and neighbourhood centre hierarchy. ~~Proposals to create in excess of 2,500 sq m of new retail floorspace that is outside of an existing town centre will be subject to the sequential test~~ significant new floorspace outside of an existing town, district or neighbourhood centre will be subject to the sequential test. ~~Proposals to create in excess of 2,500 sq m of new retail floorspace will be subject to the [significant adverse] impact assessment to enable the impact on existing shopping centres to be considered.~~ Proposals for main town centre uses will be considered in accordance with national planning policy set out in the NPPF, including the application of the sequential test and impact assessment as appropriate.

### MM/19 Supporting text to Policy CS26

8.5 The Council will ensure that proposals within Borehamwood, Potters Bar, Radlett and Bushey town centres are appropriate to the size and scale of the centre. There are a number of larger supermarkets within Borehamwood and Potters Bar, including a new supermarket which opened at Stirling Corner in January 2011, in addition to several located nearby in Watford, London Colney and Stanmore which serve communities in the ~~h~~Borough. Proposals for any additional large supermarkets will need ~~be demonstrated by retailers, in addition to satisfying the significant adverse impact assessment test as required by PPS4 to accord with national planning policy for the location of retail development as set out in NPPF.~~

## Assessment Results

- 11.2 The results of the detailed assessment of the proposed modifications are presented in Table A.8 in Appendix A. As in previous iterations of assessment, the Policy CS26 was assessed together with CS27 - Strengthening Town Centres, CS28 - Retail and commercial development in Shenley and CS29 - Safe and attractive evening economy. The latter three policies have not been modified. The discussion below reflects the sustainability performance of the policy group taking into account the performance of the original policy group as reported in the SA Report of the RCS Submission DPD (November 2011).
- 11.3 The town centre policies provide for a balanced town, district or neighbourhood centre strategy allowing appropriate size and scale retail and commercial units in line with the settlement hierarchy. Development within designated centres must allow these centres to maintain their retail and other business, leisure and cultural functions; development elsewhere will need to be commensurate to its position within the centres' hierarchy. Designated centres will be reinforced through the designation of primary and secondary shopping frontages with a focus on retail uses on primary frontages and a wider range of uses in secondary frontages. Evening economy uses, in particular, will be controlled taking into account the need to reduce anti-social behaviour, crime and fear of crime with financial contributions sought for related town centre improvements. There will be a presumption against further consents of evening economy uses in areas where concentration of such uses cause existing anti-social problems.
- 11.4 Opportunities to replace long term vacant commercial units for residential accommodation and to address the long term neglect and abandonment of commercial and other property within town centres will be considered
- 11.5 As such, these policies were assessed as achieving positive effects against SA social objectives 2 (access to essential services and facilities), 3 (housing needs) and significant positive effects in relation to SA objective 5 (crime, fear of crime and anti social behaviour).
- 11.6 Significant positive effects are assessed against the economic objectives to provide a stable and balanced economy (SA objective 20) and to sustain and enhance the viability and vitality of town centres (SA objective 21) as this group of policies strongly supports the development of balanced economy and diverse town centres. Policy CS26 now requires proposals for main town centre uses over a floorspace threshold of 2,500 sq m to be considered in accordance with national planning policy set in the NPPF. The NPPF requires an impact focusing on impacts on existing committed and planned public and private investment and on town centre vitality and viability, resulting in significant positive effects.
- 11.7 By focussing retail development within the designated town, district or neighbourhood centres through the application of the NPPF sequential test as now set in Policy CS26, retail development will be directed away from Greenfield sites and is likely to have a significant positive effect on SA environmental objective 7 (efficient use of previously developed land and buildings before Greenfield land) and also on objectives 16 (air quality) and 17 (greenhouse gases) through the shortening of travel distances and creation of accessible zones (in combination with the transport policies).

## 12. References

- Revised Core Strategy Schedule of Modifications, Hertsmere Local Development Framework, August 2012
- Revised Core Strategy Development Plan Document for Submission to the Secretary of State, Hertsmere Local Development Framework, November 2011
- Sustainability Appraisal of Revised Core Strategy Development Plan Document, November 2011
- National Planning Policy Framework, Department for Communities and Local Development, March 2012
- Hertsmere Borough Green Infrastructure Plan, March 2011
- Watling Chase Greenways Strategy, National Demonstration Project, Hertsmere Borough Council, March 2003

# Appendix A – Assessment of Modifications Tables

**Table A.1 – Assessment of Modifications to Policy CS1 The Supply of New Homes and Policy CS2 The Location of New Homes**

<p><b>Policy CS1</b></p>	<p><b>MM/2 Policy CS1 – The supply of new homes</b></p> <p>The Council will make provision for <b>at least 3550-3990</b> additional dwellings within the District between 2012 and 2027, a development rate <b>of a minimum of 237-266</b> dwellings per year.</p> <p>In providing for the new homes and identifying new locations for development in the Site Allocations DPD, the Council will take account of:</p> <ul style="list-style-type: none"> <li>i) environmental constraints and compliance with the key environmental policies set out in the Core Strategy (including Policies CS12, CS13, CS15 and CS16);</li> <li>ii) the character, pattern and density of the surrounding area;</li> <li>iii) the need to retain existing housing;</li> <li>iv) the need to locate new development in the most accessible locations taking account of local infrastructure capacity;</li> <li>v) the settlement hierarchy identified in the Hertsmere Core Strategy; and</li> <li>vi) the need to focus development within the boundaries of existing built-up areas.</li> </ul> <p><b>MM/3 Policy CS1 Supporting text</b></p> <p>2.26 Borehamwood and Potters Bar will remain the two largest centres of employment in the Borough where many homes, jobs and services are located. The Council's Strategic Housing Land Availability Assessment (SHLAA) has identified sufficient land available across the Borough to accommodate <b>at least 3,550-3,990</b> homes over the next 15 years without developing on greenfield land in the green belt. The quantum and distribution of development would be in general conformity with the requirements of the East of England Plan, rolled forward beyond 2021. This takes account of the fact that in 2011, there were over <b>1,200-300</b> homes with planning permission in the pipeline, which together a significant number of potential development sites which have been identified, is anticipated to avoid a need to release of Green Belt land for housing development.</p> <p>2.27 The Council considers that planning for <b>237 at least 266</b> homes per annum over 15 years following adoption of the Core Strategy (2012 – 2027) is the most appropriate level of growth, taking into account housing needs and what can be delivered in the Borough in a sustainable way.</p> <p>2.29 The existing infrastructure of the Borough would not be able to support <b>any significant additional</b> housing development over and above the 15 year housing target set out in paragraph 2.26.</p> <p>2.31 A proposed 15 year target of at least <b>3,550-3,990</b> new homes reflects the requirements of the East of England Plan and seeks to focus this on previously developed sites, taking account of the Green Belt constraints which exist in the Borough.</p> <p>2.34 <del>Should significant</del> <b>The emergence of</b> windfall sites <del>emerge elsewhere</del> for housing will need to be closely monitored, <del>such as Potters Bar Bus Garage, consideration will be given to reviewing the quantum and phasing of sites in Borehamwood. Provision of new housing on large, allocated sites will be made on a phased basis, particularly in Borehamwood,</del> to ensure that the impact of local services and infrastructure can be managed. Clear criteria will need to be provided to ensure that the focus on brownfield land does not lead to development at densities, which harm the character and appearance of established residential areas. In particular, following changes to the definition of previously developed land in <b>the previous PPS3 and now in the NPPF</b> in respect of private garden land, it will be necessary to provide greater clarity as to where any 'backland' development will be considered acceptable. A flexible, criteria-based approach, reflecting the different local character and pattern of development across the Borough, is likely to be more appropriate than any single borough-wide policy</p>
<p><b>Policy CS2</b></p>	<p><b>Policy CS2 The location of new homes (unchanged text)</b></p> <p>Priority will be given to locating the majority of residential development within the main settlements of Borehamwood, Potters Bar and Bushey. Between 2012 - 2027, up to 60% of new housing will be sought in Borehamwood, at least 10% in Potters Bar, up to 25% in Bushey and at least 5% in Radlett and other suitable locations.</p> <p>Windfall developments will be supported on appropriate sites in all towns, subject to local environmental constraints, the relationship with the surrounding pattern of development and the requirements of Policies SP1, CS12, CS15, CS16 and other relevant planning policies.</p> <p>Within rural locations and in particular, Shenley, Elstree and South Mimms limited, small scale infilling on suitable sites will be supported.</p>

**MM/5 Policy CS2 Supporting text**

- 3.3 The Council envisages that its housing requirements to 2027 will be met by:
- Completions on allocated sites and sites with planning permission (commitments);
  - Development on identified urban sites in the SHLAA including within the Elstree Way Corridor;
  - Development on unidentified sites within the main settlements
  - A limited amount of development on unidentified sites within rural settlements
  - **Appropriate previously developed sites in the Green Belt**
- 3.4 The Council has undertaken a technical **study studies** to assess land suitable and available for housing in the **DistrictBorough**. The Strategic Housing Land Availability Assessment (or SHLAA) involves a detailed review of land promoted or known to the Council in both urban and greenfield areas. It also provides estimates of how land could come forward over time (a housing trajectory). Key stakeholders, including local community groups and developers, were consulted on the methodology and site assessments.
- 3.5 Following the Strategic Housing Land Availability Assessment Guidance publication in July 2007, the Council's SHLAA separates the land supply on the basis of their prospects for delivery. In the first five years, it estimates the potential of deliverable sites. Many of these already have planning consent for development. From years 6-10, and beyond, sites are assessed in the SHLAA on the basis of being developable. This means they are considered suitable for housing but may not immediately come forward due to other constraints or infrastructure requirements. The SHLAA was prepared in 2010 and updated in 2011, **a further update note was produced in 2012.**
- 3.6 ~~The SHLAA also considers the potential~~ of Urban ~~Broad-large scale windfall locations defined as~~ Borehamwood, Potters Bar, Bushey and Radlett. ~~These can be~~ is counted towards the land supply from years 11-15 as development is supported by Core Strategy policies to promote the re-use of land in these towns. **A rural windfall, and a small scale urban windfall is included for years 6-15 and a reserve allowance for land currently safeguarded for housing to come forward should the Council fail to maintain a five year housing land supply (with the exception of land at Byron Avenue/Vale Avenue in Borehamwood which has since been designated as a village green).** The potential contribution of the different sources of supply is shown in Table 8. This indicates a total potential supply of just **under over 3,740 4,060** dwellings.
- 3.7 In addition to urban ~~broad locations~~**windfall**, an estimate has also been made for the potential of housing-led regeneration in Elstree Way, west of Borehamwood town centre. This area, which has already seen a number of sites brought forward for residential development in recent years, has been the subject of feasibility and transport studies commissioned by the key landowners within the Elstree Way Corridor. It is the Council's intention to bring forward an Area Action Plan DPD n for this area (see policy CS22) to facilitate the disposal and redevelopment of these sites.
- 3.8 ~~The SHLAA does not include a general estimate from windfall in Years 1-10. However, windfalls have historically and will continue to contribute to housing numbers in the borough. As such, the assessed urban housing supply above is likely to underestimate the actual housing supply in Hertsmere.~~**

**MM17 Implementation and Monitoring Framework (Chapter 9 of RCS)**

9.3 Regular monitoring will assess the effectiveness of policies and whether the Spatial Vision and Strategy are being implemented as originally intended. Future Annual Monitoring Reports (AMR) prepared by the Council will need to indicate the extent to which Core Strategy (and other subsequently prepared DPD) policies are being achieved and whether targets are being met. For example, the implementation of Policy CS3 (**Housing Delivery and Infrastructure Phasing of Housing Development**), will be dependent on regular review to establish whether the number of homes **permitted completed** is **significantly** falling below **the minimum housing rate or exceeding annualised housing requirements**, potentially triggering **a review of land allocation phasing contingency arrangements**.

9.4 The AMR will, therefore, consider the extent to whether revisions to the Core Strategy or other DPDs will be necessary or whether new DPDs are required. Indicators have been developed to provide a consistent basis for monitoring the performance of the Core Strategy. A number of these have been derived from existing AMR indicators and wherever possible they have been chosen to be SMART i.e. Specific, Measurable, Achievable, Realistic and Timely. Changes to the way in which AMRs are prepared are expected as a result of measures set out in the Localism Act and some indicators will also be dependent on external events but the Monitoring Framework in Table 17 is considered to provide the basis for identifying how the Core Strategy should be maintained or amended.

**Contingency Planning**

**9.5 There are key issues within the Core Strategy that are of significant importance to its successful delivery which include:**

- **Housing delivery and supply**
- **Provision of affordable housing and its mix**
- **Provision of infrastructure and services that support new development.**
- **Location of development**
- **Safeguarded Land**

**Housing**

**Contingency 1: Where there is a need to increase the overall delivery of housing as well as delivery of affordable housing (Policy CS1 and CS4):**

**9.6 Where housing delivery is more than 20% below the annualised (266 dwellings) housing target over a rolling three year period, and at the same point in time, the expected housing completions for the next five years are subsequently insufficient to compensate for the shortfall of the required annualised rate, a review of housing allocations and consideration of safeguarded land for housing that is presently designated as Green Belt will be undertaken. In line with national planning policy, the status of safeguarded land, between the urban area and the Green Belt, is required to meet long term development needs beyond the plan period. It is not allocated for development at the present time. Planning permission for development of safeguarded land will only be granted following a review of the Site Allocations DPD (or any other equivalent document) and, until such time, normal Green Belt policy will apply.**

Should housing delivery still remain more than 20% below the annualised housing target, as set out above, this will trigger a review of the plan and the Council will implement one or more of the following measures in order to increase the delivery of housing, as detailed below:

1. Review the DPDs to bring forward additional sites for housing in locations consistent with the overarching spatial strategy, including a review of housing allocations, affordable housing provision and S106/CIL requirements.
2. In the event that there is still a shortfall in housing delivery, that cannot be addressed through a review of the phasing of sites, then the Council will evaluate employment land and as required Green Belt land with the aim of releasing land for housing development in appropriate locations.

**9.7 Should housing delivery still remain more than 20% below the annualised housing target, as set out above, this will trigger a review of the plan and the Council will implement one or more of the following measures in order to increase the delivery of housing, as detailed below:**

1. Review the DPDs to bring forward additional sites for housing in locations consistent with the overarching spatial strategy, including a review of housing allocations, affordable housing provision and S106/CIL requirements.
2. In the event that there is still a shortfall in housing delivery, then the Council will evaluate employment land and as required Green Belt land with the aim of releasing land for housing development in appropriate locations.

**Affordable Housing**

**Contingency 2: Where overall housing targets are being met, but affordable housing delivery is not being met (Policy CS4):**

**9.8 The delivery of affordable housing is closely linked to overall housing delivery and therefore the above contingency measures are equally as relevant to the delivery of affordable housing as they are to overall housing delivery. Where affordable housing delivery is more than 20% below the annualised affordable housing target (76 dwellings) over a rolling three year period and housing completions for the next five years are subsequently projected to be below the required annualised rate then in addition to the above contingency measures, the Council will also adopt the measures set out below in order to ensure that affordable housing is delivered as anticipated.**

1. Review affordable housing threshold, and development viability within Hertsmere and review the Hertsmere Affordable Housing SPD.
2. Review the use of the Council's funds in order to facilitate an increase in the delivery of affordable housing.
3. Consider the potential to increase the delivery of affordable housing on Council owned sites.
4. Evaluate the potential for achieving a higher proportion of affordable housing on an individual basis on allocated sites.
5. Examine the opportunities available through any new Government initiatives to support the development of new affordable housing.

**Contingency 3: Where there is an insufficient affordable housing mix (Policy CS4):**



9.9 Within Hertsmere there is strong need for family sized affordable housing (3 and 4 bed properties). The council will monitor the mix of affordable housing completions. The mix (number of bedrooms) of all Affordable Housing should be within 20% of the equivalent proportions for market housing over a rolling three year period, if this falls below this target then a review of the Affordable Housing SPD will be undertaken. This will consider methods of increasing the supply of family sized affordable housing units. If over the following two years this fails to increase the supply a review of the RCS or allocated sites in the Site Allocations DPD will be considered.

Development Location

*Contingency 4: Where housing delivery is inconsistent with the location of development (Policy CS2):*

9.10 The Council will monitor housing completions in line with Policy CS2 and Table 8 of the RCS. Completion will be monitored annually, at the end of each 5 year period of the Core Strategy (2016/17, 2021/2022, 2026/2027) the cumulative completion will be assessed against CS2, where the percentages for a settlement are 20% above CS2: this will trigger a review of the Policy to ensure that the target is appropriate. The Council will assess infrastructure capacity with infrastructure providers, and housing allocations to ensure sufficient capacity.

*Contingency 5: Where additional employment land is required/release of safeguarded land is required (Policy CS8):*

9.11 In line with national planning policy, the status of safeguarded land, between the urban area and the Green Belt, is required to meet long term development needs beyond the plan period. It is not allocated for development at the present time. A planning application for development of safeguarded land will only be granted following a review of the Site Allocations DPD (or any other equivalent document) and, until such time, normal Green Belt policy will apply.

Infrastructure

*Contingency 6: Where infrastructure delivery is not forthcoming (SP1, CS18, CS20):*

9.12 The progress of infrastructure delivery will monitored with the AMR against the Infrastructure Schedule, and future iterations within the Infrastructure Topic Paper. In the event that identified infrastructure requirements are not forthcoming and additional facilities necessary to support new development cannot be accommodated in the most sustainable locations on previously developed land within the urban area, (including the extension / intensification / dual use of existing buildings and sites), the Council will work in partnership with infrastructure providers and adjoining authorities in order to ensure that any land requirements necessary to support their delivery are secured. On site provision will be secured through S106 and S38 and wider, off-site requirements through S106, S278 (for highways) and through CIL.

Plan Review

9.13 The Council commits to undertaking a partial review of the Core Strategy within three years of the adoption of this Development Plan Document. That early review will be undertaken in co-operation with neighbouring authorities taking account of the progress and status of emerging Development Plan Documents in neighbouring authorities. To support the review the Council will commission population and household projections, and consider housing and employment needs, including an updated Strategic Housing Market Assessment within the South West Hertfordshire Housing Market area.

9.14 The Council acknowledges that housing need in the authority would not be fully met in the minimum target set in Policy CS1, based on the latest available evidence. Given that the consideration of housing need across a greater than local area requires further engagement with neighbouring authorities, principally in South West Hertfordshire, it will be necessary to continue to co-operate with those authorities.

9.15 It is anticipated that this process should be completed within the next three years enabling the Strategic Housing Market Assessment to be updated, related data sources to be considered including the 2011 Census and a partial-review of the Core Strategy to be commenced at the earliest opportunity. An updated Jobs Growth and Employment Land study will also be required as part of an early review. The Council's Local Development Scheme will be updated immediately following the adoption of this Core Strategy setting out the anticipated timescales for the early partial review, including anticipated, informal joint working in the intervening period prior to this review. The Council's planned timescale for undertaking this early review will be set out in an updated Local Development Scheme.

	<p><b>MM/18 Appendix 5</b></p> <p>Policy H4 moved from the “To replace Local Plan policy” to “complements Local Plan policy” (See Appendix C of this document)</p> <p><i>Note: Local Plan Policy H4 : Green Belt Safeguarded Land for Housing</i></p> <p><i>In order to ensure the long term protection of Green Belt boundaries it is proposed that the following sites be released from the Green Belt and identified as Safeguarded Land on the Proposals Map:</i></p> <p><i>(i) Haydon Dell Farm, Bushey;</i>  <i>(ii) Land East of Farm Way, Bushey;</i>  <i>(iii) Land bounded by Heathbourne Road, Windmill Lane and Clay Lane, Bushey;</i>  <i>(iv) 16 Watford Road, Radlett;</i>  <i>(v) Byron Avenue/Vale Avenue, Borehamwood;</i>  <i>(vi) West Herts. College Annexe, William Street, Bushey.</i></p>
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Scale of Effect (SE): ST – Short Term, MT – Medium Term, LT – Long Term  
 0 – no effect; +++ strongly positive; ++ moderately positive; + slightly positive; --- strongly negative; -- moderately negative; - slightly negative

SA Objectives		Description of Effect	Duration of Effect			Description of Mitigation	Comments / Explanation
			ST	MT	LT		
<b>SOCIAL</b>							
1	To improve educational achievement, training and opportunities for lifelong learning and employability	No obvious effects.	0	0	0	n/a.	
2	To ensure ready access to essential services and facilities for all residents	The focus in this policy group to constraint new homes within existing housing areas or in the most accessible locations will ensure to a large extent that housing is sited in areas where services and facilities are accessible. It is likely that these areas area already well served by key services, and located within distance of transport links and employment opportunities. These positive effects are likely to be permanent, long term and significant.	++	++	++	None required as positive.	The scale and significance of these effects are likely to be confirmed through the Site Allocations DPD when housing sites are allocated.

3	To meet identified housing needs and improve the quality and affordability of housing	It has been acknowledged that a minimum target of 3,990 homes over the plan period at a build rate of 266 dwellings per year will not fully meet the housing need in the authority in the long term based on the latest available evidence. The effects of the proposed level of housing development on this objective are likely to be positive (but not significant) in the short term but has the potential to be negative in the medium to long term. This will require close attention to be paid by the Council to housing delivery and a readiness to act if shortfalls are identified.	+	-	--	<p>The Council must put in place a process of monitoring housing delivery in the early years which will allow it to establish whether actual delivery is in keeping with the expectations or more land for housing needs to be brought forward.</p> <p>The fulfilment identified housing need in Hertsmere will also require close co-operation with neighbouring authorities to establish where the identified need can be fulfilled.</p>	<p>The Council has introduced in the CS section on Implementation and Monitoring a commitment to undertaking a partial review of the CS within 3 years of adoption in co-operation with neighbouring authorities (modification MM/17). Also, through modification MM/17 the Council has undertaken to act should housing delivery monitoring results show that there is a shortfall by bringing forward further land for housing through the implementation of Contingency 1: Where there is a need to increase the overall delivery of housing as well as the delivery of affordable housing. This combined approach should temper the negative effects predicted for this policy group.</p>
4	To reduce poverty and social exclusion and promote equality of opportunities	As the housing provision set in Policy CS1 is recognised as not fully meeting the housing needs, in particular affordable housing needs, the policy will help combat poverty and provide greater equality of housing opportunities only to a limited extent. The scale and significance of the effects will depend on the number, location and type of housing but effects are likely to be permanent and long term.	+	-	--	See above	Significance of the effects will depend on the extent to which allocated sites are included in areas of deprivation or not and this will depend on the review that the Council has committed itself to in modifications MM/17. It will also depend on the effective implementation of Policy CS4 Affordable Housing and Policy CS21 Securing a high quality and accessible environment (e.g. Lifetime Homes Standards).

5	To reduce and prevent crime, fear of crime and anti social behaviour	This policy group enables new development to be delivered. According to Policy CS21 (Securing a high quality and accessible environment) developers would need to ensure that 'Secured by Design' principles are incorporated within all schemes. Therefore, Policy CS1 will lead to indirect positive effects in its enabling function.	+	+	+	None required as positive.	Performance against this objective will depend on the effective implementation of Policy CS21.
6	To improve population's health and reduce inequalities both geographically and demographically	New housing will be of a good quality with high levels of thermal insulation (reducing damp and cold related problems) and, thus, have a positive effect on health. Locating new housing, part of which will be affordable, in deprived areas will also help reduce health inequalities.	+	+	+	n/a	Performance against this objective will depend on the effective implementation of Policy CS4 Affordable Housing and Policy
<b>ENVIRONMENTAL</b>							
7	To make the most efficient use of previously developed land and existing buildings before Greenfield sites	The policy group is likely to have a positive effect by focussing the bulk of development on brownfield sites in Borehamwood, Potters Bar and Bushey and also in previously developed sites in the green belt. The Council's SHLAA has identified that sufficient land is available across the Borough to accommodate 3,990 homes over the next 15 years without developing on greenfield land in the Green Belt.  However, because of the acknowledgment that the housing need in the authority would not be fully met by the minimum target of 3,990 homes, it is possible that Greenfield sites will need to be developed to make up for the shortfall in the medium to long term and therefore the effects on this objective would no longer be significant.	++	+	+		
8	To reduce contamination and safeguard soil quality and quantity	Provision of a minimum of 3,990 homes in the borough, may have short term negative effects if contaminated land is disturbed as a result of the construction of the new homes. However once identified this land has been remediated this should lead to long term positive effects.	-	+	+	Mitigation includes remediation of identified contaminated land.	Performance against this objective will depend on the effective implementation of Policy CS15 Environmental impact of development.
9	To protect and enhance landscape character, historic buildings, archaeological sites and cultural features of importance to the community	Policy CS1 explicitly states that the character, pattern and density of the surrounding area are key considerations for identifying new locations. Plus it also refers to Policy CS13 (Protection or enhancement of heritage assets), Policy CS12 (a) (The enhancement of the natural environment) and Policy CS12 (b) (The Green Belt) which set out strong safeguards against this SA objective.	+	+	+	Not required as effect positive	Performance against this objective will depend on the effective implementation of Policy CS14 (Protection or enhancement of heritage assets), Policy CS12 (a) (The enhancement of the natural environment) and Policy CS12 (b) (The Green Belt).

10	To maintain and enhance the quality of countryside and landscape	See assessment of SA objective 9 above. New development may have the potential to improve the local townscape, in particular in the more deprived areas.	+	+	+	Not required as effect positive	Performance against this objective will depend on the effective implementation of Policy CS14 (Protection or enhancement of heritage assets), Policy CS12 (a) (The enhancement of the natural environment) and Policy CS12 (b) (The Green Belt).
11	To reduce dependence on private car and achieve modal shift to more sustainable transport modes	Provision of housing in key settlements in Hertsmere may reduce the need to travel particularly when located in the most accessible locations and by having housing and key services/facilities in one area. This should have minor positive effects throughout the plan period.	+	+	+	Provision of adequate/appropriate additional public transport routes and services to encourage the use of public transport.  Possible consideration of car clubs in new housing estates when private car use is still needed.	Performance against this objective will depend on the effective implementation of Policy CS23 (Development and accessibility to services and employment) and CS24 (Accessibility and parking).
12	To protect and enhance wildlife and habitats which are important on an international, national and local scale	Development is likely to be accommodated within the available brownfield sites. This should minimise its potential effects on biodiversity. However, some of these brownfield sites will actually be in the Green Belt and will most likely provide habitats for valuable species. In addition, because of the acknowledgment that the housing need in the authority would not be fully met by the minimum target of 3,990 homes, it is possible that Greenfield sites in the Green Belt will need to be developed to make up for the shortfall in the medium to long term and therefore the effects on this objective could be negative due to the loss of wildlife and habitats.  Overall effects are deemed slightly negative in the medium to long term due to the potential scale of development.	0	-	-	Biodiversity value of brownfield sites should be assessed prior to development, as they may also provide habitats for valuable species.	Performance against this objective will depend on the effective implementation of Policy CS12 (a) (The enhancement of the natural environment) and Policy CS 15 (Environmental impact of development).
13	To improve the quality of surface and ground waters	Additional housing may increase impermeable surface and rate of polluted runoff. However, as housing is planned to be located on brownfield land, a significant increase in impermeable surfaces is unlikely. In addition, development will be required to incorporate SUDS where appropriate. Development on contaminated sites may have short term negative effects due to disturbance. However, remediation of contaminated land as part of new development may benefit water quality in the future. Plus the policy also refers to Policy CS 15 (Environmental impact of development) which requires to minimise the release of pollutants into water and to use SUDS.	-/+	+	+	Use of SUDS to reduce possible effects from increased housing. Mitigation measures during construction to minimise or eliminate contaminated surface run off.	Performance against this objective will depend on the effective implementation of Policy CS 15 (Environmental impact of development).

14	To minimise water consumption	Additional housing will increase water consumption with a long term negative effect. The policy refers to Policy CS 15 (Environmental impact of development) which requires reducing water consumption. However, a negative residual effect is likely.	-	-	-	All new development should aim to minimise water consumption through the provision of water saving devices such as meters or grey-water recycling schemes.	Performance against this objective will depend on the effective implementation of Policy CS 15 (Environmental impact of development)..
15	To minimise the risk of flooding taking account of climate change	New development may increase impermeable surfaces and rate of polluted runoff or impede the flow or storage of floodwater leading to an increase in localised risk of flooding. However, as housing is planned to be located on brownfield land, a significant increase in impermeable surfaces is unlikely. In addition, development will be required to incorporate SUDS where appropriate.  Neutral effects are predicted in the short to medium term and residual effects are likely in the longer term, when more development is delivered, impermeable surfaces extend and external factors such as climate change consequences play a more visible role.	0	0	-	Ensure that new development allocations are guided by the SFRA findings and recommendations.	Performance against this objective will depend on the effective implementation of Policy CS 15 (Environmental impact of development).
16	To improve local air quality	Additional housing with increased energy demand and potentially more vehicle movement may have a negative effect on air quality. However, directing new development to urban centres will help promote the use of sustainable transport modes and reduce the reliance on private car. Further, energy demand should be reduced through adherence to the Code for Sustainable Homes in Policy CS16. Therefore, minor localised effects on air quality may arise during construction (short term).	-	0	0	Mitigation measures to reduce the effects of construction on air quality in the short term.	Performance against this objective will depend on the effective implementation of Policy CS 15 (Environmental impact of development).
17	To reduce greenhouse gas emissions	Additional housing with increased energy demand and potentially more vehicle movement may lead to increased greenhouse gas emissions. However, directing new development to urban centres will help promote the use of sustainable transport modes and reduce the reliance on the private car. Further, energy demand should be reduced through adherence to the Code for Sustainable Homes in Policy CS16, progressively meeting its increasing standards.  Minor negative effects are likely in the short to medium term, and neutral effects are predicted in the long term, when zero carbon development will become a norm and there is a step change in public behaviour towards more 'pro-environmental' habits, use of sustainable transport modes, etc.	-	-	0	.	Performance against this objective will depend on the effective implementation of Policy CS 16: Energy and CO <sub>2</sub> Reductions.

18	To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy	<p>Additional housing will lead to an increased energy demand. However, the level of energy demand should be reduced through adherence to the Code for Sustainable Homes in Policy CS16, progressively meeting its increasing standards.</p> <p>In addition, all new development or major refurbishment will be encouraged to incorporate energy from decentralised and renewable or low carbon sources.</p> <p>Minor negative effects are likely in the short to medium term, and neutral effects are predicted in the long term, when zero carbon development will become a norm and there is a step change in public behaviour towards more 'pro-environmental' habits, e.g. energy savings, use of cleaner vehicles.</p>	-	-	0		Performance against this objective will depend on the effective implementation of Policy CS 16: Energy and CO <sub>2</sub> Reductions.
19	To reduce the generation of waste and encourage re-use and recycling of waste	Additional housing will increase waste generation; however Policy CS15 'Environmental Impact of Development' should help reduce the amount of waste generated. However, a negative residual effect is likely.	-	-	-		Performance against this objective will depend on the effective implementation of Policy CS 15 (Environmental impact of development).
<b>ECONOMIC</b>							
20	To provide a prosperous, balanced and stable economy	Additional house building is likely to have direct minor positive effects through providing additional employment in the house building industry. The effect is likely to be long term as a yearly supply of housing is required through this policy. Additionally, it may have indirect effects in terms of providing regeneration opportunities and improving the image of the area for potential investors.	+	+	+	Not required as effect positive.	
21	To sustain and enhance the viability and vitality of town centres	Locating the majority of residential development within the main settlements of Borehamwood, Potters Bar and Bushey may increase footfall in the town centres, increasing their vitality.	+	+	+	n/a	

Table A.2 – Assessment of Modifications to Policy CS3 Housing Delivery and Infrastructure

<p>Policy CS3</p>	<p><b>MM/7 Policy CS3 Phasing of Development Housing Delivery and Infrastructure</b></p> <p><del>To facilitate a sustainable rate of housebuilding within the Borough under the terms of Policies CS1 and CS2, major housing sites will be phased in five year periods from 2011. Based on the findings of Annual Monitoring Reports, allocated land in later phases will be brought forward, if necessary, to maintain the five year supply of land for housing.</del></p> <p><del>To prevent the overdevelopment of housing in the Borough ahead of required infrastructure and community facilities, unimplemented residential land allocations and new residential proposals of 50 units (net) or more will not be permitted where the number of projected completions, as detailed in Annual Monitoring Report housing trajectory, is forecast to exceed 20% of the proportion sought in each phase.</del></p> <p>Where housing delivery <u>has fallen is projected to fall</u> below the <u>proportion sought in each phase required minimum rate over a rolling five year period</u> by at least 20% <u>and at the same point in time the expected completions</u> over the following <u>three years</u> <u>will be insufficient to compensate for the shortfall of the minimum required annualised rate</u>, a review of <u>the phasing and location of</u> housing allocations will be undertaken including consideration of <u>safeguarded land for housing and land</u> presently designated as Green Belt. <u>New housing development will only be permitted if satisfactory arrangements are in place to provide the necessary infrastructure.</u></p> <p><b>MM/6 Supporting text to Policy CS3</b></p> <p>3.16 Government policy in <b>PPS3 the NPPF</b> emphasises the need to identify land to enable continuous delivery of housing for at least 15 years from the date of adoption of DPDs. The Council will also seek to ensure that the district has a rolling five year supply of developable housing land. <del>It is neither appropriate nor required for all housing land to be made available for development from the outset. Such an approach would compromise the ability to deliver sustainable communities across a local authority area, placing a major burden on infrastructure and community facilities, to the detriment of existing and new householders. The Council proposes to base housing land releases in five year phases: short term (1-5 years), medium term (6-10 years) and long term (11-15 years).</del></p> <p>3.17 Housing monitoring details, including updates to the Council's housing trajectory, will be published each year in the Annual Monitoring Report. In between the publication of these reports, monitoring will be carried out continuously to ensure that there is up-to-date housing data available to inform the consideration of new planning applications and the adequacy of projected housing supply. <u>Where housing delivery and projected housing completions falls below the minimum rate, in line with Policy CS3 and the contingency arrangements set out in Chapter 9 (Implementation and Monitoring Framework), it will be necessary to take steps to increase the housing supply.</u></p> <p>3.18 The availability of supporting local infrastructure and community facilities and the need to provide additional capacity in some locations will <u>be an important consideration in the assessment of also determine the timing of the release of sites for development individual applications for significant new residential development. In addition, options for the coordinated delivery of development within the Elstree Way Corridor, a key focus for housing delivery in the Borough, will be explored by the Council with key stakeholders and their delivery and implementation will be set out in an Elstree Way Corridor Area Action Plan (AAP) in the medium to long term,</u></p> <p><u>3.19 Establishing</u> the requirements and projections of key service providers <u>across the borough</u>, where they have not been identified already, <u>will be a key factor in phasing and distribution in the Core Strategy will be a key factor in determining whether there is adequate supporting infrastructure.</u> A number of statutory bodies have different strategic planning periods and are unable to plan to 2027 and beyond. This includes the Local Education Authority, whose schools capacity projections have traditionally extended over a seven year timeframe, meaning that it has been difficult to consider the long-term land use requirements of all service providers. In the long term, wastewater and transport infrastructure arising from the wider regional housing requirements across central and southern Hertfordshire will also be an important issue.</p> <p><del>3.19 To ensure the sustainable phasing of new housing during the Plan period, where housing completions during any three year period<sup>are</sup> projected to exceed the proportion sought in each phase in Policy CS3 by 20% or more, planning permission will also not be granted for schemes in excess of 50 units. This element of Policy CS3 is only expected to apply in exceptional circumstances where there are a number of very large windfall sites emerging in close succession. Exceptionally, a large brownfield windfall site may emerge and where such proposals are accompanied by the required infrastructure requirements on or within the vicinity</del></p>
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of the site, there may be scope to relax the phasing requirements set out in Policy CS3.

**3.20 Similarly, the Council needs to ensure that there is no under-supply of new housing, because of a lack of SHLAA sites coming forward and / or suitable windfall sites being developed. Where housing completions during any following three year period are projected to fall below the proportion sought in each phase by 20% or more, as set out in Policy CS3, it will be necessary to review the phasing of all housing allocations and if necessary, either bring certain allocations forward or undertake a wider review of the Strategy, including consideration of land presently designated as Green Belt. Such a review will need to take account of housing land supply and trends in the wider housing market.**

Scale of Effect (SE): ST – Short Term, MT – Medium Term, LT – Long Term 0 – no effect; +++ strongly positive; ++ moderately positive; + slightly positive; --- strongly negative; -- moderately negative; - slightly negative							
SA Objectives		Description of Effect	Duration of Effect			Description of Mitigation	Comments / Explanation
			ST	MT	LT		
<b>SOCIAL</b>							
1	To improve educational achievement, training and opportunities for lifelong learning and employability	No obvious effects.	0	0	0	None required.	
2	To ensure ready access to essential services and facilities for all residents	New housing development will only be permitted if satisfactory arrangements are in place to provide the necessary infrastructure. This will enable the delivery of sustainable communities across Hertsmere by ensuring that necessary infrastructure is in place to reduce the burden on existing infrastructure and community facilities which is likely to occur with new housing development. The positive effects are likely to be permanent and occur in the short, medium and long term.	++	++	++	None required.	The availability of supporting infrastructure and the need to provide additional capacity in some locations will determine the timing of the release of housing sites.
3	To meet identified housing needs and improve the quality and affordability of housing	By ensuring that the district has a rolling five year supply of developable housing land over a period of 15 years from the date of adoption of the Core Strategy, an appropriate level of housing will be delivered throughout the Core Strategy period. . In addition, monitoring conditions are set in the policy which will allow for a review of the housing allocations including the consideration of safeguarded land for housing and land presently in the Green Belt in situations where the housing delivery has fallen below the required minimum rate over a rolling three year period. In this case contingency arrangements will be put into place to increase the housing supply.	++	++	++	None required.	
4	To reduce poverty and social exclusion and promote equality of opportunities	A release of housing to meet demand has the potential to enable housing allocation sites to take account of areas of deprivation and use housing development as a catalyst for promoting equality of opportunities for housing. The availability of supporting infrastructure and the need to provide additional capacity for community facilities prior to the release of housing may also combat poverty and social exclusion.	+	+	+	The detailed maps showing deprivation levels in the borough should be used to inform the release of housing to promote regeneration opportunities.	The Site Allocations DPD will identify the housing sites and as such, will confirm the scale and significance of the positive effects which will depend on the extent to which allocated sites are included in or nearby areas of deprivation.

5	To reduce and prevent crime, fear of crime and anti social behaviour	No obvious effects.	0	0	0	Designing out crime should be encouraged in new housing developments.	Designing out crime should be encouraged in new housing developments.
6	To improve population's health and reduce inequalities both geographically and demographically	Similarly to the commentary for SA objective 4, an informed housing delivery that aims to tackle issues of deprivation, could also deliver benefits against this SA objective, helping to address the issue of health inequalities.	+	+	+	The detailed maps showing IMD Multiple Deprivation and Health Domain ranking in the borough should be used to inform the release of housing to promote regeneration opportunities.	
<b>ENVIRONMENTAL</b>							
7	To make the most efficient use of previously developed land and existing buildings before Greenfield sites	See assessment of Core Policies CS1 and CS2. Positive effects are likely due to the focus on the delivery of housing on brownfield land.	+	+	+		This policy is closely linked to Core Policy CS1 in terms of providing new housing development during the plan period but refers specifically to how the housing will be delivered over time.
8	To reduce contamination and safeguard soil quality and quantity	See assessment of Core Policies CS1 and CS2.	-	+	+		As above.
9	To protect and enhance landscape character, historic buildings, archaeological sites and cultural features of importance to the community	See assessment of Core Policies CS1 and CS2.	+	+	+		As above.
10	To maintain and enhance the quality of countryside and landscape	See assessment of Core Policies CS1 and CS2.	+	+	+		As above.
11	To reduce dependence on private car and achieve modal shift to more sustainable transport modes	See assessment of Core Policies CS1 and CS2.	+	+	+		As above.
12	To protect and enhance wildlife and habitats which are important on an international, national and local scale	See assessment of Core Policies CS1 and CS2.	0	0	0		As above.
13	To improve the quality of surface and ground waters	See assessment of Core Policies CS1 and CS2.	-/+	+	+		As above.
14	To minimise water consumption	See assessment of Core Policies CS1 and CS2.	-	-	-		As above.
15	To minimise the risk of flooding taking account of climate change	See assessment of Core Policies CS1 and CS2.	0	0	-		As above.
16	To improve local air quality	See assessment of Core Policies CS1 and CS2.	0	0	0		As above.
17	To reduce greenhouse gas emissions	See assessment of Core Policies CS1 and CS2.	-	-	0		As above.

18	To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy	See assessment of Core Policies CS1 and CS2.	-	-	0		As above.
19	To reduce the generation of waste and encourage re-use and recycling of waste	See assessment of Core Policies CS1 and CS2.	-	-	-		As above.
<b>ECONOMIC</b>							
20	To provide a prosperous, balanced and stable economy	The policy is likely to have positive effects by ensuring a rate of house building which is closely linked to actual demand over the plan period enabling stability in the local construction industry. Additionally, through requiring that adequate and necessary infrastructure is provided with new housing development, this will contribute towards a balanced and stable economy.	++	++	++	Not required as effect positive.	
21	To sustain and enhance the viability and vitality of town centres	No obvious effects.	0	0	0	n/a	

**Table A.3 – Assessment of Modifications to Policy CS4 Affordable Housing**

<p><b>Policy CS4</b></p>	<p><b><u>MM/9 replacement of Policy CS4</u></b></p> <p><b><u>To increase the supply of Affordable Housing, developments of 5 self-contained, residential units or more (gross), or residential sites of more than 0.3 hectares, should make provision for an element of Affordable Housing. On sites of fewer than 15 units, this may be delivered through the provision of intermediate housing (including shared ownership and share equity), with sites of 15 units or more containing a mix social rented housing, affordable rent and intermediate housing.</u></b></p> <p><b><u>The following percentage targets will be sought through negotiation:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>40% in post code areas EN5 4, WD25 8, WD7 8, WD7 7;</u></b></li> <li>• <b><u>at least 35% in all other locations;</u></b></li> </ul> <p><b><u>Appendix 6 provides a map of the post code areas within Hertsmere.</u></b></p> <p><b><u>The policy equates to an affordable housing target of 1,140 from 2012 to 2027.</u></b></p> <p><b><u>The Council will seek the maximum level of Affordable Housing on site. A lower level of provision will not be acceptable unless the Council agrees exceptional circumstances are demonstrated. Only in exceptional circumstances, will an alternative to on-site provision be appropriate.</u></b></p> <p><b><u>As a guideline, on sites of 15 or more units (gross) or 0.5 hectares, the council expect that 75% of the Affordable Housing units will be delivered as social rented and/or affordable rent housing and the remainder as intermediate housing. The precise tenure and dwelling mix will be agreed with the Council on a site-by-site basis and reflecting current housing needs or updated supplementary guidance.</u></b></p> <p><b><u>Where scheme viability may be affected, developers will be expected to provide full development appraisals to demonstrate an alternative affordable housing provision.</u></b></p> <p><b><u>MM/8 Supporting Text to Policy CS4</u></b></p> <p>3.26 A study was commissioned to examine the impact of Affordable Housing requirements on the viability of development. It highlights that there are significant differences in market values across the area, which together with the density of development and policy requirement, are capable of affecting the viability of providing Affordable Housing. The study assesses that a 35% Affordable Housing requirement on qualifying sites is deliverable in most locations across the district and</p>
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	<p>remains a robust target. It highlights that where grant is available for Affordable Housing, this improves scheme viability, particularly in the lower value areas. Higher value areas such as Radlett and rural Hertsmere could also support a higher target requirement than the previous Local Plan requirement of 25%, with <del>35</del><b>40</b>% Affordable Housing being viable in these locations. The study also reviews the thresholds for affordable housing and suggests that sites down to 5 units and above could provide affordable housing and still be viable.</p> <p><del>3.27 In setting an Affordable Housing contribution and threshold, the Council have sought to balance the need to maximise provision with deliverability. Its preferred option is to set a consistent district wide target, as this leaves no room for doubt about the Council's requirements. A 35% requirement would represent a continuation of current local policy, as well as the indicative requirement in the East of England Plan and give some flexibility to take account of potential future costs on development such as sustainable building and community infrastructure charges.</del> Affordable Housing requirements in respect of sheltered, extra and continuing care developments, are considered separately in paragraphs 3.49.</p> <p>3.28 <del>Given the practical implications of delivering affordable housing on small sites, a</del> A local trigger threshold of <del>105</del><b>105</b> units or <del>0.32</del><b>0.32</b> hectares is considered to be viable and deliverable, albeit with a degree of tenure flexibility. This would allow for intermediate rent or shared equity/ownership to be provided instead of social rented housing on smaller schemes of fewer than 15 units or 0.5 hectares, particularly where it would be difficult to practically deliver and manage a small number of social rented homes. In such instances, it is recognised that this may be a better way to accommodate an element of Affordable Housing, rather than through social rented housing being pepper potted across a scheme and across the borough as a whole. Units will need to be provided on site unless there are exceptional circumstances. The Council will not permit proposals involving the under-development or splitting up of large sites to avoid Affordable Housing requirements.</p> <p>3.29 Based on <del>commitments completions, and</del> sites identified in the SHLAA, <del>and windfall</del> there is the potential to deliver around <del>860</del><b>1,140</b> affordable dwellings over the next 15 years based on a <del>40% and</del> <b>40% and</b> 35% affordable housing requirement. <del>Taking into account the delivery of affordable housing on windfall sites, up to 995 homes could be delivered between 2012-2027 (or 66 units per annum).</del> This will form the Council's target for monitoring purposes.</p> <p><i>(no change to paragraphs 3.30 and 3.31)</i></p> <p><b>Delivery of Affordable Housing</b></p> <p>3.32 There are recognised to be a limited number of situations where it may be unviable or physically or logistically impractical to provide such a high proportion of Affordable Housing. This may be the case on some smaller or remote sites, where contaminated land is being developed or in locations where the development density and residual values are restricted. There is therefore considered to be a need for limited flexibility to enable certain sites to provide a slightly reduced level of Affordable Housing where there is evidence, in exceptional circumstances, to demonstrate:</p> <ol style="list-style-type: none"> <li>1. that it would be economically unviable to provide 35% <del>or 40% (in high value areas)</del> of housing on the site in the form of Affordable Housing; or</li> <li>2. that the requirement to provide a reasonable and practicable mix of unit sizes across a site would necessitate a reduction in the number of affordable homes.</li> </ol> <p><b><u>MM17 Implementation and Monitoring Framework text</u></b></p> <p><b><u>(for relevant text see Contingency 1, Contingency 2 and Contingency 3 in Table A1 above)</u></b></p>
<p>Scale of Effect (SE): ST – Short Term, MT – Medium Term, LT – Long Term                  0 – no effect; +++ strongly positive; ++ moderately positive; + slightly positive; --- strongly negative; -- moderately negative; - slightly negative</p>	

SA Objectives		Description of Effect	Duration of Effect			Description of Mitigation	Comments / Explanation
			ST	MT	LT		
<b>SOCIAL</b>							
1	To improve educational achievement, training and opportunities for lifelong learning and employability	No obvious effects.	0	0	0	n/a	
2	To ensure ready access to essential services and facilities for all residents	No obvious effects.	0	0	0	n/a	

3	To meet identified housing needs and improve the quality and affordability of housing	<p>This policy seeks to optimise the supply of affordable housing in the Borough. This policy should result in increased levels of affordable housing on all qualifying sites (i.e. over 5 self contained units or residential sites over 0.3ha) through 40% being affordable in certain post code areas and at least 35% being affordable in all other locations. On-site provision is expected although developers may put forward off-site alternative affordable housing provision where the scheme viability may be affected.</p> <p>In addition, should the affordable housing delivery rates fall below the minimum affordable housing target or indicate a shortfall of family sized affordable housing, contingency arrangements will be triggered as set in MM17 Contingency 2: Where overall housing targets are being met, but affordable housing delivery is not being met and Contingency 3: Where there is an insufficient affordable housing mix.</p> <p>The effects are likely to be positive, long term and significant.</p>	+++	+++	+++	None required as positive.	
4	To reduce poverty and social exclusion and promote equality of opportunities	<p>The availability of a mix of housing tenure is an important determinant of poverty and equality. This seeks to provide a balanced mix of housing tenure based on identified need. On sites fewer than 15 units this will be achieved through the provision of intermediate housing whereas in sites of 15 units or more these will contain a mix of social rented housing, affordable rent and intermediate housing. These proportions are considered to best address revised local Affordable Housing requirements. The effects are likely to be positive, long term and significant.</p>	+++	+++	+++	Monitoring of affordable housing units and tenure mix through the development control process and the AMR.	
5	To reduce and prevent crime, fear of crime and anti social behaviour	No obvious effects.	0	0	0	Design out crime should be encouraged in new housing developments.	
6	To improve population's health and reduce inequalities both geographically and demographically	No obvious effects.	0	0	0	n/a	

**ENVIRONMENTAL**

7	To make the most efficient use of previously developed land and existing buildings before Greenfield sites	No obvious effects.	0	0	0	n/a	
8	To reduce contamination and safeguard soil quality and quantity	No obvious effects.	0	0	0	n/a	
9	To protect and enhance landscape character, historic buildings, archaeological sites and cultural features of importance to the community	No obvious effects.	0	0	0	n/a	
10	To maintain and enhance the quality of countryside and landscape	No obvious effects.	0	0	0	n/a	
11	To reduce dependence on private car and achieve modal shift to more sustainable transport modes	No obvious effects.	0	0	0	n/a	
12	To protect and enhance wildlife and habitats which are important on an international, national and local scale	No obvious effects.	0	0	0	n/a	
13	To improve the quality of surface and ground waters	No obvious effects.	0	0	0	n/a	
14	To minimise water consumption	No obvious effects.	0	0	0	n/a	
15	To minimise the risk of flooding taking account of climate change	No obvious effects.	0	0	0	n/a	
16	To improve local air quality	Provision of affordable housing may reduce the need for some sections of the community to travel so having a long term positive effect on air quality.	+	+	+	Not required as effect positive.	Sections of the community such as key workers or others with low income may have reduced reliance on cars if availability of affordable housing means their housing and employment needs are met in the same area
17	To reduce greenhouse gas emissions	Provision of affordable housing may reduce the need for some sections of the community to travel so having a long term positive effect on greenhouse gas emissions.	+	+	+	Not required as effect positive.	Sections of the community such as key workers or others with low income may have reduced reliance on cars if availability of affordable housing means their housing and employment needs are met in the same area
18	To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy	No obvious effects.	0	0	0	n/a	
19	To reduce the generation of waste and encourage re-use and recycling of waste	No obvious effects.	0	0	0	n/a	

**ECONOMIC**

20	To provide a prosperous, balanced and stable economy	The policy is likely to have a significant positive effect through the provision of affordable homes, particularly for key workers, which will contribute towards a balanced and stable economy. The effect is likely to be long term and permanent.	+++	+++	+++	Not required as effect positive.	
21	To sustain and enhance the viability and vitality of town centres	No obvious effects.	0	0	0	n/a	

**Table A.4 – Assessment of Modifications to Policy CS6 Gypsy and Traveller Sites**

<p><b>Policy CS6</b></p>	<p><b>MM/10 Policy CS6 Gypsy and Traveller sites</b></p> <p>The Council will provide for the further needs of Gypsies and Travellers on the basis of identified need within south and west Hertfordshire, <del>the</del> <b>The Council will seek to identify and allocate up to at least 9 additional pitches to meet 2011 based on the evidence before the East of England Plan requirements to 2011 examination and a further 10 2 pitches per annum to by 2017 through the identification of land in the Site Allocations DPD.</b></p> <p>In identifying land <b>or determining planning applications for</b> any required potential sites <b>/ pitches</b>, consideration will be based on a range of criteria including:</p> <ul style="list-style-type: none"> <li>i) the potential of existing sites to accommodate additional pitches;</li> <li>ii) a sequential site selection process with an emphasis on land which has been previously developed;</li> <li>iii) safe and convenient access to the <del>primary</del> <b>primary road network, with proximity to the major road network and</b> without blocking or inhibiting use of any existing rights of way; the proximity of a transit site to a major road network;</li> <li><b>iv) the proximity of a transit site to a major road network;</b></li> <li><b>iv) avoiding prejudicing adjacent nearby residential or rural amenity as a result of visual intrusion, excessive noise, lighting, traffic generation or activity at unsocial hours;</b></li> <li>v) <del>avoiding over dominating and</del> respecting the size and scale of <b>and not dominating</b> the nearest settled community, <b>ensuring that there is not an undue level of Gypsy and Traveller pitches in any one part of the Borough which might result in an</b> and avoiding an adverse impact on <b>the local environment and / or infrastructure and services;</b></li> <li>vi) safe and acceptable environmental conditions within the site including the need to avoid air and noise pollution and significantly contaminated land;</li> <li>vii) an ability to receive essential services including water, sewerage, drainage and water disposal;</li> <li><b>viii) an ability for a site with over 5 pitches to be effectively managed for Gypsies and Travellers with local connections;</b></li> <li><del>viii</del> <b>x) a location within reasonable proximity to key local services;</b></li> <li><del>ix</del> <b>xi) the potential for a site to be effectively landscaped and where necessary, an adequate buffer between the site and any nearby housing settled community;</b></li> <li><del>x</del> <b>i) the potential risk of flooding or the ability to mitigate this risk; and ensuring any other adverse effects on the built and natural environment are avoided and / or mitigated including compliance with the key environmental policies set out in the Core Strategy (including Policies CS12, CS13, CS15, CS16 and CS17); and</b></li> <li>xii) the likely availability of the site to accommodate Gypsy and Traveller pitches.</li> </ul> <p><b>MM/20 and MM/21 Supporting text to Policy CS6</b></p> <p>3.41 The Council's preferred option is to retain the target of 18 pitches established in the regional plan to 2011 and for some additional growth to 20167. <b>Based on the regional plan assessment, this would equate to an additional 2 pitches a year. The Council does not consider there is a robust basis to plan from beyond 2017, as at this point the needs assessment will be more than 10 years out of date and the government has signalled its intentions to review Gypsy and Traveller requirements. This approach demonstrates a commitment to meeting Gypsy and Traveller needs, whilst recognising that a further assessment of need and a review of this aspect of the Core Strategy will be needed by 2017.</b></p> <p><b>3.42</b> Since the regional plan was adopted, a further 9 pitches have been approved – six pitches at the Pylon Site in Potters Bar which have since been implemented and three pitches at Sandy Lane in Bushey, approved in 2011 and for which government grant funding has been received to deliver the pitches. Given</p>
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	that there may be scope for small extensions to or intensification of one or more of the other existing authorised sites, any further provision beyond this, if required, is likely to be limited to no more than one larger site or a limited number of very small sites to accommodate the requirements to 2017. The Council will also consider the potential for extending the existing transit site at South Mimms, <b>which is recognised by Hertfordshire County Council to be underused for providing some permanent pitches to provide some permanent pitches in addition to the existing transit pitches.</b>
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Scale of Effect (SE): ST – Short Term, MT – Medium Term, LT – Long Term

0 – no effect; +++ strongly positive; ++ moderately positive; + slightly positive; --- strongly negative; -- moderately negative; - slightly negative

SA Objectives		Description of Effect	Duration of Effect			Description of Mitigation	Comments / Explanation
			ST	MT	LT		
<b>SOCIAL</b>							
1	To improve educational achievement, training and opportunities for lifelong learning and employability	No obvious effect	0	0	0	n/a.	
2	To ensure ready access to essential services and facilities for all residents	This policy seeks to identify land for gypsies and travellers through the Site Allocations DPD. This will be based on a range of criteria one being that the sites are located within a reasonable proximity to key local services. This will ensure access to services and facilities for this section of the community and as such, this policy will have positive, permanent and significant positive effects.	++	++	++	None required as positive.	
3	To meet identified housing needs and improve the quality and affordability of housing	On the basis of identified need, this policy will allocate sites for gypsies and travellers thus meeting housing need for this section of the community. However, in identifying and allocating an increased number of sites and permitting additional or extended sites based on a range of criteria, this may compromise the availability of land to meet identified housing needs particularly if the housing target in Hertsmere is exceeded (competing of available land). These negative effects are likely to be felt in the medium to longer term.	+	+/-	+/-	Site allocations should be addressed with Site Allocations DPD.	
4	To reduce poverty and social exclusion and promote equality of opportunities	This policy will identify sites for gypsies and puts forward criteria based approach for allocating additional sites and as such, seeks to accommodate the gypsy community in Hertsmere. This policy will contribute to social inclusion of the gypsy and traveller community. In addition, it seeks to promote equality of opportunities by locating sites within a reasonable proximity to key local services. This policy will have permanent positive and	++	++	++	None required as positive.	



SA Objectives		Description of Effect	Duration of Effect			Description of Mitigation	Comments / Explanation
			ST	MT	LT		
		significant effects.					
5	To reduce and prevent crime, fear of crime and anti social behaviour	This criterion based approach seeks to pro-actively manage gypsy and traveller sites through direct allocation and identifying future sites. Allocating specific encampments should help to safeguard against certain crimes. In addition, this policy has the potential to reduce fear of crime through ensuring sites are properly planned and managed. This policy will have positive, permanent and significant effects.	++	++	++	None required as positive.	
6	To improve population's health and reduce inequalities both geographically and demographically	This policy identifies sites for gypsies and puts forward criteria based approach for allocating additional sites. One such criterion is the ability to receive essential services including water, sewerage drainage and water disposal and as such, this policy ensures that sites are serviced by appropriate sanitation arrangements. In addition, another criterion seeks to ensure that sites are located in accessible locations thus improving opportunities to health care and leisure. Overall this policy will have positive, permanent and significant effects.	++	++	++	None required as positive.	
7	To make the most efficient use of previously developed land and existing buildings before Greenfield sites	The policy is likely to have a positive effect by adopting a sequential site selection process with an emphasis on land which has been previously developed. There is potential for negative effects if the Site Allocations DPD identifies sites on greenfield land. Overall, the scale of effect is dependent on those sites identified in the Site Allocations DPD.	+/-	+/-	+/-	Policy already emphasises land which has been previously developed. Greenfield development may be unavoidable if demand requires all potential previously developed sites to be utilised.	Performance against this objective will depend on the effective implementation of Policy CS12 (a)The enhancement of the natural environment), Policy 12 (b) (The Green Belt )and Policy CS 15 (Environmental impact of development).
8	To reduce contamination and safeguard soil quality and quantity	Selection of previously developed sites should have a positive effect as any contamination identified in this land should be remediated before development occurs.  However there is a potential for a negative effect if the site allocation DPD identifies sites on Greenfield land. This may cause contamination of the site and most likely lead to reduction in soil quality and quantity	+/-	+/-	+/-	Policy already emphasises land which has been previously developed. Greenfield development may be unavoidable if demand requires all potential previously developed sites to be utilised.	Performance against this objective will depend on the effective implementation of Policy CS12 (a)The enhancement of the natural environment), Policy 12 (b) (The Green Belt ) and Policy CS 15 (Environmental impact of development).

SA Objectives		Description of Effect	Duration of Effect			Description of Mitigation	Comments / Explanation
			ST	MT	LT		
9	To protect and enhance landscape character, historic buildings, archaeological sites and cultural features of importance to the community	The policy has the potential for development on greenfield land which may have negative effects on landscape character and historic assets. However the detailed criteria to be considered (including rural amenity and visual intrusion) have the potential to mitigate potential negative effects.	-	-	-	Further site specific mitigation may be required such as landscape bunding and planting or archaeological site evaluation.	Performance against this objective will depend on the effective implementation Policy CS12 (a)The enhancement of the natural environment), Policy 12 (b) (The Green Belt )and Policy CS 15 (Environmental impact of development).
10	To maintain and enhance the quality of countryside and landscape	See assessment of SA objective 9 above. The policy has the potential for development on greenfield land, however the detailed criteria to be considered (including rural amenity and visual intrusion) has the potential to mitigate potential negative effects.	-	-	-	Further site specific mitigation may be required such as landscape bunding and planting. There is the potential for residual effects on the quality of the countryside that may not be able to be mitigated.	Performance against this objective will depend on the effective implementation of Policy CS12 (a)The enhancement of the natural environment), Policy 12 (b) (The Green Belt ) and Policy CS 15 (Environmental impact of development).
11	To reduce dependence on private car and achieve modal shift to more sustainable transport modes	Location of sites in reasonable proximity to key local services may reduce dependence on private car use with a minor positive effect. However the provision of the sites themselves may attract more people and vehicles to the area undermining the original benefit	+/-	+/-	+/-	Provision of public transport links to identified sites	Performance against this objective will depend on Core Policy 25 in promoting alternatives to the car and ensuring green travel plans are in place in new development (CS Policy 23) to strengthen policy. Successful implementation of such policies should contribute to this objective.
12	To protect and enhance wildlife and habitats which are important on an international, national and local scale	There is potential for small scale development of Greenfield sites which has the potential for a negative effect on undesignated habitats. Effects have the potential to be long term and permanent.	-	-	-	Policy could be strengthened to recognise the need of minimising negative biodiversity effects.	Performance against this objective will depend on the effective implementation of Policy CS12 (a)The enhancement of the natural environment), Policy 12 (b) (The Green Belt ) and Policy CS 15 (Environmental impact of development).
13	To improve the quality of surface and ground waters	Provision of authorised sites with appropriate infrastructure to manage water, sewage, drainage and water disposal should have a positive effect  However if the site allocation DPD identifies sites on Greenfield land even the provision of such infrastructure could cause disturbance and effects on water quality.	+/-	+/-	+/-	Measures to minimise the effect of development on Greenfield land possibly to include SUDS.	Performance against this objective will depend on the effective implementation of Policy CS12 (a)The enhancement of the natural environment), Policy 12 (b) (The Green Belt )and Policy CS 15 (Environmental impact of development).
14	To minimise water consumption	Where sites are provided with infrastructure to deliver water, there will be a negative long term effect on reducing mains water consumption.	-	-	-	Possible for the installation of rain water harvesting and grey water recycling systems to minimise water consumption.	
15	To minimise the risk of flooding taking account of climate change	Provision of sites in previously developed areas should add not additional effects on flood risk.  However if the site allocation DPD identifies sites on Greenfield land there	-	-	-	Development decisions must be guided by the principles of PPS25. Flood risk assessments will be required for the development of sites that lie within flood zones 2 and 3 as	Performance against this objective will depend on the effective implementation of Policy CS12 (a)The enhancement of the natural environment), Policy 12 (b) (The Green Belt )and Policy CS 15 (Environmental impact of development).

SA Objectives		Description of Effect	Duration of Effect			Description of Mitigation	Comments / Explanation
			ST	MT	LT		
		will be a negative effect as site development would increase the amount of impermeable surfaces in the area				defined by the Environment Agency.	
16	To improve local air quality	No obvious effects.	0	0	0		
17	To reduce greenhouse gas emissions	No obvious effects.	0	0	0		
18	To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy	No obvious effects.	0	0	0	n/a	
19	To reduce the generation of waste and encourage re-use and recycling of waste	No obvious effects.	0	0	0	n/a	
<b>ECONOMIC</b>							
20	To provide a prosperous, balanced and stable economy	No obvious effects.	0	0	0	n/a	
21	To sustain and enhance the viability and vitality of town centres	No obvious effects.	0	0	0	n/a	

**Table A.5 – Assessment of Modifications to Policy CS12 (a) The Enhancement of the Natural Environment**

<b>Policy CS12 (a)</b>	<p>All development proposals must conserve and enhance the natural environment of the Borough, including biodiversity, habitats, protected trees, landscape character, and sites of ecological and geological value, in order to maintain and improve environmental quality, <b>and contribute to the objectives of the adopted Greenways Strategy and the Hertsmere Green Infrastructure Plan</b>. Proposals should provide opportunities for habitat creation and enhancement throughout the life of a development. In the case of the highest quality agricultural land (Grades 1, 2 and 3a) and Preferred Areas of mineral extraction, proposals will only be permitted where there is no likelihood of the land being sterilised for future agriculture or mineral extraction.</p> <p>There will also be a presumption against inappropriate development, which causes harm to the openness and appearance of the Green Belt, as defined in PPG2 (Green Belts). Strategic gaps in the Green Belt between Bushey and Watford and Bushey and Stanmore will be maintained within which any limited development, deemed acceptable in the Green Belt, should serve to retain the separation between the towns.</p>
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Scale of Effect (SE): ST – Short Term, MT – Medium Term, LT – Long Term  
 0 – no effect; +++ strongly positive; ++ moderately positive; + slightly positive; --- strongly negative; -- moderately negative; - slightly negative

SA Objectives		Description of Effect	Duration of Effect			Description of Mitigation	Comments / Explanation
			ST	MT	LT		
<b>SOCIAL</b>							
1	To improve educational achievement, training and opportunities for lifelong learning and employability	No obvious effects.	0	0	0		
2	To ensure ready access to essential services and facilities for all residents	No obvious effects.	0	0	0		

SA Objectives		Description of Effect	Duration of Effect			Description of Mitigation	Comments / Explanation
			ST	MT	LT		
3	To meet identified housing needs and improve the quality and affordability of housing	No obvious effects	0	0	0		
4	To reduce poverty and social exclusion and promote equality of opportunities	No obvious effects.	0	0	0		
5	To reduce and prevent crime, fear of crime and anti social behaviour	No obvious effects.	0	0	0		
6	To improve population's health and reduce inequalities both geographically and demographically	No obvious effects.	0	0	0		
7	To make the most efficient use of previously developed land and existing buildings before Greenfield sites	No obvious effects	0	0	0		
8	To reduce contamination and safeguard soil quality and quantity	Emphasis for developments to conserve and enhance the natural environment and biodiversity should be complementary to reducing contamination and safeguarding soil. The positive effect is likely to be achieved in the short and medium terms. Any potential loss of soil in the longer term to meet identified housing targets should be mitigated to a certain extent with this policy.	+	+	+/-	Not required as effect positive.	Performance against this objective will depend on the effective implementation of CS 15 (Environmental impact of development).
9	To protect and enhance landscape character, historic buildings, archaeological sites and cultural features of importance to the community	No obvious effects.	0	0	0	n/a	Performance against this objective will depend on the effective implementation of Policy CS13 (Protection or enhancement of heritage assets),
10	To maintain and enhance the quality of countryside and landscape	The requirement for development proposals to conserve and enhance the natural environment of the Borough and to contribute to the objectives of the adopted Greenways Strategy and the Hertsmere Green Infrastructure Plan will have a positive effect on this objective. Creation of enhanced countryside links, car free access to main green infrastructure assets, landscape enhancements through tree planting are some of the possible benefits arising out of the revised policy. The effect is likely to be significant positive in the medium to long term as more development occurs.	+	++	++	Not required as effect positive.	Performance against this objective will depend on the effective implementation of CS 15 (Environmental impact of development).

SA Objectives		Description of Effect	Duration of Effect			Description of Mitigation	Comments / Explanation
			ST	MT	LT		
11	To reduce dependence on private car and achieve modal shift to more sustainable transport modes	No obvious effects.	0	0	0		
12	To protect and enhance wildlife and habitats which are important on an international, national and local scale	The protection of biodiversity, habitats and sites of ecological value will have a significant positive effect on protecting habitats of national and local importance. The effect is likely to be significantly positive, long term and permanent.	++	++	++	Not required as effect positive.	Performance against this objective will depend on the effective implementation of CS 15 (Environmental impact of development).
13	To improve the quality of surface and ground waters	No obvious effects.	0	0	0		
14	To minimise water consumption	No obvious effects.	0	0	0		
15	To minimise the risk of flooding taking account of climate change	No obvious effects.	0	0	0		
16	To improve local air quality	No obvious effects.	0	0	0		
17	To reduce greenhouse gas emissions	No obvious effects.	0	0	0		
18	To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy	No obvious effects.	0	0	0		
19	To reduce the generation of waste and encourage re-use and recycling of waste	No obvious effects.	0	0	0		
<b>ECONOMIC</b>							
20	To provide a prosperous, balanced and stable economy	Protection of the natural environment and landscape character is likely to have a slight positive effect by attracting tourism and recreation uses of areas of green belt and historic attractions. The effect is likely to be slightly positive, long term and permanent.	+	+	+	Not required as effect positive.	
21	To sustain and enhance the viability and vitality of town centres	No obvious effects.	0	0	0		

Table A.6 – Assessment of New Policy CS12 (b) The Green Belt

<p>Policy CS12 (b)</p>	<p><b>MM/13 New Policy CS12 (b) The Green Belt</b></p> <p><u>There is a general presumption against inappropriate development within the Green Belt, as defined on the Proposals Map and such development will not be permitted unless very special circumstances exist. Development proposals, including those involving previously developed land and buildings, in the Green Belt will be assessed in relation to the NPPF.</u></p> <p><u>Limited infilling within those parts of Elstree, Shenley and South Mimms which are in the Green Belt will be considered appropriate, provided that it is sympathetic to its surroundings, retains and protects features essential to the character and appearance of the village; and complies with other relevant policies in this Plan. Village envelopes for Elstree, Shenley and South Mimms for limited infilling will be identified through the Site Allocations DPD.</u></p> <p><u>Key Green Belt Sites (previously known as Major Developed Sites) contain established educational, research and other institutions within the Green Belt and are suitable locations for appropriate infilling; development within defined boundaries for infilling will be considered acceptable and these boundaries will be reviewed through the Site Allocations DPD.</u></p> <p><u>The Green Belt will remain unchanged from that shown in the Hertsmere Local Plan (2003) except where the boundary will be redrawn in the Site Allocations DPD around Shenley to reflect the recent development of Shenley Hospital and at Borehamwood, to the east of Rowley Lane, where it will be redrawn to reflect the addition of safeguarded land for employment development.</u></p> <p><b>MM/14 and MM/15 Supporting text to new Policy CS12 (b)</b></p> <p>5.5 _____ Within the Green Belt, there is a need to maintain strict controls over the types of development, which can be permitted. The types of uses permitted in the Green Belt are limited by central Government in <del>PPG2 (Green Belts)</del> <u>the NPPF</u> to a limited range of <del>'open land'</del> <u>uses and types of site</u>, in order to protect its openness and prevent urban sprawl or the merging of towns. These permitted uses <del>extend to include</del> <u>agriculture, forestry, essential facilities outdoor for sport and recreation, cemeteries, and mineral extraction and local transport infrastructure</u>. Limited development within <u>'Key Green Belt Sites' Major Developed Sites'</u>, <u>previously permitted through national policy as Major Development Sites, will be supported; can also be permitted and</u> there <del>are presently</del> <u>are presently</u> were previously 15 Major Developed Sites in Hertsmere comprising education and medical manufacturing or research facilities and <del>the</del> <u>the</u> number of these sites, together with their boundary 'envelope' <u>which clarifies the extent of</u> <del>appropriate infilling and development</del>, will be <u>clarified set out</u> in the Site Allocations DPD <u>to enable those sites to plan effectively for their future land use requirements including through the use of masterplans, where appropriate.</u></p> <p><b>5.8</b> _____ <u>The Green Belt will remain unchanged from that shown in the Hertsmere Local plan except around Shenley where the boundary will be redrawn to reflect the recent redevelopment of Shenley Hospital, and at Borehamwood, to the east of Rowley Lane, where it will be redrawn to reflect the safeguarding of the land for employment use. The Holiday Inn site, at the southern end of this area, is recognised to have a significant amount of previously developed land and buildings and proposals for the infilling, partial or complete redevelopment of the site will, in the interim period, be considered on their individual merits. The new boundaries resulting from these changes, and any minor changes to existing village envelopes, will be determined through the Site Allocations and Development Management DPD.</u></p> <p><del>5.8 In addition, the Council proposes the creation of a one mile wide strategic gap designation within the Green Belt between Watford, Bushey and Stanmore. Much of Bushey remains physically separate from Watford and there is a clear break between Bushey and Stanmore. The importance of maintaining established settlement patterns and a gap between the towns, given development pressures in both Watford and Stanmore - including the Health Campus in Watford and proposals at RAF Bentley Priory, Stanmore - is considered to be particularly pressing. There are a large number of previously developed sites in the Green Belt in and around Bushey and the strategic gap will serve to control the scale of any development in these locations, should proposals emerge during the Plan period</del></p> <p><b>MM/4 Figure 10 – Key Diagram</b></p> <p><i>Remove Strategic Gap designation from map</i></p>
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Scale of Effect (SE): ST – Short Term, MT – Medium Term, LT – Long Term  
 0 – no effect; +++ strongly positive; ++ moderately positive; + slightly positive; --- strongly negative; -- moderately negative; - slightly negative

SA Objectives	Description of Effect	Duration of Effect			Description of Mitigation	Comments / Explanation
		ST	MT	LT		
<b>SOCIAL</b>						
1	To improve educational achievement, training and opportunities for lifelong learning and employability	No obvious effects.	0	0	0	
2	To ensure ready access to essential services and facilities for all residents	No obvious effects.	0	0	0	
3	To meet identified housing needs and improve the quality and affordability of housing	This policy contains a general presumption against inappropriate development within the Green Belt and development will not be permitted unless very special circumstances exist. However, this policy does allow limited infilling within those parts of Elstree, Shenley and South Mimms which are in the Green Belt and also in key Green Belt sites. Also, the Strategic Gap designation within the Green Belt between Watford, Bushey and Stanmore has been removed. Therefore this policy could allow the release of certain greenbelt areas to meet identified housing subject to strict criterion. As such significant positive effects in the medium and longer term in terms of ensuring that sufficient housing to meet the needs is provided in the borough are predicted.	+	++	++	Not required as effect positive
4	To reduce poverty and social exclusion and promote equality of opportunities	No obvious effects.	0	0	0	
5	To reduce and prevent crime, fear of crime and anti social behaviour	No obvious effects.	0	0	0	
6	To improve population's health and reduce inequalities both geographically and demographically	No obvious effects.	0	0	0	
7	To make the most efficient use of previously developed land and existing buildings before Greenfield sites	The policy will provide protection of the Green Belt by not permitting inappropriate development therein. It will, however, allow for limited infilling in previously developed sites in the Green Belt and in Key Green Belt Sites. The policy will	++	+	+	Not required as effect positive.

SA Objectives		Description of Effect	Duration of Effect			Description of Mitigation	Comments / Explanation
			ST	MT	LT		
		therefore constrain development to previously developed land in urban centres in the short term but it will not necessarily do so in the medium to long term (if housing needs require expansion onto Greenfield sites) and therefore the effects are likely to be less significant.					
8	To reduce contamination and safeguard soil quality and quantity	No obvious effects.	0	0	0		
9	To protect and enhance landscape character, historic buildings, archaeological sites and cultural features of importance to the community	By allowing limited infilling in areas which are in the Green Belt, this might result in negative effects on the landscape character. The policy does outline that development in these areas will take into account a number of set criteria but new development is most likely to result in changes to the landscape character. The extent to which these changes are noticeable will depend upon the particular circumstances associated with each development and the level of development in general.	-	-	-		Performance against this objective will depend on the effective implementation of Policy CS13 (Protection or enhancement of heritage assets), Policy CS12 (a) (Protection and enhancement of the natural environment) and CS 15 (Environmental impact of development).
10	To maintain and enhance the quality of countryside and landscape	By allowing limited infilling in areas which are in the Green Belt, this might result in negative effects on the quality of the countryside and landscape character. The policy does outline that development in these areas will only be considered appropriate if certain circumstances are met but new development is most likely to result in changes. The extent to which these changes are noticeable will depend upon each development and how it is perceived by the local community.	-	-	-		Performance against this objective will depend on the effective implementation of Policy CS13 (Protection or enhancement of heritage assets), Policy CS12 (a) (Protection and enhancement of the natural environment) and CS 15 (Environmental impact of development).
11	To reduce dependence on private car and achieve modal shift to more sustainable transport modes	No obvious effects.	0	0	0		
12	To protect and enhance wildlife and habitats which are important on an international, national and local scale	The general presumption against inappropriate development within the Green Belt will make a significant positive contribution to protecting habitats of	++	-	-		Performance against this objective will depend on the effective implementation of CS 15 (Environmental impact of development).



SA Objectives		Description of Effect	Duration of Effect			Description of Mitigation	Comments / Explanation
			ST	MT	LT		
		national and local importance in Hertsmere in the short term. However, because of the acknowledgment that the housing need in the authority would not be fully met by the minimum target of 3,990 homes, it is possible that Greenfield sites in the Green Belt will need to be developed to make up for the shortfall in the medium to long term and therefore the effects on this objective could be negative due to the loss of wildlife and habitats.  Overall effects are deemed slightly negative in the medium to long term due to the potential scale of development.					
13	To improve the quality of surface and ground waters	No obvious effects.	0	0	0		
14	To minimise water consumption	No obvious effects.	0	0	0		
15	To minimise the risk of flooding taking account of climate change	No obvious effects.	0	0	0		
16	To improve local air quality	No obvious effects.	0	0	0		
17	To reduce greenhouse gas emissions	No obvious effects.	0	0	0		
18	To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy	No obvious effects.	0	0	0		
19	To reduce the generation of waste and encourage re-use and recycling of waste	No obvious effects.	0	0	0		
<b>ECONOMIC</b>							
20	To provide a prosperous, balanced and stable economy	Protection against inappropriate development within the Green Belt is likely to have a slight positive effect by attracting tourism and recreation users of areas of Green..Belt. In addition, the redrawing of the Green Belt boundary at Borehamwood through the Site Allocations DPD to reflect the additional safeguarded land for employment development will potentially deliver additional positive effects. The effect is likely to be slightly positive, long term and permanent.  In addition, the redrawing of the Green Belt boundaries at Borehamwood, to the east of Rowley Lane to reflect the safeguarding of the land for employment	+	++	++	Not required as effect positive.	

SA Objectives		Description of Effect	Duration of Effect			Description of Mitigation	Comments / Explanation
			ST	MT	LT		
		use will provide more certainty to those wishing to develop that land for employment use, potentially adding a further positive effect on the local economy in the medium to long term.					
21	To sustain and enhance the viability and vitality of town centres	Protection against inappropriate development within the Green Belt is likely to result in greater concentration of development within existing settlements, which should help to improve their viability through increased demand for services and facilities. The effect is likely to be slightly positive, long term and permanent.	+	+	+	Not required as effect positive.	

**Table A.7 – Assessment of Modifications to Policy CS16 - Energy and CO2 reductions**

Policy CS16	<p><b>MM/29 Policy CS16 Energy and CO2 reductions</b></p> <p>All new residential developments will be required to achieve the following levels of the Code for Sustainable Homes (Code) as a minimum as and when successive updates to Part L of the Building Regulations become mandatory:</p> <ul style="list-style-type: none"> <li>- 2010 - Code level 3</li> <li>- 2013 - Code level 4 once updates to Part L come into effect.</li> <li>- 2016 - Code level <b>65</b> once updates to Part L <b>and the national Zero Carbon Homes policy</b> come into effect.</li> </ul> <p>All new non-domestic will be expected as a minimum to achieve CO2 emissions reductions in-line with the Building Regulations Part L. This requirement will not come into effect until successive updates to Part L of the Building Regulations become mandatory:</p> <ul style="list-style-type: none"> <li>- 2010 - 25% reduction in the Building Emission Rate compared to the Target Emission Rate defined by <b>Part L of the Building Regulations (2006)</b>.</li> <li>- 2013 - 44% reduction in the Building Emission Rate compared to the Target Emission Rate defined by <b>Part L of the Building Regulations (2006)</b> (reductions above 70% can be delivered using allowable solutions).</li> <li>- 2019 - Zero Carbon - no additional requirement.</li> </ul> <p>The Council will further encourage all new development or major refurbishment to incorporate energy from decentralised and renewable or low carbon sources. All large scale development will be required to incorporate on-site renewable energy generation, unless it is not feasible or viable or alternative decentralised and renewable, low carbon sources can be identified. The Council will also permit new development of sources of renewable energy generation subject to: local designated environmental assets and constraints, important landscape features and significant local biodiversity; minimising any detriment to the amenity of neighbouring residents and land uses; and meeting high standards of sustainable design and construction.</p> <p><b>MM/23 and MM/24 supporting text to Policy CS16</b></p> <p>5.44 As well as applying Building Regulations, the Council will require standards to be met as set out in the Development Management policies. <b><u>In the March 2011 Budget, the Chancellor stated that by 2016 new homes would not have to be fully zero carbon but built in accordance to Level 5 of the Code for Sustainable Homes. Meeting higher carbon reduction standards may require the use of allowable solutions where carbon reduction targets cannot be met onsite. Details of what constitutes allowable solutions are expected in a future government consultation and there may be an opportunity to establish a Community Energy Fund as part of the allowable solutions framework. Following the consultation, the Council will explore the opportunities for establishing a community energy fund and will publish additional guidance, as required.</u></b></p>
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	<p>5.46 In addition to supporting the broader infrastructure requirements of electricity and gas companies, the promotion of renewable energy technology, subject to adequate mitigation of any adverse impacts, is supported by the Council. <b>The Council requires that larger developments (above 1,000 sq m or 10 new homes) provide at least 10% of their predicted energy requirements on-site.</b> The Council considers that it is preferable for carbon omissions to be reduced through sustainable design and construction, before requirements for on-site renewable energy generation <b>or allowable solutions</b> are considered.</p>
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Scale of Effect (SE): ST – Short Term, MT – Medium Term, LT – Long Term  
 0 – no effect; +++ strongly positive; ++ moderately positive; + slightly positive; --- strongly negative; -- moderately negative; - slightly negative

SA Objectives		Description of Effect	Duration of Effect			Description of Mitigation	Comments / Explanation
			ST	MT	LT		
<b>SOCIAL</b>							
1	To improve educational achievement, training and opportunities for lifelong learning and employability	No obvious effect.	0	0	0	n/a	n/a
2	To ensure ready access to essential services and facilities for all residents	No obvious effect.	0	0	0	n/a	n/a
3	To meet identified housing needs and improve the quality and affordability of housing	Residential properties built to Code for Sustainable Homes levels are likely to be of a good quality, with good thermal insulation etc. thus having a beneficial effect. Building homes to higher standards may have an adverse effect on affordability; however, potential future cost of sustainable building was factored in, whilst setting the requirements for affordable housing delivery. The Code level for new residential developments has been downgraded from Code level 6 to Code Level 5 with no indication when Code Level 6 is required to be achieved. Therefore the overall effects remain slightly beneficial.	0	+	+	None identified.	
4	To reduce poverty and social exclusion and promote equality of opportunities	No obvious effect.	0	0	0	n/a	n/a
5	To reduce and prevent crime, fear of crime and anti social behaviour	No obvious effect.	0	0	0	n/a	n/a
6	To improve population's health and reduce inequalities both geographically and demographically	Homes built to Code for Sustainable Homes levels will be of a good quality with high levels of thermal insulation (reducing damp and cold related problems) and include Health and Wellbeing parameters and thus have a positive effect on health.	++	++	++	None identified.	n/a
<b>ENVIRONMENT</b>							
7	To make the most efficient use of previously developed land	No obvious effect.	0	0	0	n/a	n/a

SA Objectives		Description of Effect	Duration of Effect			Description of Mitigation	Comments / Explanation
			ST	MT	LT		
	and existing buildings before Greenfield sites						
8	To reduce contamination and safeguard soil quality and quantity	No obvious effect.	0	0	0	n/a	n/a
9	To protect and enhance landscape character, historic buildings, archaeological sites and cultural features of importance to the community	No obvious effect.	0	0	0	n/a	n/a
10	To maintain and enhance the quality of countryside and landscape	No obvious effect.	0	0	0	n/a	n/a
11	To reduce dependence on private car and achieve modal shift to more sustainable transport modes	No obvious effect.	0	0	0	n/a	n/a
12	To protect and enhance wildlife and habitats which are important on an international, national and local scale	No obvious effect.	0	0	0	n/a	n/a
13	To improve the quality of surface and ground waters	No obvious effect.	0	0	0	n/a	n/a
14	To minimise water consumption	No obvious effect.	0	0	0	n/a	n/a
15	To minimise the risk of flooding taking account of climate change	No obvious effect.	0	0	0	n/a	n/a
16	To improve local air quality	No obvious effect.	0	0	0	n/a	n/a
17	To reduce greenhouse gas emissions	Through requiring Code level on all new residential property, CO <sub>2</sub> emissions will be reduced from the residential sector. However, the zero carbon homes by 2016 is no longer a requirement. Instead a lower Code level 5 (rather Code level 6) is set. No indication is provided as to when it is expected that Code level 6 will be achieved. New non-domestic buildings will reduce their emissions; with zero carbon 2019. By permitting new development of sources of renewable energy generation there will be a further beneficial effect against this objective.	+	+	++	None identified.	As for all new non-domestic buildings for which Zero Carbon requirement is set for 2019, a date should be set as to when Code Level 6 will be required for new residential developments.
18	To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy	Through requiring Code level on all new residential property, energy efficiency will be increased in the residential sector. New non-domestic buildings will also become more efficient. By permitting new	++	++	++	None identified.	n/a

SA Objectives		Description of Effect	Duration of Effect			Description of Mitigation	Comments / Explanation
			ST	MT	LT		
		development of sources of renewable energy generation there will be a further beneficial effect against this objective.					
19	To reduce the generation of waste and encourage re-use and recycling of waste	No obvious effect.	0	0	0	n/a	n/a
<b>ECONOMIC</b>							
20	To provide a prosperous, balanced and stable economy	Promoting the use of renewable and low carbon energy supports the growth in clean-technology markets, laying the foundation for a stable and prosperous low carbon local economy. The significance of effects will become more noticeable in the medium to longer term when the scale of clean energy technology development and utilisation is anticipated to increase.	+	++	++	n/a	n/a
21	To sustain and enhance the viability and vitality of town centres	By introducing a higher quality homes it will encourage people to live and work in the local area.	+	+	+	n/a	n/a

Table A.7 – Assessment of Modifications to Policy 26 Town Centre Strategy

<p><b>Town Centre Policies (combined assessment under 'Town Centres and Shopping')</b></p> <p><b>Policy 26</b></p> <p><b>Policy 27</b></p> <p><b>Policy 28</b></p> <p><b>Policy 29</b></p>	<p><b>MM/27 Policy CS26 Town Centre Strategy</b></p> <p>Development within the designated town, district or neighbourhood centres of Borehamwood, Potters Bar, Bushey and Radlett will be permitted provided that it maintains their primary retail function and wider role as a focus for business, leisure, cultural and other appropriate town centre uses (as defined within <b>PPS4the NPPF</b>). Retail activity elsewhere should be focused within local centres and parades, which will be expected to retain a core of local shopping facilities and accommodate any new retail development, commensurate to their position within the town, district and neighbourhood centre hierarchy. <b>Proposals to create in excess of 2,500 sq m of new retail floorspace that is outside of an existing town centre will be subject to the sequential test significant new floorspace outside of an existing town, district or neighbourhood centre will be subject to the sequential test.</b></p> <p><b>Proposals to create in excess of 2,500 sq m of new retail floorspace will be subject to the [significant adverse] impact assessment to enable the impact on existing shopping centres to be considered. Proposals for main town centre uses will be considered in accordance with national planning policy set out in the NPPF, including the application of the sequential test and impact assessment as appropriate.</b></p> <p><b>MM/19 Supporting text to Policy CS26</b></p> <p>8.5 The Council will ensure that proposals within Borehamwood, Potters Bar, Radlett and Bushey town centres are appropriate to the size and scale of the centre. There are a number of larger supermarkets within Borehamwood and Potters Bar, including a new supermarket which opened at Stirling Corner in January 2011, in addition to several located nearby in Watford, London Colney and Stanmore which serve communities in the <del>b</del>Borough. Proposals for any additional large supermarkets will need <b>be demonstrated by retailers, in addition to satisfying the significant adverse impact assessment test as required by PPS4 to accord with national planning policy for the location of retail development as set out in NPPF.</b></p> <p><b>Policy 27 – Strengthening Town Centres (unchanged text)</b></p> <p>The retail function and vitality of designated centres will be reinforced through the designation of primary and secondary shopping frontages in Borehamwood, Potters Bar, Bushey and Radlett. There will be a focus on (A1) retail uses within the primary frontages and scope for a wider range of activities in secondary frontages, with an emphasis on a mix of (A1) retail, (A2) financial and professional services and (A3) dining-in establishments. An appropriate proportion of other</p>
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	<p>uses will also be permitted in secondary frontages, including (A4) pubs and bars and (A5) take away uses, together with other appropriate arts, leisure and entertainment uses. Around the periphery of both secondary frontages and local parades, the Council will identify where any opportunities exist for residential accommodation to replace long-term vacant commercial units.</p> <p>Details of frontages and uses will be set out in the Site Allocations and Development Management DPD along with any planned measures for the Council to use compulsory purchase and other powers to address the long term neglect and abandonment of vacant commercial and other property within town centres. Proposals for rural diversification will be supported where they do not conflict with other policies although to protect the role of town centre's, further retail development at Battlers Green Farm or further afield at the Willows Farm, will not be sought.</p> <p><b>Policy 28 – Retail and commercial development in Shenley (unchanged text)</b>                  Small scale retail and commercial development in Shenley should be restricted to suitable sites within existing commercial areas. Locations will be identified in the Site Allocations and Development Management DPD, based on those defined in the Shenley Parish Plan:</p> <ul style="list-style-type: none"> <li>• along London Road in the south east of the village; and</li> <li>• at Andrew Close and the nearby junction between London Road and Porters Park Drive (excluding the reserve school site).</li> </ul> <p>Retail and commercial development in identified locations in Shenley should be of a size and scale which primarily serves the local community rather than drawing in large numbers of visitors from further afield.</p> <p><b>Policy 29 – Safe and attractive evening economy (unchanged text)</b>                  The Council wishes to promote a range of uses in town centre's that cater for the whole community, creating a balanced evening economy including entertainment and late night retailing as well as the provision of a range of eating and drinking establishments. The quantity, type and location of A3, A4, A5 and other evening or late night uses will be controlled, having regard to other Local Plan and Development Plan Document policies, together with the aims and objectives of the Hertsmere Crime and Disorder Reduction Partnership Plan, including the need to reduce anti-social behavior, crime and the fear of crime.</p> <p>Where new A3, A4 and A5 uses are permitted, financial contributions will be sought for related town centre improvements including additional CCTV, improved lighting and improved signage for CCTV and Alcohol Free Zones. In relation to those areas where concentrations of drinking establishments, night clubs or other evening or late night uses have caused existing anti-social problems, there will be a presumption against further consents for such uses.</p>
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Scale of Effect (SE): ST – Short Term, MT – Medium Term, LT – Long Term  
 0 – no effect; +++ strongly positive; ++ moderately positive; + slightly positive; --- strongly negative; -- moderately negative; - slightly negative

SA Objectives		Description of Effect	Duration of Effect			Description of Mitigation	Comments / Explanation
			ST	MT	LT		
<b>SOCIAL</b>							
1	To improve educational achievement, training and opportunities for lifelong learning and employability	No obvious effects.	0	0	0	None required.	
2	To ensure ready access to essential services and facilities for all residents	<p>The town centre policies in the Revised CS provide a balanced town, district or neighbourhood centre strategy allowing appropriate size and scale retail and commercial units in the main towns, districts and neighbourhood centres of Borehamwood, Potters Bar, Bushey and Radlett. As such, a balanced town centre strategy will ensure ready access to facilities and services is provided.</p> <p>The focus for larger scale development and night time economy in the main</p>	+	+	+	None required.	

SA Objectives		Description of Effect	Duration of Effect			Description of Mitigation	Comments / Explanation
			ST	MT	LT		
		centres of Borehamwood and Potter Bar and allowing development in Shenley Retail Park should help to concentrate facilities and services in the most accessible locations. However, there the health check study undertaken shows that there is unlikely to be a need for significant new retail space, the scale of positive effects is unlikely to be significant.					
3	To meet identified housing needs and improve the quality and affordability of housing	Policy CS24 introduces a requirement for the Council to identify where any opportunities exist for residential accommodation to replace long-term vacant commercial units. This is likely to help meet housing needs and improve the affordability of housing.	+	+	+	None required.	
4	To reduce poverty and social exclusion and promote equality of opportunities	No obvious effect.	0	0	0	None required.	
5	To reduce and prevent crime, fear of crime and anti social behaviour	The town centre policies through providing a safe and attractive environment and in not permitting further consents in areas where concentrations of drinking establishments and night-clubs cause existing problems should contribute to reducing crime and fear of crime. Policy CS29 clearly states the need to reduce anti-social behaviour, crime and the fear of crime'	++	++	++	None required.	
6	To improve population's health and reduce inequalities both geographically and demographically	No obvious effect.	0	0	0	None required.	
<b>ENVIRONMENT</b>							
7	To make the most efficient use of previously developed land and existing buildings before Greenfield sites	Policy CS26 focus retail development within the designated town, district or neighbourhood centres through the application of the sequential test as set In the NPPF. This will mean that retail development is likely to be directed away from Greenfield sites (as only when suitable sites are not available in town centres should out of centre sites be considered). This is likely to have a significant positive effect on this objective. The effect is likely to be long term and permanent.	++	++	++	Not required as effect positive.	
8	To reduce contamination and	Policy CS26 requires proposals for main	0	0	0	n/a	Performance against this objective will depend on

SA Objectives		Description of Effect	Duration of Effect			Description of Mitigation	Comments / Explanation
			ST	MT	LT		
	safeguard soil quality and quantity	town centre uses over a floorspace threshold of 2,500 sq m to be considered in accordance with national planning policy set in the NPPF. The NPPF requires an impact focusing on impacts on existing committed and planned public and private investment and on town centre vitality and viability. This policy does not cover environmental impact assessment.					the effective implementation of Policy CS15 Environmental impact of development.
9	To protect and enhance landscape character, historic buildings, archaeological sites and cultural features of importance to the community	Policy CS26 requires proposals for main town centre uses over a floorspace threshold of 2,500 sq m to be considered in accordance with national planning policy set in the NPPF. The NPPF requires an impact focusing on impacts on existing committed and planned public and private investment and on town centre vitality and viability. This policy does not cover environmental impact assessment.	0	0	0	n/a	Performance against this objective will depend on the effective implementation of Policy CS15 Environmental impact of development.
10	To maintain and enhance the quality of countryside and landscape	Policy CS26 requires proposals for main town centre uses over a floorspace threshold of 2,500 sq m to be considered in accordance with national planning policy set in the NPPF. The NPPF requires an impact focusing on impacts on existing committed and planned public and private investment and on town centre vitality and viability. This policy does not cover environmental impact assessment.	0	0	0	n/a	Performance against this objective will depend on the effective implementation of Policy CS15 Environmental impact of development.
11	To reduce dependence on private car and achieve modal shift to more sustainable transport modes	Maintaining the strength and vitality of the town centres as well as encouraging an evening economy in town centres should ensure that people do not have to travel far for retail and leisure. There is potential for this to reduce the dependence on private car use and as such, is likely to have permanent positive but not significant effect.	+	+	+	Not required as effect positive	
12	To protect and enhance wildlife and habitats which are important on an international, national and local scale	Policy CS26 requires proposals for main town centre uses over a floorspace threshold of 2,500 sq m to be considered in accordance with national planning policy set in the NPPF. The NPPF requires an impact focusing on impacts on existing committed and planned public and private investment and on town centre vitality and viability. This policy does not cover environmental impact assessment.	0	0	0	n/a	Performance against this objective will depend on the effective implementation of Policy CS15 Environmental impact of development.



SA Objectives		Description of Effect	Duration of Effect			Description of Mitigation	Comments / Explanation
			ST	MT	LT		
13	To improve the quality of surface and ground waters	Policy CS26 requires proposals for main town centre uses over a floorspace threshold of 2,500 sq m to be considered in accordance with national planning policy set in the NPPF. The NPPF requires an impact focusing on impacts on existing committed and planned public and private investment and on town centre vitality and viability. This policy does not cover environmental impact assessment.	0	0	0	n/a	Performance against this objective will depend on the effective implementation of Policy CS15 Environmental impact of development.
14	To minimise water consumption	No obvious effects.	0	0	0	n/a	
15	To minimise the risk of flooding taking account of climate change	Policy CS26 requires proposals for main town centre uses over a floorspace threshold of 2,500 sq m to be considered in accordance with national planning policy set in the NPPF. The NPPF requires an impact focusing on impacts on existing committed and planned public and private investment and on town centre vitality and viability. This policy does not cover environmental impact assessment.	0	0	0	n/a	Performance against this objective will depend on the effective implementation of Policy CS15 Environmental impact of development.
16	To improve local air quality	Provision of good retail and leisure facilities locally should reduce the need to travel to other settlements for these services which should have a permanent positive effect on improving air quality.	+	+	+	None required.	
17	To reduce greenhouse gas emissions	Provision of good retail and leisure facilities locally should reduce the need to travel to other settlements for these services which should have permanent positive effect on reducing greenhouse gas emissions from transport.	+	+	+	None required.	
18	To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy	No obvious effects.	0	0	0	n/a	
19	To reduce the generation of waste and encourage re-use and recycling of waste	No obvious effects.	0	0	0	n/a	
<b>ECONOMIC</b>							
20	To provide a prosperous, balanced and stable economy	The identification of primary and secondary shopping frontages will have a significant positive effect on supporting the wider role of town centres and contributing towards a balanced and stable economy. The effect is likely to be long term and significant.	++	++	++	Not required as effect positive.	

SA Objectives	Description of Effect	Duration of Effect			Description of Mitigation	Comments / Explanation
		ST	MT	LT		
21	To sustain and enhance the viability and vitality of town centres	+++	+++	+++	Not required as effect positive.	

