

Broxbourne Local Plan Proposed Main Modifications

Habitats Regulations Assessment Addendum

December 2019



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

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Appendix A: Schedule of Main Modifications

Appendix B: Council Responses to Actions Required following Hearing Sessions for Matter 9: Other Development Management Policies (Week Four).
Natural England’s advice

Appendix C: Natural England Correspondence: 06 November 2019 and 04 December 2019

Acronyms

ANGS	Accessible Natural Green Spaces
AA	Appropriate Assessment
DPD	Development Plan Document
DTA	David Tyldesley and Associates
HRA	Habitats Regulation Assessment
LVRP	Lee Valley Regional Park
LVRPA	Lee Valley Regional Park Authority
LSE	Likely Significant Effect
MoU	Memorandum of Understanding
RSPB	Royal Society for the Protection of Birds
SAC	Special Area of Conservation
SLAA	Strategic Land Availability Assessment
SPA	Special Protection Area
SANGS	Suitable Alternative Natural Green Spaces
SSSI	Site of Special Scientific Interest
ZOI	Zone of Influence

1 Introduction

1.1.1 Lepus Consulting has prepared this Habitats Regulations Assessment (HRA) report of the main modifications to the Broxbourne Local Plan 2018 – 2033 (referred to hereafter the as the ‘Local Plan’) on behalf of Broxbourne Borough Council.

1.1.2 This report supplements the earlier HRA outputs associated with the Broxbourne Local Plan which was prepared by Lepus Consulting in March 2018: *The Habitats Regulation Assessment of the Broxbourne Local Plan, Appropriate Assessment, Final* (hereafter referred to as the ‘2018 HRA’). This report does not contain all information normally presented in an HRA and should be read in conjunction with the 2018 HRA.

1.1.3 The purpose of this report is to determine whether the conclusions of the 2018 HRA remain valid in light of modifications to the Local Plan.

1.1.4 This report is structured as follows:

- **Chapter 1:** Introduction
- **Chapter 2:** Local Plan
- **Chapter 3:** Previous HRA Work
- **Chapter 4:** Consultation with Natural England
- **Chapter 5:** Methodology
- **Chapter 6:** Screening
- **Chapter 7:** Appropriate Assessment: Lee Valley SPA and Ramsar
- **Chapter 8:** Appropriate Assessment: Epping Forest SAC
- **Chapter 9:** Conclusions

2 Local Plan

2.1 Local Plan Preparation

2.1.1 In 2017 the Pre-Submission Local Plan was prepared and consulted upon under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Responses to this consultation exercise were used to inform the plan-making process. In March 2018 the Local Plan was submitted to the Secretary of State for independent examination. This was accompanied by the 2018 HRA.

2.1.2 Proposed Main Modifications to the Local Plan, as submitted, have now been prepared by Broxbourne Borough Council. These set out changes identified before, during and soon after the Examination Hearings in 2018.

2.1.3 Proposed Main Modifications are provided in a tracked changed version of the Local Plan Pre-Submission version: *'Local Plan Examination in Public. Local Plan 'Track Changes' version showing Main Modifications and Minor Modifications, July 2019'*. A schedule of the Main Modifications is listed in the HRA Screening tables in **Appendix A** which also sets out Broxbourne Borough Council's reasons for each Main Modification inclusion in the Local Plan.

2.2 Broxbourne Local Plan

2.2.1 The Local Plan is a development strategy for homes, jobs, shops, leisure, transport and infrastructure in the Borough of Broxbourne for the next 15 years. It includes proposals for the provision of approximately 7,700 homes and 5,000 – 6,000 jobs by 2033.

2.2.2 Three strategic housing development locations are identified in the Local Plan as follows:

- **Brookfield Garden Village:** including 1,250 homes north and west of Brookfield Riverside, comprising walkable neighbourhoods and one or more new primary schools, linked by a tree-lined boulevard;
- **Cheshunt Lakeside:** a new mixed-use urban village including 1,750 homes as well as businesses and a primary school, at land currently occupied by Delamare Road employment area; and
- **Rosedale Park:** comprising around 820 homes and a primary school at linked developments, on the former Tudor Nurseries site and at Rags Brook, opening up the valley to public access for the first time

and creating a parkland setting for existing and future developments.

2.2.3 The remainder of the residential development is proposed at a range of smaller sites, in some cases taking advantage of opportunities to support local facilities, and also includes some sites which already have planning permission, such as High Leigh Garden Village in Hoddesdon and Haslemere Marina in Waltham Cross.

2.2.4 The three key employment locations allocated in the Local Plan are as follows:

- **Park Plaza West** will provide around 4,500 new office jobs by 2033, located in a well landscaped setting, separated from the M25 by a new public park;
- **Park Plaza North** will accommodate the relocation of businesses from regeneration sites including those in Waltham Cross, Brookfield, and Delamare Road; and
- **Brookfield** will provide for 2,000 new jobs by 2033 in a mix of sectors including retail and leisure at Brookfield Riverside, and local office provision.

2.2.5 Provision will be made for five new primary schools and a new secondary school, subject to the conclusions of the Secondary School Sites Development Plan Document (DPD).

3 Previous HRA Work

3.1 Introduction

3.1.1 Between 2017 and 2018 Lepus Consulting undertook an HRA of the Local Plan. This was reported upon in the 2018 HRA report.

3.1.2 The Screening exercise undertaken as part of the HRA concluded that a Likely Significant Effect (LSE) on Lee Valley SPA, as a result of increased public access and associated disturbances caused by the Broxbourne Local Plan, could not be objectively ruled out. In particular, this related to the increase in visitor and dog walkers at the SPA and the likely disturbance this would cause for northern shoveler (*Spatula clypeata*), great bittern (*Botaurus stellaris*) and gadwall (*Mareca strepera*) populations and habitats.

3.1.3 Natural England agreed with this conclusion and that the LSE would require further consideration in the form of an Appropriate Assessment. Natural England also advised that an LSE at Epping Forest SAC could not be objectively ruled out at the screening stage. This was due to potential air pollution impacts at Epping Forest SAC caused by cumulative increases in traffic on nearby roads that may result from the Local Plan in-combination with other plans and projects. Lastly, Natural England also advised that there was insufficient evidence in the Screening Report to rule out an LSE on Wormley Hoddesdonpark Woods SAC when cumulative impacts of the Local Plan with other plans and projects were considered in-combination.

3.1.4 The AA stage of the HRA therefore considered each European Site and the following LSEs:

- Public access associated disturbances LSE at Lee Valley SPA caused by the Broxbourne Local Plan alone;
- Air pollution and public access LSEs at Epping Forest SAC caused by the Broxbourne Local Plan in-combination; and
- Public access associated disturbances LSE at Wormley Hoddesdonpark Woods SAC caused by the Broxbourne Local Plan in-combination.

3.2 Disturbance associated with public access at Lee Valley SPA and Ramsar and Epping Forest SAC

3.2.1 The 2018 AA concluded that development proposed for the Borough could potentially lead to significant increases in the number of visitors and pet dogs being walked at the area of Lee Valley SPA that overlaps with Turnford & Cheshunt Gravel Pits SSSI. Residents at the 1,750 dwellings proposed at Delamare Road, which is located within 400m of the SPA and currently has limited access to suitable alternative natural green spaces (SANGS), could potentially rely on the SPA for regular use. The Council is therefore committed to a mitigation strategy for the SPA to ensure an adverse effect caused by the Local Plan does not arise.

3.2.2 This strategy is laid out in detail in the 2018 AA report (section 4.10) and was developed in conjunction with the Council, Natural England, the Lee Valley Regional Park Authority (LVRPA) and developers. The strategy focusses on managing visitor numbers, the provision of SANGS and the creation of new habitat for the SPA's qualifying features. The HRA concluded that an LSE on Lee Valley SPA could be objectively ruled out because of the Council's adopted mitigation strategy.

3.2.3 The HRA concluded that the scope for public access associated disturbances at Epping Forest SAC, caused by existing and prospective residents of Broxbourne is severely limited, with just 0.34% of visitors at the forest travelling from Broxbourne.

3.3 Air quality impacts at Epping Forest SAC

3.3.1 The AA concluded that development proposed in the Local Plan could potentially increase traffic on roads that run within 200m of Epping Forest SAC. This SAC is currently exposed to atmospheric nitrogen deposition levels that exceed the forest's 'critical load' and its conservation status may become further undermined by additional pollution.

3.3.2 A Memorandum of Understanding (MoU) has been produced by several local authorities to investigate, monitor, avoid and mitigate air pollution at the SAC.

3.3.3 Air pollution is a transboundary and in-combination effect and this MoU is considered to be the most appropriate strategy for protecting the conservation status of the SAC. The 2018 HRA notes that Broxbourne Borough Council are committed to helping ensure appropriate measures are adopted to protect the SAC through the MoU. It was concluded in the 2018 HRA that, based on the continued development of a monitoring and mitigation strategy for the SAC through the MoU, no adverse effect on the integrity of the SAC would occur due to the emerging Broxbourne Local Plan alone or in-combination.

3.4 Recreational disturbance at Wormley Hoddesdonpark Woods SAC

3.4.1 The potential for an adverse effect on the integrity of Wormley Hoddesdonpark Woods SAC as a result of the Broxbourne Local Plan, alone and in-combination, was explored through the 2018 HRA. Overall, the SAC was shown to be in good ecological condition, and it was considered unlikely that the Plan would exacerbate the SAC's threats and pressures. It was concluded that an LSE on the SAC, as a result of the Plan alone and in-combination, could be objectively ruled out.

3.5 Conclusion of the 2018 HRA

3.5.1 In summary, the 2018 HRA for the Broxbourne Local Plan concluded that, based on the Council's continued adoption and progress of the relevant monitoring and mitigation strategies, all potential LSEs on European sites caused by the Broxbourne Local Plan alone or in-combination could be objectively ruled out.

4 Consultation with Natural England

- 4.1.1 During the Examination period, the Planning Inspector instructed the Council to liaise with Natural England over Matter 9 (other development management policies – week 4) and in particular modifications to policies NEB2 and CH1. This has duly taken place and Natural England’s advice in relation to this matter is provided in **Appendix B**.
- 4.1.2 As can be seen in **Appendix B**, Natural England requested that the wording of Policy NEB2 be modified to state that the Epping Forest SAC mitigation strategy be in place at the time of the Local Plan’s adoption.
- 4.1.3 The purpose of Natural England’s comment in this respect was to ensure that mitigation of impacts at Epping Forest SAC will be deliverable and enforceable at the time the Plan is operational. This is necessary to say with certainty that there will be no adverse impacts on the integrity of Epping Forest SAC as a result of the Plan and therefore ensure compliance with the Habitats Regulations.
- 4.1.4 Further consultation was undertaken with Natural England regarding modifications to Policy NEB2 in November and December 2019 (see **Appendix C**). This consultation took into consideration the emerging air quality work that is currently being undertaken to inform the HRA of the Epping Forest District Council Local Plan. The outcome of this consultation has informed the wording of this policy and the outcome of the HRA and is discussed further in **Section 8** below.

5 Methodology

5.1.1 This HRA report assesses the proposed main modifications. Unless otherwise stated, all assessment findings of the 2018 HRA (Appropriate Assessment) remain the same. The HRA process has engaged with four European sites:

- Epping Forest SAC;
- Lee Valley SPA and Ramsar; and
- Wormley Hoddesdonpark Woods SAC.

5.1.2 The assessment of the main modifications has been informed by the following guidance:

- Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites' - European Commission, 2001¹;
- The Habitat Regulations Assessment Handbook - David Tyldesley and Associates (referred to hereafter as the DTA Handbook), 2013 (in particular Part F: '*Practical Guidance for the Assessment of Plans under the Regulations*'²); and
- The Appropriate Assessment of Spatial Plans in England – A Guide to How, When and Why to do it - RSPB, 2007³.
- Planning Practice Guidance, 22nd July 2019: Appropriate Assessment.

5.1.3 Following the HRA methodology set out by DTA (as outlined in Chapter 2 of the 2018 HRA report) the Main Modifications have been screened for their LSEs on the above European sites (Stage 1).

¹ Assessment of plans and projects significantly affecting European sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC. European Commission Environment DG, November 2001

² Tyldesley, D., and Chapman, C., (2013) The Habitats Regulations Assessment Handbook, (October) (2018) edition UK: DTA Publications Limited.

³ RSPB (2007). The Appropriate Assessment of Spatial Plans in England. A Guide to How, When and Why to do it.

5.1.4 Following the screening stage, those Main Modifications which were identified as having the potential to result in LSEs were assessed further in the HRA through an Appropriate Assessment (Stage 2). The Main Modifications screened in were firstly reviewed to determine whether they could give rise to any adverse effect on site integrity different to those already assessed in the 2018 HRA. For any European site where a new or changed adverse effect could potentially occur as a result of a Main Modification, a detailed Appropriate Assessment was made for the European sites.

6 Screening

6.1.1 The results of the Main Modifications screening exercise are summarised in **Appendix A**. Each modification was assessed in terms of its ability to give rise to a new LSE when compared to the 2018 HRA. A number of main modifications were screened out. Those modifications that were considered likely to result in new LSEs are summarised in **Table 6.1** below.

6.1.2 For those modifications where screening was unable to rule out LSEs for the Main Modifications in respect of the European sites, more detailed Appropriate Assessment was carried out, as set out in **Chapters 7 and 8**.

Table 6.1: Summary of screening that has identified LSEs in association with the Main Modifications

Main Modified Policy	Description of LSE	European Site
BX3: Gas Distribution Station	This allocation was not included in the emerging Broxbourne Local Plan which was subject to the 2018 HRA. This is because the site was included as part of the brownfield register / SLAA. This is a new policy and site allocation for 35 dwellings and has the potential to result in new LSE. This will be subject to further evaluation as part of the HRA.	Lee Valley SPA and Ramsar <ul style="list-style-type: none"> Public access and disturbance
Policy CH2: Rosedale Park	The allocation under Policy CH2 allows for an additional 10 homes. Whilst the scale of this increase is small in magnitude, the potential for new LSEs cannot be ruled out and will be considered further in the HRA.	
Policy HOD2: 19 Amwell Street and Scania House	This allocation was not included in the emerging Broxbourne Local Plan which was subject to the 2018 HRA. This is because the site was included as part of the brownfield register / SLAA. This is a new site allocation for 60 dwellings and has the potential to result in new LSEs. This will be subject to further evaluation as part of the HRA.	
Policy HOD3: Former Hoddesdon Police Station	This allocation was not included in the emerging Broxbourne Local Plan which was subject to the 2018 HRA. This is because the site was included as part of the brownfield register / SLAA. This is a new site allocation for 30 dwellings and has the potential to result in new LSEs. This will be subject to further evaluation as part of the HRA.	
Policy HOD 8: Westfield Primary School Site	This allocation was not included in the emerging Broxbourne Local Plan which was subject to the 2018 HRA. This is because the site was included as part of the brownfield register / SLAA. This is a new site and allocation for 40 dwellings and has the potential to result in new LSEs. This will be	

Main Modified Policy	Description of LSE	European Site
	subject to further evaluation as part of the HRA.	
Policy HOD6: East of Dinant Link Road	This allocation was not included in the emerging Broxbourne Local Plan which was subject to the 2018 HRA. This is because the site was included as part of the brownfield register / SLAA. This is a new site and allocation for 35 dwellings and has the potential to result in new LSEs. This will be subject to further evaluation as part of the HRA.	
Policy WC3: Theobalds Grove Station Car Park	This allocation was not included in the emerging Broxbourne Local Plan which was subject to the 2018 HRA. This is because the site was included as part of the brownfield register / SLAA. This is a new site and allocation for 50 dwellings and has the potential to result in new LSEs. This will be subject to further evaluation as part of the HRA.	
NEB2: Wildlife Sites	This modification relates to mitigation set out in the 2018 HRA. It also reflects additional modifications raised by Natural England during HRA liaison and discussion following the examination process. It aims to ensure that the plan is effective in ensuring that mitigation measures relating to the Lee Valley SPA and the Epping Forest SAC are implemented in a timely and appropriate manner. Whilst this policy will not create any LSEs itself, its impact in terms of the HRA will be subject to further evaluation as it is a bespoke policy intended to avoid or reduce harmful effects on a European site.	Epping Forest SAC <ul style="list-style-type: none"> • Public access and disturbance • Air quality
Policy CH1: Cheshunt Lakeside	This policy relates specifically to the protection of the Lee Valley SPA and Ramsar site in order to ensure that mitigation is implemented in a timely and effective manner. Whilst modifications to this policy will not result in changes to the scale of development proposed in the emerging Broxbourne Local Plan that was subject to the 2018 HRA, its application in terms of mitigation within the HRA will be considered further as it is a bespoke policy intended to avoid or reduce harmful effects on a European site.	Lee Valley SPA and Ramsar <ul style="list-style-type: none"> • Public access and disturbance

6.1.3 In summary, the screening process was unable to rule out all LSEs as a result of the Main Modifications and these have therefore been considered further in the HRA process (**Chapters 7 and 8**).

7 Appropriate assessment: Lee Valley SPA and Ramsar

7.1 Introduction

7.1.1 The screening process was unable to rule out LSEs on the Lee Valley SPA and Ramsar site in terms of public access and disturbance issues from a number of Main Modifications. These have therefore been subject to a more detailed Appropriate Assessment.

7.1.2 The Main Modifications include a number of new site allocations and a change in dwelling numbers at one existing allocation. It is noted that the overall number of housing proposed as part of the Local Plan remains the same with the distribution of numbers being the key element that has changed as a result of the modifications.

7.1.3 In addition, a number of policies that specifically relate to the protection of the Lee Valley SPA and Ramsar and Epping Forest SAC have been included.

7.2 Baseline

7.2.1 The Lee Valley SPA and Ramsar is located within the Lee Valley Regional Park (LVRP). The LVRP covers a total area of 4,000ha, 429ha of which lies within the Borough of Broxbourne. It offers a variety of amenity services to Broxbourne, including the Olympic facilities at the Lee Valley White Water Centre, the River Lee, the Lee Navigation and a network of lakes, woodlands, wetlands, paths and wildlife habitats.

7.2.2 Of the 4,000ha park, 447.87ha has been classified as a SPA and listed as a Ramsar site, and consists of the following habitats:

- Inland water bodies (67%);
- Improved grassland (10%);
- Broad leaved deciduous woodland (10%);
- Humid or mesophile grassland (8%);
- Bogs, marshes, water fringed vegetation and fens (4%); and
- Other land (1%).

7.2.3 These habitats of Lee Valley were classified as SPA and designated as Ramsar because they are considered to support the following:

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- 6% of the UK population of great bittern (*Botaurus stellaris*);
 - 1% (1.9% according to Ramsar) of the UK population of wintering northern shoveler (*Anas clypeata*); and
 - 1.5% (2.6% according to Ramsar) of the UK population of wintering gadwall (*Anas strepera*).

7.2.4 The conservation objectives for this SPA are to ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely;
- The population of each of the qualifying features; and
- The distribution of the qualifying features within the site.

7.2.5 There are four areas of Lee Valley SPA and Ramsar located within 15km of Broxbourne and considered in this AA. Each of these areas overlaps with an SSSI:

- Walthamstow Reservoirs SSSI;
- Rye Meads SSSI;
- Amwell Quarry SSSI; and
- Turnford & Cheshunt Gravel Pits SSSI.

7.2.6 Each of these areas of Lee Valley SPA and Ramsar is host to a range of habitats and population dynamics of the qualifying fauna. They are also under different management regimes that offer varying levels of public access.

7.2.7 Only a relatively minor portion of the Walthamstow Reservoirs SSSI is located within 15km of Broxbourne. The remainder are between 15km and 20km away. Recreational access to the reservoirs is controlled via permits and it is therefore considered highly unlikely that the Local Plan would affect these reservoirs in any way. They are therefore not included any further in this assessment.

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- 7.2.8 Rye Meads SSSI covers 58.5ha and predominantly comprises flood meadows and lagoons that host important UK populations of gadwall, great bittern and northern shoveler. It lies adjacent to the northern border of the Borough. The SSSI also overlaps with the Rye Meads Nature Reserve, which is managed by the RSPB and Herts and Middlesex Wildlife Trust. Entry to Rye Meads is free for the public all year round. Clearly marked footpaths and boardwalks with screening vegetation direct visitors away from sensitive areas. This allows for potentially high numbers of visitors whilst minimising the potential for disturbance. Dogs are not allowed entry to the reserve (apart from registered assistance dogs). The wet, marshy and open water nature of this portion of the SPA makes exploring off the designated footpath more difficult and less appealing for visitors. Swimming is actively discouraged by the Herts & Middlesex Wildlife Trust.
- 7.2.9 Amwell Quarry is the 36.96ha portion of the SPA north of the Borough, designated as a SSSI; it is also a Herts & Middlesex Wildlife Trust Nature Reserve. Comprised of six former gravel pits that are now lakes, it hosts important populations of gadwall, northern shoveler and great bittern. Amwell Quarry is managed by the Herts & Middlesex Wildlife Trust and is open to the public all year round with free entry. Recreational visits are actively encouraged and marketed, particularly for the popular Dragonfly Trail that is open from May to September each year. Amwell Quarry is laid out in considerable detail with a network of three hides, clearly marked footpaths and boardwalks with screening vegetation. The route is designed to direct visitors away from the sensitive areas and minimise disturbance from the high number of visitors it can accommodate. The wet, marshy and open water nature of this portion of the SPA makes exploring off the designated footpath relatively difficult and unappealing for visitors. Swimming is actively discouraged by the Herts & Middlesex Wildlife Trust. Dogs are not allowed on the boardwalk leading to the White Hide or on the Dragonfly Trail.

7.2.10 Turnford & Cheshunt Gravel Pits is comprised of 10 former gravel pits with a combined 7.2km shoreline. It is recognised as being one of the centre pieces of the River Lee Country Park and lies on either side of the eastern border of Broxbourne. The three lakes of the SPA which overlap with the SSSI are the North Metropolitan Lake, Seventy Acres Lake and Bowyer’s Water. This area of the SPA hosts important populations of gadwall, northern shoveler and great bittern. Being a part of the LVRP, it is managed by the statutory body Lee Valley Regional Park Authority (LVRPA). The LVRPA has a management plan and wide remit which includes being responsible for “*regenerating derelict and neglected land into high quality public open spaces and wildlife habitats of ecological importance*”. Visitor accommodation is available at the Lee Valley Youth Hostel, just south west of Cheshunt Lake. Recreational activity at this portion of the SPA is similarly regulated through the zoning of water bodies, although is generally more informal than at other areas and the provision of formal recreational facilities is limited. The wet, marshy and open water nature of this portion of the SPA makes exploring off the designated footpath relatively difficult and unappealing for visitors. Dogs are allowed at this location of the SPA.

7.3 Previous 2018 HRA findings

7.3.1 In terms of public access and disturbance issues, the 2018 HRA identified that development set out in the Local Plan had the potential to lead to significant increases in the number of visitors and pet dogs being walked at the area of Lee Valley SPA and Ramsar that overlaps with Turnford and Cheshunt Gravel Pits SSSI. It noted that residents at the 1,750 dwellings proposed at Delamare Road, which is located within 400m of the SPA and currently has very limited access to SANGS, could potentially rely on the SPA for regular use.

7.3.2 The 2018 HRA therefore proposed a mitigation strategy to ensure the adequate protection of Lee Valley SPA and Ramsar and its qualifying features. The strategy focussed on managing visitor numbers, the provision of SANGS and the creation of new habitat for the SPA’s qualifying features. This was supported in the Local Plan by Policy CH1 Cheshunt Lakeside. Based on the adoption of this mitigation, the HRA concluded that adverse effects on site integrity caused by public access associated disturbances at Lee Valley SPA and Ramsar (alone and in-combination), due to development proposed in the Local Plan, could be objectively ruled out.

7.4 Potential effect of main modifications

7.4.1 It is anticipated that the following impact pathways have the potential to result in significant effects as a result of the Main Modifications in terms of public access and disturbance:

- Public access and associate disturbance (e.g. dog walking); and
- Cat predation.

7.4.2 The Main Modifications do not propose an overall increase in the number of dwellings over the Plan period (which remains at 7,718 to 2033). However, six sites that were previously included as part of the brownfield register / SLAA have now been included in the Local Plan as site allocations. The number of dwellings proposed at one further site (CH2: Rosedale Park – South of Andrews Lane) has increased by 10 dwellings. The proximity of these sites in relation to the Lee Valley SPA and Ramsar is presented in **Table 7.1**.

Table 7.1: Distance of new site allocations to Lee Valley SPA and Ramsar

Site Allocation	Number of dwellings	Distance to Lee Valley SPA and Ramsar
BX3: Gas Distribution Station	35	2407m, south west of Rye Meads SSSI. Separated by the River Lee Navigation, with the only nearby bridge being the walled off and narrow Rye Road. Site adjacent to Lee Valley Country Park.
CH2: Rosedale Park (South of Andrews Lane)	60 (an extra 10 dwellings when compared to pre-modification dwelling number)	2927m, west of Turnford and Cheshunt Pits SSSI. Green space located immediately adjacent to the site (recreational fields) and to its south west. The 2018 HRA concludes that the Rosendale Park site as a whole contains sufficient ANGS.
HOD2: 19 Amwell Street and Scania House	60	1442m, south west of Rye Meads SSSI. Separated by the River Lee Navigation, with the only nearby bridge being the walled off and narrow Rye Road. Pound Close recreation ground located 320m to its north east.
HOD3: Former Hoddesdon Police Station	30	2196m, south west of Rye Meads SSSI. Separated by the River Lee Navigation, with the only nearby bridge being the walled off and narrow Rye Road. Site adjacent to Lee Valley Country Park.
HOD 8: Westfield Primary School Site	40	1789m, south west of Rye Meads SSSI. Separated by the River Lee Navigation, with the only nearby bridge being the walled off and narrow Rye Road. Green space located to its west.
HOD6: East of Dinant Link Road	35	1101m, south west of Rye Meads SSSI. Separated by the River Lee Navigation, with the only nearby bridge being the walled off and narrow Rye Road. Site located to the north of the Lee Valley Country Park.
WC3: Theobalds Grove Station Car Park	50	644m, west of Turnford and Cheshunt Pits SSSI. Separated by the railway line. Recreational land available approximately 400m to the north west.

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- 7.4.3 Public access / disturbance can take a number of forms. Physical disturbance may include damage to habitats through erosion, troubling of grazing stock, causing changes in behaviour to animals such as birds at nesting and feeding sites, spreading invasive species, litter and fly-tipping, tree climbing, wildfire and arson, noise and light pollution and vandalism. Typically, disturbance of habitat and species is the unintentional consequence of people’s presence which can impact breeding success and survival. In particular, problems can be associated with dogs and cats, such as predation, disturbing birds and dog fouling⁴.
- 7.4.4 The 2018 HRA notes that the roaming distance for cats can varies, and can reach up to and over 1,500m⁵. At least 60% of cats are thought to roam up to 400m, and hence Thames Basin Heaths SPA prohibits buildings located within 400m of its boundary to protect its qualifying bird populations⁶.
- 7.4.5 The Thames Basin Heaths SPA Delivery Framework⁷ states that there will be a presumption against development located within 400m of a European site. Within a 400m to 5km zone from the perimeter of a European Site avoidance measures are considered necessary to avoid recreational impacts. It also notes that applications for large scale development (i.e. those comprising more than 50 houses which are located between 5-7km from the edge of the European site) would be considered on a case-by- case basis.

⁴ Natural England (2015). Public Access and Disturbance Theme Plan. <http://publications.naturalengland.org.uk/file/5969396536180736>. [Date Accessed: 06/08/19]

⁵ Barratt, D.G. (1997) Home range size, habitat utilisation and movement patterns of suburban and farm cats *Felis catus*. *Ecography*, 20, 271-280

⁶ Ibid.

⁷ Thames Basin Heaths Joint Strategic Partnership Board (2009). Thames Basin Heaths SPA Delivery Framework. <https://www.bracknell-forest.gov.uk/sites/default/files/documents/thames-basin-heaths-spa-delivery-framework.pdf>. [Date Accessed: 06/08/19].

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- 7.4.6 Whilst it is recognised that the European sites considered in this report are designated for site specific qualifying features which do not reflect those for which the Thames Basin Heaths SPA has been designated, the Delivery Framework provides a conservative guide to the likely buffer zone within which recreational impacts can be experienced. As can be seen all allocations, with the exception of HOD2: Rosedale Park (South of Andrews Lane), propose 50 or less dwellings. Rosedale Park South of Andrews Lane site proposes 60 dwellings in total. All sites are located more than 400m from a European site.
- 7.4.7 Whilst the SPA lies in close proximity to the Borough, various barriers are considered to limit the potential routes by which residents and their pets can access, and subsequently have an impact upon, the SPA. These are considered in detail in the 2018 HRA.
- 7.4.8 The 2018 HRA notes that the LVRPA has advised that whilst they actively encourage visitors to use the site, dogs have proved to be a particular issue through reed disturbance and entering the water. It is however unlikely that all new dogs introduced into the Borough will be walked at Lee Valley SPA. The 2018 HRA notes that Broxbourne offers a high quantity and quality of natural and open spaces to its residents, including the River Lee Navigation and concludes that most new residents are therefore anticipated to have excellent access to high quality green spaces suitable for recreational activities and dog walking.
- 7.4.9 **Table 7.1** includes an evaluation of existing green space provision in proximity to the new site allocations.
- 7.4.10 In-combination effects are likely to remain as assessed in the 2018 HRA as the overall quantum of development remains unchanged.

7.5 Mitigation

- 7.5.1 Main Modifications to Policies NEB2: Wildlife Sites and CH1: Cheshunt Lakeside aim to ensure implementation of the mitigation strategy set out in Section 4.10 of the 2018 HRA in terms of public access and disturbance impacts at the Lee Valley SPA and Ramsar.

7.5.2 Mitigation involves the adoption of a mitigation strategy containing a range of on-site and off-site measures. These include visitor and baseline ecological surveys, creation of new habitat and a commitment to ensure that new residential development will be permitted in line with the Natural England ANGS⁸. Of particular importance is access to a 2ha site within 300m and a 20ha site within 2km. Policy CH1 notes that this mitigation will be in place by the time that any planning permission is granted.

7.5.3 Policy NEB2: Wildlife Sites, requires development at Cheshunt Lakeside to ensure that adverse impacts at Lee Valley Country Park are avoided and mitigated through the implementation of the mitigation strategy outlined in Section 4.10 of the 2018 HRA and as detailed in Policy CH1.

7.6 Conclusions

7.6.1 In conclusion, given the scale of development proposed at each allocation (60 and less dwellings), the distance of each allocation at more than 400m from a European site, the presence of existing green space and the commitment to mitigation set out in Policies CH1 and BE2, it is not considered that there will be an adverse impact on the integrity of the Lee Valley SPA and Ramsar as a result of the Main Modifications either alone or in-combination. The findings of the 2018 HRA remain unchanged.

⁸ Natural England (2010) 'Nature Nearby' Accessible Natural Greenspace Guidance

8 Appropriate Assessment: Epping Forest SAC

8.1 Background

8.1.1 Epping Forest SAC is a large ancient wood-pasture habitat of high nature conservation value. Habitats at the SAC include extensive and ancient semi-natural woodland, old grassland plains including a variety of unimproved acid grasslands, wet and dry heathland and scattered wetlands.

8.1.2 Epping Forest is subject to high recreational pressure. There is a high level of footfall throughout the year, including some periods of significant use, which is having a diverse range of impacts including mountain biking and unmanaged fires.

8.1.3 Good air quality is recognised as a key environmental condition for the SAC. At the site, wet heathland with cross leaved heath and beech forests on acid soils habitats are under pressure from poor air quality, with atmospheric nitrogen deposition a particular concern.

8.2 Previous 2018 HRA findings

8.2.1 The West Essex / East Hertfordshire Housing Market Area (HMA) Partnership⁹ is responsible for cooperatively managing the potential impacts of growth on Epping Forest SAC. These include both recreational and air quality impacts. As noted in the 2018 HRA and at **Section 3.3** Broxbourne Borough Council are committed to helping ensure appropriate measures are adopted to protect the SAC through signing up to a MoU which will implement a mitigation strategy.

⁹ The West Essex/East Hertfordshire Housing Market Area (HMA) comprises four councils: East Hertfordshire District Council, Epping Forest District Council, Harlow District Council and Uttlesford District Council.

8.2.2 To date an interim strategy has been prepared to deal with recreational pressures and is available on the Council's website¹⁰. This is based on a detailed evidence base comprising visitor survey work¹¹. Broxbourne Borough Council falls with the outer zone of influence in terms of recreational pressures. Local Plan policy (Policy NEB2 – Wildlife Sites) will therefore ensure compliance with this interim strategy which will be mitigated through financial contributions towards access management and monitoring measures.

8.2.3 The 2018 HRA concluded that Broxbourne Council are committed to signing the MoU and positively contributing towards a strategy to protect the SAC. It therefore concluded that no adverse effect on the integrity of the SAC would occur due to the emerging Broxbourne Local Plan alone or in-combination.

8.3 Epping Forest District Council Local Plan – HRA work

8.3.1 The Inspector for Epping Forest Local Plan has raised significant issues relating to the Local Plan in relation to the HRA and has advised that *“she cannot conclude beyond reasonable scientific doubt (as the parties all agree that I must) that the Plan will not adversely affect the integrity of the SAC until steps have been taken towards resolving it.”*¹² The Epping Forest SAC interim strategy does therefore not currently address potential air pollution impacts as these impacts are still being assessed and mitigation measures considered as part of further HRA work. Once the Epping Forest District Council Local Plan and associated HRA is appropriately qualified, the air quality element of this mitigation strategy will be published.

¹⁰ Available at: <http://www.efdclocalplan.org/wp-content/uploads/2019/01/EB134-Interim-Approach-to-Managing-Recreational-Pressure-on-the-Epping-Forest-Special-Area-of-Conservation-Oct-2018.pdf>

¹¹ Liley, D., Panter, C., Weitowitz, D. & Saunders, G. (2018). Epping Forest Visitor Survey 2017. Unpublished report by Footprint Ecology for the Corporation of London. Available at: https://ex.broxbourne.gov.uk/sites/default/files/Documents/Planning_Policy/Epping%20Report%20Visitor%20Survey%20Report%202017.pdf

¹² <http://www.efdclocalplan.org/wp-content/uploads/2019/08/ED98-Epping-Forest-Post-hearing-Advice-Aug-2019-V1-final.pdf>

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- 8.3.2 Since preparation of the 2018 HRA, a significant amount of additional technical work in relation to in-combination adverse air quality impacts has been undertaken as part of the evolving HRA for the Epping Forest District Council Local Plan. This is reported upon in the AECOM report (January 2019, Version 3) Habitats Regulations Assessment of Epping Forest District Council Local Plan¹³.
- 8.3.3 This additional technical work considered other key plans and projects that could influence the quantity and location of housing and commercial/industrial development over the lifetime of the District Local Plan. This work considered growth outside the District including other HMA authorities, Harlow, Uttlesford and East Hertfordshire, as well as neighbouring Broxbourne and other eastern outer London Boroughs. Appendix C of the 2019 Epping Forest HRA report provides a detailed traffic modelling technical note which sets out the parameters which fed into the air quality work to ensure that it took account of the full anticipated Local Plan growth in the wider area. These parameters include the provision of 7,718 new homes in Broxbourne between 2016 and 2033 (i.e. the growth set out in the Broxbourne Local Plan). The study area and methodology for this additional technical work were agreed with Natural England and the Conservators of Epping Forest (refer to Appendix D of the 2019 Epping Forest HRA report).
- 8.3.4 The additional technical work concluded that growth in Epping Forest District between 2014 and 2033 is the primary source of additional ammonia and NO_x emissions on the modelled road sections and that all other plans and projects (including the Broxbourne Local Plan) make a negligible contribution to the in-combination effect.
- 8.3.5 It can therefore be concluded that the Broxbourne Local Plan is unlikely to lead to an adverse impact on the integrity of Epping Forest SAC as a result of changes to air quality from growth specified in the Local Plan either alone or in combination with other plans and projects.
- 8.3.6 Natural England's letters of 06 November 2019 and 04 December 2019 (**Appendix C**) concur with this conclusion. Natural England have advised that:

¹³ AECOM. January 2019. Habitats Regulation Assessment of Epping Forest District Council Local Plan. Available at: http://www.efdclocalplan.org/wp-content/uploads/2019/02/Epping-Forest-Local-Plan-HRA-2019_v3.pdf

- The air quality assessment, which included the Local Plan allocations within Broxbourne Borough, concluded that there would be negligible impacts from such development alone and that Epping Forest Local Plan is the dominating contributor of pollutant emissions when considered in-combination with surrounding authorities.
- Based on the conclusions of the additional air quality work (undertaken as part of the Epping Forest District Council Local Plan HRA dated January 2019) it would be reasonable to assume that responsibility for mitigating air quality impacts at Epping Forest SAC should reside with Epping Forest District Council.

8.3.7 Should the additional air quality HRA work undertaken by Epping Forest District Council indicate that this conclusion is no longer valid in relation to Broxbourne’s relative contribution to air quality impacts then the Broxbourne Local Plan will need to be amended accordingly.

8.3.8 In response to this additional technical work and subsequent consultation with Natural England, a further round of modifications to Policy NEB2 have been made. These further modifications are provided at **Appendix A** and screened in terms of the HRA process.

8.4 Potential effect of main modifications and mitigation

8.4.1 The Main Modifications do not propose an overall increase in the number of dwellings set out in the Local Plan. Therefore, it is not expected that there will be any change to the conclusions of the 2018 HRA in respect of recreation or air quality impacts at Epping Forest SAC.

8.4.2 The Main Modification to Policy NEB2: Wildlife Sites, strengthens the Council’s commitment to contribute towards the measures set out in the Epping Forest mitigation strategy in terms of recreational mitigation and embraces the recommendations set out in the 2018 HRA.

8.4.3 Policy NEB2 also now recognises emerging technical work that has been prepared to support the Epping Forest District Council Local Plan and HRA which concludes that other plans and projects (including Broxbourne Local Plan) would have a negligible contribution to air pollution at Epping Forest SAC. As such no adverse impacts on the integrity of the SAC from the Local Plan alone or in-combination are anticipated, and no mitigation in this respect is required.

8.5

Conclusion

- 8.5.1 The proposed Main Modifications are not expected to adversely affect any European site so long as the proposed mitigation set out in the 2018 HRA can be implemented. The revised wording to Policy NEB2 reflects Natural England’s recommendations and provides strengthened protection to Epping Forest SAC in terms of recreational mitigation.

9 Conclusions

9.1 Summary

- 9.1.1 A review of the Main Modifications has indicated potential LSEs associated with a number of new site allocations at the Lee Valley SPA and Ramsar in terms of public access and disturbance issues, and at Epping Forest in terms of air quality and recreational disturbance issues. Following more detailed assessment, it has been concluded that the Main Modifications would not have an adverse impact on the site integrity of a European site.
- 9.1.2 The wording of Policy NEB2 has now been strengthened to take into consideration emerging technical work that has been prepared to support the interim Epping Forest District Council Local Plan HRA and consultation with Natural England. It also recognises the existence of interim advice on this matter in terms of recreational impacts.
- 9.1.3 Recreational impacts were identified at Epping Forest SAC and an interim mitigation strategy is in place to address these. There is not expected to be any adverse effect on site integrity following the implementation of this strategy.
- 9.1.4 Drawing on recent air quality research prepared to better understand the potential impacts of development on air quality at Epping Forest SAC, the Broxbourne Local Plan is unlikely to make any significant contribution to air pollution at Epping Forest SAC. There is not expected to be any adverse effect on site integrity at Epping Forest SAC arising from air quality impacts from the Broxbourne Local Plan.

Appendix A: Schedule of Main Modifications

Appendix A: Summary of main modifications and implications for HRA

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Brookfield Riverside	The Local Plan seeks to strengthen the identity of the Borough by expanding and improving the Brookfield centre by extending Brookfield northwards up to and beyond the Turnford junction on the A10. Centred on the New River, this retail and commercial hub will be called 'Brookfield Riverside', and will consist of a vibrant centre to complement the Borough's existing towns. It will include modern shopping and leisure facilities including a department store, cinema, cafes and restaurants, and feature a civic centre, a business campus , health centre, bus station, and about 250 apartments and elderly people's accommodation within a mixed use and green environment.	Business campus not justified. See Council's response to inspector's Post-Hearings Advice Note (EXAM29A), 25 February 2019. See modifications to Brookfield Chapter.	No. The proposed modification does not give rise to development or other change but removes reference to a business campus.
Jobs	The draft Local Plan proposes between 6,000 and 7,000 <u>5,000 and 6,000</u> net additional jobs by 2033, with the possibility of significantly more in the longer term.	To reflect deletion of the business campus adjacent to the Turnford interchange and reduction in the comparison retail floorspace at Brookfield Riverside.	No. This modification proposes a reduction in net additional jobs. The modification is to reflect the deletion of the 'business campus' next to the Turnford Interchange. This number is below the number of jobs that were proposed in the emerging Broxbourne Local Plan 2018 - 2033 (referred to hereafter as the Broxbourne Local Plan) which was subject to the Lepus 2018 HRA. This modification will not change the conclusions of the 2018 HRA.
Jobs	<ul style="list-style-type: none"> Brookfield will provide for 3,000 <u>2,000</u> new jobs by 2033 in a mix of sectors including retail and leisure at Brookfield Riverside, and office-based work at the new business park <u>local office provision</u>. 	To reflect the deletion of the business campus at Brookfield and the reduction in the retail floorspace at Brookfield Riverside. See modifications to Chapter 5) Brookfield.	No. This modification proposes a reduction in net additional jobs. The modification is to reflect the deletion of the 'business campus' next to the Turnford Interchange. This number is below the number of jobs that were proposed in the emerging Broxbourne Local Plan which was subject

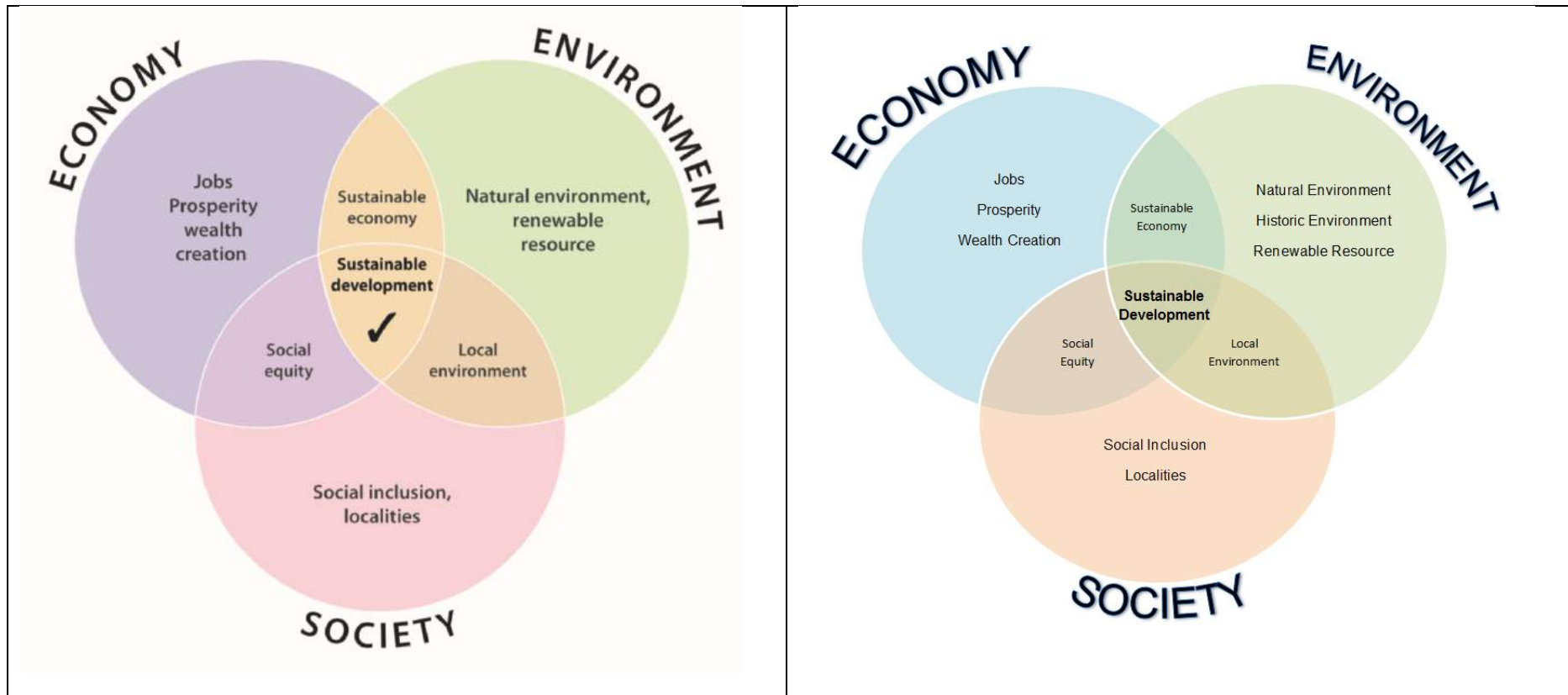
POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
			to the Lepus 2018 HRA. This modification will not change the conclusions of the 2018 HRA.
Environment	The draft Local Plan aims to protect and enhance the natural, historic, and built environment for its visual beauty, leisure and recreation value, ecology and heritage. Within the urban area, a comprehensive network of open spaces will be protected through Local Plan designations. Publicly accessible Local Green Space <u>open space</u> will be created as part of a new Green Infrastructure network at Rosedale Park, retaining separation between existing settlements in the area. At Brookfield a green spine will be created along the Turnford Brook along with new community woodland, and a New Local Green Space <u>new open space</u> will be created at Park Plaza West.	Local Green Space designation not consistent with national policy. See modifications to Chapter 24: Open Space, Recreation, and Community Facilities.	No. This modification relates to a minor change to the wording in relation to open space. This will not result not give rise to development or other change and no new likely significant effects are anticipated.
Schools	The Local Plan identifies provision for a new Secondary School at Church Lane, Wormley. New primary schools are planned for at: High Leigh Garden Village, Hoddesdon; Albury Farm, Cheshunt; Rags Brook (within the Rosedale Park development); and also at Brookfield and Cheshunt Lakeside. Expansion proposals for a number of existing primary schools across the Borough are set out in the draft Plan. <u>Regarding secondary education provision, the Local Plan includes a policy requirement for the Council to prepare a Development Plan Document to review the needs case and timing for a new secondary school, and to identify a suitable and deliverable site or sites to meet identified secondary education needs.</u>	To ensure that the plan is consistent with national policy for Green Belt, justified and effective. See Council’s response to Action Point 6 (EXAM17A). See modifications to policy INF10 (Chapter 17 – Infrastructure).	No. This modification removes the commitment to provide a new secondary school during the plan period. The requirement for a new school will be subject to a Development Plan Document. This DPD will be subject to HRA if considered appropriate.

1: Introduction to the Local Plan

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Paragraph 1.1	The consultation draft Local Plan sets out proposals for how Broxbourne will grow and develop to become a more desirable and prosperous place to live, work and visit. It covers the period 2018-2033 and consists of a Written Statement (this document) and a Policies Map. Once adopted, the policies in the new Local Plan will replace the policies in the Local Plan 2005. The policies in this Plan supersede the policies contained within the Broxbourne Local Plan 2001-2011, the majority of which were saved in 2008. A full list of superseded policies is available at Appendix F.	To ensure compliance with Regulation 8, paragraph 5 of the Town and Country Planning (Local Planning) (England) Regulations 2012. See inspector’s Supplementary Question 10A.	No. This modification will not give rise to development but ensure reference is correctly made to policies. This modification refers to a general administrative statement. No new likely significant effects are anticipated.

Figure 1: Sustainable Development

Submitted Plan	Proposed Modification
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Reason: To ensure that the plan is consistent with national policy in the emphasis given to both the historic and natural environment.

Could the Proposed Main Modification give rise to a new likely significant effect? No. the modification represents a visual change to the figure and does not represent a change which will lead to development.

2: Vision and Objectives

There are no main modifications proposed at this stage.

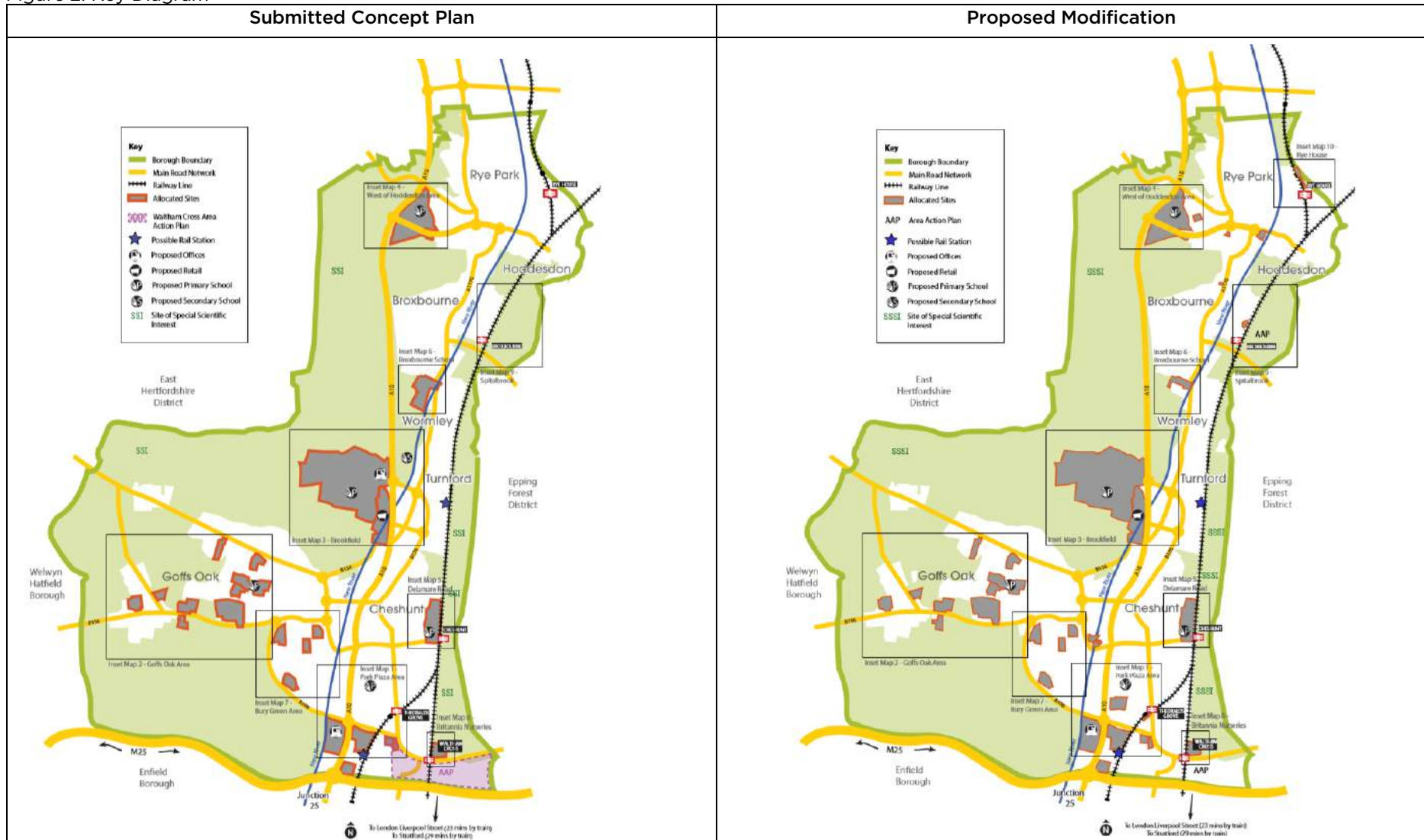
3: Development Strategy

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Paragraph 3.2	3.2 An extensive evidence base has been prepared to inform the levels of growth to be planned for to 2033. As a result, the Council has concluded that there is a need for 7,718 new homes, an average of 454 per annum, that it should plan for in excess of 6,500 between 5,000 and 6,000 new jobs, around 40,000 <u>24,000</u> square metres of new retail space (including around 33,500 <u>2,000</u> already <u>consented</u> at Brookfield) and 10,000 square metres of new leisure space.	To ensure that the plan is justified and consistent with national policy.	No. This modification proposes a reduction in the number of new jobs that the Council should plan for. The modification is to reflect the deletion of the 'business campus' next to the Turnford Interchange. This number is below the number of jobs (and area of new retail space) that was proposed in the emerging Broxbourne Local Plan which was subject to the Lepus 2018 HRA. This modification will not change the conclusions of the 2018 HRA and no new likely significant effects are anticipated.
Paragraph 3.3	3.3 ... In particular, there will be a need for new rail and bus services, a better functioning road network, <u>possibly</u> a new secondary school, five new primary schools and new health care facilities.	For consistency with modifications to Policy INF10: Secondary School Sites DPD.	No. This modification will not result in a change to the scale of development that was proposed in the emerging Broxbourne Local Plan and which was subject to the Lepus 2018 HRA. This modification will therefore not change the conclusions of the 2018 HRA and no new likely significant effects are anticipated.
Paragraph 3.4	3.4 ...It has therefore prioritised appropriate land within the existing urban area and has identified scope to provide for an additional 2,250 <u>3,633</u> new homes on urban sites.	2,250 not justified. Amended urban capacity figure set out in the Urban Capacity Update (EXAM26A).	No. This modification proposes an increase in the number of homes on urban sites (from 2,250 to 3,633). However, overall the plan aims to deliver 8,000 dwellings from 2016/17 to 2032/33, which exceeds the Objectively Assessed Need (7,718 homes in the period 2016-2033). These totals have not been changed as a result of any modification made to the Plan. Given the

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
			overall number of dwellings to be delivered as a result of the Local Plan has not changed there will be no changes to the findings of the 2018 HRA and no new likely significant effects are expected.
Paragraph 3.6	3.6 The Council has consequently identified scope to provide for at least 3,733 <u>3,422</u> new homes and in excess of 6,500 <u>around 5,000</u> new jobs within the Green Belt.	Number of new homes in the Green Belt is set out in Council’s Matter 3 hearing statement, in response to MIQ44. Jobs estimate reduced to take account of deletion of business campus and reduction in retail floorspace at Brookfield.	No. This modification proposes a decrease in the number of new homes and jobs within the Green Belt. However, overall the plan aims to deliver 8,000 dwellings from 2016/17 to 2032/33. This total has not changed as a result of any modification made to the Plan. Given the overall number of dwellings to be delivered as a result of the Local Plan has not changed there will be no changes to the findings of the 2018 HRA and no new likely significant effects are expected.
Paragraph 3.7	5. Church Lane, Wormley – the Council’s preferred location for a new secondary school.	Not consistent with national policy in the Green Belt.	No. This modification will not result in development or other change.
Policy DS1: The Development Strategy	<p>Policy DS1: The Development Strategy</p> <p>Provision will be made for at least 7,718 homes in the period 2016-2033, as set out in the housing trajectory.</p> <p>Provision will be made for in excess of 6,500 <u>between 5,000 and 6,000</u> net additional jobs focusing on Brookfield, Park Plaza, Cheshunt Lakeside and the town centres;</p> <p>Provision will be made for e. 40,000 m² <u>approximately 24,000 square metres</u> of new retail development <u>(including 2,000 already consented at the Brookfield Retail Park)</u> and e. approximately 10,000m² <u>square metres</u> of new leisure development, primarily at Brookfield Riverside.</p>	<p>Modifications necessary to ensure that the policy is justified and consistent with national policy.</p> <p>Jobs provision reduced to take account of deletion of business campus and reduction in retail floorspace at Brookfield.</p> <p>Church Lane site note consistent with national policy in relation to Green Belt. See proposed modifications to Policy INF10: Secondary School Site DPD.</p>	<p>No.</p> <p>This modification proposes a reduction in the number of new jobs that the Council should plan for. The modification is to reflect the deletion of the ‘business campus’ next to the Turnford Interchange. This number is below the number of jobs (and area of new retail space) that was proposed in the emerging Broxbourne Local Plan which was subject to the Lepus 2018 HRA. The 2018 HRA represents a worst-case assessment and no new likely significant effects are anticipated. This modification removes the commitment to provide a new secondary school during the plan period. The requirement for a new school will be subject to a Development Plan Document.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>Strategic development sites will be at Cheshunt Lakeside, Waltham Cross High Street North, Brookfield Riverside, Brookfield Garden Village, Rosedale Park, High Leigh Garden Village, and Park Plaza and Church Lane, Wormley.</p> <p>Provision will be made for a new secondary school and five new primary schools and a new secondary school, subject to the conclusions of the Secondary School Sites DPD (policy INF10).</p>		<p>This DPD will be subject to HRA if considered appropriate.</p>
Paragraph 3.12	<p>3.12 In the event that there are difficulties in implementation of the development strategy, contingency planning will focus on bringing forward the reserve site at Maxwells Farm West (Policy CH8, Section 7) (Paragraph 7.23 and see Policy CH13, Section 7) or the Waltham Cross Area Action Plan (see Policy WC3 Policy WC4, SectionChapter 11).</p>	<p>To ensure that the Plan is effective. To ensure consistency with new Policy PP4 regarding Maxwells Farm West and Rush Meadow.</p>	<p>No. The removal of Maxwell’s Farm West will not result in additional development over and above that assessed in the 2018 HRA. No new likely significant effects have been identified.</p>

Figure 2: Key Diagram



Reason: to ensure consistency with modifications to the written statement, including in relation to Green Belt, site allocations, and employment.
 HRA: No. As per above textual screening comments.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Paragraph 3.14	3.14 The Local Plan requires that 40% of new housing should be affordable, of which 50% <u>65%</u> should be <u>social/affordable rent</u> and 50% starter/shared ownership homes <u>35% intermediate and shared ownership housing</u> .	To ensure consistency with Policy H1.	No. This policy relates to a policy listing general criteria and will not result directly in development or other change which could undermine the conservation objectives of a European site.
Paragraph 3.17	3.17 Table 1 and the housing trajectory indicate that there are sufficient identified sites in place to provide just over 8,000 dwellings from 2016/17 to 2032/33, exceeding the Council’s housing requirement for the plan period by 5% <u>8%</u> . The undersupply of housing in the years 2016/17-18 (amounting to 203 <u>416</u> dwellings) is addressed in the period 2017/18-2021/22 <u>2018-2023</u> . As identified in the 2016/17 Authority Monitoring Report (AMR), due to persistent under delivery the Council has applied a 20% buffer to housing targets during the first five years, brought forward from later years, to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land. The trajectory therefore adopts an annual target of 585 additional homes per annum for the period 2017/18-2021/22, an annual target of 409 additional homes per annum for the period 2022/23-2031/32 and 454 dwellings per annum in 2032/33.	To ensure consistency with modified Table 1.	No. This modification will not lead to an increase in development or other change which could undermine the conservation objectives of a European site.

Table 1: overview of housing supply [original]

Sources of Housing Supply	2016/17	2017/18- 2021/22	2022/23- 2026/2027	2027/2028- 2031/32	2032/33	Total
Completions	251	0	0	0	0	251
Commitments	0	1069	443	0	0	1512
Local Plan Allocations	0	1702	1772	1644	197	5315
Strategic Land Availability Sites	0	38	25	25	0	88
Brownfield Register/SLAA Sites	0	134	169	37	36	376
Windfall (small sites)	0	74	185	185	37	481
Self-Build Sites	0	20	25	25	5	75
Total Supply of Housing	251	3037	2619	1916	275	8098
Objectively Assessed Need (454 per year)	454	2270	2270	2270	454	7718
Shortfall from 2016/17 to be addressed in first five years	-203	203	-	-	-	-
20% buffer brought forward from later in the Plan period	-	454	-227	-227	-	-
Adjusted Total Requirement	251	2927	2043	2043	454	7718
Adjusted dwelling per annum requirement	251	585	409	409	454	7718
Difference between supply and requirement	0	110	576	-127	-179	380

Table 1: overview of housing supply [proposed modification]

<u>Sources of Housing Supply</u>	<u>2016/17- 2017/18</u>	<u>2018/19- 2022/23</u>	<u>2023/24- 2032/33</u>	<u>Total 2016-2033</u>
<u>Completions</u>	<u>492</u>	<u>0</u>	<u>0</u>	<u>492</u>
<u>Commitments</u>	<u>0</u>	<u>926</u>	<u>0</u>	<u>926</u>
<u>Local Plan sites</u>	<u>0</u>	<u>2,156</u>	<u>3,846</u>	<u>6,002</u>
<u>Windfall</u>	<u>0</u>	<u>140</u>	<u>700</u>	<u>840</u>
<u>Self-Build Sites</u>	<u>0</u>	<u>20</u>	<u>50</u>	<u>70</u>
<u>Total supply of housing</u>	<u>492</u>	<u>3,242</u>	<u>4,596</u>	<u>8,330</u>
<u>Objectively Assessed Need (454 per annum)</u>	<u>908</u>	<u>2,270</u>	<u>4,540</u>	<u>7,718</u>
<u>Shortfall to be addressed in first five years</u>	<u>0</u>	<u>416</u>	<u>0</u>	<u>0</u>
<u>20% buffer on need and shortfall</u>	<u>0</u>	<u>537</u>	<u>-537</u>	<u>0</u>
<u>Adjusted Total Requirement</u>	<u>908</u>	<u>3,223</u>	<u>4,003</u>	<u>7,718</u>
<u>Difference between total supply and requirement</u>	<u>-416</u>	<u>19</u>	<u>593</u>	<u>612</u>

Reason: to ensure that the plan is justified and consistent with national policy.

HRA: No. As per textual comments above.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	HRA
New paragraph 3.19	<p><u>3.19 For each of the Local Plan sites shown on the Policies Map an indicative dwelling figure is provided within the relevant policy in Part 3 of the Plan and in the list of sites in Table 2 below. The indicative dwelling figures are neither a minimum nor maximum, but rather an estimate of capacity to inform the plan making process and to provide a starting point for consideration of site-specific issues through the planning application process. In considering the merits of planning applications at the Local Plan sites, the Council will apply the dwelling numbers in the context of sustainable place-making, to achieve efficient use of land through a design-led approach. Proposals at Local Plan sites which differ from the indicative dwelling numbers provided within this Plan should be fully justified with regard to site-specific factors.</u></p>	<p>To ensure that the Plan is effective in explaining the purpose of the indicative dwelling numbers for each of the sites proposed for development. See Inspector’s Action Points 16 and 33.</p>	<p>Yes. A number of new allocated sites have been added. The dwellings proposed for each allocation have changed. However, it is noted that the overall housing figure for the Plan area remains unchanged. This policy has the potential to change the number of dwelling numbers at each allocation. New likely significant effects on public access and disturbance cannot be ruled out at this stage of the assessment and will require more detailed evaluation in the HRA in respect of the Lee Valley SPA and Ramsar</p>

Table 2: Indicative dwelling figures at Local Plan sites

<u>Site Name</u>	<u>Location</u>	<u>Policy No.</u>	<u>Indicative Dwelling no.</u>
<u>Brookfield Riverside</u>	<u>Turnford</u>	<u>BR1</u>	<u>250</u>
<u>Brookfield Garden Village</u>	<u>Turnford</u>	<u>BR1</u>	<u>1250</u>
<u>Gas Distribution Station</u>	<u>Broxbourne</u>	<u>BX3</u>	<u>35</u>
<u>Broxbourne School</u>	<u>Broxbourne</u>	<u>BX4</u>	<u>153</u>
<u>Cheshunt Lakeside</u>	<u>Cheshunt</u>	<u>CH1</u>	<u>1750</u>
<u>Rosedale Park – North/South of Andrew’s Lane and South of Peakes Way</u>	<u>Cheshunt</u>	<u>CH2</u>	<u>464</u>
<u>Rosedale Park – Tudor Nurseries</u>	<u>Cheshunt</u>	<u>CH2</u>	<u>360</u>
<u>Rosedale Park – South of Andrews Lane</u>	<u>Cheshunt</u>	<u>CH2</u>	<u>60</u>
<u>Cheshunt Football Club</u>	<u>Cheshunt</u>	<u>CH7</u>	<u>165</u>
<u>Theobald’s Brook Field</u>	<u>Cheshunt</u>	<u>CH9</u>	<u>90</u>
<u>East of Dark Lane</u>	<u>Cheshunt</u>	<u>CH10</u>	<u>50</u>
<u>Former Eastern Playing Fields</u>	<u>Cheshunt</u>	<u>CH11</u>	<u>75</u>
<u>North of Bonney Grove</u>	<u>Cheshunt</u>	<u>CH12</u>	<u>0</u>
<u>Council Offices, Churchgate</u>	<u>Cheshunt</u>	<u>CH13</u>	<u>75</u>
<u>South of Hammondstreet Road</u>	<u>Cheshunt</u>	<u>CH14</u>	<u>45</u>
<u>North of Goffs Lane</u>	<u>Goffs Oak</u>	<u>GO2</u>	<u>80</u>
<u>South of Goffs Lane</u>	<u>Goffs Oak</u>	<u>GO3</u>	<u>50</u>
<u>Newgatestreet Road</u>	<u>Goffs Oak</u>	<u>GO4</u>	<u>25</u>
<u>North of Cuffley Hill</u>	<u>Goffs Oak</u>	<u>GO5</u>	<u>45</u>
<u>19 Amwell Street and Scania House</u>	<u>Hoddesdon</u>	<u>HOD2</u>	<u>60</u>
<u>Turnford Surfacing Site</u>	<u>Hoddesdon</u>	<u>HOD3</u>	<u>40</u>
<u>Former Hoddesdon Police station</u>	<u>Hoddesdon</u>	<u>HOD4</u>	<u>30</u>
<u>East of Dinant Link Road</u>	<u>Hoddesdon</u>	<u>HOD6</u>	<u>35</u>
<u>High Leigh Garden Village</u>	<u>Hoddesdon</u>	<u>HOD7</u>	<u>485</u>
<u>Westfield Primary School</u>	<u>Hoddesdon</u>	<u>HOD9</u>	<u>40</u>
<u>Waltham Cross Northern High Street</u>	<u>Waltham Cross</u>	<u>WC2</u>	<u>150</u>
<u>Theobalds Grove Station Car Park</u>	<u>Waltham Cross</u>	<u>WC3</u>	<u>50</u>
<u>Former Britannia Nurseries site</u>	<u>Waltham Cross</u>	<u>LV6</u>	<u>90</u>
-	-	-	<u>6,002</u>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Paragraph 3.19	<p>3.19 3.20 The Broxbourne Employment Land Study projects strong demand for employment space across all key employment sectors over the next 15 years plan period...The strategy is to meet those objectives through the development of a new business campuses at Brookfield and Park Plaza where high-quality buildings set within high quality environments will provide for the burgeoning creative and life science sectors that are prevalent within the London Stansted Cambridge Corridor. Brookfield will also be a major creator of new jobs in the retail and leisure sectors, as well as providing a significant number of new local office jobs. This development and Park Plaza are further described in sections Chapters 5 and 10.</p>	To ensure that the plan is justified.	No. This modification will not result in a change to the scale of development that was proposed in the emerging Broxbourne Local Plan and which was subject to the Lepus 2018 HRA. This modification will therefore not change the conclusions of the 2018 HRA and no new likely significant effects are anticipated.
Paragraph 3.21	<p>The Delamare Road and Brookfield developments are likely to necessitate the relocation of a number of businesses. This Plan identifies Park Plaza North and Maxwells Farm West as providing the best opportunityies for business relocations to enable the Council's regeneration priorities (see section Chapter 10).</p>	To ensure that the plan is effective.	No. This modification will not result in a change to the scale of development that was proposed in the emerging Broxbourne Local Plan and which was subject to the Lepus 2018 HRA. This modification will therefore not change the conclusions of the 2018 HRA and no new likely significant effects are anticipated.
Paragraph 3.24	<p>3.24 3.25 Given the level of flux in employment markets and the degree of uncertainty in future employment land and space, this Local Plan does not attempt a detailed assessment of future jobs growth numbers in the Borough. Based on standard job densities, developments at Park Plaza could accommodate up to 10,000 new jobs and Brookfield could accommodate in excess of 5,000 around 2,000 new jobs. However, it is unlikely that these numbers will be secured within the Local Plan period. Rather, it is anticipated that between 6,000 and 7,000 5,000 and 6,000 net new jobs is a realistic</p>	To ensure that the plan is justified.	No. This modification proposes a reduction in the number of new jobs that the Council should plan for. This number is below the number of jobs (and area of new retail space) that was proposed in the emerging Broxbourne Local Plan which was subject to the Lepus 2018 HRA. The 2018 HRA represents a worst-case assessment. No new likely significant effects are anticipated as a result of this modification.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	estimate of net jobs growth within the Plan period.		
Paragraph 3.27	3.27 3.28 The 2015 Broxbourne Retail and Leisure Study identifies capacity in the borough for between 9,400 square metres net and 13,200 square metres net new convenience floorspace to 2030. It also identifies capacity for between 25,000 square metres and 45,000 square metres net new comparison goods floorspace to 2030.	Not justified. See inspector's Post-Hearings Advice Note (EXAM29).	No. This deletion will not lead to an increase in development or other change which could undermine the conservation objectives of a European site. No new likely significant effects are anticipated
Paragraph 3.28	<p>3.28 3.29 Broxbourne's retail hierarchy is proposed as follows:</p> <ul style="list-style-type: none"> • Town Centres - Waltham Cross, and Hoddesdon and Brookfield Riverside • District Centre - Cheshunt Old Pond • Neighbourhood Local Centres - High Street, Cheshunt; High Road, Broxbourne; High Street, Waltham Cross; Goffs Oak; and Wormley; and Rye Road, Hoddesdon. • Local Centres - Crossbrook Street; Rye Road; Stanstead Road; Ware Road; Clarendon Parade; Chaucer Way; Cheshunt Wash; Cromwell Avenue; Great Cambridge Road; Flamstead End Road; 251-259 High Road, Broxbourne; Windmill Lane; Holdbrook Court; Roundmoor Drive; The Drive, Hoddesdon; and Turners Hill. 	For consistency with national policy and modifications in respect of policy RTC1. See inspector's Action Point 14.	No. This re-naming of the retail hierarchy will not lead to an increase in development or other change which could undermine the conservation objectives of a European site. No new likely significant effects are anticipated
New paragraph 3.30	3.30 Brookfield Riverside is identified as a broad location for a proposed new town centre where main town centre uses will be acceptable if delivered in accordance with an integrated masterplan. A town centre boundary will be	To ensure that the plan is effective. See Council's response to Inspector's Post-Hearings Advice Note (EXAM31A).	No. Brookfield Riverside is no longer classified as a town centre. Proposals at this site remain unchanged. No new likely

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<u>defined as part of a review of the Local Plan, once the extent of the town centre is known.</u>		significant effects are anticipated as a result of this modification.

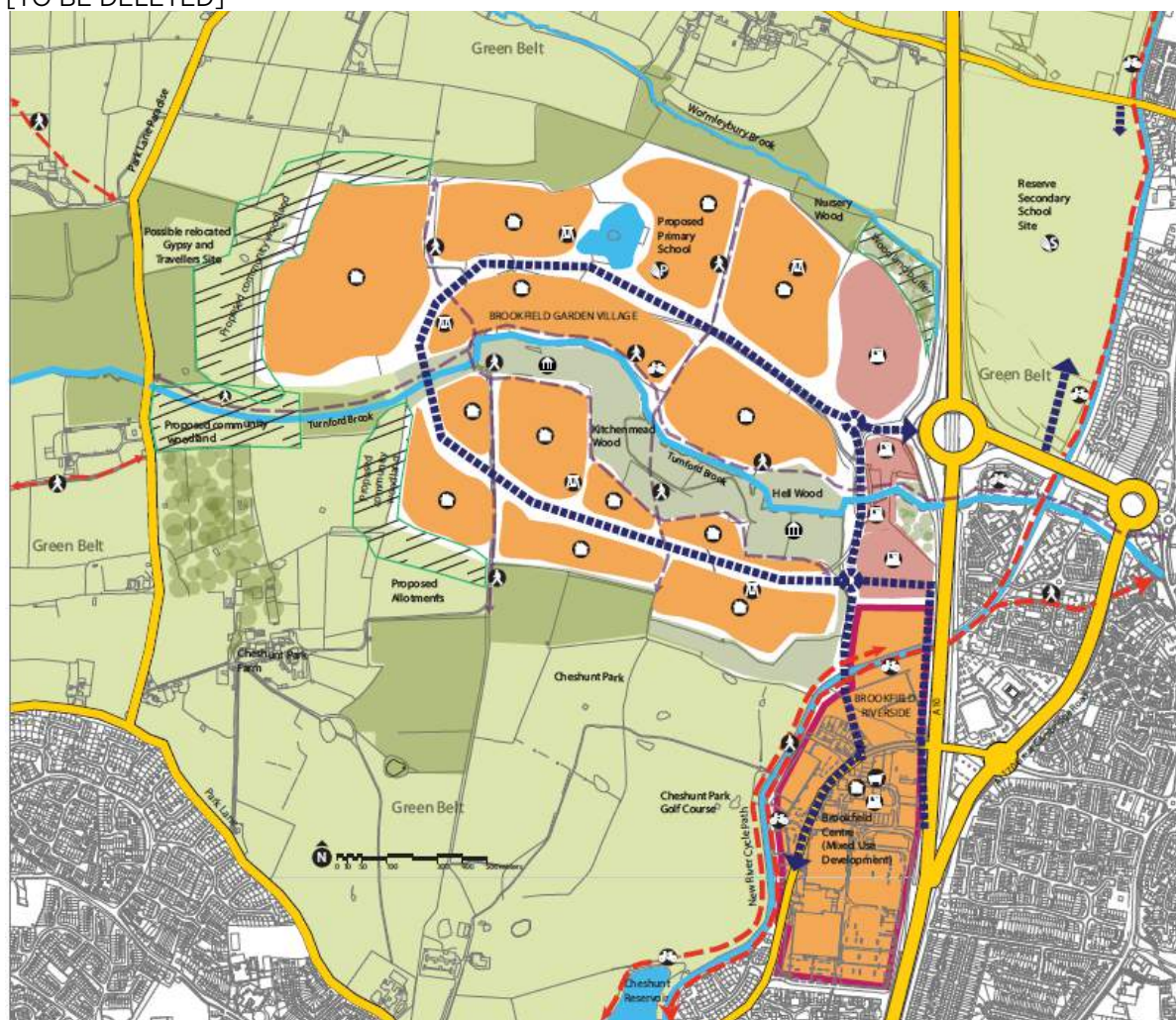
Part 3: Places

4: Introduction to Part 3: Sustainable Place-Making
 No modifications are proposed.

5: Brookfield

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Paragraph 5.1	5.1 The Council plans to develop the Brookfield area as a comprehensively planned garden suburb that will encompass a retail, civic, <u>business</u> and leisure centre for the borough of Broxbourne, a business campus and Brookfield Garden Village. Brookfield will be home to about 5,000 people.	'Local offices' are justified but a business campus as submitted is not. See Inspector's Post-Hearings Advice Note (EXAM29).	No. This modification will not result in a change to the scale of development that was proposed in the emerging Broxbourne Local Plan and which was subject to the Lepus 2018 HRA. This modification will therefore not change the conclusions of the 2018 HRA and no new likely significant effects are anticipated.

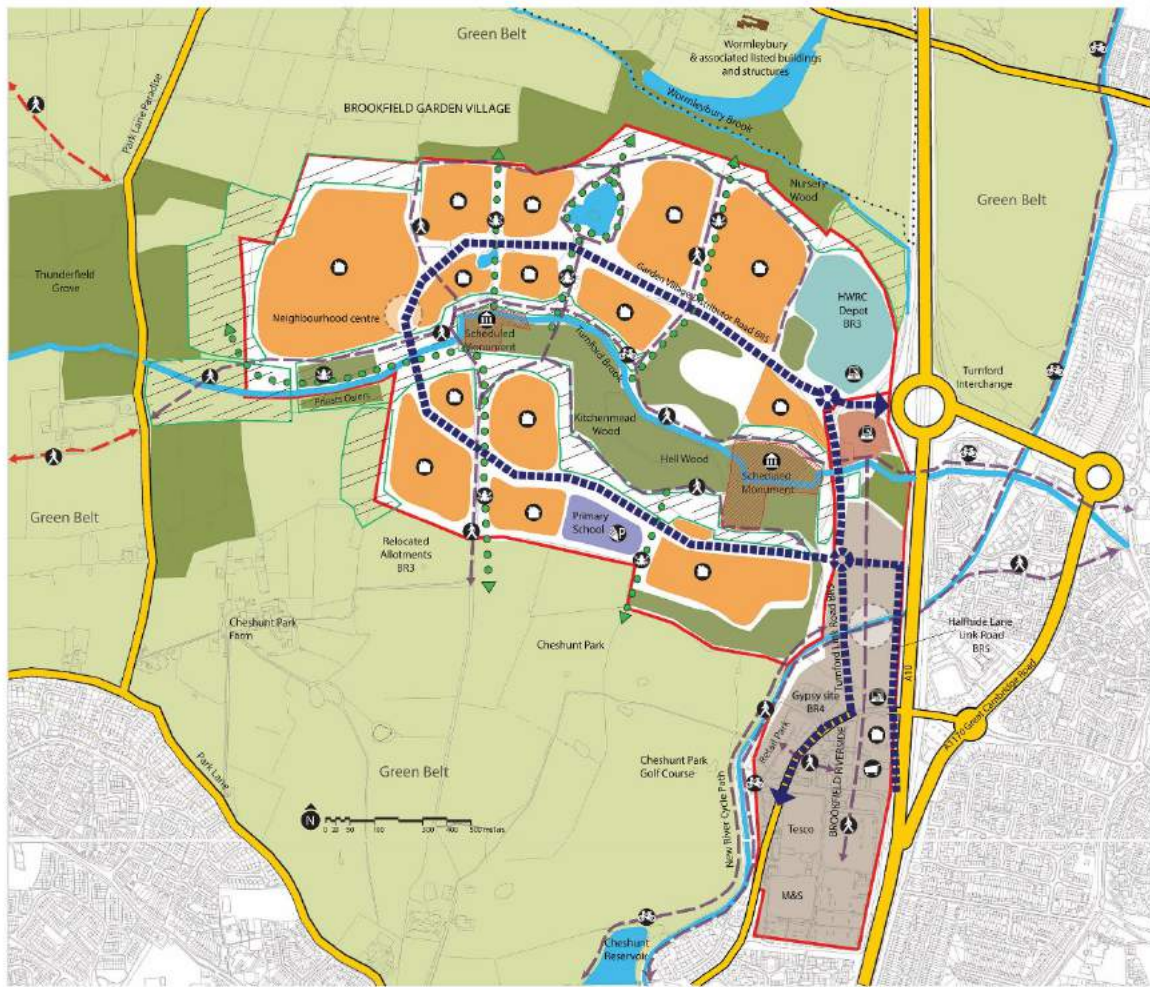
Figure 3: Brookfield Riverside and Garden Village Indicative Concept Plan
[TO BE DELETED]



Reason: To ensure that the concept plan is consistent with the Brookfield policies and is justified, effective and consistent with national policy.

HRA: No. See text above.

[MODIFIED REPLACEMENT]



POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Paragraph 5.3	<p>5.3 Development at Brookfield will encompass the following principles:</p> <ol style="list-style-type: none"> 1. Creation of a sustainable and integrated mixed use garden suburb that will accommodate retail, leisure, civic, housing, jobs and social facilities; 2. The creation of an identity and sense of place for Brookfield and the borough of Broxbourne; 3. To create a strengthened and, cohesive, and integrated retail and leisure centre and a new leisure and civic hub to provide a range of jobs and facilities for the borough of Broxbourne; 4. To achieve a step change in the economy of Broxbourne and increase the attractiveness of Broxbourne as a place to live in, invest in and visit; 5. To address traffic congestion and to create sustainable patterns of movement within Brookfield and with the remainder of the Borough; 6. To achieve exceptional standards of design and sustainability; 7. To retain and enhance the landscape, and ecology, and historic environment of the Brookfield area. 	To ensure that the objectives for Brookfield are consistent with national policy in respect of the historic environment.	<p>No. This modification will not result in a change to the scale of development that was proposed in the emerging Broxbourne Local Plan and which was subject to the Lepus 2018 HRA. This modification will therefore not change the conclusions of the 2018 HRA as no new likely significant effects are anticipated.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Paragraph 5.4	Brookfield Riverside 5.4 Brookfield is currently the home of the Brookfield Centre (Tesco's and M&S) and the Brookfield Retail Park. These will be incorporated into an extended and cohesive new shopping, civic and leisure centre that will include shops, leisure space, civic facilities, apartments and elderly persons' accommodation within a mixed use and green environment. This development will be on the land currently occupied by the New River Trading Estate, the travellers site and allotment site at Halfhide Lane, and additional land to the north of the New River as indicated on the Policies map. <u>Subject to appraisal of the options, it may also be necessary to relocate the existing gypsy site in order to achieve the sustainable development of Brookfield.</u>	For consistency with policy BR4: Halfhide Lane Gypsy site.	No. This modification will not result in a change to the scale of development that was proposed in the emerging Broxbourne Local Plan and which was subject to the Lepus 2018 HRA. This modification will therefore not change the conclusions of the 2018 HRA as no new likely significant effects are anticipated.
Paragraph 5.5	5.5 New shops are expected to include at least one department store, which will anchor the development, and a major food store. It is anticipated that a new High Street will intersect the development and that High Street retail chains will predominate within this. At the northern end of this street will be a leisure complex that will include a cinema, other leisure facilities such as ten pin bowling, cafés and restaurants set around the New River.	To ensure consistency with amended policy BR1.	No. This modification will not result in a change to the scale of development that was proposed in the emerging Broxbourne Local Plan and which was subject to the Lepus 2018 HRA. This modification will therefore not change the conclusions of the 2018 HRA as no new likely significant effects are anticipated.
Paragraph 5.6	5.6 New offices/workspaces and residential apartments will be built alongside and above shops and leisure units. It is estimated that there will be approximately 250 apartments within the development. Elderly persons' homes are best located within attractive settings close to shops and facilities and Brookfield Riverside therefore provides the ideal environment to locate housing for elderly people. The proposed	To ensure consistency with the policies map.	No. This modification will not result in a change to the scale of development that was proposed in the emerging Broxbourne Local Plan and which was subject to the Lepus 2018 HRA. This modification will therefore not change the conclusions of the 2018 HRA as no

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	location for this provision is indicated on the Policies map adjacent to the New River.		new likely significant effects are anticipated.
Paragraph 5.9	<p>The New Town Centre</p> <p>5.9 Brookfield Riverside will be characterised by a series of interconnected public spaces and squares as well as a pedestrianised shopping street creating a stimulating pedestrian environment. One of the most important spaces will be located around the New River (as indicated on the Concept Plan) where the continuity of pedestrian and cycle access requires to be maintained.</p>	<p>Insert a header before paragraph 5.7 for clarity.</p> <p>To ensure that the plan is clear and provides guidance to decision makers.</p>	<p>No.</p> <p>This modification will not result in a change to the scale of development that was proposed in the emerging Broxbourne Local Plan and which was subject to the Lepus 2018 HRA. This modification will therefore not change the conclusions of the 2018 HRA as no new likely significant effects are anticipated.</p>
Paragraph 5.10	<p>5.10 This new development combined with the existing provision will bear all the hallmarks of a town centre and Brookfield will therefore ultimately assume town centre status within the retail hierarchy, alongside Hoddesdon and Waltham Cross.</p>	<p>To ensure consistency with national policy.</p> <p>See Council response to inspector’s question. 81 (Matter 5) To ensure that the main town centre uses proposed at Brookfield Riverside are effectively integrated with the existing shops and would, ultimately, lead to the creation of a new town centre. See inspector’s post-hearings Advice Note (EXAM29).</p>	<p>No.</p> <p>This modification will not result in a change to the scale of development that was proposed in the emerging Broxbourne Local Plan and which was subject to the Lepus 2018 HRA. This modification will therefore not change the conclusions of the 2018 HRA as no new likely significant effects are anticipated.</p>
Paragraph 5.12	<p>5.12 Being at the heart of the Borough, adjacent to a mix of facilities and within an exceptional working environment, Brookfield is ideally situated to attract new businesses. It is anticipated that these new businesses will be accommodated both within the main retail, civic and leisure areas and on land immediately to the north around the Turnford interchange. to provide an attractive gateway into Brookfield from the Turnford Interchange The business area will therefore be a transition from a mixed use town centre environment into a campus</p>	<p>‘Local offices’ are justified but a business campus as submitted is not. See Inspector’s Post-Hearings Advice Note (EXAM29).</p>	<p>No.</p> <p>This modification will not result in a change to the scale of development that was proposed in the emerging Broxbourne Local Plan and which was subject to the Lepus 2018 HRA. This modification will therefore not change the conclusions of the 2018 HRA as no new likely significant effects are anticipated.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	style business park, providing a variety of unit and site types.		
NEW POLICY	<p><u>Policy BR1: Brookfield Riverside</u> <u>I. Brookfield Riverside will provide up to 19,000 square metres* net comparison retail floorspace; approximately 3,500 square metres convenience floorspace; up to 10,000 square metres of leisure floorspace; approximately 12,500 square metres local office floorspace; approximately 250 new homes (40% of which should be affordable); elderly persons’ accommodation; and a civic centre.</u> <u>II. Upon implementation Brookfield Riverside will assume town centre status and ultimately be designated as a town centre in accordance with policy RTC1. Therefore, the design, layout and scale of development should ensure that the uses proposed in part I, along with the existing shops, create a new high quality town centre. This will require the following:</u></p> <ul style="list-style-type: none"> a) <u>a high density mix of civic uses, retail and leisure, including office and residential development above, to maximise street-level pedestrian activity and the night-time economy;</u> b) <u>clearly defined character areas and landmark structures to create a strong sense of identity and assist with navigation;</u> c) <u>creation of at least two major linked public spaces, one of which should be focused on the New River;</u> 	<p>30,000 square metres net comparison retail floorspace is not justified; 17,000 square metres is justified. See inspector’s Post-Hearings Advice Note (EXAM29).</p> <p>Part II modified to ensure that the main town centre uses proposed at Brookfield Riverside are effectively integrated with the existing shops and would, ultimately, lead to the creation of a new town centre. See inspector’s Post-Hearings Advice Note (EXAM29).</p> <p>Part III modified to provide greater clarity about where the existing allotments, household waste recycling centre and Council depot will be relocated to; to avoid the need to relocate the existing traveller site or ensure that relocation would appropriately meet the needs of existing and future residents in an accessible location. See inspector’s Post-Hearings Advice Note (EXAM29).</p>	<p>No. This modification proposes a reduction in the number of new jobs that the Council should plan for. This number is below the number of jobs (and area of new retail space) that was proposed in the emerging Broxbourne Local Plan which was subject to the Lepus 2018 HRA. The 2018 HRA represents a worst-case assessment. No new likely significant effects are anticipated.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>d) <u>car parking to meet the needs of the development;</u></p> <p>e) <u>exceptional quality public realm including extensive planting and landscaping; and</u></p> <p>f) <u>integration with the existing shops, both in terms of the orientation and layout of development and in terms of connectivity and movement as set out in Policy BR5.</u></p> <p>g) <u>the scale and type of new retail units should complement the existing shops to create an overall mix that would ensure the vitality and viability of the proposed town centre.</u></p> <p><u>III. Relocation sites for the Halfhide Lane allotments, Council depot and household waste recycling centre will be provided in accordance with policy BR3, and if necessary and justified a site for the relocation of the existing Halfhide Lane gypsy site will also be provided in accordance with policy BR4. *This is inclusive of 2,000 square metres net comparison retail floorspace that has been granted planning permission at Brookfield Retail Park.</u></p>		
Paragraph 5.13	5.13 Buildings within the business campus will be of contemporary design. Subject to master planning, building heights within the campus	Business campus at Brookfield not justified. See the Inspector’s Post-Hearings Advice Note (EXAM29) and Council	No. The deletion of the business campus will not result in an increase in the scale of development that was proposed in the

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	could extend to 5 storeys' located within well landscaped settings.	modifications to delete the business campus (EXAM29A).	emerging Broxbourne Local Plan and which was subject to the Lepus 2018 HRA. This modification will therefore not change the conclusions of the 2018 HRA as no new likely significant effects are anticipated.
New paragraph 5.13	5.18 <u>5.13</u> Beyond the new link road <u>Brookfield Riverside</u> , the Turnford Brook runs westwards through Hell Wood. The land to the north and south of Hell Wood has been the subject of past mineral workings and inert landfill. Whilst this land does extend into the Green Belt, it is relatively low lying and forms a natural amphitheatre that is well screened from surrounding landscapes by mature woodland and shelter belts. It represents an exceptional opportunity to create a garden village of around 1,250 new homes.	Moved from paragraph 5.18 to provide reasoned justification to new policy BR2: Brookfield Garden Village.	No This modification proposes a justification which will not result in a change to the scale of development that was proposed in the emerging Broxbourne Local Plan and which was subject to the Lepus 2018 HRA. This modification will therefore not change the conclusions of the 2018 HRA as no new likely significant effects are anticipated.
Paragraph 5.14	5.14 Brookfield will incorporate a new link road between the Brookfield Interchange and the Turnford Interchange which will service the overall development and provide a new and direct link between West Cheshunt and the A10. The currently proposed road network is indicated on the Concept Plan above. This will enable the continuation of east to west traffic movement through the diversion of Halfhide Lane around the northern side of the development. Master planning may ultimately deliver an alternative road layout.	Paragraph moved to 5.22 to relate to new policy BR4: Transport and Movement in the Brookfield Area.	No. This modification relates to the change in the location of text within the plan only and does not represent a modification that would result in a new likely significant effect.
Paragraph 5.14	5.19 <u>5.14</u> The proposed northern and southern boundaries of this village are well defined by woodland bordering the Wormleybury Brook and Cheshunt Park which will be extended to form defensible boundaries for the new Green Belt edge. In order to conserve Wormleybury Registered Historic Park and Garden, additional planting will be provided along the northern	Moved from paragraph 5.19 to provide reasoned justification to new policy BR2: Brookfield Garden Village. References to the Historic Environment moved to reasoned justification to new	No. This modification relates to the change in the location of text within the plan only and does not represent a modification that would result in a new likely significant effect.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	edge of the development. The western and southern edges of the village are less well defined. However, the land rises sharply at these junctures and it is proposed to plant these slopes with native trees as a publicly accessible community woodland, to create a new and sustainable Green Belt edge, enabling the village to “bleed” into the countryside beyond.	policy BR6: The Environment and Landscape of Brookfield.	
Paragraph 5.15	5.15 The new expanded Brookfield needs to be accessible by public transport for the majority of households in Broxbourne, accommodated by real time information bus stops at central locations. A new service is proposed to link Brookfield with the main centres along the A10. It is anticipated that this will run at 20 minute intervals.	Paragraph moved to 5.22 to relate to new policy BR4: Transport and Movement in the Brookfield Area. See Council’s response to Inspector’s Post-Hearings Advice Note (EXAM29A).	No. This modification relates to the change in the location of text within the plan only and does not represent a modification that would result in a new likely significant effect.
New paragraph 5.15	5.20 <u>5.15</u> As indicated by the dark blue dashed line on Figure 3, a tree lined boulevard (<u>the Garden Village distributor road</u>) will extend westwards from the Turnford interchange and loop around the top of Hell Wood to link back into the new <u>Brookfield Turnford</u> link road. The village will be developed around this new the distributor road.	Moved from paragraph 5.20 to provide reasoned justification to new policy BR2: Brookfield Garden Village.	No. This modification relates to the change in the location of text within the plan only and does not represent a modification that would result in a new likely significant effect.
Paragraph 5.16	5.16 The ability to easily walk within and between the different components of Brookfield, including the existing Brookfield Centre, Brookfield Retail Park and Brookfield Garden Village, is critical. Walking and cycling connectivity within the development and between surrounding population catchments is an important element of master planning.	Paragraph moved to 5.23 to relate to new policy BR4: Transport and Movement in the Brookfield Area. See Council’s response to Inspector’s Post-Hearings Advice Note (EXAM29A).	No. This modification relates to the change in the location of text within the plan only and does not represent a modification that would result in a new likely significant effect.
New paragraph 5.16	5.21 <u>5.16</u> <u>Variations in density of development across the site will need to reflect the findings of the Heritage Impact Assessment as set out in Policy BR6. Subject to that assessment, it is anticipated that</u> the the middle and western parts of the village will be mainly characterised by	Moved from paragraph 5.21 to provide reasoned justification to new policy BR2: Brookfield Garden Village.	No. This modification relates to the change in the location of text within the plan only. The strengthening of text relates to the protection of historic environment and will not result in any modification

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	family and executive homes at low to medium densities. Two storey semi-detached and detached houses will predominate. Closer to Brookfield Riverside (and subject to the findings of the Heritage Impact Assessment), densities will be higher with more terraced/affordable homes, town houses and apartments. It is likely that these will mainly be of two and three storeys.	Modification necessary to ensure consistency with new policy BR6: The Landscape and Environment of the Brookfield Area. See Council response to inspector’s Action Point 49.	that would result in a new likely significant effect.
Paragraph 5.17	5.16 Whilst it will be accessible to public transport, Brookfield Riverside will require new car parks. These will be multi level but it is not anticipated that they will rise above four levels. To avoid severance within Brookfield and to provide an element of noise screening, it is proposed that the new car parks will be located along the A10 boundary.	Paragraph moved to 5.24 to relate to new policy BR4: Transport and Movement in the Brookfield Area. See Council’s response to Inspector’s Post-Hearings Advice Note (EXAM29A).	No. This modification relates to the change in the location of text within the plan only and does not represent a modification that would result in a new likely significant effect.
Paragraph 5.17	5.22 <u>5.17</u> The village will look to Brookfield Riverside for certain facilities but is also expected to contain a local shop(s), a new primary school and local areas for play and relaxation.	Moved from paragraph 5.22 to provide reasoned justification to new policy BR2: Brookfield Garden Village.	No. This modification relates to the change in the location of text within the plan only and does not represent a modification that would result in a new likely significant effect.
Paragraph 5.18	5.23–5.18 –The village must exhibit exceptional standards of design and landscaping, representative of the garden village approach and the sylvan setting. The Brookfield area as a whole must also be master planned to protect and enhance the biodiversity of the area. This includes Hell Wood and the valley of the Turnford Brook which will be protected and enhanced. The village and its landscape will be covered by a detailed management plan.	Reference to Superseded by new reasoned justification in respect of policy BR6.	No. This modification relates to the change in the justification text and does not represent a modification that would result in a new likely significant effect.
NEW POLICY	<u>Policy BR2: Brookfield Garden Village</u> i. <u>Subject to meeting the requirements of policy BR6, Brookfield Garden Village is expected to provide approximately 1,250</u>		No. This policy provides the same scale of development (with the exception of employment floorspace which has decreased with the removal of the

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p><u>new homes (40% of which should be affordable); elderly persons' accommodation; a primary school providing 3 forms of entry; open space for leisure and recreation; and a neighbourhood centre containing local shop(s) and facilities, as shown on the Concept Plan.</u></p> <p>II. <u>In accordance with policy BR3, the garden village will accommodate the relocated Halfhide Lane allotments as shown on the Concept Plan, and if necessary the relocated Halfhide Lane gypsy site in accordance with policy BR4.</u></p>		<p>business campus) as set out in Policy BR1 of the emerging Broxbourne Local Plan which was subject to the Lepus 2018 HRA. New likely significant effects are therefore not anticipated.</p>
<p>Paragraph 5.18</p>	<p>5.18 Beyond the new link road, the Turnford Brook runs westwards through Hell Wood. The land to the north and south of Hell Wood has been the subject of past mineral workings and inert landfill. Whilst this land does extend into the Green Belt, it is relatively low lying and forms a natural amphitheatre that is well screened from surrounding landscapes by mature woodland and shelter belts. It represents an exceptional opportunity to create a garden village of around 1,250 new homes.</p>	<p>Moved to paragraph 5.13 to provide reasoned justification to new policy BR2: Brookfield Garden Village.</p>	<p>No. This modification relates to the change in the location of text within the plan only and does not represent a modification that would result in a likely significant effect.</p>
<p>Paragraph 5.19</p>	<p>Relocated Uses 5.24 <u>5.19</u> The development of Brookfield <u>Riverside</u> will necessitate the relocation of some existing land uses. These are: 1. New River Trading Estate – this is owned by the Council and existing businesses are on short term leases. The Council will consider</p>	<p>To provide reasoned justification to new policy BR3: Relocations within Brookfield. Modifications necessary to provide greater clarity about where the depot, HWRC and allotments will relocate to. See</p>	<p>No. This modification relates to the relocation of existing land uses including: - New River Trading Estate; - Broxbourne Depot;</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>each of those businesses on a case by case basis.</p> <p>2. Broxbourne Depot – <u>a new location is identified as shown on the Concept Plan.</u></p> <p>3. Household Waste Recycling Centre (HWRC) – <u>a new location is identified as shown on the Concept Plan.</u></p> <p>4. Halfhide Lane Travellers Site – a new location for the travellers site is allocated on the Policies map with access directly from Park Lane Paradise. This land remains within the Green Belt.</p> <p>5. 4. Halfhide Lane allotments – a new location for the allotments is allocated on the Policies map with access directly from Park Lane Paradise north of Cheshunt Park. This land remains within the Green Belt.</p>	<p>inspector’s Post-Hearings Advice Note (EXAM29).</p>	<ul style="list-style-type: none"> - Household Waste Recycling Centre; and - Allotments. <p>No new facilities are to be provided, the policy relates to re-location only. The relocation areas are within the Brookfield area (BR1) and remain at a similar distance from European sites considered in the 2018 HRA.</p>
<p>NEW POLICY</p>	<p><u>Policy BR3: Relocations within Brookfield In order to achieve the development of Brookfield Riverside, existing land uses within the proposed development area will be relocated as follows:</u></p> <p>a) <u>the Halfhide Lane allotments will be relocated within Brookfield Garden Village north of Cheshunt Park as shown on the concept diagram;</u></p> <p>b) <u>the Council depot and the household waste recycling centre will be relocated from the New River Trading estate to a location north of the Turnford interchange as shown on the Concept Plan.</u></p>	<p>Modifications necessary to provide greater clarity about where the depot, HWRC and allotments will relocate to. See inspector’s Post-Hearings Advice Note (EXAM29).</p>	<p>No. This modification relates to the relocation of existing land uses including:</p> <ul style="list-style-type: none"> - New River Trading Estate; - Broxbourne Depot; - Household Waste Recycling Centre; and - Allotments. <p>No new facilities are to be provided, the policy relates to re-location only. The relocation areas are within the Brookfield area (BR1) and remain at a similar distance from European sites considered in the 2018 HRA.</p>
<p>Paragraph 5.19</p>	<p>The proposed northern and southern boundaries of this village are well defined by</p>	<p>Moved to paragraph 5.14 to provide reasoned justification to</p>	<p>No.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>woodland bordering the Wormleybury Brook and Cheshunt Park which will be extended to form defensible boundaries for the new Green Belt edge. The western and southern edges of the village are less well defined. However, the land rises sharply at these junctures and it is proposed to plant these slopes with native trees as a publicly accessible community woodland, to create a new and sustainable Green Belt edge, enabling the village to “bleed” into the countryside beyond.</p>	<p>new policy BR2: Brookfield Garden Village.</p>	<p>This deletion does not represent a modification that would result in new likely significant effects.</p>
<p>New paragraph 5.20</p>	<p><u>Halfhide Lane Gypsy Site</u></p> <p><u>5.20 Initial masterplanning work has indicated a likely need to relocate the existing gypsy site on Halfhide Lane in order to achieve the sustainable development of Brookfield Riverside. The need for this relocation requires to be demonstrated through the detailed master planning of Brookfield Riverside, and assessment of the alignment of the Turnford Link Road. In the event that relocation is demonstrated to be necessary, potential alternative relocation site options within the Garden Village include: south of the distributor road south of Hell Wood; north of the proposed site for the relocated allotments; and north-west of the Turnford interchange. Policy BR4 below provides the basis for any relocation.</u></p>	<p>To ensure that the plan is justified and effective. See inspector’s Action Point 50 (EXAM31).</p>	<p>No. This modification relates to the relocation of the Halfhide Lane Gypsy Site in order to deliver the new road link. The relocation area for the Gypsy Site will be within the Garden Village area and therefore remain at a similar distance from European sites considered in the 2018 HRA. No LSEs are therefore anticipated.</p>
<p>NEW POLICY</p>	<p><u>Policy BR4: Halfhide Lane Gypsy Site</u> <u>1. An assessment of options for a link road between Halfhide Lane and the Turnford Interchange to inform the masterplanning process should be undertaken. The assessment should determine whether or not an appropriate link road can be delivered, and the sustainable development of Brookfield Riverside achieved in accordance with policy BR1, without</u></p>	<p>To ensure that the plan is justified, effective, and consistent with national policy. See inspector’s Post-Hearings Advice Note (EXAM29) and Action Point 50 (EXAM31).</p>	<p>No. This modification relates to the relocation of the Halfhide Lane Gypsy Site in order to deliver the new road link. The relocation area for the Gypsy Site will be within the Garden Village area and therefore remain at a similar distance from European sites considered in the 2018 HRA. No LSEs are therefore anticipated.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p><u>necessitating the relocation of the existing Gypsy site.</u></p> <p><u>II. If the assessment in part I of this policy concludes that relocation is essential, an assessment of options for a replacement site within the Garden Village should be undertaken in accordance with the following criteria:</u></p> <ul style="list-style-type: none"> <u>i. Site requirements including the ability to meet the identified future accommodation needs and provision of a suitable paddock area;</u> <u>ii. accessibility to services and facilities including the potential to provide safe and convenient walking and cycling connections;</u> <u>iii. deliverability of the site;</u> <u>iv. constraints including air quality, heritage, ecology, noise, landscape and topography, flood risk, drainage, ground conditions, and utilities provision;</u> <u>v. compatibility with neighbouring uses including integration within the wider masterplan for Brookfield;</u> <u>vi. impacts on the amenity of existing site residents; and</u> <u>vii. the ability of potential mitigations to satisfactorily address any of the above.</u> <p><u>III. The foregoing assessments should be undertaken in consultation with the Halfhide Lane residents and other interested parties.</u></p>		

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Paragraph 5.20	5.20 As indicated by the dark blue dashed line on Figure 4, a tree lined boulevard will extend westwards from the Turnford interchange and loop around the top of Hell Wood to link back into the new Brookfield link road. The village will be developed around this new road.	Moved to paragraph 5.15 to provide reasoned justification to new policy BR2: Brookfield Garden Village.	No. This modification will not result in new likely significant effects.
New paragraph 5.21	Transport and Movement in the Brookfield Area <u>5.21 The Broxbourne Transport Strategy sets out a package of area-based schemes across the borough, including measures for highways, parking, public transport, ‘smarter choices’ (for example travel planning) and walking and cycling. A brief overview of those schemes for the Brookfield area is provided below. A full list of potential transport interventions is provided in Appendix A to the Broxbourne Transport Strategy.</u>	To provide a reasoned justification to new policy BR5: Transport and Movement in the Brookfield Area. See Council’s response to the inspector’s Post-Hearings Advice Note (EXAM29A).	No. This modification relates to high level transport planning and will not result in new likely significant effects.
Paragraph 5.21	The middle and western parts of the village will be mainly characterised by family and executive homes at low to medium densities. Two storey semi-detached and detached houses will predominate. Closer to Brookfield Riverside, densities will be higher with more terraced/affordable homes, town houses and apartments. It is likely that these will mainly be of two and three storeys.	Moved to paragraph 5.16 to provide reasoned justification to new policy BR2: Brookfield Garden Village.	No. This modification relates to the change in the location of text within the plan only and does not represent a modification that would result in new likely significant effects.
New paragraph 5.22	5.14 <u>5.22 Brookfield will incorporate a new link road between the Brookfield Interchange and the Turnford Interchange (the Turnford Link Road) which will service the overall development and provide a new and direct link between West Cheshunt and the A10 as well as providing access to the Garden Village.</u> The currently proposed road network is indicated on the Concept Plan above. This will enable the continuation of east to west traffic movement	To provide clarity in the reasoned justification to new policy BR5: Transport and Movement in the Brookfield Area. See Council’s response to the inspector’s Post-Hearings Advice Note (EXAM29A).	No. This modification provides clarity to Policy BR5 and does not represent a modification that would result in a new likely significant effect.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	through the diversion of Halfhide Lane around the northern side of the development. Master planning may ultimately deliver an alternative road layout.		
Paragraph 5.22	5.22 The village will look to Brookfield Riverside for certain facilities but is also expected to contain a local shop(s), a new primary school and local areas for play and relaxation.	Moved to paragraph 5.17 to provide reasoned justification to new policy BR2: Brookfield Garden Village.	No. This modification relates to the change in the location of text within the plan only and does not represent a modification that would result in a new likely significant effect.
Paragraph 5.23	5.14 <u>5.23</u> The new expanded Brookfield needs to be accessible by public transport for the majority of households in Broxbourne. accommodated by <u>Real time bus information will be provided at</u> bus stops at central locations. A new service is proposed to link Brookfield with the main centres along the A10 Waltham Cross . It is anticipated that this will run at 20-minute intervals.	Moved from paragraph 5.14 to provide reasoned justification to new policy BR5: Transport and Movement in the Brookfield Area.	No. This modification relates to the change in the location of text within the plan only and does not represent a modification that would result in a new likely significant effect.
Paragraph 5.24	5.15 <u>5.24</u> The ability to easily walk within and between the different components of Brookfield, including the existing Brookfield Centre, Brookfield Retail Park and Brookfield Garden Village, is critical. Walking and cycling connectivity within the development and between surrounding population catchments is an important element of master planning.	Moved from paragraph 5.16 to provide reasoned justification to new policy BR5: Transport and Movement in the Brookfield Area.	No. This modification represents a paragraph re-numbering only.
Paragraph 5.24	The development of Brookfield will necessitate the relocation of some existing land uses. These are: 1. New River Trading Estate – this is owned by the Council and existing businesses are on short term leases. The Council will consider each of those businesses on a case by case basis. 2. Broxbourne Depot.	Moved to paragraph 5.18 to provide reasoned justification to new policy BR3: Relocations within Brookfield.	No. This modification relates to the change in the location of text within the plan only and does not represent a modification that would result in a new likely significant effect.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>3. Household Waste Recycling Centre.</p> <p>4. Halfhide Lane Travellers Site – a new location for the travellers site is allocated on the Policies map with access directly from Park Lane Paradise. This land remains within the Green Belt.</p> <p>5. Halfhide Lane allotments – a new location for the allotments is allocated on the Policies map north of Cheshunt Park. This land remains within the Green Belt.</p>		
Paragraph 5.25	<p>5.16 <u>5.25</u> Whilst it will be accessible to public transport, Brookfield Riverside will require new car parks. These will be multi-level but it is not anticipated that they will rise above four levels. To avoid severance within Brookfield and to provide an element of noise screening, it is proposed <u>anticipated</u> that the new car parks will be located along the A10 boundary.</p>	To ensure that the plan is effective. See Council's response to the inspector's Post-Hearings Advice Note (EXAM29A).	No. This modification strengthens the text but would not result in a change to the scale of development proposed in emerging Broxbourne Local Plan which was assessed in the 2018 HRA.
NEW POLICY	<p><u>Policy BR5: Transport and Movement in the Brookfield area</u></p> <p><u>1) The following highway interventions require early delivery as part of the comprehensive development of Brookfield Riverside and Brookfield Garden Village:</u></p> <p><u>a) construction of a Halfhide Lane to Turnford Interchange link road (the 'Turnford Link Road'), together with provision of a new western arm at the A10 Turnford Interchange, as shown on the Concept Plan. The road design and layout will facilitate safe pedestrian and</u></p>	To ensure that the plan is effective and will ensure a comprehensive approach to delivery of the necessary transport infrastructure to the area. See Council's response to the Inspector's Post-Hearings Advice Note (EXAM29A). See also Council's response to Action Point 51.	No. Policy BR1 of the emerging Broxbourne Local Plan previously included provision for a new relief road - the Brookfield Link Road (New link road connecting Brookfield Lane West, from Brookfield Retail Park to the Turnford Interchange). This policy was assessed as part of the 2018 HRA. This policy does not therefore introduce elements of development that would result in new likely significant effects.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p><u>cycle crossings between the Garden Village, Riverside, Brookfield Retail Park and Brookfield Centre. The alignment of the road will be determined in accordance with Policies BR4 and BR6;</u></p> <p>b) <u>The Garden Village distributor road, which should take the form of a tree-lined boulevard providing access to all parts of the development for buses, bicycles and private vehicles. The alignment and design of the road will ensure multiple safe crossing points for people and for wildlife at key desire lines, as well as preserving mature trees; and</u></p> <p>II) <u>Sustainable transport and modal shift will be facilitated through provision of the following:</u></p> <p>a) <u>a frequent bus service through the development connecting with Cheshunt station, Waltham Cross, and Hertford Regional College;</u></p> <p>b) <u>pleasant and safe pedestrian links to ensure integration within the town centre environment, including with the existing retail park; with Brookfield Garden Village and with existing residential areas on both sides of the A10; and</u></p> <p>c) <u>new cycle paths east-west under the A10 at Turnford Brook, the New River, and at Halfhide Lane; to the Garden</u></p>		

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p><u>Village; and along the New River to existing residential areas of west Cheshunt.</u></p> <p><u>III) Other measures should be provided in accordance with the Broxbourne Transport Strategy and Policy INF2.</u></p>		
Paragraph 5.25	<p>Brookfield is subject to an overall masterplan being developed by the Council. That master plan is indicated in conceptual form above. It will ensure that different land interests are resolved and connected.</p>	<p>Moved to paragraph 5.30 to provide reasoned justification to new policy BR7: Integrated Development of Brookfield.</p>	<p>No. This modification relates to the change in the location of text within the plan only and does not represent a modification that would result in a new likely significant effect.</p>
-	<p><u>The Environment and Landscape of the Brookfield Area</u></p>	<p>New heading inserted before paragraph 5.25 for clarity.</p>	<p>No. This modification relates to the addition of a heading within the text and does not represent a modification that would result in a new likely significant effect.</p>
Paragraph 5.26	<p>The Council's overall master plan is being informed by separate detailed master plans for Brookfield Riverside and Brookfield Garden Village as well as a development scheme for Brookfield Retail Park which now has planning permission.</p>	<p>Moved to paragraph 5.31 to provide a reasoned justification to new policy BR7: Integrated Development of Brookfield.</p>	<p>No. This modification relates to the change in the location of text within the plan only and does not represent a modification that would result in a new likely significant effect.</p>
New paragraph 5.26	<p><u>5.26 Surveys indicate the presence of protected species, including badgers, within and adjacent to Brookfield Garden Village. Planning applications should address a number of factors including: the extent and form of built development as it affects wildlife; the scale and design of wildlife corridors and buffer areas; limitations on public access to sensitive areas; appropriate lighting and planting to provide natural cover and protection for local fauna; access to foraging areas; and design of the Garden Village distributor road (including</u></p>	<p>To ensure that the plan is effective and consistent with national policy in relation of the historic environment. See also the Council's response to Inspector's Action Point 53 (EXAM31A)</p>	<p>No. This modification relates to the protection of the natural environment and not represent a change which could result in new likely significant effects on any European site.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<u>wildlife tunnels). It is expected that these measures will be enforced through the use of planning conditions and that a wildlife and ecology management plan will be put in place to protect valuable species and habitats.</u>		
New paragraph 5.27	<u>5.27 In relation to the historic environment, there are two scheduled monuments within the woodland along Turnford Brook, as shown on the Concept Plan and Policies Map, both of which are screened from the wider development by trees. Perriors Manor lies to the western end of the wood and the Hell Wood moated site and enclosure lies at the eastern end of the wood near the Brookfield Riverside. Wormleybury Registered Historic Park and Garden is located along the northern edge of the Garden Village site and contains the grade I listed Wormleybury house and associated listed structures. The boundaries of these sites are shown on the Concept Plan and also on the Policies Map.</u>	To ensure that the plan is effective and consistent with national policy in relation of the historic environment. See Council’s response to Inspector’s Post-Hearings Advice Note (EXAM29A) and to Action Point 53 (EXAM31A).	No. This modification relates to the protection of the historic environment and not represent a change which could result in new likely significant effects on any European site.
New paragraph 5.28	<u>5.28 Planning applications will be required to ensure appropriate design and layout of development with regard to historic assets and their significance and setting, and where appropriate, mitigation measures to address impacts on the historic environment. The indicative location of green infrastructure to protect the significance of historic assets is shown on the Concept Plan. The nature and extent of green infrastructure and development areas will be informed by the findings of a heritage impact assessment¹. Development on the elevated parts of the site to the south of the heritage assets at Wormleybury should preserve their setting.</u>	To ensure that the plan is effective and consistent with national policy in relation of the historic environment. See Council’s response to Inspector’s Post-Hearings Advice Note (EXAM29A) and to Action Point 53 (EXAM31A).	No. This modification relates to the protection of the natural environment and also provides general design principles. It does not represent a change which could result in new likely significant effects on any European site.

¹ Further information is provided in Historic England Good Practice Advice Note 1: Local Plan Making and Good Practice Advice Note 3: Setting and Views.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
New paragraph 5.29	<u>5.29 The location and scale of the buffers, wildlife corridors, community woodland and development areas shown on the Concept Plan are indicative. The final layout and design of developed and undeveloped areas should be determined with regard to robust assessment as part of planning applications. Supporting evidence will need to be supplied with applications, for example evidence from the biodiversity impact metric will be required to demonstrate net gain in accordance with policy NEB1.</u>	To ensure that the plan is effective and consistent with national policy in relation of the historic environment. See Council’s response to Inspector’s Post-Hearings Advice Note (EXAM29A) and to Action Point 53 (EXAM31A).	No. This modification relates to the protection of the natural environment and not represent a change which could result in new likely significant effects on any European site.
New Paragraph 5.30	<u>5.30 Public access to existing and proposed woodland, wildlife corridors and green infrastructure should have regard to the objectives relating to heritage assets and biodiversity. This will be achieved by incorporating the findings of a heritage impact assessment and a biodiversity assessment into planning of the layout and landscaping of development and future management.</u>	To provide greater clarity on how public access to existing and proposed woodland, wildlife corridors and landscape buffer areas will be planned for in the layout and landscaping of development and future management, having regard to the objectives relating to heritage assets and biodiversity. See Council’s response to inspector’s Action Point 54 (EXAM31A).	No. This modification relates to the protection of the historic environment and not represent a change which could result in new likely significant effects on any European site.
New paragraph 5.31	<u>5.31 Applications should indicate how net gains can be provided for biodiversity across the site, which may require restrictions on public access in some locations where biodiversity gains can best be achieved. They should also indicate how the historic environment can be preserved at Wormleybury, and how the significance of the scheduled monuments of Perrior’s Manor and the moated house can be better revealed.</u>	As above.	No. This modification relates to the protection of the natural and historic environment and not represent a change which could result in new likely significant effects on any European site.
NEW POLICY	<u>Policy BR6: The Environment and Landscape of the Brookfield Area Natural Environment</u>	To safeguard the natural environment and biodiversity of the area; to conserve or where possible enhance the	No. This modification relates to the protection of the natural and historic environment, providing design

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>I. <u>Development should minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks. Planning applications should demonstrate how evidence has informed the extent of the development, including the layout and design of wildlife corridors, and appropriate measures for undeveloped areas, in particular to provide for the continued occupation of active badger setts within and in the vicinity of Brookfield Garden Village.</u></p> <p><u>Historic Environment</u></p> <p>II. <u>A heritage impact assessment should be undertaken to inform the masterplanning process for Brookfield Garden Village. This should identify the significance of all relevant heritage assets and their settings and be used to help determine the detailed extent, scale, density, layout and landscaping of development and mitigation measures necessary to prevent harm.</u></p> <p><u>Landscape</u></p> <p>III. <u>New community woodland will mitigate any visual impacts on the wider landscape, and the valley of the Turnford Brook will form an important</u></p>	<p>significance of the heritage assets on and near the site and their settings. See the inspector’s Post-Hearings Advice Note (EXAM29). See also the Council’s response to Inspector’s Action Point 53 (EXAM31A)</p>	<p>principles. It does not represent a change which could result in new likely significant effects on any European site.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p><u>piece of strategic green infrastructure in accordance with policy NEB3. Natural and semi-natural greenspace will be provided through a masterplan-led approach, and should maximise benefits to the natural and historic environment.</u></p>		
Paragraph 5.32	<p>Master Planning 5.25 <u>5.32</u> Brookfield is subject to an overall master plan being developed by the Council. That master plan is indicated in conceptual form above. It will ensure that different land interests are resolved and connected.</p>	<p>Moved from paragraph 5.25 to provide a reasoned justification to new policy BR7: The Integrated Development of Brookfield.</p>	<p>No. This modification relates to the renumbering of paragraphs only.</p>
Paragraph 5.33	<p>5.26 <u>5.33</u> The Council’s overall master plan is being informed by separate detailed master plans for Brookfield Riverside and Brookfield Garden Village as well as a development scheme for Brookfield Retail Park which now has planning permission.</p>	<p>Moved from paragraph 5.26 to provide a reasoned justification to new policy BR7: The Integrated Development of Brookfield.</p>	<p>No. This deletion does not represent a modification that would result in a likely significant effect.</p>
NEW POLICY	<p><u>Policy BR7: Integrated development of Brookfield</u> <u>I. Brookfield will be developed as a sustainable and integrated garden suburb in accordance with the requirements set out in policies BR1, BR2, BR3, BR4, BR5, and BR6 to be incorporated within integrated master plans.</u> <u>II. The Brookfield area, as shown in Figure 3, will be subject to a masterplan covering the whole area, setting out the quantum and distribution of land uses; access; sustainable high quality design and layout principles; necessary infrastructure; the relationship between the site and other adjacent and nearby land uses; landscape, heritage and biodiversity assets; and other relevant matters.</u></p>	<p>To ensure that the policy is effective in achieving the integrated development of Brookfield. See also Council’s response to inspector’s Action Point 55 (EXAM31A).</p>	<p>No. This modification relates to design principles that aim to protect the historic and natural environment. This modification will not result in any new likely significant effects.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p><u>III. In order to ensure that the area is planned and delivered comprehensively, any application for development on all/part of the Brookfield area will be assessed against its contribution to the overall comprehensive masterplan for Brookfield.</u></p> <p><u>IV. If necessary, compulsory purchase will be pursued by the Council.</u></p>		
<p>Policy BR1</p>	<p>Policy BR1: Brookfield</p> <p>Brookfield will be developed as a sustainable and integrated garden suburb in accordance with the following requirements to be incorporated within integrated master plans:</p> <p><u>Brookfield Riverside</u></p> <p>1. Up to 30,000 square metres net retail comparison floorspace;</p> <p>2. c. 3,500 square metres retail convenience floorspace;</p> <p>3. Up to 10,000 square metres leisure floorspace;</p> <p>4. A civic centre;</p> <p>5. c. 250 new homes;</p> <p>6. 40% affordable homes;</p> <p>7. Elderly persons' accommodation;</p> <p>8. Business campus with c. 30,000 to 50,000 square metres floorspace;</p> <p>9. Exceptional quality public realm;</p> <p>10. Car parking;</p> <p>11. Easy pedestrian connectivity to the existing Brookfield Centre and Brookfield Retail Park and proposed Brookfield Garden Village; and</p> <p>12. New community woodland.</p> <p><u>Brookfield Garden Village</u></p> <p>1. c. 1,250 new homes;</p> <p>2. 40% affordable homes;</p>	<p>To ensure that the plan is justified, effective and consistent with national policy as set out in other modifications above. See the Inspector's Post-Hearings Advice Note (EXAM29).</p>	<p>No. This modification relates to change in the wording which is captured in Policy BR7 above.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>3. Elderly persons' accommodation; 4. 3 forms of entry of primary schooling; 5. Local centre; 6. Public open space and wood land including enhancement of the valley of the Turnford Brook as a green corridor and linear park through the development; 7. Protection and enhancement of scheduled monuments.</p> <p><u>Brookfield Link Road</u></p> <p>New link road connecting Brookfield Lane West, from Brookfield Retail Park to the Turnford Interchange.</p> <p><u>Relocated uses</u></p> <p>The following uses require relocation: 1. Halfhide Lane travellers site; 2. Halfhide Lane allotments; 3. Household Waste Recycling Centre; 4. The Broxbourne Council depot.</p> <p>Section 106 agreements will accompany future planning permission(s) and proportionate contributions will be allocated to priorities within the Infrastructure Delivery Plan. Brookfield is to be developed in accordance with a comprehensive masterplan.</p> <p>Piecemeal development of the area will be resisted.</p> <p>If necessary, compulsory purchase will be pursued by the Council.</p>		

6: Broxbourne

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Paragraph 6.2	The popular village centre is home to numerous local shops, pubs and restaurants but the streetscape would benefit from environmental improvements. There are also opportunities to improve the village green, local parks and footpaths. The Council will engage with the local community to identify, design, prioritise and seek funding for local projects that will improve the village. <u>The boundaries of the improvement plan area will be defined in consultation with the local community.</u>	To ensure that the plan is effective. See Further Modifications in respect of the Historic Environment.	No. This modification will not result in changes to the scale of development set out in the emerging Broxbourne Local Plan and as assessed in the 2018 Lepus HRA. The conclusions of the 2018 HRA therefore remain unchanged. This modification will not result in any new likely significant effects.
Paragraph 6.3	Broxbourne Station (<u>Grade II listed</u>) is currently proposed to be the northern terminus of Crossrail 2.	To make clear that the station itself is an important heritage asset.	No. This modification will not result in changes to the scale of development set out in the emerging Broxbourne Local Plan and as assessed in the 2018 Lepus HRA. The conclusions of the 2018 HRA therefore remain unchanged. This modification will not result in any new likely significant effects.
Policy BX1: Broxbourne Village Improvement Plan	<p>Policy BX1: Broxbourne Village Improvement Plan</p> <p>I. The Council will work with the local community to produce an improvement plan <u>Supplementary Planning Document</u> for the village of Broxbourne. <u>Development proposals should have regard to the SPD, once adopted.</u></p> <p>II. <u>Proposals that improve the environmental quality and attractiveness of Broxbourne village, including in terms of streetscape, open spaces, historic</u></p>	<p>Change required to ensure that the intended outcome of the plan is clear and to make clear how a decision maker should react, in accordance with NPPF paragraph 154. Modification to the Policies Map to show the extent of the area to be addressed by the Improvement Plan.</p> <p>See Council response to inspector’s Further Preliminary Question no. 1 and q. 144 (Matter 6)</p>	No. This modification will not result in changes to the scale of development set out in the emerging Broxbourne Local Plan and as assessed in the 2018 Lepus HRA. The conclusions of the 2018 HRA therefore remain unchanged. This modification will not result in any new likely significant effects.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p><u>environment (including the Conservation Area) and accessibility on foot and by bicycle, will be supported.</u></p>		
<p>Policy BX2: Broxbourne Station and Environs</p>	<p>Policy BX2: Broxbourne Station and Environs <u>I. The Council will support a long term development plan for produce an Area Action Plan to review options for the development and use of land at Broxbourne Station and environs in the context of Crossrail 2.</u></p> <p><u>II. Development proposals within this area should consider the potential to enhance setting of the listed station building and conserve the adjoining Conservation Area as well as providing net biodiversity gains in accordance with policy NEB1.</u></p>	<p>Change required to ensure that the intended outcome of the plan is clear and to make clear how a decision maker should react, in accordance with NPPF paragraph 154.</p> <p>See Council response to inspector’s Further Preliminary Question no. 1 and q. 145 (Matter 6).</p> <p>Part II added to ensure that the plan is consistent with national policy in terms of the historic and natural environment.</p>	<p>No. This modification strengthens the protection for the historic environment and does not result in changes to the scale of development set out in the emerging Broxbourne Local Plan and as assessed in the 2018 Lepus HRA. The conclusions of the 2018 HRA therefore remain unchanged. This modification will not result in any new likely significant effects.</p>
<p>Paragraph 6.6</p>	<p><u>Gas Distribution Station A particular opportunity has been identified at the disused gas distribution station north of Broxbourne Station. Removal of the existing derelict structures will improve the visual amenity of the area.</u></p>	<p>Text supporting the introduction of Policy BX3 below.</p>	<p>Yes. LSEs on air quality have been screened out as the overall housing number set out in the Local Plan has not changed in comparison to that assessed in the 2018 HRA. Changes in overall traffic flows and the subsequent impact on air quality will therefore remain as per the HRA made in 2018.</p>
<p>New Policy BX3: Gas Distribution Station</p>	<p><u>The former Gas Distribution Station north of Broxbourne station will accommodate approximately 35 dwellings. Vehicular access will be provided from Admiral’s Walk adjacent to the railway line.</u></p>	<p>To ensure that the Plan is effective by clearly setting out the key principles for development of this SLAA/urban capacity site.</p> <p>See Council response to inspector’s Further Preliminary Question no. 1</p>	<p>However, this is a new site allocation and has the potential to result in new LSEs in terms of public access and disturbance issues.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
			<p>Public access and disturbance issues have been screened out at Wormley-Hoddesdonpark Woods SAC based on the same evidence provided in the 2018 HRA. This noted that there is <i>'considered to be significant provision of Accessible Natural Green Spaces (ANGS) in the Brookfield and Rosedale Park strategic sites. Many of these open and outdoor spaces can be reached on foot by residents within a matter of minutes'</i>.</p> <p>Public access and disturbance impacts from the new allocations at the Lee Valley SPA and Ramsar will however be subject to further evaluation within the HRA.</p>
Paragraph 6.7	<p>6.6 6.7 Broxbourne School is proposing to redevelop its school buildings on the site of the existing school playing fields. This would be enabled through a housing development on the site of the current school buildings. Outline planning permission has now been granted for up to 153 new homes, new school buildings and extended playing fields and leisure facilities which will be used by the wider community. An indicative concept plan for Broxbourne School is included in Appendix E, showing the location of the Conservation Area and the Grade II listed buildings on Broxbourne High Road. As shown on the Policies Map and the Concept Plan, the land containing both the residential development and the relocated school buildings is removed from the Green Belt.</p>	To ensure clarity and consistency with national policy in respect of the historic environment and Green Belt.	<p>No.</p> <p>This modification strengthens the protection for the historic environment and does not result in changes to the scale of development set out in the emerging Broxbourne Local Plan and as assessed in the 2018 Lepus HRA. The conclusions of the 2018 HRA therefore remain unchanged and no new likely significant effects are anticipated.</p>
Policy BX4: Broxbourne School	<p>Policy BX34: Broxbourne School The Council will work with Broxbourne School to deliver it's redevelopment in accordance with outline planning permission 07/16/0512.</p>	Modification in response to Inspector's Question 1 in Further Preliminary Questions (part b) to give an indication of	<p>No.</p> <p>This modification strengthens the protection for the historic environment and does not result in changes to the scale of</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p><u>Land at Broxbourne School will accommodate approximately 150 homes and provide a high quality replacement 8FE secondary school together with playing fields and pitches on land to the south of the residential allocation. Development should ensure that the historic environment in the vicinity of the site is conserved.</u></p>	<p>what would be acceptable if a particular scheme with planning permission were not to be progressed. See also inspector’s q. 143.</p>	<p>development set out in the emerging Broxbourne Local Plan and as assessed in the 2018 Lepus HRA. The conclusions of the 2018 HRA therefore remain unchanged and no new likely significant effects are anticipated.</p>

Appendix E - Inset Map 6 - Broxbourne School

Submitted Plan	Proposed Modification
 <p>This map shows the submitted plan for Broxbourne School. It features an orange area labeled 'Housing on existing School site' with a dashed blue arrow pointing to it. A purple area labeled 'Secondary School building relocated' is shown. A large blue area represents 'School playing fields'. A red dashed line indicates the 'Green Belt' boundary, which encloses the playing fields and the relocated school building. Other features include 'Existing Conservation Area', 'Leisure Hub, shared facilities between School/Community', and 'Junction improvements' on a nearby road. A scale bar at the bottom left shows 0, 10, 50, and 100 metres.</p>	 <p>This map shows the proposed modification to the Broxbourne School site. It includes the same orange housing area and purple relocated school building as the submitted plan. However, the 'School playing fields' are now shown in green and are labeled 'Removed from Green Belt'. The red dashed line representing the 'Green Belt' boundary has shifted to exclude the playing fields. Other features like 'Existing buildings to be demolished', 'Conservation Area', and 'Leisure Hub, shared facilities between School/Community' remain. A scale bar at the bottom left shows 0, 20, 50, and 100 metres.</p>

Reason: For consistency with national policy in relation to Green Belt, to clarify that the relocated school site is removed from the Green Belt whilst the playing fields will be retained within the Green Belt.

Could the Proposed Main Modification give rise to a new likely significant effect?: Yes. As per comments above

7: Cheshunt

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
<p>CH1: Cheshunt Lakeside</p>	<p>Policy CH1: Cheshunt Lakeside</p> <p>Cheshunt Lakeside will be developed as a new mixed use urban village to accommodate:</p> <ol style="list-style-type: none"> 1.c. 1,750 new homes; 2.40% affordable homes; 3.Buildings limited to a maximum of 8 storeys in height; 4.Elderly persons' accommodation; 5. <u>Approximately 20,000 square metres of business space to accommodate existing businesses within the allocated land area that could be satisfactorily located within the proposed mixed use urban village. Businesses and business floorspace for new business start-ups and additional business space;</u> 6.A local centre, situated along Windmill Lane, connecting Cheshunt Lakeside to Cheshunt Railway Station; 7.A two form of entry primary school; 8.Landscaped open space; and 9.Relocation of Network Rail depot. <p>A section 106 agreement will accompany a future planning permission and proportionate contributions will be allocated to priorities within the Infrastructure Delivery Plan.</p> <p>Cheshunt Lakeside is to be developed in accordance with a comprehensive master plan. Incremental development of the area will be resisted.</p> <p>The Council will work in partnership with Natural England, the Lee Valley Regional Park Authority and the developers of Cheshunt Lakeside to agree <u>a mitigation strategy</u></p>	<p>In order to ensure that mitigation relating to the Lee Valley SPA is implemented in a timely and effective manner. See inspector's Action Point no.1 and Action Point no. 20.</p> <p>In order to ensure that mitigation relating to the Lee Valley SPA is implemented in a timely and effective manner. See inspector's Action Point no.1 and 43.</p>	<p>Yes.</p> <p>This policy relates specifically to the protection of the Lee Valley SPA and Ramsar site through delivery of mitigation. It is a bespoke policy intended to avoid or reduce harmful effects on a European site. Whilst modifications to this policy will not result in changes to the scale of development proposed in the emerging Broxbourne Local Plan that was subject to the 2018 HRA, its application in terms of mitigation within the HRA will be considered further.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p><u>containing</u> a range of <u>on-site and off-site</u> measures <u>aimed at mitigating to mitigate</u> the effect of the development on the qualifying interests of the Lee Valley Special Protection Area. <u>The mitigation strategy will be in place by the time of grant of any planning permission for the development. Proposals must also satisfy the requirements set out in Policy NEB2: Wildlife Sites.</u></p> <p>If necessary, compulsory purchase will be pursued by the Council.</p>		
<p>Paragraph 7.8</p>	<p>7.8 <u>As explained in relation to Policy NEB2</u>, The Council has carried out <u>an appropriate assessment a Habitats Regulations Assessment (HRA)</u> of this plan. That assessment found that the proximity of the proposed Cheshunt Lakeside development less than 400 metres from the Special Protection Area (SPA) was likely to have an adverse effect on the qualifying interests of the SPA (Bittern, Gadwall and Shoveler), unless mitigation measures were put in place. In considering any application, the Council will need to be satisfied that the development provides sufficient mitigation, in accordance with the mitigation hierarchy in Policy NEB1 <u>and the provisions of Policy NEB2</u>, to ensure that no adverse effect on the Lee Valley SPA arises. This is likely to require the provision of access to sufficient on-site recreational open space and amenity space to meet the day to day needs of residents, as well as off-site mitigation measures such as the provision of habitat for qualifying species, and improved visitor management infrastructure such as information signs and paths which encourage activity away from the qualifying interests. <u>The project level appropriate</u></p>	<p>In order to ensure that mitigation relating to the Lee Valley SPA is implemented in a timely and effective manner. See inspector’s Action Point no.1 and AP43.</p>	<p>Yes. As above.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>assessment will enable the collection of more detailed information on the qualifying interests and inform the detail of mitigation measures to be provided. The HRA (including the proposed mitigation measures), together with the Mitigation Strategy prepared to accompany the outline planning permission for Cheshunt Lakeside (which contains more detailed information), are available on the Council's website at www.broxbourne.gov.uk/neb.</p>		
Paragraph 7.12	<p>7.12 The Old Pond District Centre is Cheshunt's traditional shopping area but now plays a mainly localised role in serving its immediate catchment population. There are few vacancies within the centre and it is relatively vibrant. However, it is dominated by traffic and the street environment is poor. The Council has commenced a strategy to address these issues. Proposals for new development should have regard to the Council's Cheshunt Old Pond Strategy in accordance with Policy RTC2: Development within town, district and local centres, neighbourhood centres and parades (see Chapter 23: Retail and Town Centres)</p>	See proposed change to Policy CH3: Cheshunt Old Pond below.	No. This modification will not result in changes to the emerging Broxbourne Local Plan that was assessed in the 2018 HRA. No new likely significant effects are therefore anticipated.
Policy CH2: Rosedale Park	<p>Policy CH2: Rosedale Park <u>Rosedale Park South (Tudor Nursery and environs)</u> [1-9 - no modifications proposed] <u>10. Conservation of the setting of listed buildings on Burton Lane and Goffs Lane through appropriate design and layout.</u> <u>South of Andrews Lane and east of Burton Lane</u> 1. e. 50 homes <u>approximately 60 homes;</u></p>	To ensure that the Plan is effective. See Council's response to inspector's Q. 100.	Yes. The allocation under Policy CH2 allows for an additional 10 homes. Whilst the scale of this increase is small in magnitude, the potential for new likely significant effects cannot be ruled out and will be considered further in the HRA.

Figure 5 Rosedale Park indicative Concept Plan
Submitted Plan



Figure 5 Rosedale Park indicative Concept Plan



Reason: to indicate the location of the historic assets in the vicinity of the site.

Could the Proposed Main Modification give rise to a new likely significant effect?: Yes. As per text above.

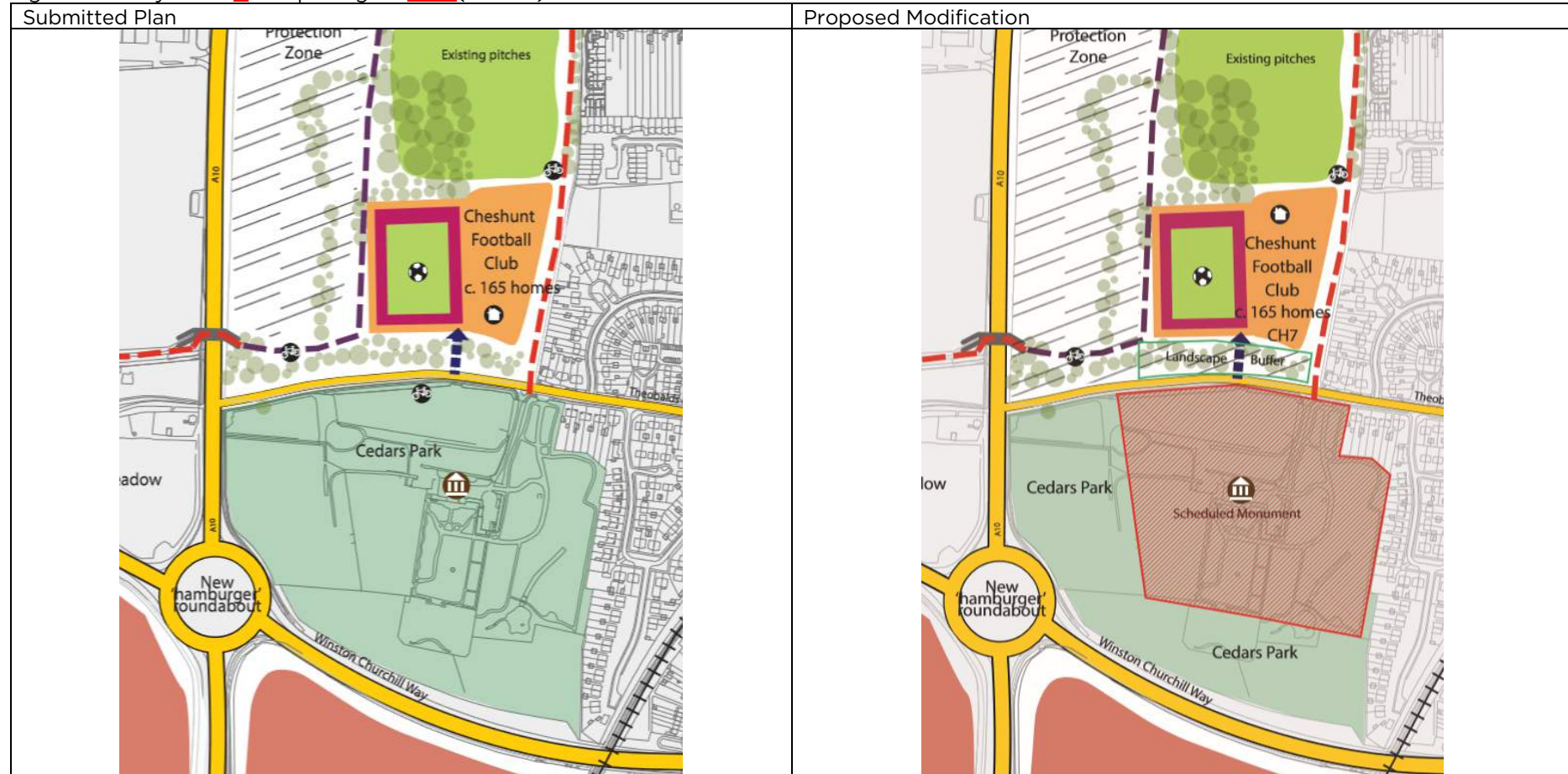
POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Paragraph 7.12	7.12 The Old Pond District Centre is Cheshunt’s traditional shopping area but now plays a mainly localised role in serving its immediate catchment population. There are few vacancies within the centre and it is relatively vibrant. However, it is dominated by traffic and the street environment is poor. The Council has commenced a strategy to address these issues.	To ensure that the plan is effective and consistent with national policy.	No. This deletion would not result in a change to the scale of development proposed in emerging Broxbourne Local Plan which was assessed in the 2018 HRA.
Paragraph 7.13	7.13 Proposals for new development should have regard to the Council’s Old Pond Strategy, once adopted, in accordance with Policy RTC2: Development within town, district and centres, neighbourhood centres and shopping parades (see Chapter 23: Retail and Town Centres). The main focus of the Strategy is on how the Old Pond can be made a better place to do business, to visit and to live in. The strategy looks to improve the local environment and streetscene, enhancing the local environment in part through improvements to Grundy Park, creation of new and improved public spaces, and conserving and enhancing the historic environment, including in relation to the listed buildings on College Road and the listed and locally listed buildings on Turners Hill. Development opportunities within the Old Pond are limited and this Local Plan is not proposing any major developments. However, the Strategy will consider opportunities for new development alongside consideration as to how the Old Pond can be made a better place to do business, to visit and to live in.	To ensure that the plan is effective and consistent with national policy.	No. These modifications aim to strengthen the policy wording in terms of providing general criteria for testing the acceptability of policies. They will not result in a change to the scale of development proposed in emerging Broxbourne Local Plan which was assessed in the 2018 HRA.
Policy CH3: Cheshunt Old Pond	Policy CH3: Cheshunt Old Pond The Council will support proposals which accord with the following priorities for the district centre:	Change required to ensure that the intended outcome of the plan is clear and to make clear how a decision maker should react, in accordance with NPPF paragraph 154. In order to make	No. This allocation existed in the emerging Broxbourne Local Plan. This modification provides design criteria for the site which will not give rise to new likely significant effects.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<ol style="list-style-type: none"> 1. Public realm improvements to create an attractive and accessible environment for pedestrians and cyclists whilst enabling the circulation of vehicular traffic; 2. Provision of a diverse retail, services, food and drink offering; 3. Improvements to Grundy Park at Turners Hill; 4. Provision of a street market and events programme; 5. Parking improvements; and 6. Townscape improvements including conservation and wherever possible enhancement of historic assets and their settings. 	<p>the policy effective the strategy area will be delineated on the Policies Map and the status of the district centre strategy will be secured by insertion of additional wording into Policy RTC2: Development within Designated Centres.</p> <p>See Council’s response to inspector’s Further Preliminary Question no. 1c.</p>	
Paragraph 7.17	<p>7.17 7.18 Cheshunt FC is proposing to progressively redevelop the stadium for sporting, commercial and community activities. This development would be financed through the construction and sale of new homes around the stadium and between the stadium and the existing urban edge at Montayne Road. The Council is supportive in principle of this development. As shown on the Concept Plan, the existing tree belt along Theobalds Lane will conserve the setting of the listed structures and scheduled monument at Cedars Park.</p>	<p>To make clear that the development is consistent with national policy in respect of the historic environment.</p>	<p>No. This modification relates to design guidance which protects the historic environment. It will not result in a change to the scale of development proposed in emerging Broxbourne Local Plan which was assessed in the 2018 HRA. This modification will not give rise to new likely significant effects.</p>
Policy CH4: Old Cambridge Road Corridor	<p>Policy CH4: Old Cambridge Road Corridor</p> <ol style="list-style-type: none"> i. The Council will produce an improvement plan Supplementary Planning Document for the Old Cambridge Road corridor between Turners Hill and Waltham Cross. 	<p>Change required to ensure that the intended outcome of the plan is clear and to make clear how a decision maker should react, in accordance with NPPF paragraph 154. Modification to the Policies Map to show the</p>	<p>No. This modification relates to design guidance in terms of pedestrian and cycling accessibility. It will not result in a change to the scale of development proposed in emerging Broxbourne Local Plan which was assessed in the</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>II. <u>Development proposals should have regard to the SPD, once adopted. Proposals that improve the environmental quality and attractiveness of the Old Cambridge Road Corridor, including in terms of streetscape and accessibility on foot or by bicycle, will be supported.</u></p>	<p>extent of the area to be addressed by the Improvement Plan.</p> <p>See Council’s response to inspector’s Further Preliminary Question no. 1 (part c).</p>	<p>2018 HRA. This modification will not give rise to new likely significant effects.</p>
<p>Policy CH7: Cheshunt Football Club</p>	<p>Policy CH7: Cheshunt Football Club</p> <p><u>A development of c.165 new homes, community and commercial floorspace is proposed at Cheshunt FC to enable the development of the Cheshunt FC Stadium.</u></p> <p><u>Cheshunt Football Club will be developed as a mixed sporting, community, commercial and residential development comprising:</u></p> <ol style="list-style-type: none"> 1. <u>Enhanced facilities and football stadium;</u> 2. <u>A development of approximately 4,000 square metres net floorspace for community, business, leisure and ancillary retail uses;</u> 3. <u>Approximately 165 new homes.</u> <p><u>The site will be developed in accordance with a comprehensive masterplan. Incremental development of the area will be resisted.</u></p>	<p>To ensure that the policy is effective and consistent with national policy. See inspector’s Action Point 23.</p>	<p>No.</p> <p>This modification will not result in a change to the scale of development proposed in emerging Broxbourne Local Plan and which was assessed in the 2018 HRA. This modification will not give rise to new likely significant effects.</p>
<p>Policy CH8: Albury Farm Landscape Protection Zone</p>	<p>Policy CH8: Albury Farm Landscape Protection Zone</p>	<p>To ensure that the policy is effective. See inspector’s Action Point 24.</p>	<p>No.</p> <p>This modification sets out acceptable land uses within this zone. These are unlikely to result in new likely significant effects.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p><u>I. The area indicated on the Policies Map will be protected from development <u>other than ancillary buildings or structures which</u></u></p> <ul style="list-style-type: none"> <u>a) are demonstrated to be necessary to the effective implementation of any of the uses contained in Part II of this policy; and</u> <u>b) are designed and sited to ensure consistency with the objective of retaining openness along the A10.</u> <p><u>II. Acceptable land uses within this zone could include any of the following:</u></p> <ul style="list-style-type: none"> <u>a) agriculture;</u> <u>b) sport and recreation facilities, including playing pitches, sports fields, parks and other open spaces;</u> <u>c) allotments;</u> <u>d) cemeteries;</u> <u>e) wildlife habitat creation;</u> <u>f) any other land uses which do not compromise the openness of the landscape.</u> 		<p>Farm?</p>

Figure 6 Albury area eConcept diagram Plan (extract)



Reason: to ensure that the boundaries of the historic assets at Cheshunt Park in relation to the Cheshunt Football Club site allocation are clear, and to make clear the location of the landscape buffer between the two.

Could the Proposed Main Modification give rise to a new likely significant effect?: No. See comments above

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
New paragraph 7.21	<u>7.21 Bury Green is notable for the presence of a number of historic assets, including part of the route of the former Ermine Street Roman road (now Dark Lane) as well as a fine example of a moated house which is considered to be the remains of Cheshunt Manor.</u>	To provide reasoned justification to policies CH10 and CH11.	No. Modification relates background historic environment information only and will not result in a change to the scale of development proposed in emerging Broxbourne Local Plan and which was assessed in the 2018 HRA. No new likely significant effects are anticipated.
CH10: East of Dark Lane	East of Dark Lane is allocated for 60 50 homes, 40% of which should be affordable. <u>Development should conserve the setting of the Half Moat Manor Scheduled Monument and archaeological assessment should be undertaken in advance of any development in the area. A development brief will be prepared for this site.</u>	To ensure consistency with national policy regarding the historic environment. Development brief no longer necessary – planning application received.	No. The scale of development proposed at East of Dark Lane has been reduced from 60 to 50 and protection of historic assets included. This will not result in an increase in the scale of development proposed in emerging Broxbourne Local Plan and which was assessed in the 2018 HRA. The conclusion provided in the 2018 HRA therefore provide a worst-case assessment. No new likely significant effects are anticipated.
CH11: Former Eastern Playing Field	Former Eastern Playing Field of St Mary’s School will be developed to provide <u>new elderly persons accommodation</u> a residential care comprising 75 units in a parkland setting. A new community hall will be provided at the southern end of the site <u>within an undesignated open space, as shown on the Concept Plan. Development proposals should conserve the setting of the Grade I listed</u> opposite St. Mary’s Church.	To ensure that the policy is effective and consistent with national policy regarding the historic environment.	No. This modification will not result in an increase in the scale of development proposed in emerging Broxbourne Local Plan and which was assessed in the 2018 HRA. The conclusion provided in the 2018 HRA therefore stands. No new likely significant effects are anticipated.
Policy CH12: Land North of Bonney Grove	Policy CH12: Land North of Bonney Grove <u>is allocated in part for housing to enable improvements to club facilities. allocated for comprehensive residential redevelopment, subject to the following requirements:</u>	To ensure that the policy is effective. See inspector’s Action Point 19.	No. This modification proposes no change the housing number from that assessed in the 2018 HRA as part of the emerging Broxbourne Local Plan. No new likely significant effects are anticipated.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>a) <u>relocation of the V&E sports Club to a suitable alternative location;</u></p> <p>b) <u>approximately 100 homes, 40% of which should be affordable;</u></p> <p>c) <u>development in accordance with a comprehensive masterplan; and</u></p> <p>d) <u>suitable access arrangements from Goffs Lane.</u></p> <p><u>II. Should a suitable relocation site for the V&E Club not be agreed by all relevant parties within two years of the date of adoption of this Plan, the Council will consider favourably proposals for a stand-alone residential development at Bonneygrove Field subject to the following requirements:</u></p> <p>a) <u>approximately 40 homes, 40% of which should be affordable;</u></p> <p>b) <u>appropriate mitigations to ensure compatibility of new residential uses with adjacent outdoor sports activities; and</u></p> <p>c) <u>suitable access arrangements from Lieutenant Ellis Way.</u></p> <p><u>A development brief will be prepared for this site.</u></p>		
Paragraph 7.21	<p>7.21 <u>7.22</u> West of Goffs School lies the V&E sports club, including football pitches, and further to the west is an area of undeveloped land known as Bonneygrove Field. <u>Although not forming part of the Council's planned housing land supply, it</u> is considered that this</p>	<p>To ensure that the policy is effective. See inspector's Action Point 19.</p>	<p>No. This modification proposes no change the housing number from that assessed in the 2018 HRA as part of the emerging Broxbourne Local Plan. No new likely significant effects are anticipated.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	area has the potential to be developed in part for housing as a means to improve the facilities at the club and improve the frontage onto Goffs Lane as part of a comprehensive development and contribute to the requirements of Policy H1: Making Effective Use of Urban Land. A development brief will be prepared for this site.		

Figure 7 Bury Green North - indicative Concept Plan (extract)

Submitted Plan	Proposed Modification
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Reason: to ensure that the plan is consistent with national policy in respect of the historic environment.

Could the Proposed Main Modification give rise to a new likely significant effect?: No. See above.

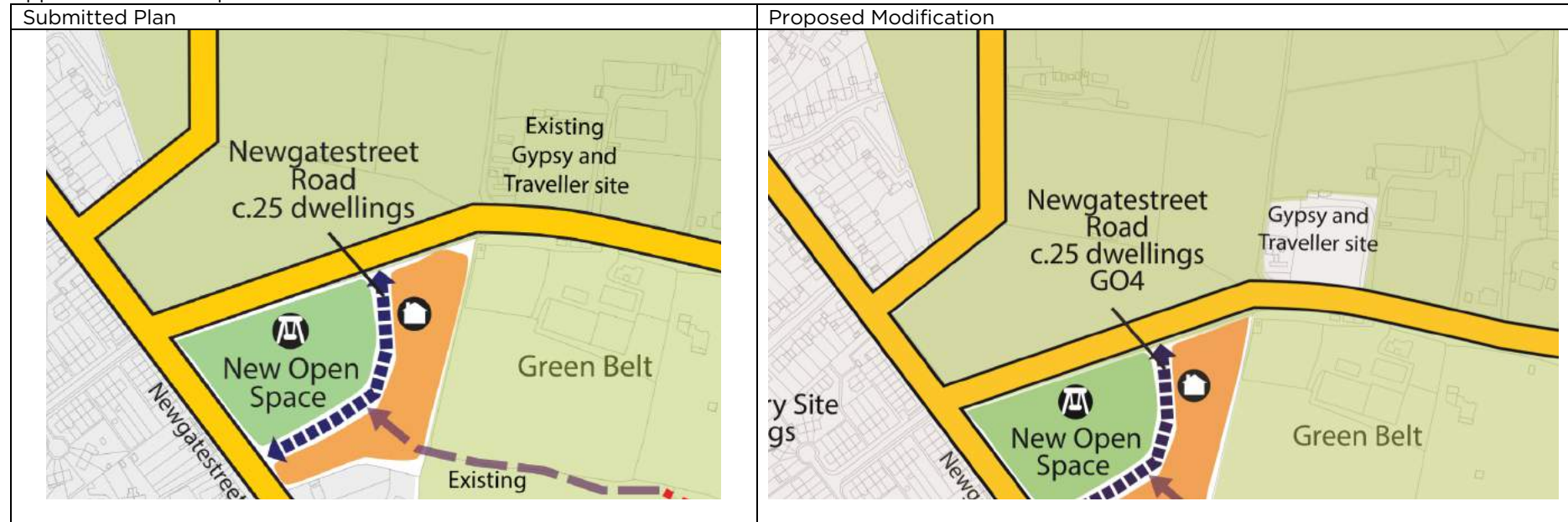
POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Policy CH13: Council Offices, Churchgate	Policy CH13: Council Offices, Churchgate A development of <u>approximately 75</u> new homes is proposed at Bishops' College as a mixture of conversion and redevelopment. A development brief will be prepared for this site to address a range of issues including Development proposals should conserve the setting, character and appearance of the listed buildings and Conservation Area and associated green spaces including the New River. A development brief will be prepared for this site.	To ensure that the policy is effective and consistent with national policy regarding the historic environment.	No. This modification proposes no change the housing number from that assessed in the 2018 HRA as part of the emerging Broxbourne Local Plan. No new likely significant effects are anticipated.
Paragraph 7.23	Maxwells Farm West and Rush Meadow 7.23 This site is proposed for removal from the Green Belt as part of wider Green Belt changes in the vicinity. It is not being specifically allocated for development within this Local Plan but it is recognised that its development could contribute to the strategic economic objectives of the Plan within the Plan period.	Moved to Chapter 10 (Park Plaza) for clarity and consistency.	No. This deletion will not result in an increase in the scale of development proposed in emerging Broxbourne Local Plan and which was assessed in the 2018 HRA.
Policy CH14: South of Hammondstreet Road	A development of e. 44 <u>approximately 45</u> dwellings is proposed South of Hammondstreet Road, including amenity open space and a play area.		No. This modification proposes no change the housing number from that assessed in the 2018 HRA as part of the emerging Broxbourne Local Plan (number rounded up to 45). No new likely significant effects are anticipated.
Paragraph 7.25	7.25-7.24 No new secondary schools are planned during the Plan period. However, it is anticipated that children from northern Cheshunt may attend the proposed a new secondary school at Church Lane in Wormley, in the area towards the end of the plan period. <u>should it be established that additional provision is necessary. See policy INF10.</u>	For consistency in relation to modifications to Policy INF10.	No. This modification will not result in an increase in the scale of development proposed in emerging Broxbourne Local Plan and which was assessed in the 2018 HRA. No new likely significant effects are anticipated.

8: Goffs Oak

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Paragraph 8.3	8.3 The popular village centre is home to numerous local shops, pubs and restaurants but the streetscape would benefit from environmental improvements. There are also opportunities to create new public open space and improve local parks and footpaths. The Council will engage with the local community to identify, prioritise and seek further funding for local projects that will improve the village. <u>The extent of the improvement plan will be determined in consultation with the community.</u>	Change arising from modification to policy GO1: Goffs Oak Village Improvement Plan (see below).	No. This modification allows for community consultation and will not result in an increase in the scale of development proposed in the emerging Broxbourne Local Plan and which was assessed in the 2018 HRA. No new likely significant effects are anticipated.
Policy GO1: Goffs Oak Village Improvement Plan	Policy GO1: Goffs Oak Village Improvement Plan I. The Council will work with the local community to produce an improvement plan <u>Supplementary Planning Document</u> for the village of Goffs Oak. <u>Development proposals should have regard to the SPD, once adopted.</u> II. <u>Proposals that improve the environmental quality and attractiveness of Goffs Oak village centre, including in terms of streetscape and open space, and accessibility on foot or by bicycle, will be supported.</u>	Modification in response to inspector’s Further Preliminary Questions no.1 (part c). Change required to ensure that the intended outcome of the policy is clear and to make clear how a decision maker should react, in accordance with NPPF paragraph 154. Modification to the Policies Map to show the extent of the area to be addressed by the Improvement Plan.	No. Modifications relate to the requirement for SPD for the village and design principles to encourage walking and cycling. This modification will not result in an increase in the scale of development proposed in the emerging Broxbourne Local Plan and which was assessed in the 2018 HRA. No new likely significant effects are anticipated.

Figure 10 Goffs Oak indicative concept diagram (extract)

Appendix E inset map 2



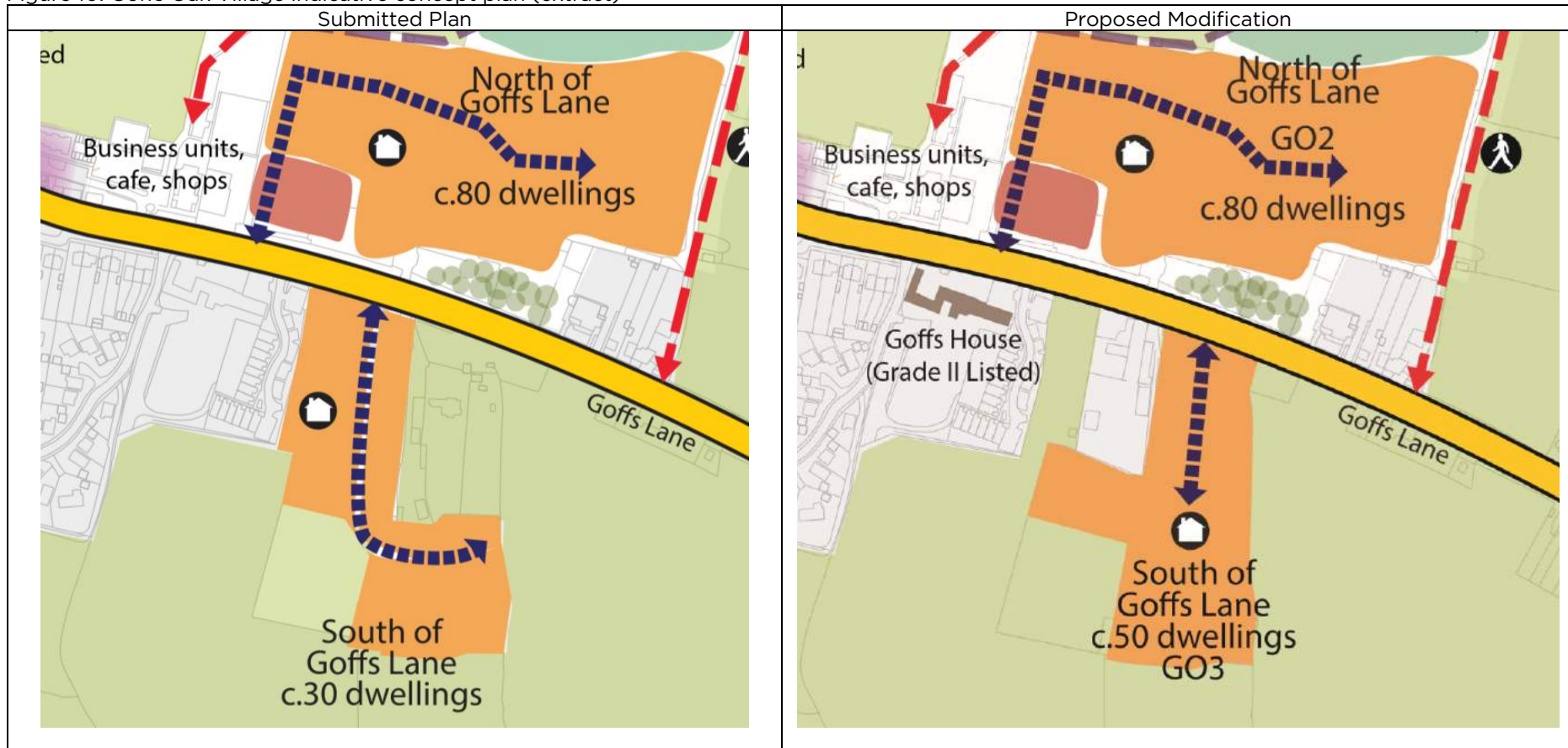
Reason: For consistency with national policy in relation to Traveller sites and Green Belt, to clarify that the traveller site at St James' Road is removed from the Green Belt (see also modification to Policies Map).

Could the Proposed Main Modification give rise to a new likely significant effect?: No. See text above.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Paragraph 8.5	This area is occupied by a former travelling show person site and a number of workshops. It adds little to the life of the village and Lafiya House and the former piggery site to the rear. <u>It is an opportunity to create a new housing development close to the village centre. The former travelling show person site to the west has been removed from Green Belt but falls outside the site allocation.</u>	Clarification of proposed change to the Policies Map as set out in Summary of Main Issues [EXAM5]. Proposed to exclude former travelling showperson site from the allocation as it is not available.	No. This modification relates to a change in wording. It will not result in an increase in the scale of development proposed in the emerging Broxbourne Local Plan and which was assessed in the 2018 HRA. No new likely significant effects are anticipated.
Policy GO3: South of Goffs Lane	The sites identified on the Policies map are <u>is</u> allocated for €-30 <u>approximately 50</u> dwellings, of <u>of</u> which 40% should be affordable.	To ensure that the plan is effective and consistent with national policy. See Council response to q. 93.	No. This modification relates to a change in wording. It will not result in an increase in the scale of development proposed in the emerging Broxbourne Local Plan and which was assessed in the 2018 HRA. No new likely significant effects are anticipated.
Policy GO4: Newgatestreet Road	The site identified on the Policies map is allocated for development as follows: 1. €-25 <u>Approximately 25</u> homes [remainder of policy unchanged]	Minor change.	No. This modification relates to a change in wording. It will not result in an increase in the scale of development proposed in the emerging Broxbourne Local Plan and which was assessed in the 2018 HRA. No new likely significant effects are anticipated.
Policy GO5: North of Cuffley Hill	The sites identified on the Policies maps are allocated for residential developments as follows: 1.CG Edwards - € <u>approximately 20</u> homes; 2.Fairmead Nursery - € <u>approximately 12</u> homes; 3.Rosemead Nursery - € <u>approximately 14</u> homes. Development of these areas will incorporate: 1.40% affordable housing;* 2.Public open space; 3.Retention of protected trees.	For consistency with national policy. See Council’s response to inspector’s question no. 95.	No. This modification relates to a change in wording. It will not result in an increase in the scale of development proposed in the emerging Broxbourne Local Plan and which was assessed in the 2018 HRA. No new likely significant effects are anticipated.

	*A commuted sum in lieu of on-site provision may be appropriate		
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Figure 10: Goffs Oak Village indicative concept plan (extract)



Reason: to ensure that the plan is effective. See Council's response to Question 97 (hearing statement Matter 6)
Could the Proposed Main Modification give rise to a new likely significant effect?: See text above.

9: Hoddesdon

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Paragraph 9.2	9.2 Hoddesdon Town Centre is one of Broxbourne’s foremost conservation areas. In 2010 the Hoddesdon Town Centre Strategy was published and this created the stimulus for the regeneration of the town centre over the last seven years and in particular the successful redevelopment of the Tower Centre. During that time, a number of other developments, an on-going programme of public realm improvement projects and a strengthened series of events have been implemented through annual action plans. These have created a vibrant and popular town centre that has been resilient to the recessions affecting many similar centres. The time is now right to undertake a full review of the Town Centre Strategy and this Local Plan provides the framework for that review. <u>Proposals for new development should have regard to the Council’s Hoddesdon Town Centre Strategy and its successor in accordance with Policy RTC2: Development within town, district and local centres, neighbourhood centres and shopping parades (see Chapter 23: Retail and Town Centres)</u>	Change arising from amendment to Policy HOD1 below. See set 2 Modifications and inspector’s question no 142.	No. This modification makes no change to development proposed in the emerging Broxbourne Local Plan and which was assessed in the 2018 HRA. No new likely significant effects are anticipated.
Policy HOD1: Hoddesdon Town Centre Strategy	HOD1: Hoddesdon Town Centre Strategy The Council will undertake a review of the Hoddesdon Town Centre Strategy to ensure that Hoddesdon continues to develop its role as an historic market centre for the town of Hoddesdon. The Strategy will prioritise the following: <u>The Council will support proposals which accord with the following town centre priorities:</u>	To ensure that the plan is effective by identifying 19 Amwell Street and Scania House and providing additional guidance in Policy HOD2. See Set 2 Modifications and inspector’s question no 142.	No. This modification makes no change to development proposed in the emerging Broxbourne Local Plan and which was assessed in the 2018 HRA. No new likely significant effects are anticipated.

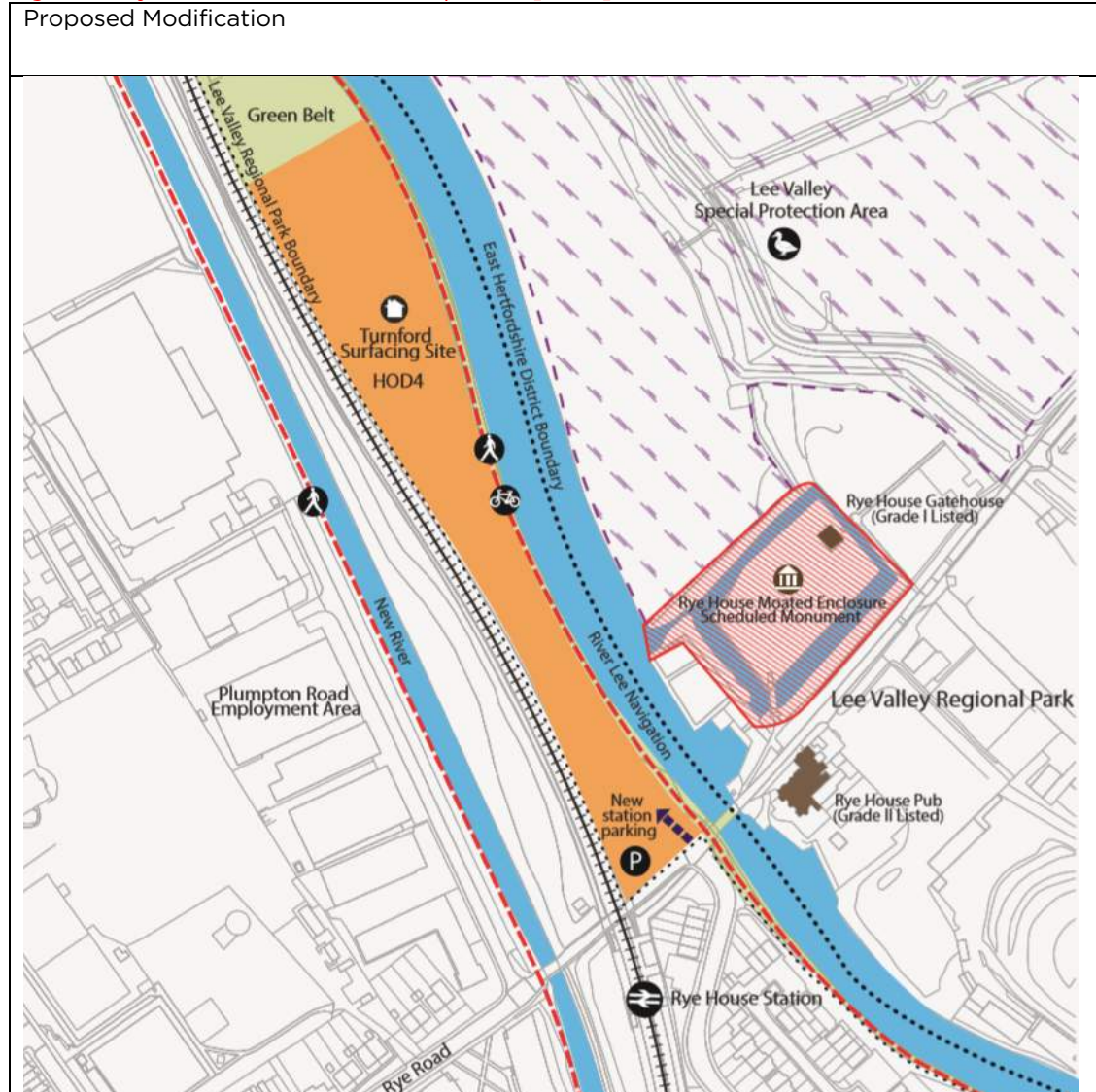
POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<ol style="list-style-type: none"> 1. The completion of public realm improvements throughout Hoddesdon High Street and beyond, including the enhancement of historic buildings; 2. The development of key sites, including a gateway development at and around Scania House to the north end of the High Street; 3. The provision of a mix of day and evening activities; 4. A full review of parking and access; <u>Access and parking improvements;</u> 5. An enhanced programme of events; 6. Protection and enhancement of historic character. 		
New paragraph 9.3	<p><u>9.3 19 Amwell Street and Scania House are currently occupied by the headquarters for B3 Living and other businesses. Currently, the buildings that occupy the site make little contribution to the character of the town centre. B3 Living, who own the site, are seeking to redevelop the space to provide for retirement living. This presents an opportunity to create an attractive and welcoming gateway development into the town centre, and enhance the setting of nearby historic assets.</u></p>	To provide the reasoned justification to new policy HOD2.	Yes. LSEs on air quality have been screened out as the overall housing number set out in the Local Plan has not changed in comparison to that assessed in the 2018 HRA. Changes in overall traffic flows and the subsequent impact on air quality will therefore remain as per the HRA made in 2018.
New Policy HOD2: 19 Amwell Street and Scania House	<p><u>Policy HOD2: 19 Amwell Street and Scania House</u> <u>The site at 19 Amwell Street and Scania House will accommodate approximately 60 dwellings with high quality design appropriate to a town centre northern gateway and the Conservation Area.</u></p>	To ensure that the Plan is effective by clearly setting out the key principles for development of this SLAA/urban capacity site. See Set 2 Modifications and inspector’s question no 142.	However, this is a new site allocation and has the potential to result in new LSEs in terms of public access and disturbance issues. Public access and disturbance issues have been screened out at Wormley-Hoddesdonpark Woods SAC based on the same evidence provided in the 2018 HRA. This noted that there is ‘ <i>considered to be</i>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
			<p><i>significant provision of Accessible Natural Green Spaces (ANGS) in the Brookfield and Rosedale Park strategic sites. Many of these open and outdoor spaces can be reached on foot by residents within a matter of minutes’.</i></p> <p>Public access and disturbance impacts from the new allocations at the Lee Valley SPA and Ramsar will however be subject to further evaluation within the HRA.</p>
<p>Paragraph 9.3</p>	<p>Just south of the town centre, the former Hoddesdon Police Station building is now vacant and Hertfordshire Constabulary is seeking redevelopment of the site for residential purposes.</p>	<p>To provide reasoned justification of policy HOD3.</p>	<p>Yes.</p> <p>LSEs on air quality have been screened out as the overall housing number set out in the Local Plan has not changed in comparison to that assessed in the 2018 HRA. Changes in overall traffic flows and the subsequent impact on air quality will therefore remain as per the HRA made in 2018.</p>
<p>Policy HOD3: Former Hoddesdon Police Station</p>	<p>The former Hoddesdon Police Station site will accommodate approximately 30 dwellings. Development proposals should conserve and enhance the Conservation Area and the setting of the nearby listed buildings, and make a positive contribution to the street scene appropriate to this prominent site on the approach to Hoddesdon Town Centre.</p>	<p>To ensure that the Plan is effective by clearly setting out the key principles for development of this SLAA/urban capacity site. See Set 2 modifications in response to inspector’s Further Preliminary Question no. 6 and AP44 regarding the historic environment.</p>	<p>However, this is a new site allocation and has the potential to result in new LSEs in terms of public access and disturbance issues.</p> <p>Public access and disturbance issues have been screened out at Wormley-Hoddesdonpark Woods SAC based on the same evidence provided in the 2018 HRA. This noted that there is <i>‘considered to be significant provision of Accessible Natural Green Spaces (ANGS) in the Brookfield and Rosedale Park strategic sites. Many of these open and outdoor spaces can be reached on foot by residents within a matter of minutes’.</i></p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
			Public access and disturbance impacts from the new allocations at the Lee Valley SPA and Ramsar will however be subject to further evaluation within the HRA.
New paragraph 9.7	<u>9.7 The site lies within the setting of a number of historic assets including the scheduled monument of the Rye House Moated enclosure and associated listed structures including the Grade I listed Gatehouse, and the Grade II listed Rye House public house. All of these assets lie outside the borough within East Hertfordshire, but for reference are shown on the Policies Map. There is the potential for archaeological remains under the Turnford Surfacing site.</u>	To provide reasoned justification of policy HOD4 in relation to the historic environment.	No. This modification allows for the protection of the historic environment and therefore will not lead to likely significant effects.
Policy HOD2: Turnford Surfacing Site	<p>Policy HOD2 HOD4: Turnford Surfacing Site The Council seeks the redevelopment of the Turnford Surfacing Site in accordance an updated Development Brief.</p> <p><u>The Turnford Surfacing Site is allocated for around 40 dwellings and a small car park to serve Rye Park station. Development should be of a suitable design and layout to reflect this importance location as a Lee Valley Regional Park gateway site (Policy LV5) as well as protecting the natural and historic environment. Further detail will be added through an update to the existing Development Brief.</u></p>	<p>Modification in response to inspector’s Further Preliminary Questions no. 1 (part a). The housing number was omitted from the submitted policy because of the intention to review the development brief, however the number of 40 dwellings contained within the Housing Trajectory remains the best available estimate.</p> <p>See Set 2 Modifications and inspector’s question no 138.</p>	No. This modification proposes no change the housing number from that assessed in the 2018 HRA as part of the emerging Broxbourne Local Plan. No new likely significant effects are anticipated.

Submitted Plan
n/a

Figure 11: Rye House indicative Concept Plan [NEW]



Reason: to ensure that the plan is clear in respect of historic assets and the environment in the vicinity of the site allocation.

Could the Proposed Main Modification give rise to a new likely significant effect?:

Yes. See comments above.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Paragraph 9.6	<p>9.6 9.9 In 2013, the Council produced the Hoddesdon Business Park Improvement Plan. This identifies six employment campuses – Woollensbrook, Pindar Road, Rye Park, RD Park, Dobb’s Weir and Ratty’s Lane. It established boundaries for the business park, a strategy for its overall development and more detailed plans for improvements and promotion. These include plans for the Essex Road Gateway sites adjacent to the Dinant Roundabout, <u>which is owned by the Council and where a small housing development is proposed to the south of a new link road which will greatly improve access to the business park by alleviating pressure on the current pinch-point where Essex Road crosses the New River.</u> Most of the Plan remains relevant today and it still forms the framework for the future development of the Business Park.</p>	Supporting amendments to proposed Policy HOD8 below. See Set 2 modifications.	No. This modification proposes new likely significant effects are anticipated.
Policy HOD4: High Leigh Garden Village	<p>Policy HOD4 HOD7: High Leigh Garden Village The Council will work with the developers to deliver High Leigh Garden Village in accordance with outline planning permission 07/13/0899/O.</p> <p><u>Land at High Leigh Garden Village will accommodate approximately 485 homes, a 2FE primary school, and small scale shops and leisure and community uses to serve the immediate locality.</u></p>	Modification in response to inspector’s Further Preliminary Questions no. 1 (part b) to give an indication of the scale and form of development as well as what would be acceptable if a particular scheme with planning permission were not to be progressed. See Set 2 modifications and inspector’s q. 140 and 141.	No. This modification proposes a reduction in the housing number from that assessed in the 2018 HRA as part of the emerging Broxbourne Local Plan. No new likely significant effects are therefore anticipated.
New Paragraph 9.11	<p><u>Hertfordshire County Council has announced its intention to relocate the existing Westfield Primary School from Westfield Road to the High Leigh development, expanding its capacity from 1FE to 2FE. Funding for the move will come in part from the redevelopment of the vacated Westfield Road site for housing.</u></p>	Supporting amendments to proposed Policy HOD8 below.	Yes. LSEs on air quality have been screened out as the overall housing number set out in the Local Plan has not changed in comparison to that

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
<p>New Policy HOD8: Westfield Primary School Site</p>	<p><u>Policy HOD 8: Westfield Primary School Site</u> <u>The Westfield Primary School site will accommodate approximately 40 dwellings following the relocation of the school to a new site at High Leigh Garden Village.</u></p>	<p>To ensure that the Plan is effective by clearly setting out the key principles for development of this SLAA/urban capacity site. See Set 2 modifications in response to inspector’s Further Preliminary Question no. 6.</p>	<p>assessed in the 2018 HRA. Changes in overall traffic flows and the subsequent impact on air quality will therefore remain as per the HRA made in 2018.</p> <p>However, this is a new site allocation and has the potential to result in new LSEs in terms of public access and disturbance issues.</p> <p>Public access and disturbance issues have been screened out at Wormley-Hoddesdonpark Woods SAC based on the same evidence provided in the 2018 HRA. This noted that there is <i>‘considered to be significant provision of Accessible Natural Green Spaces (ANGS) in the Brookfield and Rosedale Park strategic sites. Many of these open and outdoor spaces can be reached on foot by residents within a matter of minutes’</i>.</p> <p>Public access and disturbance impacts from the new allocations at the Lee Valley SPA and Ramsar will however be subject to further evaluation within the HRA.</p>

Figure 11 High Leigh Garden Village (extract)
 Appendix E inset map 4

Submitted Plan	Proposed modification
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Reason: For consistency with national policy in relation to Traveller sites and Green Belt, to clarify that the traveller site at St James' Road is removed from the Green Belt (see also modification to Policies Map)

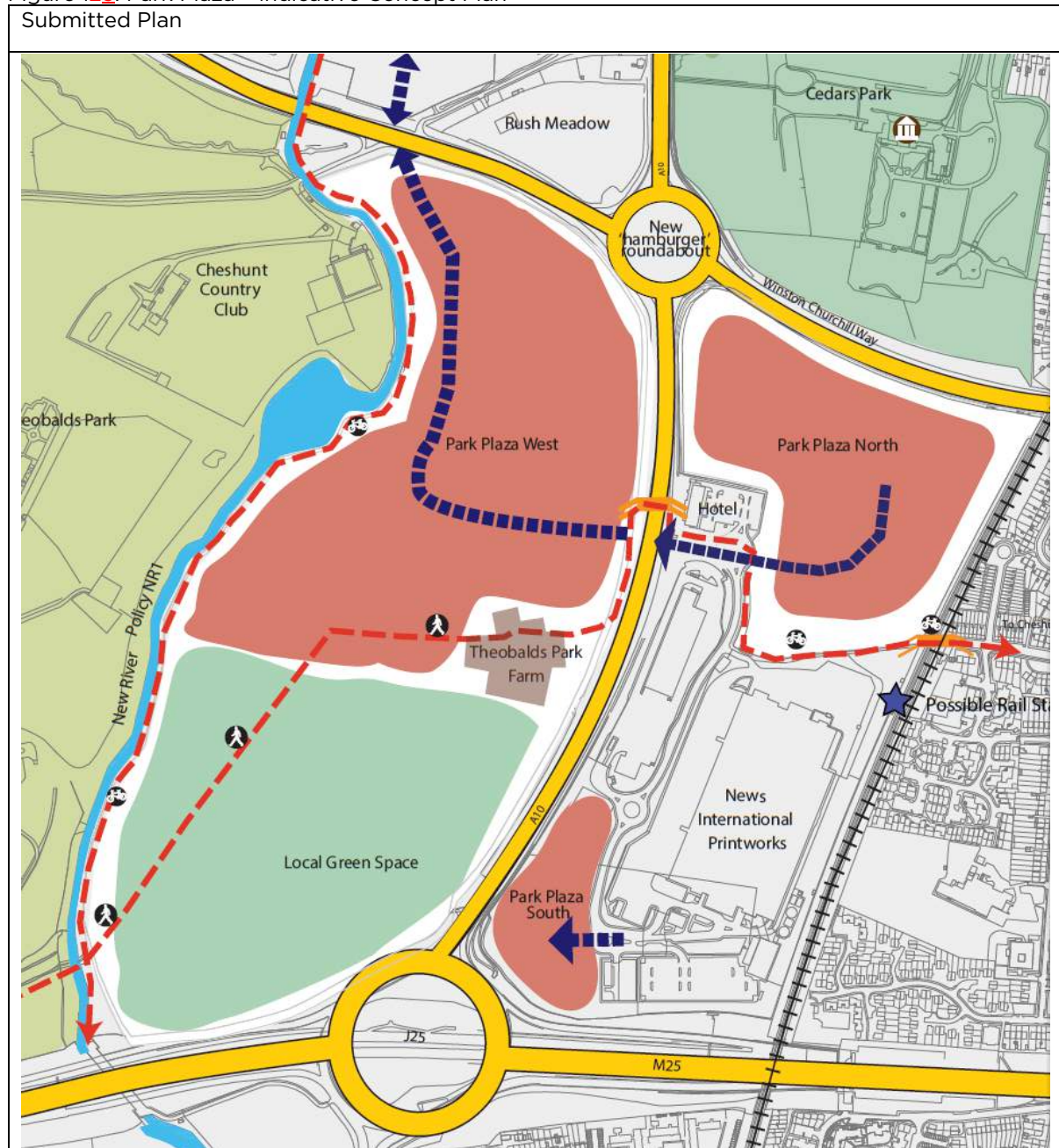
Could the Proposed Main Modification give rise to a new likely significant effect?: **Yes. See above text.**

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
New Policy HOD6: East of Dinant Link Road	<u>Policy HOD6: East of Dinant Link Road</u> <u>The site will provide for a new link road to Hoddesdon Business Park south of the existing Essex Road bridge. The remaining land south of the link road will accommodate approximately 35 new dwellings with access provided from Lampits.</u>	To ensure that the Plan is effective by clearly setting out the key principles for development of this SLAA/urban capacity site. See Set 2 modifications in response to inspector's Further Preliminary Question no. 6.	Yes. LSEs on air quality have been screened out as the overall housing number set out in the Local Plan has not changed in comparison to that assessed in the 2018 HRA. Changes in overall traffic flows and the subsequent impact on air quality will therefore remain as per the HRA made in 2018.
Paragraph 9.11	9.11 9.14 Regarding the proposed primary school at High Leigh, options included relocation of a local school. Additional demand for primary school places in the Borough during the plan period could will be met through <u>the relocation and expansion of Westfield Primary School and expansion of existing other local schools if necessary.</u>	Yes.	However, this is a new site allocation and has the potential to result in new LSEs in terms of public access and disturbance issues. Public access and disturbance issues have been screened out at Wormley-

			<p>Hoddesdonpark Woods SAC based on the same evidence provided in the 2018 HRA. This noted that there is '<i>considered to be significant provision of Accessible Natural Green Spaces (ANGS) in the Brookfield and Rosedale Park strategic sites. Many of these open and outdoor spaces can be reached on foot by residents within a matter of minutes</i>'. Public access and disturbance impacts from the new allocations at the Lee Valley SPA and Ramsar will however be subject to further evaluation within the HRA.</p>
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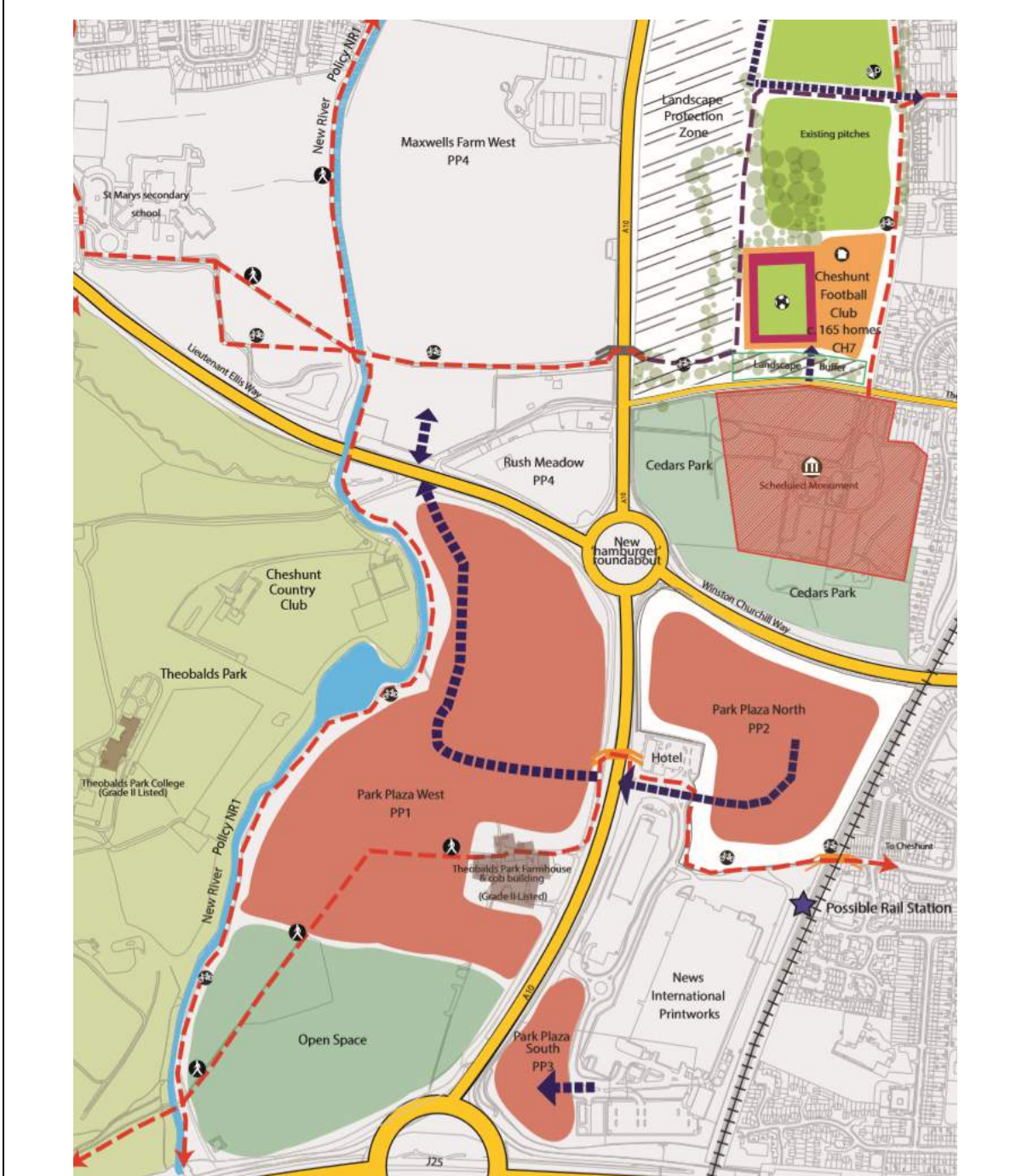
10: Park Plaza

Figure 123: Park Plaza - indicative Concept Plan



Reason: To ensure consistency between the policy provision within PP1 for minimum 12.5 hectares open space south of the development area and the concept diagram, and designation of the site as open space rather than Local Green Space for consistency with national policy.

Proposed Modification



Reasons: To ensure that the Plan is clear in terms of the positions of the respective site locations, and also in respect of the historic assets in the area.

Could the Proposed Main Modification give rise to a new likely significant effect?: Yes. See above text.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
New paragraph 10.4	<p><u>10.4 There are a number of historic assets within the site, including the Grade II listed Theobald's Park Farm, cob outbuilding and barn, as well as two areas of archaeological interest. Any development proposals will also need to address potential impacts on the setting of assets beyond the site, in particular the Cedars Park Scheduled Monument and the Grade II listed Theobalds College.</u></p>	<p>To provide reasoned justification for Policy PP1 in relation to the historic assets in and near the site which are to be respected.</p>	<p>No. This modification relates to the protection of historical features and will therefore not lead to a change or development which would have new likely significant effects.</p>
Policy PP1: Park Plaza West	<p>Policy PP1: Park Plaza West Land at Park Plaza West is allocated for the development of a business campus. This campus will be developed in strict accordance with a Master Plan and design codes based on the following principles:</p> <ol style="list-style-type: none"> 1. Up to 100,000 square metres gross floorspace; 2. Gateway development sensitive to Green Belt setting; 3. Restricted to use classes B1a (offices) or B1b (research and development) or other uses that support the campus or clearly demonstrate that they meet the employment objective of the Local Plan; 4. Generous and well landscaped setting including <u>the southern area of the site (forming the southern part of Theobald's Park Farm as shown on the Policies Map and Concept Diagram)</u> to be laid out as <u>public</u> open space (minimum 12.5 hectares) <u>in accordance with Policy ORC1</u>; 5. Landmark development at corner of A10 and Lieutenant Ellis Way; 6. Bus service to be provided; 7. <u>Parking in accordance with Local Plan Guidelines; A parking strategy that balances the provision of car parking spaces with the</u> 	<p>See Inspector's Action Point no. 27.</p>	<p>No. This modification represents amendments to the text to pick up cross references to the relevant figures and strengthening of a series of design criteria at this site. This modification will not lead to a change or development which would have new likely significant effects.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p><u>objective of securing modal shift to other forms of transport for trips to and from the site;</u> 8. <u>Contributions to meeting the transport mitigations set out within Policies INF3, INF5, INF7 and INF8 of this Local Plan;</u> 8. <u>9.</u> Pedestrian and cycle connections to be made to the urban area <u>and pedestrian and cycle linkages within the site and the area of open space to facilitate and encourage cycling and walking;</u> 9-10. <u>New River and environs to be developed as a Green Corridor; and</u> 10. <u>11.</u> Cecil's Pond to be restored; 11. <u>12.</u> Historic assets (including the listed barn) and their setting should be <u>respected conserved and where possible enhanced.</u></p> <p>This site will be developed in strict accordance with a master plan and design codes for buildings and the public realm which will be incorporated within an outline planning application for the development.</p>		
<p>Policy PP2: Park Plaza North</p>	<p>Policy PP2: Park Plaza North 1. <u>Park Plaza North is allocated for a variety of small and medium sized enterprises mix of employment uses</u> as follows:</p> <p>1. Bulky goods retailers that need to be relocated Restricted to use classes B1, B2 or businesses requiring to relocate as a result of regeneration developments proposed within this Local Plan <u>Waltham Cross Town Centre;</u> and 2. Landmark development at the corner of the A10 and Winston Churchill Way. 2. <u>A mix of B1, B2 and B8 uses on the remainder of the site-</u></p>		<p>No. This modification strengthens the policy with a series of design criteria. This modification will not lead to a change or development which would have new likely significant effects.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p><u>II. The site will be developed in general accordance with a master plan and design code which will be incorporated within an outline planning application for the development. The masterplan should include a visual landmark development at the corner of the A10 and Winston Churchill Way.</u></p> <p><u>III. Any visual impacts on the historic environment at Cedars Park should be mitigated through appropriate massing, design and landscaping.</u></p>		
New Paragraph 10.7	<p><u>Maxwells Farm West and Rush Meadow</u></p> <p><u>10.7 Development of this site for a variety of uses would contribute to the strategic employment objectives and vision of the Plan within the Plan period as set out in Chapter 2 and in relation to the economic development strategy in Chapter 3. That contribution should include the accommodation of appropriate employment uses displaced from the proposed Brookfield and Cheshunt Lakeside developments that would create a high quality environment. Land uses should be compatible with a sequential approach to town centre uses as set out in policy RTC1 and in national policy. There are infrastructure challenges to accommodating the development of this site alongside the wider Park Plaza proposals and the infrastructure impacts of developing this land will need to be fully tested within planning applications.</u></p>		No. Maxwell’s Farm was previously referred to in the emerging Broxbourne Local Plan as a reserves site and assessed as such in the 2018 HRA. Overall employment areas have been reduced as a result of the Modifications. The scenario therefore assessed in the 2018 HRA in this respect are therefore considered to be worst case. No LSEs are therefore anticipated.
NEW POLICY	<p><u>Policy PP4: Maxwells Farm West and Rush Meadow</u></p> <p><u>I. Acceptable land uses for this area will be compatible with the economic development strategy and vision for the borough, providing</u></p>		No. Maxwell’s Farm was previously referred to in the emerging Broxbourne Local Plan as a reserves site and assessed as such in the 2018 HRA. Overall employment areas have been reduced as a result of the

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p><u>high-value jobs within a landscaped environment.</u></p> <p><u>II. Development proposals for this area should:</u></p> <ul style="list-style-type: none"> <u>a) include appropriate provision for businesses displaced from Brookfield Riverside (policy BR1) and Cheshunt Lakeside (policy CH1);</u> <u>b) provide semi-natural green corridors along the New River and existing cycle path;</u> <u>c) include an appropriate landscape buffer to maintain a sense of openness to the landscape along the A10;</u> <u>d) achieve scale, massing and design sensitive to the historic assets associated with Cedars Park;</u> <u>e) take account of long views, for example across the Lea Valley and north towards Bishops' College bell tower and St. Mary's church;</u> <u>f) provide vehicular access compatible with Park Plaza West (policy PP1);</u> <u>g) ensure that the comprehensive development of Rush Meadow and Maxwells Farm West is not prejudiced;</u> 		<p>Modifications. The scenario therefore assessed in the 2018 HRA in this respect are therefore considered to be worst case. No LSEs are therefore anticipated.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p><u>h) facilitate the comprehensive delivery of transport and utilities infrastructure to the wider area; and;</u></p> <p><u>i) make proportionate contributions to off-site infrastructure required to serve the wider area.</u></p>		

11: Waltham Cross

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
[Picture of Eleanor Cross memorial]	Eleanor Cross (Grade I listed)	To make clear that the memorial is an historic asset addressed by the modification to policy WC1.	No. This modification relates to the inclusion of historical classification. It will not lead to a change or development which would have new likely significant effects.
Paragraph 11.3	<p>11.3 In 2015 the Waltham Cross Town Centre Strategy was published and this has created an agenda for the regeneration of the town centre over the next 5 – 10 years. Proposals for new development should have regard to the Council’s Waltham Cross Town Centre Strategy in accordance with Policy RTC2: Development within town, district and local centres, neighbourhood centres and shopping parades (see Chapter 23: Retail and Town Centres).</p> <p>11.4 The emphasis of the Strategy is on improving the vitality of the town centre and in particular the attractiveness and accessibility of its northern end (see below), enhancing the retail offer and attracting investment, enhancing the public realm, improving connectivity and providing a year wide calendar of events. The initial priority is for public realm improvements along the High Street. A centrepiece of the Strategy is the creation of a new town square at the Roundel. The Grade I listed Eleanor Cross Memorial Schedule Monument (see picture above) and Harold House (Grade II* listed) are key features of the local townscape.</p>	Change arising from amendment to Policy WC1 below.	No. This modification relates to the correct reference to the Town Centre Strategy and inclusion of historical classification. It will not lead to a change or development which would have new likely significant effects.
WC1: Waltham Cross Town Centre	WC1: Waltham Cross Town Centre The Council will implement the Waltham Cross Town Centre Strategy. The strategy will prioritise the following: The Council will support proposals which accord with the following town centre priorities:	Change required to ensure that the intended outcome of the policy is clear and to make clear how a decision maker should react, in accordance with NPPF paragraph 154. The status of the	No. This modification relates to criteria to protect the historic environment. It will not lead to a change or development which would have new likely significant effects.

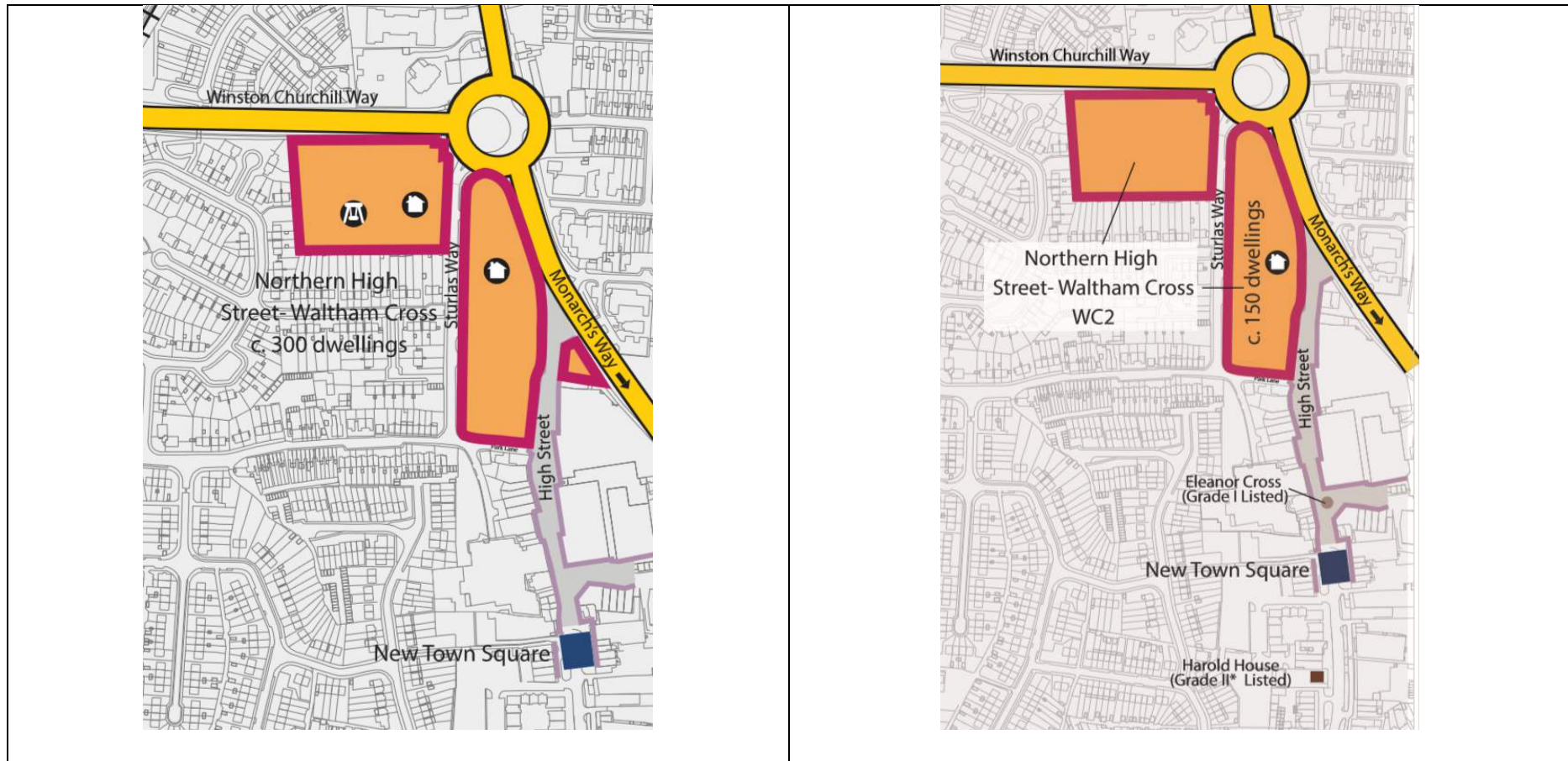
POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	1. A vibrant town centre throughout the daytime and the evening; 2. Redevelopment of the northern High Street (see below); 3. Public realm improvements throughout the High Street and beyond; 4. Additional homes in and around the town centre; <u>and</u> 5. <u>Conserving and where possible enhancing the setting of historic assets.</u>	town centre strategy will be secured by insertion of additional wording into Policy RTC2: Development within Designated Centres. See Set 2 modifications and inspector’s q. 137.	
Paragraph 11.4	11.4 The northern end of High Street the High Street presently sees relatively low levels of footfall and has a level of vacancy significantly higher than the southern end. Whilst the ‘big box’ Wickes (<u>east of Sturlas Way</u>) and Homebase DIY stores (<u>west of Sturlas Way</u>) at this end of the High Street play a recognised role in the broad retail offer of the town, they turn their back on this end of the street and create closure to the pedestrianised core, consequently limiting footfall and the viability of the retail units. Previous endeavours to redevelop the northern end of the High Street for a retail led development have not attracted investors. The Town Centre Strategy therefore now promotes this site for a mixed use, high density development of apartments, shops and community uses. The estimated capacity for the site is for 300 new homes. This would entail the relocation of Wickes, and Homebase to Park Plaza and negotiations are on-going with both companies towards this end.	See Inspector’s Action Point 30.	No. This modification provides site location text which will not lead to a change or development which would have new likely significant effects.
New paragraph 11.5	<u>11.5 The estimated capacity of the eastern part of the site is for 150 new homes. This would entail the relocation of Wickes, potentially to Park Plaza North (see Policy PP2). The western</u>	See Inspector’s Action Point 30.	No. In the emerging Broxbourne Local Plan this site was proposed for the development of 300 new homes. This

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p><u>part of the allocation comprises the Homebase store and negotiations will take place with both the landowner and Homebase to establish the most sustainable future for this site. That may result in the status quo, a redevelopment incorporating a re-modelled Homebase store or the closure of the Homebase store and its potential relocation.</u></p>		<p>policy now proposes the development of 150 new homes at this site. This is a reduction in the overall number of homes. The conclusion provided in the 2018 HRA therefore provide a worst-case assessment and no likely significant effects as a result of this modification are expected.</p>
<p>Policy WC2: Waltham Cross Northern High Street</p>	<p>Policy WC2: Waltham Cross Northern High Street Waltham Cross Northern High Street will be developed as a mixed use quarter <u>as follows comprising the following:</u></p> <ol style="list-style-type: none"> <u>1. c. 300+ new homes;</u> <u>2. 40% affordable housing;</u> <u>3. Shops/commercial/community ground floor uses.</u> <ol style="list-style-type: none"> a) <u>On the land east of Sturlas Way, approximately 150 homes;</u> b) <u>On the land west of Sturlas Way, the potential for significant housing development, possibly as part of a mixed use development incorporating the existing store;</u> c) <u>40% affordable housing;</u> d) <u>Shops/commercial/community ground floor uses.</u> <p>The site is to be developed in accordance with a comprehensive master plan. Incremental development of the area will be resisted.</p>	<p>See Inspector’s Action Point 30.</p>	<p>No. In the emerging Broxbourne Local Plan this site was proposed for the development of 300 new homes. This policy now proposes the development of 150 new homes at this site. This is a reduction in the overall number of homes. The conclusion provided in the 2018 HRA therefore provide a worst-case assessment and no new likely significant effects as a result of this modification are expected.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p><u>Masterplanning is to consider reasonable options for the relocation of the Wickes and Homebase stores.</u></p> <p>A section 106 agreement will accompany a future planning permission and proportionate contributions will be allocated to priorities within the Infrastructure Delivery Plan.</p> <p>If necessary, compulsory purchase will be pursued by the Council.</p>		

Figure 13-Figure 14: Waltham Cross Northern High Street indicative Concept Plan

Submitted Plan	Proposed Modification
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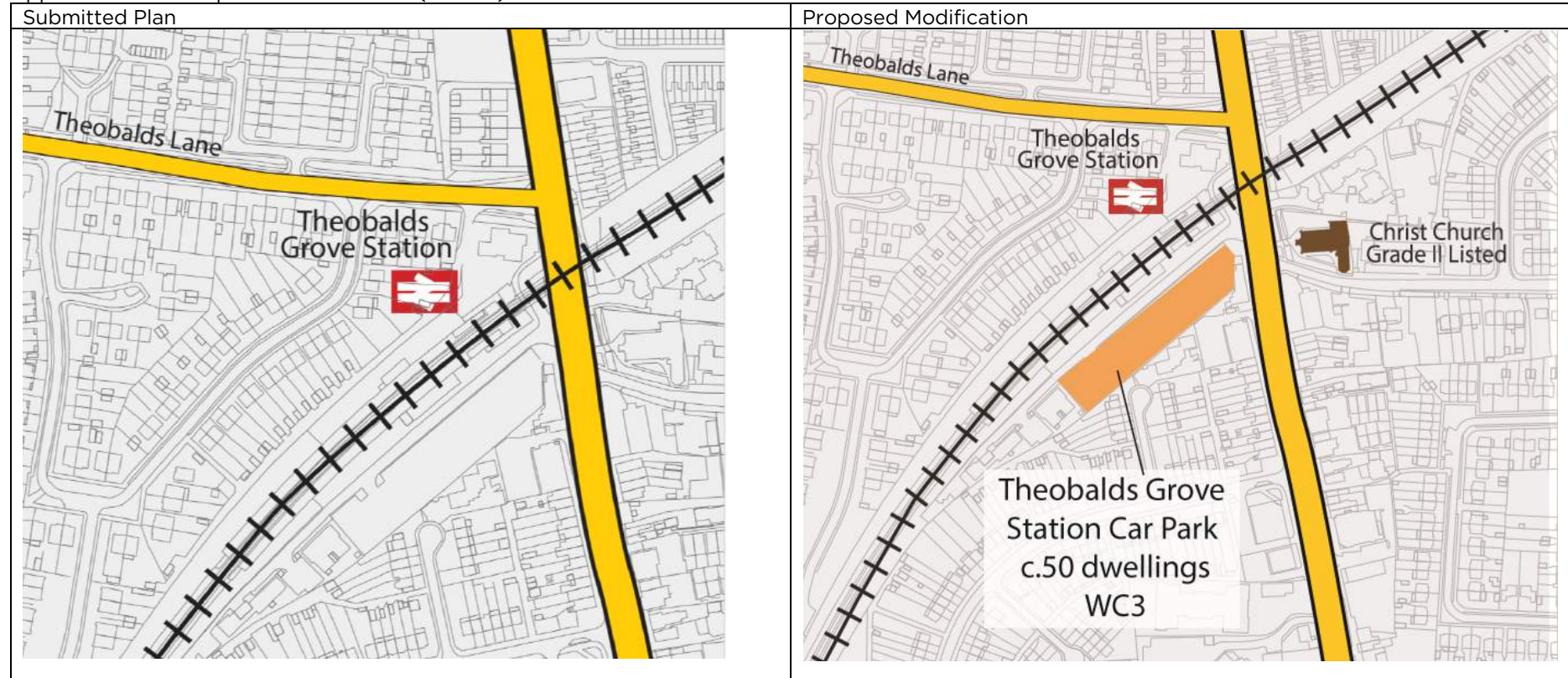
Reason: To ensure that the policy is effective, and to ensure consistency with modification to Policy WC2, to make clear that 150 homes are proposed for the land east of Sturlas Way.

Could the Proposed Main Modification give rise to a new likely significant effect?: No. See text above.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Paragraph 11.5	<p>Sites for New Homes</p> <p>11.5 The Town Centre Strategy promotes a number of other prospective housing sites, the most notable being the proposed redevelopment of the Waltham Cross Conservative Club and the opportunity to relocate and redevelop the Royal Mail depot site. In addition to these, planning permission was granted in 2015 for 90 new homes on the site of the derelict Britannia Nurseries (see Policy LV6: Former Britannia Nurseries Site, Waltham Cross). Network Rail is promoting residential development of an under-used part of the Theobalds Stations car park north of the town centre, a proposal supported by an existing Council development brief. Development of these and other sites will all assist in the wider regeneration of Waltham Cross.</p>	Supporting amendments to proposed Policy WC3 below.	<p>Yes.</p> <p>LSEs on air quality have been screened out as the overall housing number set out in the Local Plan has not changed in comparison to that assessed in the 2018 HRA. Changes in overall traffic flows and the subsequent impact on air quality will therefore remain as per the HRA made in 2018.</p> <p>However, this is a new site allocation and has the potential to result in new LSEs in terms of public access and disturbance issues.</p> <p>Public access and disturbance issues have been screened out at Wormley-Hoddesdonpark Woods SAC based on the same evidence provided in the 2018 HRA. This noted that there is '<i>considered to be significant provision of Accessible Natural Green Spaces (ANGS) in the Brookfield and Rosedale Park strategic sites. Many of these open and outdoor spaces can be reached on foot by residents within a matter of minutes</i>'.</p> <p>Public access and disturbance impacts from the new allocations at the Lee Valley SPA and Ramsar will however be subject to further evaluation within the HRA.</p>
New paragraph 11.7	<p>Theobalds Grove Station</p> <p>11.7 An opportunity has been identified adjacent to Theobald's Grove Station as a result of under-usage of the existing car park. The site is partially screened from the High Street by the Wheatsheaf Public House, opposite Christ Church (Grade II listed).</p>	Reasoned justification to new policy WC3	
New Policy	<p>Policy WC3: Theobalds Grove Station Car Park The Theobalds Grove Station car park site will accommodate approximately 50 dwellings. Development should safeguard access to the businesses in the station arches as well as providing sufficient station car and cycle parking and contributing to the aims of the Old Cambridge Road Corridor improvement plan, as set out in Policy CH4.</p>	To ensure that the Plan is effective by clearly setting out the key principles for development of this SLAA/urban capacity site. See Set 2 modifications in response to inspector's Further Preliminary Question no. 6.	

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
		Dwelling number increased to approximately 50 - see updated Table 1 (EXAM4D) September 2018.	

Appendix E Inset Map 1: Park Plaza Area (extract)



Reason: to make clear the location of the site allocation on the Concept Plan.

Could the Proposed Main Modification give rise to a new likely significant effect?: **Yes. See text above.**

12: Wormley and Turnford

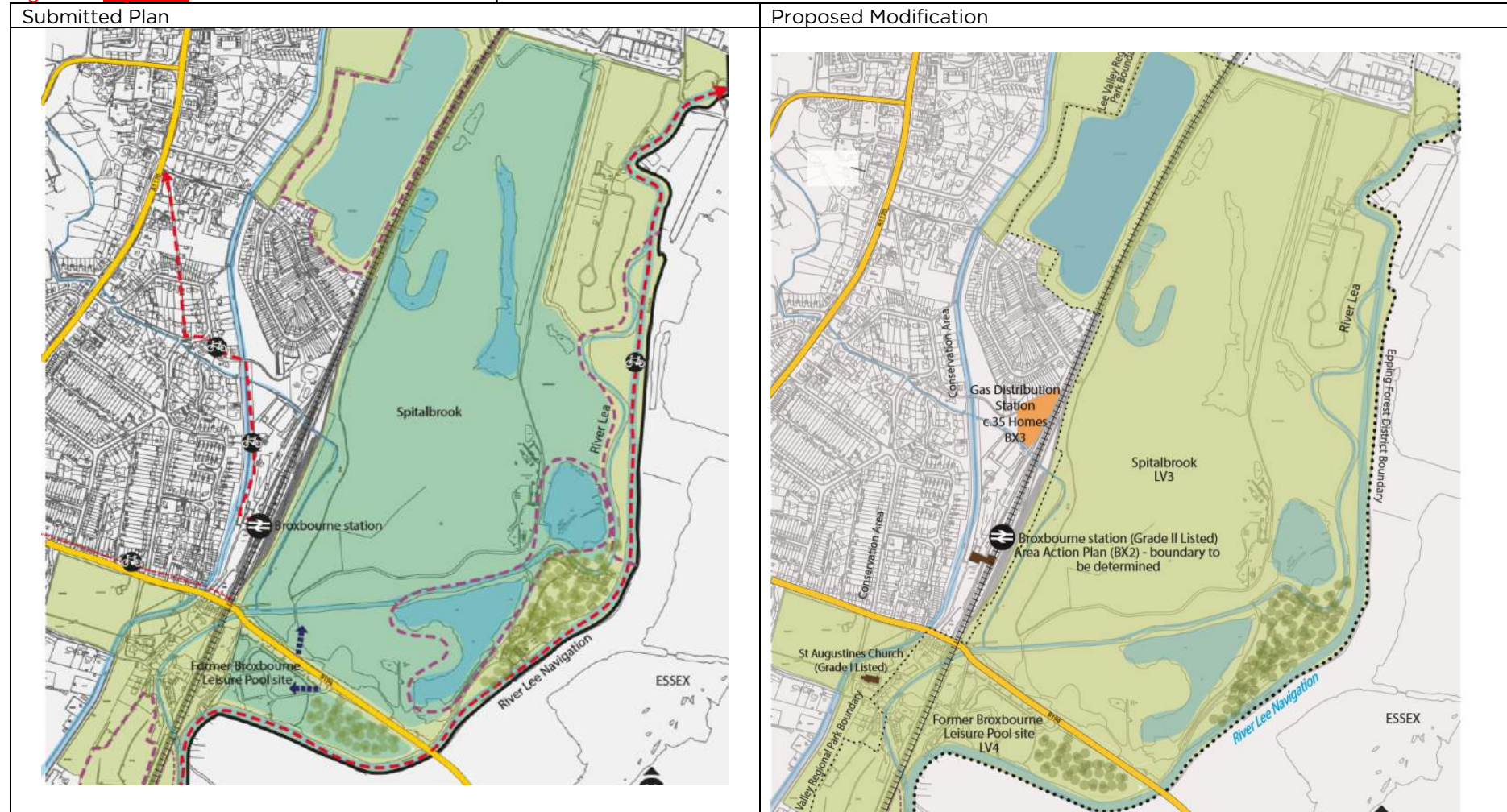
POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Paragraph 12.4	12.4 Wormley village centre is also a conservation area, which is on Historic England’s ‘Heritage at Risk’ register. There is significant scope for improving the public realm and individual buildings within the Conservation Area. The Council will engage with the local community to identify, design, prioritise and seek funding for local projects that will improve the village. A conservation area management plan will form part of the production of the borough-wide Historic Environment Strategy Supplementary Planning Document (see Policy HE1).	Change following from deletion of policy WT1 (see below).	No. This modification relates to the protection of historical assets and will not lead to any development which will have a new likely significant effect.
Policy WT1: Wormley Conservation Area Improvement Plan	Policy WT1: Wormley Conservation Area Improvement Plan The Council will produce a conservation area improvement plan for Wormley Conservation Area.	Policy does not provide guidance to a decision maker (NPPF paragraph 154). Intention of the policy is effectively addressed by proposed modifications to Policy HA1: General Strategy for the Historic Environment. See Council response to inspector’s Further Preliminary Question 1 (part c) and Set 2 Modifications, as well as q. 146.	No. The removal of this policy will not lead to any development or change with new likely significant effect.
Paragraph 12.5	12.5 Macers Estate is a mix of privately owned homes and former council housing. The Council still owns the community centre and the shop but sold most of its housing stock many years ago. Much of the estate is now owner-occupied with the remainder owned and managed by B3 Living and Paradigm housing associations. Parts of the estate are adjacent to the Wormley Conservation Area.	To provide reasoned justification to new part III of policy WT2.	No. This modification provides clarification on the location of the Conservation area. This will not lead to any development or change with new likely significant effect.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Policy WT2: Macer's Estate	Policy WT2: Macer's Estate I. The Council will work with B3 Living to undertake improvements within the Macers Estate, including the following priorities: 1.New homes, possibly through major redevelopment; 2.Improvements to the community centre; 3.Environmental improvements. <u>II. Development proposals which could affect the Wormley Conservation Area should conserve and where possible enhance the historic environment.</u>	To ensure that the policy is consistent with national policy in respect of the historic environment.	No. This modification relates to the protection of the Conservation area and will not lead to any development or change with new likely significant effect.

13: Lee Valley Regional Park

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Paragraph 13.8	The Council and the Park Authority have previously collaborated to produce a development brief to enable the development of the former leisure pool site for recreational activities. Since that time, very limited interest has been shown in taking forward development of the site. The brief had previously ruled out housing as an element of a new development. However, it is now considered that some residential development could be justified if it enabled the overall improvement of the Park in this location.	To ensure consistency with national Green Belt policy. See inspector’s Action Point no 8.	No. This deletion will not lead to any development or change with new likely significant effect.
Policy LV3: Broxbourne Leisure Pool Site	Policy LV3: Broxbourne Leisure Pool Site The Council and the Park Authority will update the Broxbourne Leisure Pool Development Brief in the context of policy GB1 and national policy relating to development in the Green Belt. to include the potential for residential development to the western end of the site to enable the wider development and improvement of the site and preservation of the existing parkland and natural areas.	To ensure consistency with national Green Belt policy. See inspector’s Action Point no 8.	No. This deletion will not lead to any development or change with new likely significant effect.

Figure 14 Figure 15: Former Leisure Pool site and Spitalbrook



Reason: to make clear the relationship between the proposed Area Action Plan, the Conservation Area and listed buildings

HRA: See text above.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Policy LV4: Spitalbrook	Policy LV4: Spitalbrook The Council will work with the Park Authority and the site owners to put in place a reclamation scheme for the Spitalbrook area to include the following: <ul style="list-style-type: none"> • Environmental improvements including habitat restoration; • Improved public access and connectivity including a network of foot and cycle paths; and • Leisure and recreation facilities including a visitor hub. <p style="color: red;">The scale and nature of any development that would enable these objectives will inform the appropriate planning approach to the delivery of the proposed development plan.</p>	To ensure consistency with national Green Belt policy. See inspector’s Action Point no 8.	No. This deletion will not lead to any change to the scale and nature of development set out in the emerging Broxbourne Local Plan and as assessed in the 2018 HRA. No new likely significant effects to those already assessed are therefore anticipated.
Policy LV6: Former Britannia Nurseries Site, Waltham Cross	Policy LV6: Former Britannia Nurseries Site, Waltham Cross The former Britannia Nurseries site, Bryanstone Road, is allocated for 90 residential dwellings in accordance with permission reference no. 07/13/0158/O. <u>The Former Britannia Nurseries site, Waltham Cross, will accommodate approximately 90 homes plus a new gateway to the Lee Valley Regional Park including car parking and walking and cycling connections.</u>	Modification in response to inspector’s Further Preliminary Questions no.1 (part b) to give an indication of the scale and form of development as well as what would be acceptable if a particular scheme with planning permission were not to be progressed. See also inspector’s q. 135	No. This modification will not lead to any change in the scale and nature of development set out in the emerging Broxbourne Local Plan and as assessed in the 2018 HRA. No new likely significant effects to those already assessed are therefore anticipated.

14: Countryside

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Paragraph 14.3	<p>This area provides strategic separation between metropolitan London and the southerly settlements of Hertfordshire. It is mainly characterised by attractive rolling farmland and woodlands. It is also interspersed by a number of public paths. The only significant development issue is the future of the Cheshunt Country Club at Theobalds Park which is owned by Tesco^s and contains a number of sports facilities including a pavilion and sports pitches. The company has proposed that this area be allocated for a range of uses and has specifically identified its potential for development as a business park. That is not proposed within this Plan and the site remains in the Green Belt. Nevertheless, it is clear that there needs to be a solution for the building and the site. <u>A potential option for the site could be to accommodate a sports club but the Council will consider other uses subject to compatibility with Green Belt policy.</u></p>	<p>To ensure that the policy is effective and consistent with national policy relating to Green Belt. See inspector’s Action Point 26.</p>	<p>No. This modification will not lead to any change to the scale and nature of development set out in the emerging Broxbourne Local Plan and as assessed in the 2018 HRA. No new likely significant effects are therefore anticipated.</p>
Policy CS1: Cheshunt Country Club	<p>Policy CS1: Cheshunt Country Club <u>I. The Council will work with the land owner to secure a sustainable future for the Cheshunt Country Club that is compatible with its countryside-Green Belt location.</u></p> <p><u>II. To ensure consistency with Policy GB1 and national policy in relation to Green Belt, proposals for built development should not have a greater impact on the openness of the Green Belt than the existing structures on the site;</u></p>	<p>To ensure that the policy is effective and consistent with national policy relating to Green Belt. See inspector’s Action Point 26.</p>	<p>No. This modification will not lead to any change to the scale and nature of development set out in the emerging Broxbourne Local Plan and as assessed in the 2018 HRA. No new likely significant effects are therefore anticipated.</p>

15: The New River

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Paragraph 15.5	15.5 The Council now wishes to explore the potential for a much more extensive conservation area along the course of the New River, the intention being to recognise and provide an appropriate level of protection to the historic artefacts along it. As the first stage of such a designation, the Council proposes to carry out a conservation area appraisal along the length of the New River within the Borough. <u>This will be carried out as part of the production of the borough-wide Historic Environment Strategy Supplementary Planning Document (see Policy HE1).</u>	Change following from deletion of policy NR1 (see below).	No. This modification focuses on the protection of the historic environment and will not lead to any change to the scale and nature of development set out in the emerging Broxbourne Local Plan and as assessed in the 2018 HRA. No new likely significant effects are therefore anticipated.
Policy NR1: New River Conservation Area	Policy NR1: New River Conservation Area The Council will commission a conservation area appraisal to assess the merits of extending the New River Conservation Area along the length of the New River.	Policy does not provide guidance to a decision maker (NPPF paragraph 154). Intention of the policy is effectively addressed by proposed modifications to Policy HA1: General Strategy for the Historic Environment. See Council response to inspector’s Further Preliminary Question 1 (part c) and Set 2 Modifications, as well as q. 147.	No. This modification proposes inclusion of text in Policy HA1 and relates to the protection of the historic environment. This modification will not lead to any change to the scale and nature of development set out in the emerging Broxbourne Local Plan and as assessed in the 2018 HRA. No new likely significant effects are therefore anticipated.

16: Gypsies, Travellers, and Travelling Showpeople

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Paragraph 16.2	The Council has undertaken a Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment. This concluded that there is a need to provide for 21 22 additional traveller pitches over the Plan period. These are required to meet the overall needs of the Wharf Road site and the future accommodation needs of defined gypsies and travellers living within the authorised sites. As set out below, each of the four proposed gypsy and traveller sites has sufficient capacity to accommodate identified needs. Planning applications for new pitches will be considered on their merits.	Pitch number correction due to an inconsistency within the evidence base document GT1. See Council response to q. 149 (Matter 7). To provide reasoned justification of the policy. See Council response to Action Point 34.	No. One additional gypsy and traveller pitch has been identified in the ‘needs assessment’. Given this minimal increase in pitch numbers (1) it is considered that there will be new likely significant effects over and above those assessed in the 2018 HRA.
Paragraph 16.3	Hertford Road The Hertford Road site has scope for limited expansion to meet the needs of that community on land to the immediate south which is in the ownership of the Council. This land is proposed to be allocated for that use. At Hertford Road, sufficient land is allocated to meet the accommodation needs of that community over the Plan period.	To provide reasoned justification of the policy. See Council response to Action Point 34.	No. This modification makes no changes to development in relation to gypsy, travellers and travelling show people as proposed in the emerging Broxbourne Local Plan and as assessed in the accompanying 2018 HRA. No new likely significant effects over and above those assessed in the 2018 HRA are therefore considered likely.
Paragraph 16.4	St James Road The St James Road site has limited scope to accommodate additional pitches for defined travellers within that community. No further expansion of the site area is required. Most of the residents of the St. James Road site are not considered to meet the national definition of gypsies and travellers. However, there is space within the boundaries of the site for additional pitches.	To provide reasoned justification of the policy. See Council response to Action Point 34.	No. This site was previously included in the emerging Broxbourne Local Plan and as such assessed in the accompanying HRA. The proposed modification is not likely to lead to new likely significant effects over and above those already assessed in the 2018 HRA.
Paragraph 16.5	Halfhide Lane The Brookfield development will necessitate the relocation of the Halfhide Lane site. The Local Plan therefore allocates a new site within the Brookfield development with road access	To provide reasoned justification of the policy. See Council response to Action Point 34.	No. This site was previously included in the emerging Broxbourne Local Plan and as such assessed in the accompanying HRA. The proposed modification removes

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>provided directly from Park Lane Paradise. It is proposed that this new site will encompass c. 20 pitches, an expansion of 5 pitches over the current provision.</p> <p>The Halfhide Lane site is proposed to be relocated within the Brookfield site allocation. Whilst most of the residents of this site are not considered to meet the national definition of gypsies and travellers, that relocation will provide for additional/expanded pitches to provide for the growth of those families over the Plan period.</p>		<p>commitment to pitch numbers but is not likely to lead to new likely significant effects over and above those already assessed in the 2018 HRA.</p>
Paragraph 16.6	<p>Wharf Road Most of the identified need for 22 pitches (see above) relates to the previously unauthorised Wharf Road site. The extent of the allocation of this site addresses the needs of all the resident gypsy and traveller families over the Plan period – both within existing pitches and through the creation of new pitches. The accommodation needs of the more long standing Wharf Road travelling community are recognised by the Council. However, the situation at Wharf Road has become very complex with substantial sub-letting of caravans to individuals with no long term connection to the Borough. The Council is therefore seeking to work with the established community and the Lee Valley Regional Park Authority to create an authorised site at Wharf Road for that community. This will entail the relocation of the straggle of plots along the River Lee onto land currently owned by the Authority in the central area where most of the unauthorised plots are currently located. This will create a central integrated site that can then be authorised, licenced and properly</p>	<p>To provide reasoned justification of the policy. See Council response to Action Point 34.</p>	<p>No. One additional gypsy and traveller pitch has been identified in the 'needs assessment'. Given this minimal increase in pitch numbers (1) it is considered that there will be new likely significant effects over and above those assessed in the 2018 HRA.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	serviced with roads, water, electricity and drainage. It will also entail the discontinuance of sub-letting.		
Policy GT1: Gypsy and Traveller Sites	<p>The Council will work with the travelling communities to allocate sites as follows as shown on the Policies Map:</p> <ol style="list-style-type: none"> 1. Expansion of Hertford Road by 3 pitches where additional appropriate needs cannot be accommodated within the existing site boundaries; 2. Accommodation of 2 new pitches within the existing St James' Road site; 3. Relocation of Halfhide Lane to accommodate c. 20 pitches in total the appropriate needs of the Halfhide Lane gypsy community; 4. Authorised site at Wharf Road to accommodate c. 20 pitches in total the appropriate needs of the Wharf Road Community. <p>These sites are allocated for the specific needs of the resident travelling communities to which they relate and the future expansion of those communities through new household formation within those communities. They are not to meet the needs of extended family members not currently resident within the Borough of Broxbourne.</p> <p>The means for ensuring that these sites meet the immediate needs of those communities in perpetuity will be set out within planning permissions.</p>	See Council response to inspector's q. 154, Matter 7	No. One additional gypsy and traveller pitch has been identified in the 'needs assessment'. Given this minimal increase in pitch numbers (1) it is considered that there will be new likely significant effects over and above those assessed in the 2018 HRA.
Paragraph 16.7	Travelling Showpeople		No. This site was allocated for travelling show people in the emerging Broxbourne

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>16.7 Broxbourne has one operating travelling showpeople site, on land within the Green Belt at the south-western corner of Goffs Lane and Lieutenant Ellis Way. The site has been removed from the Green Belt in order to enable the effective implementation of Policy GT2 as set out below. There is significant scope to accommodate the future needs of the resident community within the site boundaries. A master plan will be agreed with the site owner to secure this objective. Therefore no new travelling showpeople sites are allocated within this Local Plan.</p>	<p>To ensure that the Plan is consistent with national policy in relation to Green Belt. See inspector’s Action Point no 9.</p>	<p>Local Plan and therefore assessed in the 2018 HRA. The proposed modification relate to Green Belt but are not likely to lead to new likely significant effects over and above those already assessed in the 2018 HRA.</p>
<p>Policy GT2: Extended Travelling Showpersons site</p>	<p>Policy GT2: Extended Travelling Showpeople Site</p> <p><u>I.</u> The travelling showpeople site at Goffs Lane is allocated to meet the specific <u>accommodation</u> needs of resident travelling showpersons with a clear family connection to the Borough of Broxbourne. The means for ensuring that these sites meet these immediate needs will be set out within planning permissions.</p> <p><u>II.</u> The Council will consider proposals for space for storage of equipment and other uses related to travelling shows, subject to acceptable impacts on the safety and amenity of the occupants and neighbouring residents and agreement of a suitable masterplan.</p>	<p>To ensure that the policy is effective and consistent with national policy and effective in meeting the accommodation needs of travelling showpeople.</p> <p>See inspector’s Action Point no 9 and Council response to q. 159 (Matter 7).</p>	<p>No. This site was allocated for travelling show people in the emerging Broxbourne Local Plan and therefore assessed in the 2018 HRA. The proposed modification relate to Green Belt but are not likely to lead to new likely significant effects over and above those already assessed in the 2018 HRA.</p>

Part 4: Infrastructure and Delivery

17: Infrastructure

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Paragraph 17.1	The aim of the Council is to delivery sustainable development in Broxbourne. To achieve this, development needs to be carefully co-ordinated and managed in conjunction with the provision of the necessary infrastructure. The Council's infrastructure Delivery Plan (IDP) will co-ordinate what infrastructure is need to support development, where it is needed, when it is needed, who the lead providers are, and how it is going to be funded. <u>New infrastructure should also contribute to place-shaping and make a positive contribution towards the vision and objectives for Broxbourne set out in Chapter 2 of this Plan.</u>	To ensure consistency with national policy in respect of the social, economic and environmental dimensions of sustainable development, including the historic environment.	No. The modifications proposed relate to general design principles which will not lead to development or any change which would result in new likely significant effects.
Policy INF2: Broxbourne Transport Strategy	The Council will <u>work with Hertfordshire County Council to implement the Broxbourne Transport Strategy to achieve the following:</u> <ul style="list-style-type: none"> • <u>an integrated package of interventions across all modes of transport;</u> • <u>active and sustainable trip choices wherever possible;</u> • <u>small scale and cost-effective improvements to existing provision including through travel planning and better information;</u> • <u>maximised sustainability, viability and deliverability of interventions through prioritisation as follows: firstly by reducing the need to travel, then encouraging more sustainable forms of travel, then making better use of existing infrastructure, and lastly</u> 	To ensure that the plan is effective and consistent with national policy. See inspector's Further Preliminary Question 1 (part c) and Set 1 Modifications (EXAM6). See also Council response to q. 190 (Matter 10).	No. The modifications proposed relate to Transport Strategy design principles which will not lead to development or any change which would result in new likely significant effects.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p><u>by providing additional capacity:</u></p> <ul style="list-style-type: none"> • <u>An appropriate balance between competing priorities including north-south and east-west connectivity; catering for through-traffic and meeting the needs of local traffic; targeted investment and widespread investment; and planning for traffic and planning for people.</u> 		
<p>Policy INF3: Road Infrastructure</p>	<p>Road infrastructure is proposed to include: The Council will work with Hertfordshire County Council and Highways England to deliver the road infrastructure set out in the Transport Strategy including:</p> <ol style="list-style-type: none"> 1. Increasing junction capacity at Junction 25 of the M25; 2. Improvements to traffic flow through the A10 roundabout linking Lieutenant Ellis Way and Winston Churchill Way; 3. Improvements to traffic flow through the signalised A10 junctions with Church Lane and College Road; 4. The northern extension of Brookfield Lane West to the Turnford Interchange on the A10; 5. Improvements to the Sun and Hertford Road roundabouts, and Essex Road in Hoddesdon. 	<p>To ensure that the plan is effective and consistent with national policy. See inspector’s Further Preliminary Question 1 (part c) and Set 1 Modifications (EXAM6). See also Council response to q. 191 (Matter 10).</p>	<p>No. The proposed modification relates to the organisations that will contribute to the Transport Strategy. It will not lead to development or any change which would result in new likely significant effects.</p>
<p>Policy INF7: Bus Transport</p>	<p><u>I. The Council will work with Hertfordshire County Council and the bus operating companies to deliver a range of measures to provide investment in new and extended bus service provision; better interchanges between different modes of transport and between services; better information; and improved ticketing.</u></p> <p><u>II.</u> The following bus services and bus infrastructure are proposed:</p>	<p>To ensure that the plan is effective and consistent with national policy. See inspector’s Further Preliminary Question 1 (part c) and Set 1 Modifications (EXAM6). See also Council response to q. 193 (Matter 10).</p>	<p>No. The proposed modification relates to the organisations that will contribute to the Transport Strategy and general high-level policy actions. It will not lead to development or any change which would result in new likely significant effects.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<ol style="list-style-type: none"> 1. New 'town' bus service linking Brookfield, Cheshunt Lakeside and Waltham Cross with the rail stations; 2. New bus service connecting High Leigh with Hoddesdon town centre and Broxbourne station; 3. Re-instated and re-modelled bus service linking Waltham Cross and Park Plaza; 4. Extended bus service (242) into Rosedale Park; 5. Potential expansion of Waltham Cross bus station; and 6. New bus stops at Brookfield. 		
Paragraph 17.20	<p>The Council is keen to ensure that opportunities for walking and cycling in the Borough are maximised. To that end, the Council has prepared a Local Cycling and Walking Infrastructure Plan (LCWIP) which aims to significantly increase levels of walking and cycling in part by providing a network of safe and attractive paths culminating at key trip generators such as town centres, stations, schools and workplaces. It includes an Action Plan containing a range of projects across the Borough, which link each of the proposals with specific Local Plan development sites where appropriate. Key proposals are as follows:</p> <ul style="list-style-type: none"> • A network of cycling corridors across the Borough, including A1170/B176, 	Change arising from amendment to Policy INF8 below.	No. The modifications relate to the removal of aims of the Local Cycling and Walking Infrastructure Plan. These are now included at Policy INF8. These modifications will not lead to development or a change which would result in new likely significant effects.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>Church Lane, the Lee Valley Park, the New River and approaches into the Town Centres, each of which will be accompanied by new cycling infrastructure;</p> <ul style="list-style-type: none"> • Core Walking Zones at Hoddesdon and Waltham Cross Town Centres, Cheshunt Old Pond, and Brookfield Riverside, within which public realm enhancements will seek to enhance the safety and attractiveness of walking to the town centres; and • Other measures to influence travel choices, including School Safety Zones; safe crossing points; improved lighting; barrier removal; improved signposting; and promotion of active travel opportunities. • Core Walking Zones at Hoddesdon and Waltham Cross Town Centres, Cheshunt Old Pond, and Brookfield Riverside, within which public realm enhancements will seek to enhance the safety and attractiveness of walking to the town centres; and • Other measures to influence travel choices, including School Safety Zones; safe crossing points; improved lighting; barrier removal; improved signposting; and promotion of active travel opportunities. 		

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Paragraph 17.21	The Council will work closely with Hertfordshire County Council to implement the LCWIP and will seek funding from a range of sources to pay for the measures proposed.	Change arising from amendment to Policy INF8 below.	No. This modification will not lead to development or a change which would result in new likely significant effects.
INF8: Local Cycling and Walking Infrastructure Plan	<p><u>I. The Council will work with Hertfordshire County Council to implement the following approach as set out in the Local Cycling and Walking Infrastructure Plan (LCWIP):</u></p> <ol style="list-style-type: none"> 1. <u>A network of cycling corridors to connect across the Borough, each of which will be accompanied by new cycling infrastructure;</u> 2. <u>Core Walking Zones within which public realm enhancements will seek to enhance the safety and attractiveness of walking to the town centres; and</u> 3. <u>Other measures to influence travel choices in favour of walking and cycling, including School Safety Zones; safe crossing points; improved lighting; barrier removal; improved signposting; and promotion of active travel opportunities.</u> <p><u>II. Proposals which deliver the projects contained in the LCWIP to contribute to the creation of a safe and attractive walking and cycling routes, will be supported.</u></p>	To ensure that the plan is effective and consistent with national policy. See inspector’s Further Preliminary Question 1 (part c) and Set 1 Modifications (EXAM6). See also Council response to q. 194 (Matter 10).	No. The proposed modification relates to the delivery of the Local Cycling and Walking Infrastructure Plan which includes high-level policy actions. It will not lead to development or any change which would result in new likely significant effects.
Paragraph 17.23	Sewerage in the north end of the Borough drains into Rye Meads sewage works. The middle and south ends of the Borough drain into Deephams sewage works in Enfield. # is understood that both sewage treatment works are currently being upgraded and that there is	Text agreed with Thames Water following their October 2018 Rye Meads STW Position Statement which states that “our recent high level assessment indicates that from	No. The modifications do not make significant changes to the wording that was assessed as part of the Broxbourne Local Plan and subject to HRA in 2018. They do not propose development or any change

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>capacity to accommodate all the new development within this Plan to at least 2026. Upgrades to both sewage treatment works are due to be completed in 2019 which are likely to provide capacity into the 2030s. The capacity of the works will be kept under regular review and updates will be included in future iterations of the IDP.</p>	<p>a final effluent stream point of view we currently expect the site to have capacity up to 2036.”</p>	<p>which would result in new likely significant effects.</p>
<p>Paragraph 17.28</p>	<p>17.28 There is currently secondary capacity within existing schools. However, Hertfordshire County Council advises that this is expected to fill up as a result of the ageing of existing children currently in primary schools and new children within new development. By the middle of the Plan period, the County Council considers that a new secondary school is likely to be required. Locational options have been considered for this new school and a central location within the Borough is considered to be most suited. Land is consequently being safeguarded at Church Lane, Wormley for the development of this school. Based on feasibility work commissioned by Hertfordshire County Council, it is considered that the primary vehicular access to the site should be from the A10 link road to the south, with a secondary access from Church Lane. Masterplanning will determine the configuration of the site but it is anticipated that a substantial area will be set aside for environmental mitigation and enhancement.</p>	<p>See inspector’s Action Point no 6.</p>	<p>No. The modification removes the location options for a new secondary school, simply addressing need. This will not lead to new likely significant effects.</p>
<p>Paragraph 17.29</p>	<p>17.29 Should a secondary school be required, Broxbourne Council’s preferred site is located at Church Lane, Wormley, and a significant amount of technical work has already been completed in respect of this site. However, the County Council has raised issues regarding the</p>	<p>To provide the reasoned justification to policy INF10.</p>	<p>No. The preferred site location for a new secondary school is the same as that assessed in the emerging Broxbourne Local Plan and subject to the 2018 HRA. This modification will not lead to new</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p><u>deliverability of the site. A Development Plan Document (DPD) is therefore proposed to resolve the outstanding matters and enable the delivery of suitable educational facilities to meet need as it arises, whether at Church Lane or elsewhere. This work will be undertaken following adoption of the Local Plan to provide a robust planning framework for the delivery of a school site later within the Local Plan period.</u></p>		likely significant effects over and above those already assessed in the 2018 HRA.
INF10: Reserve Secondary School Site	<p>Policy INF10: Reserve Secondary School Site <u>DPD</u> Land is safeguarded at Church Lane, Wormley for the development of a new secondary school.</p> <p><u>The Council will prepare a Secondary School Site Development Plan Document (DPD) to:</u></p> <ul style="list-style-type: none"> a) <u>Review the needs case and timing for delivery of a new secondary school;</u> b) <u>identify a suitable and deliverable site or sites to meet identified secondary education needs;</u> c) <u>demonstrate why the selected site was chosen from amongst a range of potential alternative options;</u> d) <u>include sufficient detail to make clear how a decision maker should react to a development proposal on the site;</u> e) <u>Provide an approach to Green Belt which is effective and consistent with national policy.</u> 	To ensure that the plan is consistent with national policy for Green Belt, justified and effective. See Council’s response to Action Point 6 (EXAM17A). See modifications to policy INF10 (Chapter 17 – Infrastructure).	No. The preferred site location for a new secondary school is the same as that assessed in the emerging Broxbourne Local Plan and subject to the 2018 HRA. This modification will not lead to new likely significant effects over and above those already assessed in the 2018 HRA.

18: Planning Obligations and CIL

There are no main modifications proposed at this stage.

19: Implementation

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Paragraph 19.5	<p><u>Monitoring</u></p> <p>The Council produces an Authority Monitoring Report (AMR) which is updated on an annual basis. Progress with the plans and strategies set out in the table above will be monitored through the AMR. Current and past AMRs are available on the Council's website at www.broxbourne.gov.uk/amr.</p>	To ensure that the Local Plan is effective. See inspector's Action Point no. 2	No. The proposed addition of the word monitoring will have no implications for the findings of the 2018 HRA.
New paragraph 19.6	<p><u>In order to ensure that the Local Plan is effective, the Council will monitor the implementation of the Plan against the objectives set out in Chapter 2. The main inter-relationships between the objectives (for example between the objectives for health and wellbeing and environment, and between those for transport and sustainable neighbourhoods) are set out within the monitoring framework in Appendix G.</u></p>	To ensure that the Local Plan is effective. See inspector's Action Point no. 2	No. The modification will strengthen requirements in relation to monitoring and have no implications for the findings of the 2018 HRA.
New policy IMP2	<p><u>Policy IMP2: Monitoring of Development</u></p> <p><u>Implementation of the Broxbourne Local Plan will be kept under review using the indicators set out in Appendix G and reported in the Authority Monitoring Report. Monitoring will also include an update on the implementation of schemes and proposals set out in the list of supporting plans and strategies set out in Table 3.</u></p>	To ensure that the Local Plan is effective. See inspector's Action Point no. 2	No. The modification will strengthen requirements in relation to monitoring and have no implications for the findings of the 2018 HRA.

Part 5: Development Management Policies

20: Design and Sustainable Construction

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
<p>Policy DSC1: General Design Principles</p>	<p>Policy DSC1: General Design Principles I. The Council expects a high standard of design for all development. <u>Wherever possible,</u> Ddevelopment proposals must:</p> <p style="padding-left: 40px;">(a) enhance local character and distinctiveness, taking into account: existing patterns of development; significant views; urban form; building typology and details; height; roof form; fenestration detail; materials; building lines and other setbacks; trees; landscaping; and features of local and historic significance;</p> <p>II. All major developments should comply with <u>have regard to</u> the Council's Supplementary Planning Guidance in relation to design.</p>	<p>To ensure that policy is effective.</p> <p>To make clear that all applications should normally accord with the SPG and that any departures from the guidance are properly justified.</p> <p>See Council response to Preliminary Question no. 16 (EXAM6), as well as Council response to q. 171 and 172.</p>	<p>No. The proposed text modification will result in no change or development with new likely significant effects.</p>
<p>DSC4: Management and Maintenance</p>	<p>I. To ensure the long-term attractiveness and usability of open and public spaces and leisure and sports facilities, the Council will seek to ensure that a high standard of management and maintenance is planned for the development over the lifetime of the development, at the time of the application.</p> <p>II. <u>Where appropriate,</u> Aapplicants are <u>will be</u> required to submit a long term management and maintenance plan for the development, covering a range of reasonably foreseeable management</p>	<p>To ensure that the policy is effective.</p> <p>See Council response to inspector's question no. 173 (Matter 9).</p>	<p>No. The proposed text modification will result in no change or development with new likely significant effects.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	and maintenance issues and contingencies, and proposing consequential remedial actions. III. Once the plan has been agreed with the Council, compliance with the management plan will be secured as part of a legal agreement running in perpetuity with the site.		
DSC6: Designing Out Crime	I. Applicants must demonstrate they have considered all of the following elements in any proposal: (a) that they have maximised opportunities for natural or passive surveillance and public facing frontages through the arrangement of buildings; (b) the potential of boundary treatments and flat roofed extensions as a means of accessing upper floor windows;	To ensure that the policy is effective. See Council response to inspector's question no. 174 (Matter 9).	No. The proposed text modification will result in no change or development with new likely significant effects.

21: Housing

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Policy H1: Making Effective Use of Urban Land	I. The Council will optimise the potential for housing delivery on all suitable and available brownfield sites, especially: A. Redevelopment/conversion and re-use of vacant or redundant sites; B. Estate renewal and regeneration opportunities; C. Suitable opportunities within defined town centre boundaries as shown on the Policies map that are in accordance with policy RTC2; D. Sites within the boundaries of the Waltham Cross Area Action Plan (Policy WC3),	In order to ensure that the proposed allowance represents a reliable source of supply and that effective use is made of urban land (see Inspector's Action Points 4 and 36.	No. The modification relates to high-level criteria for development and will not lead directly to proposed development or any change which will result in a new likely significant effect.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p><u>provided that these will not impede the delivery of a strategic approach to development, in particular around transport hubs.</u></p> <p><u>II. The Council will proactively use its brownfield register to identify appropriate sites for residential development and increase planning certainty for those wishing to build new homes.</u></p> <p><u>III. Any proposals for development that include the provision of housing in designated Employment Areas, or on the site of an existing employment use elsewhere, must satisfy the requirements of policies ED2 and ED3 respectively.</u></p>		
<p>Policy H1: Affordable Housing</p>	<p>I. Affordable housing includes social/affordable rented housing, intermediate and shared ownership housing. The provision of affordable housing will be required on all new residential developments of more than 10 units, or which have a maximum combined gross floorspace of more than 1,000 square metres (gross internal area).</p> <p>[parts II and III unchanged]</p> <p>IV. The affordable housing split will be 65% social/affordable housing for rented and 35% intermediate and shared ownership affordable housing for sale unless identified requirements or market conditions indicate otherwise.</p>	<p>To ensure consistency with national policy. See Council response to inspector's question 162 (part a) (Matter 8).</p> <p>To ensure that the policy is effective and consistent with national policy. See Inspector's Action Point no 37.</p>	<p>No. The modification relates to high-level criteria for affordable housing in terms of development and will not lead directly to proposed development or any change which will result in a new likely significant effect.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>[part v unchanged]</p> <p>VI. Contributions towards the off-site provision of affordable housing in lieu of on-site provision will be an exception and will only be accepted in relation to developments which the Council considers are unsuitable for the provision of affordable housing. Contributions towards the off-site delivery of affordable housing will be negotiated on a site by site basis, <u>in accordance with regard to</u> the Council's Affordable Housing Strategy, and national policy requirements and funding arrangements at the time of the negotiation.</p>	<p>To ensure that consistency with national policy. See Council response to inspector's questions 164 (Matter 8).</p>	
<p>Policy H3: Housing Mix</p>	<p>I. The Council will seek a mix of housing for each site that results in residential areas that are balanced and socially diverse. <u>Both market and affordable housing</u> developments proposed for strategic housing allocations, as shown on the policies map, must be inclusive, providing for a mix of occupiers and tenures and the entire range of ages.</p> <p>II. On schemes over 20 units, <u>at least</u> 5% should meet the Building Regulations Requirement M4(2): Category 2 – Accessible and Adaptable Dwellings, or its successor. <u>This requirement applies separately to the provision of both market and affordable housing on the site.</u></p>	<p>To ensure that the plan is justified and consistent with national policy. See Council response to inspector's q. 166 (Matter 8). To ensure that the policy is effective in ensuring that all residential development contributes to creating an appropriate housing mix in the locality (see inspector's Action Point 38).</p> <p>To ensure that the policy is consistent with national policy and effective. See inspector's Action Point 39.</p>	<p>No. The modification relates to high-level criteria for housing mix in terms of development and will not lead directly to proposed development or any change which will result in a new likely significant effect.</p>

22: Economic Development

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Policy ED3: Loss of Employment Uses - Rest of the Borough	<p>Policy ED3: Loss of Employment Uses - Rest of the Borough</p> <p>Development which would cause the loss of an existing employment use, will only be permitted where all the following criteria are met:</p> <p>(a) The retention of the site or premises for employment use has been fully explored without success, and that there is no reasonable prospect of the site/premises being suitable and viable for reuse or any alternative employment use in the medium term; or</p> <p>(b) Continued use of the site for employment generating purposes is incompatible with surrounding land uses; and,</p> <p>(c) The proposal does not prejudice the continued viability of existing Employment Areas and neighbouring uses.</p>	Part c not justified. See inspector's action Point 35.	<p>No.</p> <p>The modification relates to high-level criteria for loss of employment uses and will not lead directly to development or any change which will result in a new likely significant effect.</p>

23: Retail and Town Centres

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Paragraph 23.4	<p>Development within Retail Defined Town, District and Local Centres</p> <p>The Policies Map shows the boundaries of the Borough's main town, district and local shopping centres: Hoddesdon Town Centre; Waltham Cross Town Centre; and Cheshunt Old Pond District Centre; and Brookfield Retail Centre, as well as seven local centres.</p>	See inspector's Action Point no 13.	<p>No.</p> <p>The modification relates to minor textural changes to that outlined in the emerging Broxbourne Local Plan and assessed in 2018 in the HRA. This modification will not lead to new likely significant effects over and above those already assessed in the 2018 HRA.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
New paragraph 23.5	<p><u>National policy sets out ‘main town centre uses’ which are considered appropriate within these defined centres as follows:</u></p> <ul style="list-style-type: none"> • <u>retail development (including warehouse clubs and factory outlet centres);</u> • <u>leisure/entertainment facilities/the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls);</u> • <u>offices;</u> • <u>arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).</u> 	<p>To ensure consistency with national policy. See Council response to inspector’s question no. 81 (Matter 5).</p>	<p>No. The modification relates to terminology regarding main town centre uses and is not different in nature to that outlined in the emerging Broxbourne Local Plan and assessed in 2018 in the HRA. This modification will not lead to new likely significant effects over and above those already assessed in the 2018 HRA.</p>
New paragraph 23.6	<p><u>For main town centre use development outside the defined centres, planning applications involving retail and leisure use floorspace over the nationally prescribed default impact floorspace threshold (2,500 sq m gross) should be accompanied by an impact assessment in accordance with national policy requirements.</u></p>	<p>To ensure consistency with current national policy. See Council response to inspector’s question no. 81 (Matter 5).</p>	<p>No. This modification relates to the requirement for impact assessment. This modification will not lead to any development or change that would result in a new likely significant effect.</p>
	<p>Policy RTC1: Retail Hierarchy</p> <p>I. The Council will permit new <u>retail town centre use</u> development within town and district <u>the defined</u> centres, as shown on the Policies Map, that is compatible with their function and position within the retail hierarchy below:</p> <ul style="list-style-type: none"> • Town Centres: Brookfield—Riverside, Hoddesdon Town Centre and Waltham Cross Town Centre; 	<p>See inspector’s Action Point no 14.</p>	<p>No. The modification relates to terminology regarding main town centre uses and is not different in nature to that outlined in the emerging Broxbourne Local Plan and assessed in 2018 in the HRA. This modification will not lead to new likely significant effects over and above those already assessed in the 2018 HRA.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<ul style="list-style-type: none"> • District Centre: Cheshunt Old Pond District Centre; and • Neighbourhood Centres, Local Centres and Parades: <u>High Street, Cheshunt; High Road, Broxbourne; High Street, Waltham Cross (Nos 228-286 and 229-267); Crossbrook Street (Nos 99-137); Goffs Oak; Wormley; and Rye Road.</u> <p>The NPPF sets out a sequential test for retail uses, which applies the hierarchy, set out above.</p> <p><u>II. Brookfield Riverside is identified as a broad location for a proposed new town centre where main town centre uses will be acceptable if delivered in accordance with an integrated masterplan as set out in Policy BR1. A town centre boundary will be defined as part of a review of the Local Plan, once the extent of the town centre is known.</u></p> <p><u>III. Retail Main town centre use</u> development will not be permitted elsewhere in the Borough unless otherwise provided for in this plan or where <u>it satisfies, where applicable, national policy requirements relating to a sequential approach and impact assessment.</u></p> <p>(a) need can be demonstrated which is not adequately met within the Borough at present; and</p> <p>(b) following a sequential test, it is demonstrated that the requirements of development cannot be physically accommodated within existing centres; or on edge of centre sites or the existing centres cannot accommodate the development</p>		

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>without damage to their historic or architectural character or overall environment;</p> <p>e) the proposals would not have a material adverse impact upon the vitality and viability of town, district and local centres.</p>		
<p>Policy RTC2: Development within Designated Centres</p>	<p>Policy RTC2: Development within Designated Centres town, district, and local centres, neighbourhood centres and shopping parades</p> <p>I. Retail uses, excluding small convenience shops must be directed in the first instance to the Borough's main retail centres as shown on the Policies Map, i.e. Hoddesdon Town Centre, Waltham Cross Town Centre, Cheshunt Old Pond District Centre and Brookfield Centre. If these locations are unavailable or unsuitable, retail uses will be directed to the Borough's local centres.</p> <p>H. I. The following criteria will be used to consider the acceptability of new development proposals, including extensions, alterations, and changes of use <u>within the Borough's town, district, and local centres, neighbourhood centres and shopping parades:</u></p> <p>(a) whether the development enhances the historic character of the centre (where relevant) and the public realm;</p> <p>(b) the role of the shopping centre and services it provides;</p> <p>(c) the vitality and viability of the centre;</p> <p>(d) the provision of safe access, full and complete servicing arrangements, and parking;</p>	<p>See inspector's Action Point no 15.</p>	<p>No. The modification relates to terminology regarding main town centre uses and is not different in nature to that outlined in the emerging Broxbourne Local Plan and assessed in 2018 in the HRA. This modification will not lead to new likely significant effects over and above those already assessed in the 2018 HRA.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>(e) any adverse impacts upon the centre or residents in terms of noise, fumes, smells, litter and general disturbance.</p> <p><u>II. Planning applications for new development, including changes of use, within the above centres should have regard to the relevant Council strategy, including the town centre strategies for Hoddesdon or Waltham Cross, or the district centre strategy for Cheshunt Old Pond.</u></p>		

24: Open Space, Recreation, and Community Facilities

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Paragraph 24.3	<p>24.3 New housing places additional pressure on existing open spaces and other sport and recreation facilities. To reduce this, proposals for residential development are expected to provide on-site areas of open space and play facilities. <u>A number of new areas of open space are designated within this Plan as set out within Policy ORC1 below.</u> In some cases, on-site provision may not be the best planning solution to meet additional requirements for open space or play or leisure facilities. In these circumstances, developers will need to provide financial contributions towards off-site provision in lieu of providing facilities on site.</p>	<p>For consistency with Policies PPI, ORC1 and national policy relating to the definition of 'open space'.</p>	<p>No. This modification sets out open space provision but will not result in development or change and therefore there will be no new likely significant effect.</p>
Policy ORC1: New Open Space, Leisure, Sport and Recreational Facilities	<p>Policy ORC1: New Open Space, Leisure, Sport and Recreational Facilities</p> <p>[parts I – V of this policy unchanged]</p>	<p>To ensure effectiveness and consistency with national policy.</p> <p>Point VI added to redesignate Local Green Spaces as Open</p>	<p>No. This modification sets out open space provision but will not result in development or change and therefore there will be no likely significant effect.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p><u>VI. The areas shown on the Policies Map and concept diagrams at Rosedale Park, Theobalds Park Farm south of Park Plaza West, North of Goffs Lane and at Newgatestreet Road in Goffs Oak, are all designated as new open space. Other specified areas of new open space (see policies CH1, GO5 and BR1) should form part of the masterplan for each site. These areas will be kept permanently free from built development, and should include a mix of formal and informal recreational space, parks and gardens, planting schemes, or landscaping.</u></p>	<p>Green Spaces, taking account of the Inspector’s Preliminary Question no. 25 which draws attention to the requirements of NPPF paragraphs 76 and 77, which suggest that Local Green Space is not an appropriate designation for new open spaces.</p> <p>See Council response to Question no. 132 and Action Point 28 and 41.</p>	
<p>Policy ORC2: Loss of Open Space, Leisure, Sport and Recreational Facilities</p>	<p>Policy ORC2: Loss of Open Space, Leisure, Sport and Recreational Facilities</p> <p>I. Open spaces, sport, recreational and leisure facilities, including playing fields, allotments and children’s play areas, <u>including but not limited to open spaces listed in Appendix A</u>, will be protected from development.</p> <p>II. Exceptions to this will be considered if they meet the following criteria:</p> <p>(a) an assessment has been undertaken, which clearly shows the open space, facility, buildings or land to be surplus to requirements identified need throughout the plan period; and</p> <p>(b) the proposed use is of direct benefit to the wider community or part of a wider regeneration scheme; or</p> <p>(c) the development is for alternative sports and or recreational provision, the needs for which clearly outweighs the proposed loss; or</p>	<p>To ensure effectiveness.</p> <p>Modification in response to inspector’s Preliminary Questions (no. 24) to clarify that policy ORC2 is intended to apply both to the open spaces listed in Appendix A of the Plan and other areas of open space.</p> <p>See Council response to Question no. 175.</p>	<p>No.</p> <p>This modification sets out open space provision but will not result in development or change and therefore there will be no new likely significant effect.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	(d) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location and accessible on the same basis as the original to local residents.		
Paragraph 24.13	Local Green Space 24.13 Local Green Space is a national policy designation denoting areas of special importance which should be kept permanently open and undeveloped. Unlike Green Belt, Local Green Space must be either publicly accessible or provide some other benefit to the local community. The Local Plan designates a number of Local Green Spaces, which will be kept permanently free from built development, and should include a mix of formal and informal recreational space, parks and gardens, planting schemes, or landscaping.	To ensure consistency with national policy. Use of Local Green Space inconsistent with NPPF paragraph 76 and 77. See inspector’s Preliminary Question no. 25 and Council response to Q. 175..	No. This deletion relates to open space provision and ensures compliance with national policy. It will not result in development or change and therefore there will be no new likely significant effect.
ORC3: Local Green Space	Local Green Space 24.13 Local Green Space is a national policy designation denoting areas of special importance which should be kept permanently open and undeveloped. Unlike Green Belt, Local Green Space must be either publicly accessible or provide some other benefit to the local community. The Local Plan designates a number of Local Green Spaces, which will be kept permanently free from built development, and should include a mix of formal and informal recreational space, parks and gardens, planting schemes, or landscaping. ORC3: Local Green Space 1. The St James’ Green Link at Rosedale Park, Turnford Brook at Brookfield, Theobalds Park Farm south of Park Plaza West, and Goffs Oak	To ensure consistency with national policy. Use of Local Green Space inconsistent with NPPF paragraph 76 and 77. See inspector’s Preliminary Question no. 25 and Council response to Q. 175.	No. This deletion relates to open space provision and ensures compliance with national policy. It will not result in development or change and therefore there will be no new likely significant effect.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>Open Space, are all designated as Local Green Space as shown on the Policies Map. Within these areas built development will not be permitted; II. Local Green Spaces must be designed and laid out to the highest standards in order to maximise their value and accessibility to local communities in the surrounding area; III. Suitable arrangements for the maintenance of Local Green Space in perpetuity should be provided.</p>		

25: Water

There are no main modifications proposed at this stage.

26: Green Belt

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Policy GB1: Green Belt	<p>Within the Green Belt, as defined on the Policies Map, permission will not be given for development identified within the NPPF as inappropriate development, unless very special circumstances are demonstrated which clearly outweigh the harm. planning applications will be considered in line with the provisions of the National Planning Policy Framework.</p>	<p>To ensure consistency with national policy.</p> <p>See Council response to inspector’s question no. 56.</p>	<p>No. This deletion relates to Green Belt and ensures compliance with national policy. It sets out high-level planning criteria and will not result in development or change and therefore there will be no new likely significant effect.</p>
Paragraph 26.6	<p>26.6 The Council proposes that on derelict former glasshouse sites, development for self-build <u>and custom build</u> housing at low densities, <u>and also accommodation for gypsies and travellers</u>, will be permitted. The Council is proposing this approach so that:</p>	<p>See inspector’s Action Point no 10.</p>	<p>No. This modification relates to the nature of development permitted at glasshouse sites. The modification does not result in changes to the wording assessed in the emerging Broxbourne Local Plan and the 2018 HRA. This modification will not lead to new likely</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<ul style="list-style-type: none"> • The untidy appearance of derelict glass house sites can be tidied up; • Investment for the larger glass house sites can be achieved; • The purpose of the Green Belt in preventing urban sprawl is maintained; • Unsustainable developments are not proposed; and • Extensions to public open spaces, such as Cheshunt Common, rights of way and along watercourses can be achieved where desirable. 		significant effects over and above those already assessed in the 2018 HRA.
Paragraph 26.7	The Green Belt designation will remain unaltered as each of these sites meets at least one Green Belt purpose as defined in the NPPF.	See inspector’s Action Point no 10.	
Policy GB2: Residential Development on Derelict Glass House Sites	Policy GB2: Residential Development on Derelict Glass House Sites I. Operating glass house sites will be safeguarded for horticultural production. Where horticultural production has ceased, their redevelopment for self-build and custom build housing will be considered in accordance with the following criteria: i) The glass houses were erected and in place prior to 20th October 2015; and ii) Evidence is provided that the site is incapable of accommodating a viable horticultural business; and iii) The continued horticultural use of the site is not necessary to support a larger horticultural/agricultural holding; and	To ensure that the policy is effective in line with inspector’s Action Point no 10.	No. The modifications are minor in nature and will not result in new likely significant effects.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>iv) The development would comprise serviced plots suitable for the delivery of self-build housing development; and</p> <p>v) Redevelopment would benefit the overall openness of the Green Belt.</p> <p>II. Development will only be permitted if the following criteria are met:</p> <p>a) The development enhances the rural character of the countryside within which it is set;</p> <p>b) The proposal includes an acceptable design code that sets out the layout, servicing and landscaping of the development and coding for the dimensions, design and materials for all aspects of the development;</p> <p>c) The proposal includes a delivery and management plan for the development.</p> <p>III. Where the site has been contaminated, decontamination of the entire site will be required as a precursor to the residential development.</p>		
Paragraph 26.10	<p>Restrictions on building coverage should be viewed in context, including the coverage of existing built structures, location, potential to increase the openness of the Green Belt, and the wider design context and layout as addressed in the proposed design code. For self-build developments, it is very unlikely that the Council would accept building site coverage in excess of 10% of the site area, and</p>	See inspector’s Action Point no 10.	No. This deletion relates to Green Belt and ensures compliance with national policy. It will not result in development or change and therefore there will be no new likely significant effect.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	in many instances site coverage considerably below this figure is likely to be appropriate.		
Paragraph 26.12	26.12 The Council accepts that the rural economy and land uses change over time. While traditional agriculture has a vital role in our countryside, alternative and additional enterprises can make a valuable contribution to farm incomes and the rural economy. The importance of diversification within the farming economy is widely recognised. Changing financial circumstances can result in unwelcome applications for inappropriate and unsustainable residential development, unless alternative uses can be found.	Policy not consistent with national policy or justified. See inspector’s Action Point no 11.	No. This deletion relates to Green Belt and ensures compliance with national policy. It will not result in development or change and therefore there will be no new likely significant effect.
Paragraph 26.13	26.13 Many farms have assets which have the potential to be exploited for additional, non-agricultural income, should farmers choose to widen their business base outside of traditional agriculture.	See inspector’s Action Point no 11.	No. This deletion relates to Green Belt and ensures compliance with national policy. It will not result in development or change and therefore there will be no new likely significant effect.
Policy GB3: Rural Diversification	Policy GB3: Rural Diversification 1. Rural/farm diversification schemes will be permitted where: (a) the proposal retains existing or provides additional employment; and (b) the proposal is complementary to, and financially supports, the agricultural operation and farming activities; and (c) the scale and character of the use is not inappropriate to the rural location; and (d) the proposal maximises opportunities to use existing buildings; and	See inspector’s Action Point no 11.	No. This deletion relates to Green Belt and ensures compliance with national policy. It will not result in development or change and therefore there will be no new likely significant effect.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>(e) the proposal will not result in a significant increase in adverse effects associated with site related traffic or have an unacceptable adverse impact on the local environment, residential amenity, ecological interests or green belt openness when compared with the existing use.</p> <p>II. Where new buildings are required in connection to the use they must:</p> <p>(a) be necessary to enable the diversification;</p> <p>(b) be minimal in size and located adjacent to the existing buildings; and</p> <p>c) have a limited impact on the openness of the Green Belt.</p> <p>III. Where appropriate, the Council welcomes proposals that would involve the conversion of suitable premises for visitor or tourism activities, subject to compliance with the policies in this Plan.</p>		
26.14	<p>Financial records for the previous 3 years, certified as a true record by a suitably qualified person, will need to be supplied with any application for rural diversification together with a business plan for the proposed diversification venture.</p>	See inspector's Action Point no 11.	No. This deletion relates to Green Belt and ensures compliance with national policy. It will not result in development or change and therefore there will be no new likely significant effect.
26.15	<p>Applicants should also consider the guidance in the 'Information for Applicants' section following the Green Belt Policy above.</p>	See inspector's Action Point no 11.	No. This deletion relates to Green Belt and ensures compliance with national policy. It will not result in development or change and therefore there will be no new likely significant effect.
26.16	<p>Buildings, structures or features which are additional to the requirements of the diversified</p>	See inspector's Action Point no 11.	No. This deletion relates to Green Belt and ensures compliance with national policy. It

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	use may be required to be must be demolished within an agreed timeframe.		will not result in development or change and therefore there will be no new likely significant effect.
26.17	<p>Rural Housing</p> <p>26.17 There is a clear and established need for reasonably priced rural housing for agricultural, horticultural or forestry workers. In Broxbourne, an isolated house in the country would have considerable value on the open market, and houses permitted expressly for farm workers would soon be sold to others. This issue is particularly problematic for areas close to London. In certain situations such as tourism developments, housing has been permitted as an exception to enable a particular use, where it would otherwise not have been permitted. As a general rule, dwellings proposed for rural purposes should be modest in scale to ensure that they remain affordable over time.</p>	See inspector’s Action Point no 11.	No. This deletion relates to Green Belt and ensures compliance with national policy. It will not result in development or change and therefore there will be no new likely significant effect.
26.18	26.18 Applications for removal of occupancy conditions will need to be made on a case by case basis, with a strong presumption against the removal of the condition.	See inspector’s Action Point no 11.	No. This deletion relates to Green Belt and ensures compliance with national policy. It will not result in development or change and therefore there will be no new likely significant effect.
Policy GB4: Occupancy Conditions	<p>Policy GB4: Occupancy Conditions</p> <p>Where a restrictive occupancy condition has been imposed, the Council will strongly resist the removal of the condition. Any applications for removal will need to demonstrate that:</p> <p>a) there is no demand in the Borough for rural workers dwellings; and</p>	See inspector’s Action Point no 11.	No. This deletion relates to Green Belt and ensures compliance with national policy. It will not result in development or change and therefore there will be no new likely significant effect.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	b) the dwelling has been comprehensively marketed for at least two years to rural workers at an affordable price.		
Paragraph 26.19	Applicants are strongly advised to seek pre-application advice from the Council to determine whether it is worthwhile submitting an application.	See inspector’s Action Point no 11.	No. This deletion relates to Green Belt and ensures compliance with national policy. It will not result in development or change and therefore there will be no new likely significant effect.
Paragraph 26.20	The Council may use Article 4 Directions to remove permitted development rights for extensions and outbuildings to ensure that the size of the house remains modest and therefore affordable, and the openness of the Green Belt is not eroded on a piecemeal basis over time	See inspector’s Action Point no 11.	No. This deletion relates to Green Belt and ensures compliance with national policy. It will not result in development or change and therefore there will be no new likely significant effect.

27: Natural Environment and Biodiversity

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Paragraph 27.8	The DEFRA and NE endorsed Biodiversity Impact Calculator (BIC, Environment Bank 2014, v2) <u>biodiversity impact assessment metric</u> has been designed to quantify the value of biodiversity (in terms of habitats) in a consistent, transparent and objective way. This mechanism is considered to be an <u>the</u> appropriate method for determining ecological value and delivering net <u>measurable</u> ecological gain. <u>The relevant assessment metric can be found on the Council’s website at www.broxbourne.gov.uk/neb.</u>	See inspector’s action point no. 42. To ensure that reference is made to relevant national guidance about determining ecological value and delivering ecological gain.	No. This modification will not give rise to development or any change that will result in a new likely significant effect.
NEB1: General Strategy for the Environment	NEB1: General Strategy for Biodiversity [no modifications proposed to parts I-IV of this policy]	To clarify that the policy applies to all planning permissions for development that include measures to improve	No. This modification relates to environmental protection and enhancement and will not give rise to

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>V. When granting permission <u>for any proposals that include measures to improve biodiversity</u>, the Council will impose conditions or seek planning obligations that secure appropriate management regimes to deliver biodiversity gain in perpetuity.</p>	<p>biodiversity. See inspector's Action Point no. 42.</p>	<p>development or any change that will result in a new likely significant effect.</p>
<p>Paragraph 27.12</p>	<p>27.12 The <u>Conservation of Habitats and Species Regulations (the habitats regulations)</u> require the highest levels of protection for '<u>European sites</u>' (internationally designated wildlife sites). The Borough of Broxbourne includes the internationally designated Broxbourne-Hoddesdon <u>park</u> Woods complex, a Special Area for Conservation (SAC) and the Lee Valley Special Protection Area (SPA) and Ramsar sites along the River Lee. The nature conservation and geological interest of internationally designated sites are not permitted to be harmed by development unless they meet the criteria listed below.</p>	<p>To ensure that the plan is effective in ensuring that mitigation measures relating to the Lee Valley SPA and the Epping Forest SAC are implemented in a timely and appropriate manner. (See inspector's Action Point no 1.)</p> <p>See also inspector's Action Point 43.</p>	<p>No. This modification relates to environmental protection and enhancement and will not give rise to development or any change that will result in a new likely significant effect.</p>
<p>New Paragraphs 27.13-27.15</p>	<p><u>27.13 The Council's Habitats Regulations Assessment (HRA) considered all of the European sites within 15km of the Borough Boundary and concluded that adverse effects could not be ruled out in respect of two: the Lee Valley SPA and Epping Forest SAC (located outside the borough boundary). The HRA concluded that any potential adverse impacts on the Lee Valley SPA would arise primarily from the proposed development of Cheshunt Lakeside (see Policy CH1). As set out in that policy, such impacts will be avoided through a Mitigation Strategy which will be in place by the time of the grant of any planning permission for the development. Policy CH1 is accompanied by further information including a summary of the required mitigation measures at paragraph 7.8.</u></p>	<p>As above.</p>	<p>Yes. This modification relates to mitigation set out in the 2018 HRA. Whilst it will not lead to development or any change that will result in a likely significant effect, its ability to mitigate adverse impacts on site integrity will be evaluated in more detail.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p><u>27.14 Development within Broxbourne may, in-combination with development in other areas, affect Epping Forest Special Area of Conservation (SAC), which lies outside the borough boundary. The HRA of the Epping Forest Local Plan considered the in-combination impacts of development on Epping Forest Special Area of Conservation (SAC) from a number of local authority areas including Broxbourne. Interim access management and monitoring measures have been prepared to address recreational pressures on the Forest. It is proposed that such measures will be funded through a proportionate approach to developer financial contributions within the inner (or if necessary, outer) Zone of Influence (ZOI), the boundaries of which are based on a recent visitor survey and may be modified to reflect the evidence of future survey data. Although it is anticipated that the majority of these financial contributions will be provided by developments within the inner ZOI, contributions may be sought from developments within the outer ZOI (which currently includes parts of the Borough of Broxbourne) if necessary to ensure the implementation of the adopted measures and avoidance of adverse effects on the Eppign Forest SAC.</u></p> <p><u>27.15 The measures for the Lee Valley SPA and Epping Forest SAC, together with maps showing the extent of the inner and outer ZOI and latest forest visitor survey, and the Council's Habitats Regulations Assessment, are provided on the Council's website at www.broxbourne.gov.uk/neb.</u></p>		

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Paragraph 27.13	<p>27.13 <u>27.16 Nationally designated wildlife sites are also known as Sites of Special Scientific Interest (SSSIs), a number of which are also European Designated sites as identified above.</u> Local Wildlife Sites are identified by the Hertfordshire Local Wildlife Sites Partnership, coordinated by the Herts and Middlesex Wildlife Trust. Local Wildlife Sites (LWS) are considered to be of significance for wildlife in at least a district context. There are currently 35 Local Wildlife Sites in the Borough of Broxbourne.</p>	<p>In order to ensure that mitigation relating to the Lee Valley SPA is implemented in a timely and effective manner. See inspector’s Action Point no.1</p>	<p>No. This modification refers to the hierarchy of protection offered ecologically designated sites.</p>
NEB2: Wildlife Sites	<p>NEB2: Wildlife Sites</p> <p><u>Internationally Designated Wildlife Sites</u></p> <p><u>I Development at Cheshunt Lakeside should ensure that adverse impacts on the Lee Valley SPA, either alone or in-combination, are avoided and mitigated through the implementation of the mitigation strategy, in accordance with Policy CH1;</u></p> <p><u>II. Where necessary, contributions towards the measures set out in the Epping Forest mitigation strategy for recreational impacts will be sought from residential developments within the Epping Forest ZOI in order to mitigate and avoid in-combination effects on the SAC;</u></p> <p><u>III. Development proposals which may have an adverse impact on any internationally designated wildlife site, either alone or in-combination, must satisfy the requirements of the Conservation of Habitats and Species Regulations, determining site specific impacts and avoiding or mitigating against impacts identified.</u></p>	<p>To ensure that the plan is effective in ensuring that mitigation measures relating to the Lee Valley SPA and the Epping Forest SAC are implemented in a timely and appropriate manner. (See inspector’s Action Point no 1.)</p>	<p>Yes. This modification relates to mitigation set out in the 2018 HRA. It is a bespoke policy intended to avoid or reduce harmful effects on a European site. Whilst it will not lead to development or any change that will result in a likely significant effect, its ability to mitigate adverse impacts on site integrity will be evaluated in more detail.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>Internationally and Nationally Designated Wildlife sites</p> <p>IV. Development which would harm the nature conservation or geological interest of an internationally or nationally important wildlife site, as shown on the Policies Map, will not be permitted unless:</p> <p>(a) it is required in connection with the management or conservation of the site; or</p> <p><u>(b) the development provides appropriate avoidance or mitigation measures and as a last resort compensation to offset any adverse impacts on the interest features of the site.</u></p> <p>(b) there are imperative reasons of overriding public interest for the development; and</p> <p>(c) there is no alternative to the development.</p> <p>Compensation for the harm will be required.</p> <p>Locally designated sites of wildlife value</p> <p>IV. Development on, or which negatively affects, a Local Wildlife Site or Local Nature Reserve, as shown on the Policies Map, will not be permitted unless:</p> <p>(a) local development needs significantly outweigh the nature conservation value of the site; and</p> <p>(b) the development provides appropriate avoidance or mitigation, and as a last resort</p>		

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	compensation measures, to offset any detriment to the nature conservation interest on the site.		

28: Environmental Quality

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Policy EQ2: Air Quality	<p>Policy EQ2: Air Quality</p> <p>I. Applicants should consider the impact of their proposals on air quality. Where it is likely that a decline in air quality will occur, applicants should provide details of how the adverse effects have been <u>will be</u> mitigated in order to comply with national air quality objectives. <u>Where adequate mitigation cannot be provided, development will not normally be permitted.</u></p> <p>II. Developments proposing housing, schools, and other uses vulnerable to the effects of poor air quality within AQMAs will be required to provide an air quality assessment which will detail options for the mitigation of poor air quality on users, particularly through development design. <u>Where air quality exposure is not reduced to acceptable levels, development will not normally be permitted.</u></p> <p>III. If following mitigation, a development proposal results in a residual, net decline in air quality which exceeds, or further exceeds, national air quality objectives for pollutants in any part of the borough, it will be refused.</p>	To ensure that the policy is consistent with national policy, justified and effective. See inspector’s action point 46.	No. This modification relates to environmental protection policy and will not result in development or any change that will have a new likely significant effect.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
New Paragraph 28.11	<p><u>The acceptability or otherwise of a proposal will be determined with reference to the relevant limit values or Air Quality Objectives, and the Council's Local Plan for Air Quality in addition to its Air Quality Action Plan which are anticipated to be appraised by the government during 2019. For further details see www.broxbourne.gov.uk/airquality.</u></p>	<p>For consistency with national policy and to make it clear how a decision maker should react.</p>	<p>No. This modification relates to environmental protection policy and will not result in development or any change that will have a new likely significant effect.</p>

29: Historic Environment

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
<p>Paragraphs 29.1-29.5</p>	<p>29.1 Our historic environment is irreplaceable. It makes a significant contribution to local distinctiveness and the sense of place of an area. The presence of heritage assets enhances the local environment and sustains a sense of local distinctiveness that contributes to our understanding of both the past and the present.</p> <p>29.2 The Borough is fortunate to have a varied historic environment which ranges from nationally significant Bronze Age landscapes in Broxbourne and Wormley Woods, to archaeological sites dating from the Mesolithic (Middle Stone Age) period along the River Lee and a Bronze Age settlement at John Warner school. Broxbourne also has a Late Iron Age and Roman cemetery in Hoddesdon; rare Tudor Wall Paintings at the Star Public House in Hoddesdon; a Roman roadside settlement in Cheshunt Park and part of the Outer London Stop Line constructed to protect London in World War II.</p> <p>29.3 Broxbourne has the following types of nationally designated heritage assets:</p> <ul style="list-style-type: none"> • 258 listed buildings and structures; • 34 <u>34 Areas of Archaeological Interest;</u> • <u>7 Scheduled Monuments;</u> • 6 Conservation Areas; <u>and</u> • <u>1</u> Grade II Registered Historic-Park <u>and Garden</u> (Wormleybury). <p>29.4 The Borough also has a number of heritage assets on the Heritage At Risk Register including</p>	<p>To clarify that areas of archaeological significance are not nationally designated (see also proposed modification to the Glossary).</p> <p>For consistency, to include scheduled monuments in the list of nationally designated assets.</p>	<p>No. This modification splits out areas of archaeological interest from designated heritage assets. It will not lead to development or a change that would have a new likely significant effect.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>two of our conservation areas – at Churchgate and Wormley.</p> <p>29.5 Heritage assets can be formally designated, such as those listed above or be non-designated, identified by the Council (such as areas of archaeological interest and locally listed buildings), and others such as the Hertfordshire Gardens Trust. Heritage assets are protected under a variety of different legislation; however they form an important element of a place, and so are protected from harm through the planning system.</p>		
<p>New paragraph 29.6</p>	<p>The Council will work in partnership with Historic England and other stakeholders as necessary to prepare an Historic Environment Strategy Supplementary Planning Document (SPD) to be produced in accordance with national policy and guidance. The SPD will include a full review of the borough’s historic assets, including existing and new designations, to set out a programme of improvements and to provide more detailed guidance to applicants in relation to the Local Plan sites. It is anticipated that this will be published for consultation and adopted during 2019.</p>	<p>Justification of the need for the proposed SPD added to Policy HA1 (see below).</p> <p>See Council responses to inspector’s question no. 177 and Action Point P44.</p>	<p>No. This modification relates to the preparation of SPD. This will set out design guidance on the protection of the historical environment. It will not lead to development or change that will have a new likely significant effect.</p>
<p>Policy HA1: General Strategy for the Historic Environment</p>	<p>Policy HAE1: General Strategy for the Historic Environment</p> <p>I. The Council will seek to ensure that development not only avoids harm, but also improves the setting of Broxbourne’s historic environment, and better reveals the significance of heritage assets.</p> <p>II. To achieve this, the Council will:</p>	<p>Policy rewording considered necessary for consistency with the requirements of Paragraph 126 of the NPPF. Modification addresses the deletion of policies which support the production of a strategy without clarifying the intended outcomes. (Policy NR1: New River Conservation Area; Policy WT1: Wormley Conservation Area Improvement Plan). The</p>	<p>No. This modification splits out designated and non-designated features of historical interest and relates to the preparation of SPD. This will set out design guidance on the protection of the historical environment. It will not lead to development or change that will have a new likely significant effect.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<ul style="list-style-type: none"> • carry out a borough-wide characterisation study; • investigate the use of Article 4 Directions in conservation areas; • improve signage relating to heritage assets, and • seek to increase public access to the historic environment and heritage assets where-ever possible; • prepare or update Conservation Area Character Appraisals; and • review the potential for new Conservation Areas. <p>III. Development proposals must have regard to the Broxbourne Historic Environment Strategy Supplementary Planning Document, once adopted.</p>	<p>General Strategy for the Historic Environment is considered a more appropriate place to group this information and provide clarity on the intended outcomes.</p>	
<p>New paragraph 29.7</p>	<p>National planning policy and guidance sets out requirements for the consideration of proposals which could affect the historic environment, including both designated and non-designated asset and their setting.</p>	<p>To ensure consistency with national policy. See Council response to Action Point 44.</p>	<p>No. This modification safeguards the historical environment and relates to relevant national policy. It does not propose development or a change that would result in a new likely significant effect.</p>
<p>New Policy</p>	<p>Policy HE2: Development affecting the Historic Environment</p> <p>Development proposals affecting heritage assets or their settings should conserve or enhance the historic environment, and will be</p>	<p>To ensure consistency with national policy. See Council response to Action Point 44.</p>	<p>No. This modification safeguards the historical environment and relates to relevant national policy. It does not propose development or a change that</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p><u>determined in accordance with relevant national planning policy relating to the historic environment, along with other relevant policies in the Plan.</u></p>		<p>would result in a new likely significant effect.</p>
<p>Paragraphs 29.6-29.10</p>	<p>Information for Applicants</p> <p>29.6 A Heritage Statement, prepared in accordance with paragraph 128 of the NPPF should accompany all applications that affect heritage assets. Appropriately qualified persons should be used.</p> <p>29.7 Where a development has the potential to affect heritage assets with an archaeological interest, applicants should submit a desk-based assessment and, where necessary, the results of a field evaluation, at the time of the submission of an application. Applicants will need to consult with the Hertfordshire County Council's Historic Environment Unit directly in preparing the required assessments.</p> <p>29.8 Planning consent will be refused where proposed development leads to substantial harm to, or total loss of the significance of a heritage asset. The exceptions to be used in making this judgement are set out in Paragraph 133 of the NPPF.</p> <p>29.9 Where there is evidence to suggest that a heritage asset has been deliberately neglected or damaged, the state of that asset will not be considered in taking a decision on the effect of the proposal on the heritage asset.</p>	<p>To be addressed as part of the supplementary planning document required in Policy HE1.</p>	<p>No. Deleted text will be addressed in the SPD. Its removal will not result in new likely significant effects.</p>
<p>New paragraphs 29.8-10</p>	<p><u>Information for Applicants</u></p> <p><u>29.8 Applicants should check the Policies Map and the Council's interactive Local Plan Map for</u></p>	<p>To reflect modifications to policies HA2-12 and supporting text.</p>	<p>No. This modification aims to safeguard the historical environment. It does not propose development or a change that</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p><u>any potential impacts on historic assets at an early stage in the development of their proposals. The Policies Map shows the location of Scheduled Monuments and the boundaries of the Conservation Areas. The interactive Local Plan map includes the location of listed and locally listed buildings and areas of archaeological interest, as well as Scheduled Monuments and Conservation Areas. The interactive map will be updated as new information becomes available.</u></p> <p><u>29.9 Applicants should consult with Hertfordshire County Council's Historic Environment Unit directly in preparing any necessary assessments, and should consider seeking pre-application advice from Broxbourne Council in cases where the historic environment could be a significant issue. Historic England has also published a number of documents which provide further guidance on development and the historic environment.</u></p> <p><u>29.10 Council requirements and information regarding the historic environment, including the SPD (once published) together with other evidence including the Local List and information regarding specific assets are available on the Council's website at www.broxbourne.gov.uk/historicenvironment</u></p>		<p>would result in a new likely significant effect.</p>
Paragraph 29.10	<p>29.10 Heritage England has published a number of documents and publications which provide further guidance on developments and heritage assets. These should be taken into consideration alongside the policies set out within this document.</p>	Included in new paragraph 29.8	<p>No. Deleted text will not result in new likely significant effects.</p>
Paragraphs 29.11-13	<p>Conservation Areas</p>	To be addressed as part of the supplementary planning	<p>No.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>29.11 Conservation areas are designated areas of special historic or architectural interest, where it is considered desirable to preserve or enhance this interest.</p> <p>29.12 Each of the Borough’s conservation areas has its own unique character. There are six Conservation Areas currently designated in the Borough: Hoddesdon Town Centre; Broxbourne; New River; Wentworth Cottages; Wormley; and Churchgate.</p> <p>29.13 Each has its own distinctive character. The Council has produced information leaflets which summarise the main features of the character and appearance of the conservation areas.</p>	<p>document required in Policy HE1.</p>	<p>Deleted text will be addressed in the SPD. Its removal will not result in new likely significant effects.</p>
<p>Policy HA2: Conservation Areas</p>	<p>Policy HA2: Conservation Areas</p> <p>I. Proposals for new development, changes of use and alterations and extensions to existing buildings, within the conservation areas shown on the Policies Map, will be permitted providing that the development preserves or enhances the established character and appearance of the conservation area.</p> <p>II. In assessing the effect of any development on the character and appearance conservation area, the Council will consider:</p> <p>a) The urban fabric, with particular regard to established building lines and street patterns; and</p> <p>b) Whether the development is sympathetic in scale, form, massing, and height to the predominant form of development within the conservation area; and</p>	<p>To ensure consistency with national policy. See Council response to Action Point 44.</p>	<p>No. This modification aims to safeguard the historical environment. It does not propose development or a change that would result in a new likely significant effect.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>e) Whether the development retains and restores, traditional features such as shop fronts, walls, railings, paved surfaces and street furniture, and improves the condition of structures worthy of retention; and</p> <p>d) The impact of the proposal on important views into, out of or within the conservation area; and</p> <p>e) The effect on trees, hedgerows and other significant landscape features; and</p> <p>f) Whether the development incorporates landscaping appropriate to the character and appearance of the conservation area; and</p> <p>g) Whether the development enhances the conservation area by the removal of unsympathetic features, and/or the reinstatement of missing features; and</p> <p>h) Whether the proposed use is consistent with the character of the conservation area.</p> <p>III. New development will be expected to make a positive contribution to the character and distinctiveness of the conservation area.</p> <p>IV. Development outside but adjoining or visually related to a conservation area must not have a detrimental effect on the character, appearance, or land uses within that area; or views in to or out of, the conservation area.</p> <p>SHOPFRONTS AND ADVERTISEMENTS WITHIN CONSERVATION AREAS</p>		

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>V. The Council will only permit development proposals including solutions to shop front security and/or use of standardised shop front designs, fascias or advertisement displays in a conservation area if they:</p> <p>i) Are sympathetic to the character and appearance of the Conservation Area; and</p> <p>ii) Respect the scale, proportions, character and materials of construction of the upper part of the building and adjoining buildings and the street scene in general; and</p> <p>iii) Incorporate traditional materials where the age and character of the building makes this appropriate.</p> <p>VI. Internally illuminated fascias or projecting signs will not be permitted.</p> <p>VII. The Council will not support applications for additional signs that would result in a proliferation of advertisement material on any individual building or group of buildings.</p>		
Paragraph 29.14	<p>Demolition</p> <p>29.14 There is a presumption against the demolition of buildings within Conservation Areas. Exceptions may be considered where the character and appearance of the area would benefit by removal of a particular eyesore. The importance of any building, in terms of the qualities, character and appearance of the conservation area will be assessed with particular regard to the following factors, based upon advice provided by Historic England:</p>	<p>To ensure consistency with national policy.</p> <p>See Council response to inspector's question no. 183.</p>	<p>No.</p> <p>This modification aims to safeguard the historical environment and comply with national policy. It does not propose development or a change that would result in a new likely significant effect.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>the age, style, architecture and materials of the building; its relationship with any nearby listed buildings; whether it contributes as part of a group; whether it has significant historical associations with established townscape features; and whether it has significant historical associations with local people or past events.</p>		
<p>HA3: Demolition in a Conservation Area</p>	<p>Policy HA3: Demolition in a Conservation Area</p> <p>Within conservation areas permission for development involving demolition or substantial demolition will only be granted if it can be demonstrated that:</p> <p>i) the structure to be demolished makes no material contribution to the special character or appearance of the area; or,</p> <p>ii) it can be demonstrated that the structure is wholly beyond repair or incapable of beneficial use; or</p> <p>iii) it can be demonstrated that the removal of the structure and its subsequent replacement with a new building and/or open space would lead to the enhancement of the conservation area.</p>	<p>To ensure consistency with national policy.</p> <p>See Council response to inspector's question no. 183.</p>	<p>No.</p> <p>This modification aims to safeguard the historical environment and comply with national policy. It does not propose development or a change that would result in a new likely significant effect.</p>
<p>Paragraphs 29.15-16</p>	<p>29.15 Details of how a proposal protects and improves the area should be set out in the planning or heritage statement.</p> <p>29.16 The Council has prepared, or will prepare, conservation area appraisals which applicants must refer to when preparing development proposals within these locations. In the first instance, applicants should consult the information leaflets the Council has produced which summarise the main features of the</p>	<p>To be addressed as part of the supplementary planning document required in Policy HE1.</p>	<p>No.</p> <p>Deleted text will be addressed in the SPD. Its removal will not result in new likely significant effects.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	character and appearance of the conservation areas.		
Paragraphs 29.17-21	<p>Listed Buildings</p> <p>29.17 The 'National Heritage List for England' identifies buildings of special interest. These 'listed buildings' have a high level of legal protection, as well as imposing extra responsibilities on their owners.</p> <p>29.18 The Borough has 258 buildings which are nationally listed and protected for their heritage value. The Council has also sought to protect buildings, structures and open spaces which have not been designated nationally for listing but which contribute towards the Borough's distinction and heritage. These have been placed on the Council's local list. Listed buildings and locally listed buildings make a significant contribution towards the heritage and distinctiveness of the Borough's urban area. Their protection, particularly in the case of nationally listed buildings, is therefore paramount.</p> <p>29.19 The Council expect property owners/partners to work proactively with the authority in bringing forward proposals to preserve or enhance heritage assets or under threat within the Borough to facilitate their successful rehabilitation and seek their viable re-use consistent with their heritage value and special interest.</p> <p>Works affecting Listed Buildings</p> <p>29.20 'Listed building consent' is required from the Council for any works that affect a nationally listed building. The listing of a building is</p>	To be addressed as part of the supplementary planning document required in Policy HE1.	No. Deleted text will be addressed in the SPD. Its removal will not result in new likely significant effects.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>intended to ensure that it will be conserved in accordance with its significance. Alterations and improvements will be approved where they are compatible with the special architectural or historic interest of the building. The Council will not permit uses, alterations or extensions that would be detrimental to the designated heritage asset, including those that affect its setting.</p> <p>29.21 The register of nationally listed buildings and locally listed buildings can change during the lifetime of the plan. Any updates to these lists, including the removal or addition of buildings and structures, can be seen on the Council's website.</p>		
<p>Policy HA4: Listed Building</p>	<p>Policy HA4: Listed Building</p> <p>The Council will only support applications for development affecting a listed building where:</p> <p>i) The extension/alteration would not adversely affect its character as a building of special architectural or historic interest both internally or externally or it's wider setting; and</p> <p>ii) The design is high quality, with particular attention paid to details such as fenestration, materials including type of bricks and bonds used, means of enclosure; and</p> <p>iii) Any change of use would preserve its character as a building of special architectural or historic interest; and</p> <p>iv) the application will ensure the continued use and viability of the building or structure.</p>	<p>To ensure consistency with national policy.</p>	<p>No. This modification aims to safeguard the historical environment and comply with national policy. It does not propose development or a change that would result in a new likely significant effect.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>II. Any application should have regard to the following matters:</p> <p>(a) whether any original features or aspects that led to the building being included on the list will be lost, altered, or negatively impacted on, as a result;</p> <p>(b) whether the materials proposed are sympathetic to those used originally;</p> <p>(c) whether the style and proportions of additional or altered doors, windows and roof(s) complement or preserve the characteristics of the original doors, windows, or roof(s);</p> <p>(d) whether the proposal is in keeping with the overall design/appearance of the existing building/s and its surroundings;</p> <p>(e) whether the proposal, due to cumulative alterations and additions, will lead to an unsympathetic and/or adverse development.</p>		
<p>Paragraphs 29.22-23</p>	<p>Information for applicants</p> <p>Changes of use</p> <p>29.22 In determining applications affecting listed buildings, the Council will be mindful of government advice that the best use for any historic building is usually the use for which the building was originally designed and constructed.</p> <p>29.23 A change in the use of a listed building brings with it the same inherent risks of damage as physical alterations promoted for their own sake. It is important to assess all additional</p>	<p>To be addressed as part of the supplementary planning document required in Policy HE1.</p>	<p>No. Deleted text will be addressed in the SPD. Its removal will not result in new likely significant effects.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>legislative requirements such as those arising from compliance with the building control and fire regulations, which may necessitate internal alterations to features such as doors, fireplaces and staircases. Applicants will need to provide this information at the outset in the consideration of any development proposals because of the potentially damaging effects of these requirements on the character of a building. The Council will give serious consideration to such issues before any decision is taken about whether or not consent should be granted.</p>		
Paragraph 29.24	<p>Locally Listed Buildings</p> <p>29.24 Although still providing an essential element of distinctiveness, buildings on the local list are not subject to the high level of protection afforded to nationally designated buildings. The inclusion of a building on the local list is a material consideration in the determination of planning applications.</p>	To be addressed as part of the supplementary planning document required in Policy HE1.	No. Deleted text will be addressed in the SPD. Its removal will not result in new likely significant effects.
HA5: Locally Listed Buildings	<p>HA5: Locally Listed Buildings</p> <p>The Council encourages the retention of Locally Listed Buildings. Where planning permission is required for the alteration or extension of a Locally Listed Building, permission will only be granted where historic or architectural features are retained or enhanced, unless a clear and convincing justification is provided as to why that is not possible.</p>	To ensure consistency with national policy.	No. This modification aims to safeguard the historical environment and comply with national policy. It does not propose development or a change that would result in a new likely significant effect.
Paragraphs 29.25-29.26 unchanged	<p>Setting</p> <p>29.25 The NPPF accords serious weight to the setting of a heritage asset. It defines the setting as:</p>	To be addressed as part of the supplementary planning document required in Policy HE1.	No. Deleted text will be addressed in the SPD. Its removal will not result in new likely significant effects.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve.</p> <p>29.26 While the setting of a listed asset may be limited to its immediate surroundings, it often can extend some distance from it. The value of a listed building can be greatly diminished if unsympathetic development elsewhere harms its appearance or its harmonious relationship with its surroundings.</p>		
<p>HA6: Works Affecting the setting of Heritage Assets</p>	<p>HA6: Works Affecting the setting of Heritage Assets</p> <p>I. Proposals affecting the setting of a nationally designated building, structure, landscape or other historic feature, or a locally listed asset, heritage asset should demonstrate that they have safeguarded the relevant features of the heritage asset and its setting in order to ensure that the significance of the asset is sustained and enhanced, unless a clear and convincing justification is provided as to why this is not possible.</p> <p>II. Proposals outside the curtilage, which affect the setting of a nationally designated building, structure, landscape, historic park or garden or other feature, should demonstrate that the proposal does not adversely impact on the relevant features of the building, structure or feature and its setting.</p>	<p>To ensure consistency with national policy.</p>	<p>No. This modification aims to safeguard the historical environment and comply with national policy. It does not propose development or a change that would result in a new likely significant effect.</p>
<p>Paragraph 29.27 unchanged</p>	<p>Demolition of Listed Buildings</p> <p>29.27 Prosecution will be undertaken for any unauthorised demolition or alteration of a nationally listed building.</p>	<p>To be addressed as part of the supplementary planning document required in Policy HE1.</p>	<p>No. Deleted text will be addressed in the SPD. Its removal will not result in new likely significant effects.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
HA7: Demolition of Listed Buildings	<p>HA7: Demolition of Listed Buildings</p> <p>I. Proposals for developments that involve the demolition of a listed building or structure will not be approved unless there are proven overriding issues that would favour demolition over protection. Applicants will be required to submit detailed, expert evidence justifying demolition a clear and convincing justification is provided having regard to the following criteria:</p> <p>(a) any particular architectural features or history of the building that warranted it being listed;</p> <p>(b) the setting of the building and its contribution to the local street scene and community;</p> <p>(c) whether all reasonable steps to preserve the building have been investigated over the longer term and shown to be unrealistic;</p> <p>(d) the condition of the building, the cost of repairing and maintaining it in relation to its importance and the value derived from its existing use.</p> <p>II. Where details of a replacement building have been provided, any replacement will be expected to be of a high quality design and respect and, where appropriate, use particular materials, design and scale which reference the character of the original building</p>	To ensure consistency with national policy.	No. This modification aims to safeguard the historical environment and comply with national policy. It does not propose development or a change that would result in a new likely significant effect.
Paragraph 29.28	29.28 Details of how a proposal protects and improves the area should be set out in the planning or heritage statement.	To be addressed as part of the supplementary planning document required in Policy HE1.	No. Deleted text will be addressed in the SPD. Its removal will not result in new likely significant effects.
Paragraphs 29.29-29.31 unchanged	Historic Parks and Gardens	To be addressed as part of the supplementary planning	No.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>29.29 Historic parks and gardens are a fragile resource, easily damaged or lost over time. The English Heritage 'Register of Historic Parks and Gardens of special historic interest in England' was established in 1983. There is currently one such site in the Borough, at Wormleybury. Wormleybury comprises a 57ha landscaped park surrounding a country house which developed from an earlier formal scheme in the 1770s and the remnants of an early nineteenth century garden famed for its international plant collection. The Council will seek to ensure that the special interest of this parkland (and of any others which may from time to time be added to the register) is maintained and, if necessary, restored.</p> <p>29.30 In addition to the parks and gardens on the Historic England Register, the Hertfordshire Gardens Trust has also compiled a list of other locally important sites in the Borough. These are considered by the Council to be of sufficient quality to warrant preservation and protection when considering development proposals.</p> <p>29.31 Planning permission will not be granted for proposals that would cause unacceptable harm to historic parks or gardens (whether designated or not), their settings or public views into, out of, or within them. The Council will through its planning role promote conservation and public appreciation of the Borough's landscapes, and seek the designation of other worthy landscapes.</p>	<p>document required in Policy HE1.</p>	<p>Deleted text will be addressed in the SPD. Its removal will not result in new likely significant effects.</p>
<p>HA8: Historic Parks and Gardens</p>	<p>HA8: Historic Parks and Gardens</p> <p>1. Development proposals that materially harm the special historic character, appearance, views into or out of and the setting of those sites listed</p>	<p>To ensure consistency with national policy. See new policy HE1.</p>	<p>No. This modification aims to safeguard the historical environment and comply with national policy. It does not propose</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	on the Historic England 'Register of Historic Parks and Gardens' will not be permitted, unless a clear and convincing justification is provided as to why that is not possible.		development or a change that would result in a new likely significant effect.
Paragraph 29.32 unchanged	Information for Applicants 29.32 Applicants are required to submit a Historic Landscape Assessment prior to the determination of the application. This may include an archaeological assessment if located within an area of archaeological importance.	To be addressed as part of the supplementary planning document required in Policy HE1.	No. Deleted text will be addressed in the SPD. Its removal will not result in new likely significant effects.
Paragraphs 29.33-35	Areas of Archaeological Interest 29.33 Archaeological areas include those that contain features of historical interest or locations where there is evidence to suggest that archaeological remains may be present. It may also be necessary for archaeological investigations to be carried out on land not designated due to the Borough's longstanding history. 29.34 There are thirty four areas designated as being archaeologically significant in Broxbourne. 29.35 Archaeological remains are a finite and dwindling resource. Appropriate management of archaeological remains is essential to ensure they survive in good condition and are not needlessly or thoughtlessly destroyed.	To be addressed as part of the supplementary planning document required in Policy HE1.	No. Deleted text will be addressed in the SPD. Its removal will not result in new likely significant effects.
Policy HA9: Archaeology	Policy HA9: Archaeology 1. Development which would adversely affect the site or setting of nationally important archaeological remains will not normally be permitted. Any harm or loss will require clear and convincing justification.	To be addressed as part of the supplementary planning document required in Policy HE1.	No. Deleted text will be addressed in the SPD. Its removal will not result in new likely significant effects.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>II. An archaeological field evaluation must be submitted where proposals are on, or adjacent to sites of known archaeological interest or sites with a reasonable likelihood of possessing potential archaeological significance.</p> <p>III. Where development proposals are considered to have an impact on archaeological remains the Council will seek to firstly preserve them in situ. Where this is not possible, there must be appropriate management of archaeological sites, including preservation of any material, as part of the planning consent.</p>		
<p>Paragraphs 29.36-41</p>	<p>Information for applicants</p> <p>29.36 New developments must consider the archaeological implications of their proposals. Where a site has potential archaeological interest (whether scheduled or unscheduled) a desk based assessment will be required. Applicants should consult the Local Plan Interactive Map which shows known areas of archaeological interest. This should be based on the collation of existing written and graphic information, in order to identify the likely character, extent and relative quality of the actual or potential archaeological resource.</p> <p>29.34 If features are present then a field evaluation may also be necessary to define their character, extent and relative quality so that their worth may be assessed in local, regional and national contexts.</p> <p>29.38 This will be secured through an archaeological written scheme of investigation (WSI) which must include provision for appropriate publication of the evidence.</p>	<p>To be addressed as part of the supplementary planning document required in Policy HE1.</p>	<p>No. Deleted text will be addressed in the SPD. Its removal will not result in new likely significant effects.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Paragraphs 29.30-41	<p>Scheduled Monuments</p> <p>29.39 Scheduled Monuments are both finite and fragile. These irreplaceable assets are subject to a growing range of threats and pressures, due to population pressures and natural processes such as climate change. They can also be endangered by criminal or irresponsible behaviour, or neglect.</p> <p>29.40 Scheduled monuments are designated under separate (non-planning) legislation; however, planning has a role to ensure that new development does not adversely affect them. There is a strong presumption against any harm to Scheduled Monuments and heritage assets with archaeological interest that are of equivalent significance to Scheduled Monuments.</p> <p>29.41 There are eight scheduled monuments in Broxbourne Borough as follows: Theobalds Palace, Waltham Cross; Motte Castle south of Cock Lane; Hell Wood moated site and enclosure; Perrior's Manor moated site and fish pond; Half Meat Manor House, Cheshunt; Hoddesdon Park Wood Moated site, Hoddesdon; and Eleanor Cross, Waltham Cross.</p>	To reflect modifications including Policy HE1 and new Policy HE2.	No. Deleted text will be addressed in the SPD. Its removal will not result in new likely significant effects.
Policy HA10: Scheduled Monuments	<p>Policy HA10: Scheduled Monuments</p> <p>Proposals which adversely affect the significance of a Scheduled Monument or any non-designated feature with equivalent significance, will not be permitted, but for wholly exceptional circumstances.</p>	For consistency with national policy	No. This modification aims to safeguard the historical environment and comply with national policy. It does not propose development or a change that would result in a new likely significant effect.
Paragraph 29.43	<p>Other consents</p> <p>29.43 The Council will actively discourage proposals which adversely affect a Scheduled Monument or the setting of a Scheduled</p>	To reflect modifications including Policy HE1 and new Policy HE2.	No. This modification aims to safeguard the historical environment and comply with national policy. It does not propose

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>Monument, or any non-designated feature of equivalent significance. An evaluation report of the impact of the development on the Scheduled Monument, prepared by a suitably qualified person, will be required to be submitted with any application for development.</p>		<p>development or a change that would result in a new likely significant effect.</p>
<p>Paragraphs 29.45 and 29.46</p>	<p>Non-designated Heritage Assets</p> <p>29.44 In addition to those heritage assets that are statutorily protected, non-designated assets can be identified by the Council if they are considered to be of local significance. Significance refers to the value of a historic asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from the heritage asset's physical presence, but also its setting. Significance will be measured in terms of how the asset meets the following five criteria:</p> <ul style="list-style-type: none"> • Rarity • Representativeness • Aesthetic appeal • Integrity • Association <p>29.45 The Borough has many non-designated heritage assets of value and local significance. These require protection so that they continue to contribute to the richness of the Borough's historic environment and inform future development.</p>	<p>To be addressed as part of the supplementary planning document required in Policy HE1.</p>	<p>No. Deleted text will be addressed in the SPD. Its removal will not result in new likely significant effects.</p>
<p>Policy HA11: Non-Designated Heritage Assets</p>	<p>Policy HA11: Non-Designated Heritage Assets</p>	<p>To ensure consistency with national policy.</p>	<p>No. This modification aims to safeguard the historical environment and comply with</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>I. The Council will engage with local communities to identify undesignated heritage assets that contribute to local distinctiveness and refer to existing information in the historic environment record.</p> <p>II. Where a proposal would adversely affect a non-designated heritage asset, regard will be had to the scale of any harm or loss and the significance of the heritage asset</p>		<p>national policy. It does not propose development or a change that would result in a new likely significant effect.</p>
<p>Paragraph 29.46</p>	<p>Information for Applicants</p> <p>29.46 Applicants are advised to seek pre-application advice from the Council in respect of applications which may affect a non-designated heritage asset in advance of submitting an application.</p>	<p>To be addressed as part of the supplementary planning document required in Policy HE1.</p>	<p>No. Deleted text will be addressed in the SPD. Its removal will not result in new likely significant effects.</p>
<p>[New paragraph 29.46]</p>	<p>The Council will work in partnership with Historic England and other stakeholders as necessary to prepare an Historic Environment Strategy Supplementary Planning Document to include a full review of the borough's historic assets, including existing and new designations, to set out a programme of improvements and to provide more detailed guidance to applicants in relation to the Local Plan sites. It is anticipated that this will be published for consultation and adopted during 2019.</p>	<p>Justification of the need for the proposed SPD added to Policy HA1 (see below).</p> <p>See Council response to inspector's question no. 177.</p>	<p>No. Deleted text will be addressed in the SPD. Its removal will not result in new likely significant effects.</p>
<p>Paragraphs 29.47 and 29.48</p>	<p>Enabling Development</p> <p>29.47 The maintenance and upkeep of listed buildings, due to their age and structure, can be costly. It is the responsibility of the landowner to maintain the features and qualities which resulted in the listing of the asset. Proposals are occasionally submitted for new development within the grounds of a listed building to help fund essential improvements to that building.</p>	<p>To ensure consistency with national policy.</p>	<p>No. This modification aims to safeguard the historical environment and comply with national policy. It does not propose development or a change that would result in a new likely significant effect.</p>

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<p>This is commonly referred to as “enabling development”.</p> <p>29.48 The Council is mindful that the effect of any enabling development can be negative and destroy more than is saved. The Council supports Historic England in wishing to see a presumption against such development unless the applicant demonstrates that such development is essential in order to secure the long-term future of the building and the benefits of the enabling development clearly outweigh any disbenefits to the historic asset and its setting.</p>		
<p>HA12: Enabling Development</p>	<p>HA12: Enabling Development</p> <p>New development, which is required in the grounds of a nationally listed building to help fund essential improvements to that building a heritage asset, will only be permitted where it is demonstrated that:</p> <p>i) the benefits significantly outweigh any detriment to the historic, archaeological or architectural qualities of the asset; and</p> <p>ii) the benefits significantly outweigh any detriment to the local character and setting; and</p>	<p>To ensure consistency with national policy.</p>	<p>No. This modification aims to safeguard the historical environment and comply with national policy. It does not propose development or a change that would result in a new likely significant effect.</p>

30: Transport and Movement

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
TM1: Sustainable Transport	Cycling provision VI. Development proposals must provide for cycle facilities through the use of accessible and safe routes to and around the site, the provision of cycle storage and cycle parking areas. <u>Guidelines regarding the number of cycle spaces required can be found in Appendix B.</u>	To ensure consistency with national policy. See Council response to inspector’s question no. 195.	No. This modification ensures consistency with national policy. It will not result in development or a change and there will be no new likely significant effects.
TM4: Electric Vehicle Charging Points	I. The Council will expect that all parking spaces within new housing developments, including communal parking spaces, have active EV charging points, <u>or passive charging points where it can be demonstrated that provision of active charging points is not reasonable.</u> II. At least 20% of all new parking spaces for new retail and commercial development must be fitted with active EV charging points, <u>with passive provision for all the remaining spaces.</u> III. All cabling and charging points for commercial parking spaces must be capable of supplying a rapid charging service.	To ensure effectiveness of the policy. Inconsistency between Policy TM4 and paragraph 30.16. See Council response to inspector’s Preliminary Question 30c. The distinction between active and passive facilities ensures that the policy is effective, even for small developments. See Council response to inspector’s question no. 196.	No. This modification ensures effectiveness of policy. It will not result in development or a change and there will be no new likely significant effects.
Paragraph 30.16	In developments of below 5 new homes, electric charging points are encouraged and may be required as mitigation for development in certain locations. New non-residential/commercial developments less than 1000 square metres will also be encouraged to make provision for electrical charging points. A management, maintenance and repair plan will be required to be submitted as part of any application for development requiring EV charging points. Active spaces are fully wired and connected, ready to use, points at parking spaces. Passive provision requires the necessary underlying infrastructure (e.g. capacity in the	See comments regarding policy TM4 above. See Council response to inspector’s Preliminary Question 30c. Deletion of text necessary to remove the contradiction with policy TM4.	No. This modification ensures consistency with national policy. It will not result in development or a change and there will be no new likely significant effects.

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
	<u>connection to the local electricity distribution network and electricity distribution board, as well as cabling to parking spaces) to enable simple installation and activation of a charge point at a future date.</u>		

Appendix A: Schedule of Open Spaces

There are no main modifications proposed.

Appendix B: Car and Cycle Parking Guidelines

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Appendix B	Maximum Car Parking <u>Standards Guidelines</u> Cycle Parking Standards Guidelines	To ensure consistency with national policy. See Council response to question no. 195	No. The modification relates to guidelines for parking standards. This will not result in development or a change and therefore no new likely significant effect.
C3 Residential	The Council will consider up to 60% of the maximum 1.5 per dwelling parking guidance in town centres and 75% within areas with medium to high PTAL ratings.		No. This deletion will not result in development or a change and therefore no new likely significant effect.
Rail stations – cycle parking	5-1/t [long-term] spaces per peak period train to be decided in each case on individual merits		No. This deletion will not result in development or a change and therefore no new likely significant effect.
Parking for disabled motorists	ii) Elderly persons dwellings up to 10 spaces (demand-based as calculated from above standards) more than 10 spaces (demand-based as calculated from above standards) – 1 space per 4 persons.		No. This deletion will not result in development or a change and therefore no new likely significant effect.

Appendix C: List of Policies

Policy Number	Policy Name	Section Chapter Number
DS1	The Development Strategy	3
PM1	Sustainable Place Making	4
BR1	Brookfield	5
BR1	Brookfield Riverside	5
BR2	Brookfield Garden Village	5
BR3	Relocations within Brookfield	5
BR4	Halfhide Lane Gypsy Site	5
BR5	Transport and Movement in the Brookfield area	5
BR6	The Environment and Landscape of Brookfield	5
BR7	Integrated development of Brookfield	5
BX1	Broxbourne Village Improvement Plan	6
BX2	Broxbourne Station and Environs	6
BX3	Gas Distribution Station	6
BX34	Broxbourne School	6
CH1	Cheshunt Lakeside	7
CH2	Rosedale Park	7
CH3	Cheshunt Old Pond	7
CH4	Old Cambridge Road Corridor	7
CH5	Cheshunt Park	7
CH6	Cedars Park	7
CH7	Cheshunt Football Club	7
CH8	Albury Landscape Protection Zone	7
CH9	Theobald's Brook Field	7
CH10	East of Dark Lane	7
CH11	Former Eastern Playing Field, St. Mary's School	7
CH12	Land North of Bonney Grove	7
CH13	Council Offices, Churchgate	7
CH14	South of Hammondstreet Road	7
GO1	Goffs Oak Village Improvement Plan	8

GO2	North of Goffs Lane	8
GO3	South of Goffs Lane	8
GO4	Newgatestreet Road	8
GO5	North of Cuffley Hill	8
HOD1	Hoddesdon Town Centre	9
<u>HOD2</u>	<u>19 Amwell Street and Scania House</u>	<u>9</u>
<u>HOD3</u>	<u>Former Hoddesdon Police Station</u>	<u>9</u>
HOD 2 3	Turnford Surfacing Site	9
HOD 3 5	Hoddesdon Business Park	9
<u>HOD6</u>	<u>East of Dinant Link Road</u>	<u>9</u>
HOD 4 7	High Leigh Garden Village	9
<u>HOD8</u>	<u>Westfield Primary School Site, Westfield Road</u>	<u>9</u>
HOD 8 9	Barclay Park and Spital Brook	9
PP1	Park Plaza West	10
PP2	Park Plaza North	10
PP3	Park Plaza South	10
<u>PP4</u>	<u>Maxwells Farm West</u>	<u>10</u>
WC1	Waltham Cross Town Centre	11
WC2	Waltham Cross Northern High Street	11
<u>WC3</u>	<u>Theobalds Grove Station Car Park</u>	<u>11</u>
WC 3 4	Waltham Cross Renaissance Area Action Plan	11
WT1	Wormley Conservation Area Improvement Plan	12
WT2	Macers Estate	12
LV1	Lee Valley Regional Park	12
LV2	Lee Valley White Water Centre	13
LV3	Broxbourne Leisure Pool Site	13
LV4	Spitalbrook	13
LV5	Lee Valley Park Gateways	13
LV6	Former Britannia Nurseries Site, Waltham Cross	13
CS1	Cheshunt Country Club	14

CS2	Countryside Protection and Enhancement	14
NR1	New River Conservation Area	15
NR21	New River Path	15
GT1	Gypsies and Traveller sites	16
GT2	Travelling Showpeople Site	16
INF1	Infrastructure	17
INF2	Broxbourne Transport Strategy	17
INF3	Road Infrastructure	17
INF4	Crossrail 2/four tracking	17
INF5	Rail Stations	17
INF6	Level Crossings	17
INF7	Bus Transport	17
INF8	Local Cycling and Walking Infrastructure Plan	17
INF9	Utilities Statements	17
INF10	Reserve Secondary School Site <u>DPD</u>	17
INF11	New and Expanded Primary Schools	17
INF12	Educational Facilities	17
INF13	Health Care	17
INF14	Hotels	17
PO1	Planning Obligations	18
PO2	Community Infrastructure Levy	18
IMP1	Delivery of Development	19
<u>IMP2</u>	<u>Monitoring of Development</u>	<u>19</u>
DSC1	General Design Principles	20
DSC2	Extensions and alterations to existing developments	20
DSC3	Design affecting the public realm	20
DSC4	Management and maintenance	20
DSC5	Sustainable Construction	20
DSC6	Designing out Crime	20
DSC7	Comprehensive Urban Regeneration	20

DSC8	Shop Fronts and Fascias	20
DSC9	Advertisement and Signs	20
H1	Making Effective Use of Urban Land	21
H1 ₂	Affordable Housing	21
H2 ₃	Conversion of non-residential buildings to residential use	21
H3 ₄	Housing Mix	21
H4 ₅	Houses in Multiple Occupation	21
H5 ₆	Housing for Specific Needs	21
H6 ₇	Loss of Specialist Residential Accommodation	21
H7 ₈	Residential Annexes	21
H8 ₉	Permanent Residential Moorings	21
ED1	New Employment Uses	22
ED2	Employment Areas	22
ED3	Loss of Employment Uses - Rest of the Borough	22
RTC1	Retail Hierarchy	23
RTC2	Development within Designated Centres town, district and local centres, neighbourhood centres and parades	23
RTC3	Evening Economy	23
RTC4	Hot Food Take-Away Uses	23
ORC1	New Open Space, Leisure, Sport and Recreational Facilities	24
ORC2	Loss of Open Space, Leisure, Sport and Recreational Facilities	24
ORC3	Local Green Space	24
ORC4 ₃	Amenity Spaces	24
ORC5 ₄	Community Uses	24
ORC6 ₅	Equestrian Development	24
W1	Improving the Quality of the Environment	25
W2	Water Quality	25
W3	Water Efficiency	25
W4	SuDS	25
W5	Flood Risk	25
GB1	Green Belt	26

GB2	Residential Development on Derelict Glass House Sites	26
GB3	Rural Diversification	26
GB4	Occupancy Conditions	26
NEB1	General Strategy for Biodiversity	27
NEB2	Wildlife Sites	27
NEB3	Green Infrastructure	27
NEB4	Landscaping and Biodiversity in New Developments	27
NEB5	Protected Trees and Hedgerows	27
EQ1	Residential and Environmental Quality	28
EQ2	Air Quality	28
EQ3	Lighting	28
EQ4	Noise	28
EQ5	Contaminated Land	28
EQ6	Unstable Land	28
HA1	General Strategy for the Historic Environment	29
HA2	Conservation Areas	29
HE2	Development affecting the Historic Environment	29
HA3	Demolition in a Conservation Area	29
HA4	Listed Buildings	29
HA5	Locally Listed Buildings	29
HA6	Works affecting the setting of Heritage Assets	29
HA7	Demolition of Listed Buildings	29
HA8	Historic Parks and Garden	29
HA9	Archaeology	29
HA10	Scheduled Monuments	29
HA11	Non-designated Heritage Assets	29
HA12	Enabling Development	29
TM1	Sustainable Transport	30
TM2	Transport and New Developments	30
TM3	Access and Servicing	30
TM4	Electric Vehicle Charging Points	30

TM5	Parking Guidelines	30
TM6	Vehicle Cross-overs	30

Could the Proposed Main Modification give rise to a new likely significant effect?: No. Modifications in relation to policy numbering will have no likely significant effect.

Appendix D: Glossary

POLICY/PARAGRAPH	PROPOSED MODIFICATION	REASON	Could the Proposed Main Modification give rise to a new likely significant effect?
Glossary	Affordable Homes Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. A full definition of this term can be found on <u>in the Glossary contained within the Appendices to the National Planning Policy Framework in Annex 2.</u>	To ensure consistency with national policy. See Council response to question no. 162 (part b)	No. Modifications that relate to definitions provided in the glossary will have no new likely significant effect.
Glossary	Movement Corridor: the phrase ‘movement corridor users’ is equivalent to ‘road users’ but could also include shared cycle/pedestrian paths where there is the potential for conflict between different users which could be mitigated through careful design and layout.	To ensure effectiveness of the Plan. Added in response to inspector’s Preliminary Questions (no. 30) to clarify the meaning of this term in Policy TM2.	No. Modifications that relate to definitions provided in the glossary will have no new likely significant effect.
Glossary	Area of Archaeological Interest A <u>locally designated</u> area which holds, or potentially may hold, evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them.	To clarify that areas of archaeological interest are not nationally designated. See also proposed amendment to paragraph 29.3.	No. Modifications that relate to definitions provided in the glossary will have no new likely significant effect.

Appendix E: Concept Diagrams

Proposed amendments to the concept plans at Figure 2 (3: Development Strategy); Figure 10 (8: Goffs Oak); Figure 12 (10: Park Plaza) and Figure 13 (11: Waltham Cross) will be carried across to the concept diagrams within Appendix E.

[NEW] Appendix F: Broxbourne Local Plan Second Review 2001-2011: Saved policies to be superseded

Reason: To ensure compliance with Regulation 8, paragraph 5 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

<u>Policy No.</u>	<u>Broxbourne Local Plan Second Review 2001-2011: superseded policies</u>
<u>SUS1</u>	<u>Sustainable Development Principles</u>
<u>SUS2</u>	<u>Energy</u>
<u>SUS4</u>	<u>Minerals</u>
<u>SUS5</u>	<u>Pollution</u>
<u>SUS6</u>	<u>Air Quality</u>
<u>SUS7</u>	<u>Air Quality Management Areas</u>
<u>SUS8</u>	<u>Noisy Development</u>
<u>SUS9</u>	<u>Requirement for a Noise Impact Study</u>
<u>SUS10</u>	<u>Noise Sensitive Development</u>
<u>SUS11</u>	<u>Light Pollution and floodlighting</u>
<u>SUS12</u>	<u>Development on Contaminated Land</u>
<u>SUS13</u>	<u>Hazardous Substances</u>
<u>SUS14</u>	<u>Water Supply Waste Water Treatment and Water Conservation</u>
<u>SUS15</u>	<u>Ground and Surface Water Protection</u>
<u>SUS16</u>	<u>Flood Risk Assessments</u>
<u>SUS17</u>	<u>Flood Prevention</u>
<u>SUS18</u>	<u>Surface Water Drainage</u>
<u>GBC1</u>	<u>Revisions to Green Belt Boundary</u>
<u>GBC2</u>	<u>Development within The Metropolitan Green Belt</u>
<u>GBC3</u>	<u>Agricultural and Forestry Buildings</u>
<u>GBC5</u>	<u>Removal of Agricultural Occupancy Conditions</u>
<u>GBC6</u>	<u>Proposals for Non Agricultural Uses of Green Belt Land</u>
<u>GBC7</u>	<u>Buildings Required in association with Predominantly Open Uses of Green Belt Land</u>
<u>GBC8</u>	<u>Ancillary Dwellings In the Green Belt</u>

<u>Policy No.</u>	<u>Broxbourne Local Plan Second Review 2001-2011: superseded policies</u>
<u>GBC9</u>	<u>Removal of Restrictive (Non Agricultural) Occupancy Conditions</u>
<u>GBC10</u>	<u>Travelling Show people</u>
<u>GBC11</u>	<u>Extension and Alteration of Existing Dwellings In The Green Belt (including free standing buildings within the Green Belt</u>
<u>GBC12</u>	<u>Extension of Residential Curtilage</u>
<u>GBC13</u>	<u>Replacement Dwellings In The Green Belt</u>
<u>GBC14</u>	<u>Rural Diversification</u>
<u>GBC15</u>	<u>Re-Use of Existing Rural Buildings</u>
<u>GBC16</u>	<u>Landscape Character Areas and Enhancement</u>
<u>GBC17</u>	<u>Protection and Enhancement of Public Rights of Way</u>
<u>GBC18</u>	<u>Protection of Internationally Important Wildlife Sites</u>
<u>GBC19</u>	<u>Protection For Sites Of Wildlife And Nature Interest</u>
<u>GBC20</u>	<u>Protected Species</u>
<u>H2</u>	<u>Maximising the Development Potential from sites</u>
<u>H5</u>	<u>Longer Term Housing Allocations 2008-2011</u>
<u>H6</u>	<u>Protecting The Amenity Of Existing Residential Areas</u>
<u>H7</u>	<u>Retention or Refurbishment of Existing Housing Stock</u>
<u>H8</u>	<u>Design Quality of Development</u>
<u>H9</u>	<u>Conversion Of Existing Residential Property To Self Contained Flats</u>
<u>H10</u>	<u>Residential Conversion Of Non Residential Premises</u>
<u>H11</u>	<u>Housing Densities In New Development On Unallocated Housing Sites</u>
<u>H12</u>	<u>Housing Mix</u>
<u>H13</u>	<u>Affordable Housing</u>
<u>H14</u>	<u>Securing Provision Of Affordable Housing</u>
<u>H15</u>	<u>Affordable Housing: Ensuring Continuing Benefits</u>
<u>H16</u>	<u>Residential Care Homes</u>
<u>H17</u>	<u>Sheltered Housing</u>
<u>H18</u>	<u>Hostel Accommodation</u>
<u>H19</u>	<u>Loss of Specialist Residential Accommodation</u>
<u>EMP1</u>	<u>Employment Areas</u>
<u>EMP2</u>	<u>Park Plaza Employment Site</u>

<u>Policy No.</u>	<u>Broxbourne Local Plan Second Review 2001-2011: superseded policies</u>
<u>EMP3</u>	<u>North East Hoddesdon Key Site</u>
<u>EMP4</u>	<u>Essex Road Improvement Scheme</u>
<u>EMP5</u>	<u>Employment Uses in Town Centres</u>
<u>EMP6</u>	<u>Local Employment Sites</u>
<u>EMP7</u>	<u>Incompatible Employment Uses</u>
<u>EMP8</u>	<u>Home Working</u>
<u>EMP9</u>	<u>Small Business Units</u>
<u>EMP11</u>	<u>Replacement of St Mary's High School</u>
<u>EMP12</u>	<u>Nurseries and Creches</u>
<u>RTC1</u>	<u>Hierarchy of Town and Local Centres</u>
<u>RTC2</u>	<u>Vitality and Viability of Town and District Centres</u>
<u>RTC3</u>	<u>Developers' Contributions</u>
<u>RTC4</u>	<u>Criteria for assessing new retail proposals</u>
<u>RTC5</u>	<u>Non-retail uses within Core frontages of Hoddesdon and Waltham Cross Town Centres</u>
<u>RTC6</u>	<u>Non-retail uses other than in Core Town Centre frontages</u>
<u>RTC7</u>	<u>Proposals for Class A3 and similar uses</u>
<u>RTC8</u>	<u>Shop Fronts</u>
<u>RTC9</u>	<u>Shop and Business Fascias</u>
<u>RTC10</u>	<u>Residential Use in Town Centres</u>
<u>BFC1</u>	<u>Comprehensive approach to Development at Greater Brookfield</u>
<u>BFC3</u>	<u>Land at Brookfield Farm and Brookfield Retail Park</u>
<u>BFC4</u>	<u>New River Trading Estate</u>
<u>BFC5</u>	<u>Redevelopment of Household Waste site and Highway Depot</u>
<u>BFC6</u>	<u>Land west of Halfhide Lane (Halfhide Lane site)</u>
<u>BFC7</u>	<u>Relocation of Travellers</u>
<u>BFC8</u>	<u>Impact of development on the highway network within the Greater Brookfield Locality</u>
<u>BFC9</u>	<u>Design & Appearance</u>
<u>BFC10</u>	<u>Protection of the setting of the Green Belt and Great Cambridge Road</u>
<u>BFC11</u>	<u>Pedestrian links beside The New River</u>
<u>CLT1</u>	<u>Community, Open Space and Recreational Facilities</u>

<u>Policy No.</u>	<u>Broxbourne Local Plan Second Review 2001-2011: superseded policies</u>
<u>CLT2</u>	<u>Childrens Play Areas</u>
<u>CLT3</u>	<u>Maintenance of Landscaping/Open Space</u>
<u>CLT4</u>	<u>Lee Valley Regional Park</u>
<u>CLT5</u>	<u>Hotels and Overnight Accommodation</u>
<u>CLT6</u>	<u>Bed and Breakfast Accommodation</u>
<u>HD1</u>	<u>Effect of development on nationally important Sites and Monuments</u>
<u>HD2</u>	<u>Requirements for evaluation of a Heritage Asset</u>
<u>HD3</u>	<u>Preservation of Heritage Asset</u>
<u>HD4</u>	<u>Demolition (Listed Buildings)</u>
<u>HD5</u>	<u>Alterations and Extensions to Listed Buildings</u>
<u>HD6</u>	<u>Other Development affecting a listed building and its Curtilage</u>
<u>HD7</u>	<u>Enabling development</u>
<u>HD8</u>	<u>Condition of buildings</u>
<u>HD9</u>	<u>Parks and Gardens of Historic Interest</u>
<u>HD10</u>	<u>New Buildings and Changes of Use of Existing Buildings in Conservation Areas</u>
<u>HD11</u>	<u>Demolition within conservation areas</u>
<u>HD12</u>	<u>Development adjoining, or visually related to, Conservation Areas</u>
<u>HD13</u>	<u>Design Principles</u>
<u>HD14</u>	<u>Design Statement on Local Character</u>
<u>HD15</u>	<u>Comprehensive approach to Urban Regeneration</u>
<u>HD16</u>	<u>Prevention of Town Cramming</u>
<u>HD17</u>	<u>Retention/Enhancement of Landscape Features</u>
<u>HD18</u>	<u>Trees, Hedgerows and Woodlands</u>
<u>HD19</u>	<u>Waterside Green Chains</u>
<u>HD20</u>	<u>Water courses in urban areas</u>
<u>HD21</u>	<u>Protection of open spaces not included within the hierarchy of open space</u>
<u>HD22</u>	<u>Community Safety</u>
<u>HD23</u>	<u>Access for the disabled</u>
<u>HD24</u>	<u>Telecommunications</u>
<u>T1</u>	<u>Local Transport Plan</u>

<u>Policy No.</u>	<u>Broxbourne Local Plan Second Review 2001-2011: superseded policies</u>
<u>T2</u>	<u>Passenger Transport and Interchange Facilities</u>
<u>T3</u>	<u>Transport and New Development</u>
<u>T4</u>	<u>Green Travel Plans</u>
<u>T5</u>	<u>Development Standards</u>
<u>T6</u>	<u>Rural Roads</u>
<u>T7</u>	<u>Home Zones</u>
<u>T8</u>	<u>Greater Brookfield Area</u>
<u>T9</u>	<u>Pedestrian Needs</u>
<u>T10</u>	<u>Cycling Provision</u>
<u>T11</u>	<u>Car Parking</u>
<u>IMP2</u>	<u>Community and Infrastructure needs linked to new development</u>
<u>IMP3</u>	<u>Enforcement</u>

Could the Proposed Main Modification give rise to a new likely significant effect?: No. Modifications in relation to policy numbering will have no likely significant effect.

[NEW] Appendix G: Monitoring Framework

<u>Objective</u>	<u>Policies</u>	<u>Indicator</u>	<u>Measure</u>
<u>Objective 1) Housing: Provide a range of market, affordable, elderly persons and special needs housing in the form of apartments, family and executive properties.</u>	<u>DS1: Development Strategy</u>	<u>Supply of new homes</u>	<u>Housing trajectory</u>
	<u>H1: Affordable Housing</u>	<u>Criteria as set out in policy</u>	<u>Target in policy (40%)</u>
	<u>Policy GT1: Gypsy and Traveller Sites</u>	<u>Supply of new pitches</u>	<u>Target in policy</u>
<u>Objective 2) Employment: Strengthen the local economy by providing a range of job opportunities in existing business parks and town centres, new high value jobs in business park environments and by securing investment in skills and training programmes.</u>	<u>ED1: New Employment Uses</u> <u>ED3: Loss of Employment Uses – Rest of Borough</u>	<u>Number of new jobs created</u> <u>B1/B2/B8 employment floorspace</u>	<u>Positive trend against jobs target in Policy DS1</u>
	<u>Related objectives: 3) Town Centres, Shopping and Leisure</u>		
	<u>BR1: Brookfield</u>	<u>Criteria as set out in policy</u>	<u>Key milestones achieved</u>

<u>Objective</u>	<u>Policies</u>	<u>Indicator</u>	<u>Measure</u>
<u>Objective 3) Town Centres, Shopping and Leisure: Improve the range and quality of retail, leisure and civic facilities by continuing to improve the Borough's centres.</u>	<u>RTC2: Development within Designated Centres</u>	<u>retail floorspace</u>	<u>Gain/loss</u>
	<u>Related objectives: 2) Employment; 4) Sustainable Neighbourhoods</u>		
<u>Objective 4) Sustainable Neighbourhoods: Ensure that growth and regeneration improves the physical quality and social and economic prosperity of neighbourhoods for residents, businesses, workers and visitors.</u>	<u>DS1: General Design Principles</u>	<u>Criteria as set out in policy</u>	<u>Positive trend</u>
	<u>DS3: Design Affecting the Public Realm</u>	<u>Criteria as set out in policy</u>	<u>Delivery of new and/or improved public realm schemes</u>
	<u>DSC7: Comprehensive Urban Regeneration</u>	<u>Comprehensive delivery at locations set out in the Local Plan</u>	<u>Planning and delivery of comprehensive schemes</u>
	<u>Related objectives: 5) Environment; 6) Transport; 8) Health and Wellbeing</u>		
<u>Objective 5) Environment: Protect and enhance the natural, historic and built environment for its visual beauty, leisure and recreation value, ecology and heritage.</u>	<u>NEB2: Wildlife Sites</u>	<u>Impacts on internationally designated sites; SSSI status (favourable/unfavourable)</u>	<u>No deterioration against standards in mitigation strategy; SSSI status improvements</u>
	<u>NEB3: Green Infrastructure</u>	<u>Supply and enhancement</u>	<u>New and enhanced assets</u>
	<u>NEB4: Ancient Woodland, Protected Trees or Hedgerows</u>	<u>Protected assets</u>	<u>Additions/deletions</u>
	<u>HA2: Conservation Areas</u>	<u>Heritage at Risk Register</u>	<u>Additions/deletions</u>
	<u>HA4: Listed Buildings; HA5: Locally Listed Buildings</u>	<u>Asset registers</u>	<u>Additions/deletions</u>
	<u>GB1: Green Belt</u>	<u>Change in extent of Green Belt</u>	<u>Loss of Green Belt</u>
	<u>GB2: Residential Development on Derelict Glass House Sites</u>	<u>Degree of openness; environmental enhancements</u>	<u>Contextual site appraisal</u>
	<u>Related objectives: 4) Sustainable Neighbourhoods; 8) Health and Wellbeing</u>		
<u>Objective 6) Transport: Ensure that growth and regeneration can be safely accommodated by local roads, the A10 and the West Anglia mainline and that it encourages as many journeys as possible by bus, rail, walking and cycling so that people have a safe, viable and attractive alternative to driving.</u>	<u>TM1: Sustainable Transport</u>	<u>Percentage sustainable mode share</u>	<u>Local Transport Plan monitoring</u>
	<u>INF3: Road Infrastructure</u>	<u>Schemes set out in policy</u>	<u>Timely delivery</u>
	<u>INF7: Bus Transport</u>	<u>Proposals set out in policy</u>	<u>Timely delivery</u>
	<u>INF8: Local Cycling and Walking Infrastructure Plan</u>	<u>Proposals set out in policy</u>	<u>Timely delivery</u>
	<u>Related objectives: 4) Sustainable Neighbourhoods; 7) Infrastructure; 8) Health and Wellbeing</u>		
	<u>INF10: Secondary School Site DPD</u>	<u>Identification and delivery of site</u>	<u>Progress with DPD</u>

<u>Objective</u>	<u>Policies</u>	<u>Indicator</u>	<u>Measure</u>
<u>Objective 7) Infrastructure: Ensure that sufficient infrastructure, services and facilities are in place or provided as part of housing, employment, retail/leisure and other developments to meet the education, healthcare, leisure and other needs of residents, businesses, workers and visitors.</u>	<u>INF11: New and Expanded Primary Schools</u>	<u>Schemes set out in policy</u>	<u>Timely delivery</u>
	<u>INF13: Health Infrastructure</u>	<u>Provision in line with NHS estates plan</u>	<u>Timely delivery</u>
	<u>PO1: Planning Obligations</u>	<u>Contributions received</u>	<u>Infrastructure Delivery Plan targets by infrastructure type</u>
	<u>PO2: Community Infrastructure Levy</u>	<u>Contributions received</u>	
	<u>Related objectives: 6) Transport; 8) Health and Wellbeing</u>		
<u>Objective 8) Health and wellbeing: Encourage active lifestyles and healthy choices through an integrated approach to active travel, clean and safe environments and enhanced access to indoor and outdoor sports, play and recreation.</u>	<u>ORC1: New Open Space, Leisure, Sport and Recreational Facilities</u>	<u>Proposals set out in policy</u>	<u>Timely delivery</u>
	<u>ORC2: Loss of Open Space, Leisure, Sport and Recreational Facilities</u>	<u>Protection of assets listed in policy</u>	<u>Lost assets</u>
	<u>EQ2: Air Quality</u>	<u>Nitrogen dioxide levels</u>	<u>Air Quality Annual Status Report</u>
	<u>Related objectives: 4) Sustainable Neighbourhoods; 5) Environment; 6) Transport.</u>		

Could the Proposed Main Modification give rise to a new likely significant effect?: No. Modifications in relation to monitoring requirements will have no likely significant effect.

List of Changes to the Policies Map

The Policies Map has been updated to reflect proposed modifications arising from the examination process, and is available alongside this document. A list of modifications to the policies map is provided below.

Map layer	Reason	Could the Proposed Main Modification give rise to a new likely significant effect?
Green Belt (GB1)		
Remove Green Belt designation at St James' Road traveller site (Goffs Oak); Wharf Road (Turnford); Hertford Road (Hoddesdon); and the travelling showpeople site at Goffs Lane.	For consistency with national policy in respect of gypsy and traveller sites and Green Belt. See Council's Matter 7 Hearing Statement, response to Inspector's Question 160.	No. This modification removes the Green Belt designation at these three sites; however, the same sites were considered in the emerging Broxbourne Local Plan as sites for the provision of gypsy, traveller and travelling show people pitches. Development of pitches at these sites has therefore already been taken into consideration in the 2018 HRA. This modification proposes no new site allocations for gypsy, travellers and travelling showpeople. There will be no new likely significant effects associated with this modification.
Revised Green Belt boundary following the track to the south of Broxbourne School allocation	To ensure that Policy BX3 is effective and consistent with national policy in respect of the Green Belt.	No. This modification removes the Green Belt designation at this site. The same site was considered in the emerging Broxbourne Local Plan for the provision of housing and relocation of the secondary school within the site boundary. This proposal was taken into consideration in the 2018 HRA. This modification does not propose an extension to the site boundary just a re-designation of the Green Belt boundary. There will be no new likely significant effects associated with this modification.
Amend Green Belt and site boundaries at site South of Goffs Lane.	To ensure that Policy GO3 is effective. See also Council's Matter 6 Hearing Statetement, response to Inspector's Question 97 and proposed modifications	Yes. This modification alters the site boundary in addition to the Green Belt designation. In addition, Policy GO3 allows for the

Map layer	Reason	Could the Proposed Main Modification give rise to a new likely significant effect?
	to Figure 10: South of Goffs Lane Indicative Concept Plan.	development of an addition 20 dwellings when compared to that set out in the emerging Broxbourne Local Plan and assessed in the accompanying HRA. This modification will be subject to further assessment in the HRA.
Employment areas (ED2)		
Increase area of the allocation at Park Plaza West.	To correspond with the position of 12.5ha minimum open space as set out in policy PP1. See Council response to AP28 (EXAM24A) and corresponding amendments to the indicative Concept Plan Figure 13 (EXAM6D).	Yes. This modification results in the extension of the allocation area. This extended area was not including in the emerging Broxbourne Local Plan or assessed in the 2018 HRA. It will therefore be subject to further assessment in this HRA.
Increase the amount of land shown with the designated employment area at Park Plaza West and reduce the open space accordingly.	To ensure consistency with the agreed masterplan which formed the basis of the amended Concept Plan	Yes. This modification results in the extension of the allocation area. This extended area was not including in the emerging Broxbourne Local Plan or assessed in the 2018 HRA. It will therefore be subject to further assessment in this HRA.
Delete the business campus land north of Brookfield Riverside.	To ensure that the plan is justified and consistent with national policy. See Council's response to the Inspector's Post-Hearings Advice Note.	No. The removal of the business campus will not result in a change to the outcome of the 2018 HRA.
Local Green Space		
Remove Local Green Space designation from within Hell Wood.	For consistency with modified policy BR6 and paragraph 5.29 regarding public access to existing and proposed woodland, wildlife corridors and green infrastructure.	No. The modification will not result in development or change that would result in likely significant effects.
Replace Local Green Space with New Open Space (ORC1) designations at the following locations: Park Plaza West; Rosedale Park; Newgatestreet Road and North of Goffs Lane (Goffs Oak)	For consistency with national policy. See also Policy ORC1.	No. The modification will not result in development or change that would result in likely significant effects.
New Open Space, Leisure, Sport and Recreation (ORC1)		
Adjust extent of Open Space shown south of Park Plaza West	To correspond with the position of 12.5ha minimum open space as set out in policy PP1. See Council response to AP28 (EXAM24A) and corresponding amendments to the indicative Concept Plan Figure 13 (EXAM6D).	No. The modification will not result in development or change that would result in likely significant effects.

Map layer	Reason	Could the Proposed Main Modification give rise to a new likely significant effect?
Wildlife Sites		
New boundary to site located within the large employment area at Hoddesdon.	To reflect an update by to the boundaries of the site.	Yes. This modification will result in a change to the site boundary and thus the developable area. The likely significant effects associate with this modification will be subject to further assessment in this HRA.
Open Space, Leisure, Sport and Recreation (ORC2)		
Brookfield: relocate allotment site from Park Lane Paradise to land north of Cheshunt Park.	For consistency with modified Policy BR3. See AP	No. This modification relates to the re-location of an allotment. This will not result in development or change that would result in new likely significant effects.
Gypsy and Traveller Sites (GT1)		
Delete proposed Traveller Site at Park Lane Paradise (Brookfield).	For consistency with proposed modification to policy BR4 and national policy regarding traveller sites and Green Belt.	No. This modification relates to the deletion of the Traveller Site at Park Lane Paradise. This will not result in development or a change with new likely significant effects.
Residential and Mixed-use site allocations		
Include the following SLAA sites as site allocations on the policies map: <ul style="list-style-type: none"> - 19 Amwell Street, - Former Hoddesdon Police Station, - East of Dinant Link Road, - Westfield Primary School (Hoddesdon); - Gas Distribution Station (Broxbourne); and - Theobalds Grove Station Car Park (Waltham Cross) 	To ensure that the Plan is clear as to how a decision maker should react. See the Council's response to Further Preliminary Question 6 (EXAM4A).	Yes – were these sites assessed in the HRA in 2018??
Show policy area CH12: land north of Bonney Grove (Cheshunt) as a site allocation (currently shown as 'Residential development and retention of sports club/pitches'.)	To ensure consistency with other site allocations.	No. This modification relates to the renaming of the site under Policy CH12. This will not result in development or a change with new likely significant effects.
Renumber policies to reflect additional site allocations.	For clarity and consistency.	No. The renumbering of policies will not affect the findings of the HRA.

Map layer	Reason	Could the Proposed Main Modification give rise to a new likely significant effect?
Waltham Cross Area Action Plan		
Delete the boundary of the Waltham Cross Area Action Plan.	To ensure consistency with the approach to other plans and strategies and to enable the boundaries to be defined by reference to evidence collected through work on the Action Plan.	No. This modification will not result in development or a change with new likely significant effects.
Town Centre boundaries		
Delete Brookfield Town Centre boundary.	To ensure that the plan is effective. See proposed modification to policy RTC1 (new part II).	No. This modification will not result in development or a change with new likely significant effects.
Scheduled Monuments		
Show boundaries of scheduled monuments, including at Rye House in East Hertfordshire District, near the Turnford Surfacing site (HOD3)).	To provide clarity in respect of proposals affecting the historic environment.	No. This modification will not result in development or a change with new likely significant effects.
Infrastructure		
Delete INF10 Secondary School designation from the Church Lane site.	To reflect the proposed modifications to Policy INF10.	No. This modification will not result in development or a change with new likely significant effects.
Neighbourhood Centres, Local Centres and Parades		
Retain the following local centres on this map layer: High Street, Cheshunt; High Road, Broxbourne; High Street, Waltham Cross (Nos 228-286 and 229-267); Crossbrook Street (nos 99-137); Goffs Oak; Wormley; and Rye Road. Delete all other centres and parades.	See proposed modification to policy RTC1 (part I).	No. This modification will not result in development or a change with new likely significant effects.
Other		
Include policy label PP4 on the site of Maxwells Farm West	To ensure consistency with the new policy PP4 and ensure that the plan is effective and provides clarity in respect of how a decision maker should react.	No. This modification will not result in development or a change with new likely significant effects.
Amend Key to replace NR2 with NR1.	Amendment following deletion of Policy NR1: New River Conservation Area.	No. This modification will not result in development or a change with new likely significant effects.

Appendix B: Council Responses to Actions Required following Hearing Sessions for Matter 9: Other Development Management Policies (Week Four). Natural England’s advice

**Council Responses to Actions Required following Hearing Sessions for Matter 9:
Other Development Management Policies (Week Four).
Natural England's advice**

AP43. Council to liaise with Natural England to propose further main modifications to policies NEB2 and CH1 and associated reasoned justifications to ensure that the Plan is consistent with national policy and the Habitat Regulations, justified and effective with regard to the provision of necessary mitigation for development affecting internationally designated wildlife sites.

1. Natural England's Advice

1.1 Natural England has worked together with Broxbourne Borough Council to agree further main modifications to policies NEB2 and CH1 as requested by the Inspector.

1.2 Natural England is supportive of all the proposed changes as detailed in the Councils submission to AP43 with the exception of point II of Policy NEB2. We advise that the policy needs to be strengthened by making reference to the requirement for the Epping Forest Mitigation Strategy to be in place by the time the plan is adopted to ensure compliance with the Habitats Regulations.

2 Justification for requesting Additional changes to Policy NEB2

2.1 The Appropriate Assessment stage of a Habitats Regulation Assessment is testing whether the plan will have an adverse effect on integrity, either alone or in combination. This integrity test incorporates the application of the Precautionary Principle as a matter of law. It is therefore important for the assessment process to eliminate the prospect of adverse effects as much as is possible. This means that the local plan should be as specific as it can be when proposing mitigation measures and must also ensure that there is certainty that the mitigation measure will be deliverable.

2.2 The Epping Forest Mitigation Strategy is a required measure to enable a conclusion of no adverse effect to be reached for recreational and air pollution impacts on Epping Forest Special Area of Conservation (SAC). Therefore it is imperative that there is certainty that the proposed mitigation measure is deliverable and enforceable by the time the plan is operational to ensure the adverse impacts can be mitigated. The only way this can be achieved is to ensure there is a commitment in policy that the Mitigation Strategy will be in place by the time the plan is adopted.

2.3 We therefore propose the following additional wording (in red and underlined) to Policy NEB2 II:

Where necessary, contributions towards the measures set out in the Epping Forest mitigation strategy (to be in place by the time of plan adoption) will be sought from developments within the Epping Forest ZOI in order to mitigate and avoid in-combination effects on the SAC;

Natural England

Sarah Fraser MRTPI– Senior Planning Adviser West Anglia Team

Appendix C: Natural England Letters

Date: 06 November 2019
Our ref: Broxbourne LP Policy NEB2
Your ref:



Planning Policy Team
Broxbourne Borough Council
Bishops College, Cheshunt, Waltham Cross EN8 9XF
By email only: planningpolicy@broxbourne.gov.uk

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Sir/Madam,

Broxbourne Local Plan: Regulation 19 Consultation

Thank you for your consultation on the above dated 31 October 2019 which contained an attached document entitled '*NEB2 mods with comments 31.10.19*' which we returned with tracked changes and comments on the 6th of November 2019.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England assumes that wording under the title 'Internationally Designated Wildlife Sites' will replace the wording under the same heading as proposed in your authorities response to action point 1, examination document EXAM14A.¹ Natural England recognises that, in total, the proposed new wording for policy NEB2 is a considerable improvement and addresses our soundness concern that that the submission version did not reflect the hierarchy of sites.

We have previously advised that part II should be amended to read as follows:

*"II. Where necessary, financial contributions towards the measures set out in the any Epping Forest mitigation strategy for recreational impacts will be sought from residential developments within the Epping Forest ZOI in order to mitigate and avoid in-combination effects on the SAC **which will be in place by the time of plan adoption**²,"*

This is consistent with our advice to and our agreement with Harlow Council and other surrounding authorities. As a competent authority under the Habitats Regulations within Epping Forest Special Area of Conservation's identified zone of influence, Natural England maintains that your authority should have joint responsibility for ensuring that a mitigation strategy is completed on time and that you need to demonstrate that an adverse effect on integrity as a result of your local plan's growth can be avoided in this manner. We do, however, note that an interim strategy is already in place and that this matter is one which both parties are content to leave to the inspector's discretion.

Natural England have expressed some concern relating to the supporting text and references to the Epping Forest Local Plan and Habitats Regulations Assessment ('HRA') in paragraph 27.14. The wording would be acceptable to us if you recognised that the Epping Forest Local Plan and HRA are currently undergoing examination and that the access management and monitoring measure are currently only interim (as per our tracked changes document sent on the 6th of October 2019). We

¹ https://ex.broxbourne.gov.uk/sites/default/files/Documents/Planning_Policy/EXAM%2014A%20-%20Council%27s%20Response%20to%20AP1%20-%20Internationally%20Designated%20Wildlife%20Sites.pdf

² Proposed additional text shown in bold

recognise that this would 'date' the plan should Epping Forest Local Plan be found sound and a full mitigation strategy be agreed but it would likewise seem anomalous if they were not.

The inspector for Epping Forest Local Plan has raised significant issues relating to the local plan and in relation to HRA has advised that "*she cannot conclude beyond reasonable scientific doubt (as the parties all agree that I must) that the Plan will not adversely affect the integrity of the SAC until steps have been taken towards resolving it.*"³ It is therefore important that any reliance on Epping Local Plan and associated HRA is appropriately qualified. Should you identify alternative wording which addresses this issue to your greater satisfaction we would be happy to consider it at our earliest convenience.

Regarding air quality impacts paragraph 27.14 recommends the following wording or similar is included for accuracy:

*~~"An in-combination assessment of air quality, including from planned development in~~ **The air quality assessment, which included the Local Plan allocations within Broxbourne Borough, concluded that there would be negligible impacts from such development outside Epping Forest District alone and that Epping Forest Local Plan is the dominating contributor of pollutant emissions when considered in combination with surrounding authorities.**"⁴*

The inspector for Epping Forest Local Plan has advised that further work is required on their HRA but, given the current evidence, Natural England advise that at this point in time, it would not be inappropriate for the Inspector to conclude that the responsibility for mitigating air impacts on Epping Forest SAC should reside with Epping Forest District Council.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Jamie Melvin on 020 802 61025. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours faithfully,



Mr Aidan Lonergan
Area Manager
Natural England
West Anglia

³ <http://www.efdclocalplan.org/wp-content/uploads/2019/08/ED98-Epping-Forest-Post-hearing-Advice-Aug-2019-V1-final.pdf>

⁴ Propose additional text shown in bold, proposed removals struck-through.

Date: 04 December 2019
Our ref: Broxbourne LP Policy NEB2 November
Your ref:



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Broxbourne Borough Council
Bishops College, Cheshunt, Waltham Cross EN8 9XF
By email only: planningpolicy@broxbourne.gov.uk

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T 0300 060 3900

Dear Sir/Madam,

Broxbourne Local Plan: Main Modifications

Thank you for your consultation on the above dated 15 November 2019 and updated HRA dated November 2019 which addresses the current situation regarding air quality impacts and acknowledges our previous advice in our letter dated 6th of November 2019.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England can confirm the following:

- 1 We are content for the issues and conclusions relating to air quality impacts to be addressed in the HRA rather than in the Local Plan. This is appropriate given the conclusion of the Broxbourne Local Plan HRA and the Epping Forest Local Plan HRA. Paragraphs 8.3.7 of the Broxbourne Local Plan HRA now contains a caveat which recognises that should the additional air quality HRA work being undertaken by EFDC indicate that the conclusion in relation to Broxbourne's relative contribution to air quality impacts is no longer valid that the Broxbourne Local Plan will need to be amended accordingly.
2. We agree with the proposed wording of Policy NEB2 which clarifies that financial contributions will be sought to mitigate **recreational** impacts only from **residential** development. The only outstanding issue is in relation to Natural England's advice for the policy to require that the Epping Forest SAC Mitigation Strategy should be in place by the time of local plan adoption. We understand that the Planning Inspector will advise as to whether Natural England's advice in relation to this outstanding issue will be implemented in the final Report following the consultation on the proposed modifications.
3. Natural England can confirm that we are content with the amended proposed wording for inclusion in paragraphs 27.12 -27.18 of the Local Plan. We note that paragraph 27.14 now makes it clear that the access, management and monitoring measures currently in place to address recreational impacts on the SAC are interim only.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Jamie Melvin on 020 802 61025. For any new consultations, or to provide further information on this consultation please

send your correspondences to consultations@naturalengland.org.uk.

Yours faithfully,

A handwritten signature in black ink that reads "Aidan Lonergan". The signature is written in a cursive, flowing style.

Mr Aidan Lonergan
Area Manager
Natural England
West Anglia

Ecological Services

Green Infrastructure

Landscape and Visual Impact Assessment

Landscape Character Assessment

Habitats Regulations Assessment

Strategic Environmental Assessment

Sustainability Appraisal



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