



The Planning
Inspectorate

Report to Broxbourne Borough Council

by Geoff Salter BA MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

7th December 2011

PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

REPORT ON THE EXAMINATION INTO BROXBOURNE CORE STRATEGY DEVELOPMENT PLAN DOCUMENT

Document submitted for examination on 14 December 2010

Examination hearings held between 15 March and 30 March, 2011

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Abbreviations Used in this Report

AA	Appropriate Assessment
AHVA	Affordable Housing Viability Assessment
AoS	Areas of Search
CS	Core Strategy
DPD	Development Plan Document
dpa	Dwellings per annum
dph	Dwellings per hectare
EEP	East of England Plan
IDP	Infrastructure delivery plan
LDS	Local Development Scheme
LP	Local Plan
PC	Proposed Change
PPS	Planning Policy Statement
ppd	persons per dwelling
RS	Regional Strategy
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SoS	Secretary of State
SRN	Strategic Road Network

Non-Technical Summary

This report concludes that the Broxbourne Core Strategy Development Plan Document (DPD) as submitted does not provide an appropriate basis for the planning of the Borough over the next 15 years. The Council has failed to justify its strategy with sufficient evidence to support a very significant element of the proposals, the proposed expansion of Greater Brookfield into a sub-regional retail and leisure centre. The strategy would also fail to meet the minimum housing requirements for the final 5 years of the plan period and the minimum required provision for gypsies, travellers and travelling show people.

A number of changes are therefore essential for legal compliance in terms of general conformity with RS and for soundness. In summary, these are:

- Adding a further 200 dwellings to be provided in the final 5 years of the plan period
- Re-wording part of the policy on housing mix to make clear that on site affordable housing provision is expected unless there are exceptional circumstances to justify commuted payments
- Deletion of Policy CS4 and some supporting text regarding gypsies, travellers and travelling showpeople
- Deletion of the chapter on Greater Brookfield and Policy CS7, together with consequential changes to part of the retail and town centres chapter and Policy CS6.

Introduction

1. This report contains my assessment of the Broxbourne Core Strategy Development Plan Document (DPD) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004. It considers whether the DPD is compliant in legal terms and whether it is sound. Planning Policy Statement (PPS) 12 (paragraphs 4.51-4.52) makes clear that to be sound, a DPD should be justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my examination is the submitted draft core strategy (December 2010) which is broadly the same as the document published for consultation in August 2010.
3. My report deals with the changes that are needed to make the DPD sound. The changes that I recommend **[IC]** are set out in Appendix C. Some of these changes materially alter the substance of the plan and its policies, but they arise from the evidence base and the discussions at the hearings held in March. They do not undermine the sustainability appraisal and participatory processes undertaken with regard to the elements of the Core Strategy (CS) that I find sound.
4. The Council have put forward some changes which for the most part are factual updates, corrections of minor errors or other minor amendments in the interests of clarity. Some of these 'minor' changes, including for example references to the East of England plan (EEP), are needed for soundness and they are endorsed in Appendix B. As most of the other changes do not relate to soundness they are generally not referred to in this report, although they improve the plan. I endorse the full schedule shown in Appendix A. I am content for the Council to make any additional minor changes to page, figure, paragraph numbering and to correct any spelling errors prior to adoption.
5. In writing this report I have taken into account all such changes and the consultation responses from all representors in response to the changes and my own requests for comments on various matters throughout the examination. All documents, including changes, responses and hearings statements are available to see in the examination core document library, both on line and at the Council offices.

Assessment of Soundness

Preamble

6. The submitted CS was published shortly after the Government had announced the revocation of the East of England Plan (EEP). However, that revocation was challenged successfully in the courts and the EEP remains part of the Development Plan until its revocation comes into effect through due procedures following the enactment of the Localism Bill, currently passing through Parliament. The Council considered that the CS is broadly in

conformity with the EEP and has put forward a number of minor changes to reflect the current statutory position.¹ For the reasons set out below, I disagree with the Council on three critical aspects of the strategy and the CS would fail the statutory requirement of Section 20(5)(b) of the Planning and Compulsory Purchase Act 2004 unless the recommended changes are made.

7. Shortly before the hearing sessions closed a Ministerial Statement was published entitled 'Planning for Growth'². All those who submitted a representation were offered the opportunity to respond on the implications of the statement for the contents of the CS. I have read those submissions and the response of the Council, taking particular account of comments related to some of the key issues discussed at the hearings on commercial elements of the strategy, such as the expansion of Brookfield 'centre'. I have attached significant weight to the need to secure economic growth and employment, particularly with regard to my support for the areas of search for proposed business parks in the green belt at Park Plaza West and Maxwells Farm West, both of which should generate significant employment growth.
8. During preparation of the report a further decision in the Court of Appeal was issued concerning the status of regional strategies, the 'Cala 3 decision'. As this was directly relevant to some of the evidence presented to the examination and matters discussed at the hearings I requested comments on its implications from the Council and other participants. I have taken the responses to these requests into account in completing this report.
9. In late July 2011 the Government issued the consultation draft of the National Planning Policy Framework (NPPF), which contains a number of references to the presumption in favour of sustainable development. A further consultation period of three weeks took place to ensure that the examination took account of the implications of this policy development for the Core Strategy examination. The consultation responses on this topic have been taken into account in this report.

Main Issues

10. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings there are eight main issues upon which the soundness of the plan depends.

Issue 1 – Spatial vision

Does the CS present a clear spatial vision for the Borough, recognising its distinct qualities?

11. Broxbourne is a relatively small Borough in extent, heavily constrained by the Lee Valley Regional Park to the east and green belt designation elsewhere. The CS aims to strengthen existing communities along the A10 corridor but recognises that new housing needs may only be met in full if land is released from the green belt in the latter half of the plan period. Similarly, the evidence base, particularly the Employment Opportunities Study³ supports the

¹ BCD/18

² Planning for Growth – Statement by Mr Greg Clark 23/03/11

³ Derrick Wade Waters 2010 – ES Emp3

need to change the Borough's employment profile through development of 'higher end' jobs at new business parks that would also involve release of green belt land. Another major element of the strategy is the expansion of the Brookfield centre to create a new sub-regional shopping centre by providing a very substantial amount of retail floorspace (about 50,000 sq m) together with significant leisure development, the relocation of a travellers' site and council depot and new housing.

12. This bold approach to continue concentration of development along the A10 corridor but make a step change in the nature of the Borough's retail and employment facilities is spelt out clearly in the CS. It was nevertheless the subject of significant local opposition, from some residents and neighbouring authorities, which formed the basis of the oral hearings programme. Given the history of erosion of gaps between settlements along the A10, the concentration of more housing, jobs and services along this corridor generally follows established principles of local planning policy. However, the Greater Brookfield element of the spatial strategy is unsound for other reasons, as explained in Issue 5 below, and requires a change through deletion. The approach will add further pressure to existing infrastructure, another key issue that needs to be addressed fully.
13. The decision to identify broad Areas of Search (AoS) for both housing and employment growth in the green belt was criticised as failing to meet the advice in PPS12 that critical decisions on strategic issues or sites should not be avoided. This is a finely balanced issue which the relevant housing and employment sections of this report address in more detail below. The evidence of the housing trajectory in the Annual Monitoring Report (AMR)⁴ shows that a five year supply is available. At present sufficient urban sites have been identified to meet housing needs without the release of green belt land in the first five year period. I agree with the Council that the detailed boundaries of the green belt would be appropriately refined in the Site Allocations DPD, which is programmed for preparation and examination following adoption of the CS.
14. The proposals for employment development on the west side of the A10 at Park Plaza West and Maxwells Farm are planned for development after the remaining allocations on the east side of the A10 have been completed. In the absence of any other comparable sites, the CS gives a sufficiently clear indication that releases of green belt are needed to widen the Borough's employment base. Unlike all the housing areas, which have more capacity than needed over the plan period and beyond, the allocation of both sites can be justified on grounds of employment need. The Areas of Search (AoS) are clearly defined by major highways and a river and there is a case for making a strategic allocation now. However, considerable uncertainties about the scope and deliverability (including viability) of the sites remain, particularly concerning potential highways improvements. Consequently the approach to identify AoS, rather than strategic sites, is sound in the circumstances (see section 4 below).

Issue 2 - Housing supply

⁴ Annual Monitoring Report December 2010

Will the right amount of housing be provided in appropriate sustainable locations?

EEP requirements

15. The CS plans to meet the requirement for 5,600 dwellings in the period from 2001 to 2021 [280 dwellings per annum (DPA)] as set out in the EEP. Because of a higher rate of completed and committed development up to 2011, Broxbourne Borough has a requirement for dwellings to be provided at 240 dpa between 2011 and 2021. However, Policy H1 of the EEP states that beyond 2021 housing should be provided at the same annual rate as before, ie 1400 dwellings at 280 dpa, whereas the Council is seeking to provide for just 240 dpa.

The housing trajectory

16. Looking at the elements of housing supply, there was no dispute about the level of completions up to March 2010. Some objectors raised significant questions about the deliverability of some urban sites identified as commitments in the SHLAA, particularly concerning their viability at current house price levels. The Council gave evidence that some sites had been excluded. A discount rate of 10% had been applied for those expected to come forward in the first 5 years of the plan period but this 10% was added back in to account for higher numbers of dwellings being completed on committed sites, based on past experience. Other sites had been deferred to the second and third 5 year periods if deliverability was thought to be a problem in the short term. Wildlife and other constraints had been taken into account. Windfalls have not been included in the Council's figures, in accordance with government guidance in PPS3. The density assumptions take into account the Council's intention to provide a broader mix of dwellings than in the recent past, in particular to encourage more family houses rather than flats.
17. The Council's view that in effect all commitments and SHLAA sites would come forward is rather optimistic. However, even if these elements of supply were discounted, say by 10% in the first 5 years of the plan period, enough land from committed and SHLAA sites is likely to come forward to enable the timely delivery of a five year supply from 2011. The full requirement for a ten year housing supply is dependent on difficult choices being made in the Site Allocations DPD but could be achieved. The proposal in the draft NPPF for an additional 20% allowance in the first five year period may be subject to change and can be afforded only limited weight at this stage. However, if necessary, there would be scope to provide for any confirmed requirement to increase in the trajectory through the Site Allocations DPD.

Capacity of green belt sites

18. Whatever the outcome with regard to commitments and urban SHLAA sites, it is quite clear that green belt sites will be needed, possibly as early as year 6, to meet housing requirements, based on the EEP targets, as the Council acknowledges. Evidence of local need from the Strategic Housing Market Assessment (SHMA) indicates that an even higher figure could be justified.⁵

⁵ SHMA – ES HOU 1

The Housing Needs Assessment of 2007⁶ sets out an annual need for 773 affordable homes. Policy SS7 of the EEP anticipates this by stating that a local review of the green belt will be required in Broxbourne. It was agreed that in broad terms the four AoS would have capacity for about 3,600 dwellings. Policy CS2 also provides for the Site Allocations DPD to consider the suitability for housing of other 'edge of urban area' green belt sites, which might be in more sustainable locations. The AoS and other potential sites are all close to urban areas and have not been seriously questioned as the most suitable locations.

19. The issue of whether the CS sets a clear enough framework for lower tier DPDs is not clear cut. As the Council clarified in evidence, the AoS are not identified as sequentially preferable to the urban edge sites. This leaves significant choices to be made in the Site Allocations DPD. This pragmatic approach may be consistent with the government's localism agenda; it may be appropriate to make choice between sites later, following further consultation, allowing small sites in the green belt to be considered concurrently. There is no reason to comment on the merits of any individual site (eg W of Hoddesdon, West of Cheshunt, the greenhouse sites or others at Newgate Street) at this stage. Similarly, bearing in mind my recommendation about the Greater Brookfield strategic allocation, the merits of the proposal for 200 dwellings in the green belt at Turnford could be considered in comparison with other sites. The approach certainly provides sufficient flexibility to deal with contingencies. A further advantage concerns the uncertainty attached to potential requirements to improve the Borough's infrastructure, particularly the road network in the A10 corridor and possibly even junction 25 of the M25. This is addressed below.

Housing conclusions

20. It is clear that the CS would result in a shortfall of at least 200 dwellings, more if commitments do not come forward at 100%, compared with the EEP minimum target in the final 5 years of the plan period to 2026. The Council justified this position by referring to the intended revocation of the EEP, possibly shortly after the adoption of the CS. The weight to be given to the government's intentions for RSs has been the subject of much discussion in the courts and elsewhere, as it was at the hearings. However, the most recent Court of Appeal decision in the case of CALA Homes confirms that it would be unlawful for me to take into account the proposal to abolish the RS in my examination of the CS.
21. At present the EEP is part of the development plan and the statutory requirement is for the CS to be in general conformity with it. Government policy in PPS3 that LPAs should seek to meet their own housing needs, based on local evidence such as survey material used to inform a Strategic Housing Market Assessment (SMHA), remains. The Council's case was founded on community opposition to the adverse environmental impact that would result from meeting the EEP requirement, which would involve further losses of green belt. There is no evidence that local need has reduced since the EEP

⁶ AHNS – ES Hou 4

was approved; the Housing Needs Assessment Report of 2007⁷ indicates an annual affordable housing need of 773 homes.

22. The CS would not fully meet a minimum requirement for 280 dpa in the last 5 years of the plan period. The failure to provide for an essential component of the EEP, in the absence of any compelling evidence about housing need to the contrary, means that the CS would not be broadly in conformity with this the development plan. However, this could be rectified, since the green belt Areas of Search, which have been subject to Sustainability Appraisal (SA), have more than enough capacity to provide for the full number of dwellings. The initial estimate for both all AoS and other urban edge sites is about 4,000 dwellings, more than double the number required, even taking into account some reductions in SHLAA urban sites.
23. The local evidence of housing need is consistent with the minimum target set out in the EEP, which the CS should aim to meet. The total number of dwellings should be increased, with some acknowledgement that a limited amount of additional green belt land is likely to be released as a result. Change **IC1** is needed to make the CS sound.

Issue 3 - Will the CS provide the right mix of different housing types, including affordable housing?

Affordable housing - Are the proposed percentages and thresholds in Policy CS3 based on sound evidence and consistent with PPS3?

24. Policy CS3 sets out an indicative target of 40% for affordable housing to be applied to sites with 15 or more dwellings, in accordance with PPS3. The policy is backed up by a viability study⁸ which confirms that a target of 30%, based on a split of 80% social rent/20% intermediate housing would be achievable on a range of sites across the Borough, assuming availability of some Social Housing Grant. However, representors with interests in some large greenfield sites confirmed at the hearings that a target of 40% may be achievable.
25. The wording of the policy is sufficiently flexible to take account of viability issues on all sites. I have some concern that the issue of the split between social rent and intermediate housing, which can have a significant impact on viability, is to be established in the Broxbourne Housing Strategy, as cross referenced in Policy CS3 and not subject to full independent examination. The SHMA uses an assumed ratio of 65:35 for social rent/intermediate housing, which is what is currently sought by the Council in negotiations. Any change to this ratio, in particular to increase the proportion of social rent housing, could have a significant effect on viability.
26. The recently revised PPS3 changes the definition of affordable housing to add affordable rented housing but does not require tenure split to be set out in a DPD. Policy CS3 provides for adequate flexibility but the Council may wish to clarify the ratios of various types of affordable housing that will be sought as a target, subject to viability considerations, in a review of the policy to make it more effective.

⁷ ES HOU 4

⁸ AHVS – ES Hou3

27. The policy does appear to give equal emphasis to commuted payments for off-site provision 'where this is considered more appropriate'. This wording is rather more flexible than the clear direction in PPS3 to provide such housing on site wherever possible. A change in wording as recommended in **IC2** is essential for soundness to reflect the guidance in PPS3.

Gypsies, travellers and travelling showpeople

28. The CS is quite clear that the Council does not intend to meet the EEP requirement for 18 new pitches for gypsies and travellers between 2006 and 2011 and a compound increase of 3% thereafter. This stance was taken because the EEP target was said by the Council to be intended to meet not just a local need in Broxbourne, but also to provide for regional requirements, principally the relocation of unauthorised pitches in Essex. Policy CS4 indicates that a new site for travelling showpeople will be allowed but does not provide a firm commitment to provide the number of pitches for gypsies and travellers required in the EEP.
29. The Gypsy and Traveller Accommodation Assessment (GTAA)⁹ identifies a requirement for 45 pitches in Northern and Eastern Hertfordshire to meet the area's needs between 2006 and 2011, some of which would be needed in the Borough. As drafted Policy CS4 sets out criteria which restrict new plots to those within or adjoining existing sites or allowing the relocation of existing sites. Other criteria would severely restrict the potential provision although it is recognised that green belt land is likely to be required.
30. The direction of travel of government policy is indicated by the draft statement which will eventually replace Circular 1/06 (which the SoS has said will be withdrawn). However, paragraphs 30 and 31 of the current circular advise that the CS should set out criteria for the location of gypsy and traveller sites and that the number of pitches set out in the RS is translated into specific site allocations in a DPD. Policy CS4 neither allocates sites nor delegates their allocation to a lower level DPD. Moreover, the weight to be attached to the EEP cannot be reduced and the statutory requirement for general conformity with the RS remains. In the circumstances it is necessary to delete the policy to remove a clear conflict with the requirement of the EEP. In the absence of any contrary evidence about need, the CS should set out a commitment to meeting the EEP requirement in the Site Allocations DPD. **[IC3]**

Issue 4 – Employment

Will the CS provide adequate employment opportunities of the right type? Is the objective to provide more 'high-value' jobs justified and realistic?

31. The EEP sets out an indicative employment target for Hertfordshire of 68,000 jobs from 2001 to 2021. In Broxbourne, the CS aims to carry forward one of the main objectives of the Herts Economic Development Strategy (HEDS) by increasing local skill levels and encouraging new high-value jobs. The clear intention is to make a step change in the economic base of the Borough, rather than expand existing opportunities in low value, low-knowledge, land hungry sectors such as industry and warehousing, as recommended in the

⁹ Northern and Eastern Hertfordshire GTAA 2006 – ES Trav1

Broxbourne Employment Land Review¹⁰. The proposed shift would reduce the socio-economic problems facing the Borough and contribute to Hertfordshire's wider economic agenda but carries some risks, given recent difficulties in attracting new investment for employment growth. However, it can be justified by the HEDS and a more recent study¹¹ and is clearly in tune with the government's post-budget statement encouraging the planning system to provide the framework for economic growth across a range of sectors.¹²

Park Plaza North (PPN)

32. The CS makes no change to current proposals for this important site at the southern end of the A10 corridor to be developed for business use. There are understandable concerns about the deliverability of this objective, following a lengthy delay before development started on part of the original Local Plan allocation. The marketing evidence is a clear indication that higher-end business park based on knowledge enterprises continues to have viability difficulties, despite the preparation of a detailed development brief. The original intention for the site has already been diluted by the development of the News International building which contains a substantial amount of warehouse space. While some flexibility may be needed, it is important to try to maintain a clear direction of policy to bring about a different market perception of the area and achieve re-alignment of the local economy over a longer period. The strategy is flexible enough to accommodate the type of owner-occupier led development sought by the market and is justified.

Park Plaza West (PPW)

Is the release of green belt at Park Plaza West justified? Will the mechanism for release from the green belt be effective? Can transport effects be mitigated satisfactorily? Is the proposal viable and deliverable?

33. This proposal is for a major employment site on the west side of A10, opposite Park Plaza North, an established location for a business park in accordance with saved Policy 15 of the Herts Structure Plan. Policy E3 of the EEP requires strategic employment sites to be provided at a number of locations, including Hertfordshire where they would support regeneration of the Lee Valley. The site provides an important opportunity to extend Park Plaza North to create enough critical mass for 'high end' jobs. The Council acknowledged the value of the green belt in providing separation of Enfield/M25 from Cheshunt. But there is nowhere else in the Borough where the necessary critical mass can be achieved, with such good transport links. The loss of green belt can be justified by the exceptional circumstances of a highly constrained urban area and consequent limited opportunity to achieve a step change in employment profile without release of such land. The EEP provides for a review of the green belt in Broxbourne to accommodate all needs. The employment justification of the government's growth agenda, carried forward as a clear policy direction in the NPPF, weighs heavily in favour of the proposal.
34. The Council will find it a difficult task to create a science park that will genuinely compete with others such as those at Cambridge and in the Thames

¹⁰ Roger Tym 2008 – ES Emp1

¹¹ Derrick Wade Waters 2010 – ES Emp3

¹² Planning for Growth – Statement by Mr Greg Clark 23/03/11

Valley. There are no genuine links to a prestigious university, since the Herts College is a second tier educational institution. Nevertheless, the site has a strong locational advantage for road travel and it would be possible to make much needed improvements to the links between the whole south A10 area and the nearest railway stations through the provision of public transport support and better footpaths and cycleways.

35. Investment in highway capacity along A10 corridor will be essential. This would have to be the subject of further study, and is a strong argument in favour of the AoS approach rather than firm strategic allocation at this stage. Much more work is needed, not least in more accurate calculation of traffic levels, the highway improvements works needed and how their costs would be apportioned fairly for all development proposed in the CS area. I agree that this is the right approach, as set out in the Council's suggested changes to paragraphs 94, 95 and 142 of the CS, which I endorse as changes which are necessary to make the CS sound **[Appendix B]**. In the circumstances these critical transport issues, together with master planning of the area and possibly further more detailed SA, will have to be resolved at a later stage and the phasing element of the policy is also sound.

Maxwells Farm West (MFW)

Is the Maxwells Farm West proposal justified? Will the mechanism for release from the green belt be effective? Can cumulative transport effects be mitigated satisfactorily? Is the proposal viable and deliverable?

36. Similar considerations apply to Maxwells Farm West. From past experience, a major employer is needed to anchor such a scheme, in the way that the News International building was intended to underpin Park Plaza North. In present economic circumstances, a number of parties gave evidence that a speculative proposal would not come forward. Although the policy wording allows for a different type of development, more focussed on industrial uses, similar arguments about the need to encourage employment growth apply to this site. A defensible green belt boundary would be formed by the river to the west and there are exceptional circumstances for its release, to create critical mass with Park Plazas North and West.
37. However, as with PPW, transport requirements need to be resolved. A full transport assessment of all development requirements, including residential and other retail/leisure schemes is needed, to ensure each element of the CS pays its appropriate share over the plan period, but not to address existing problems. The CS indicates in the 'what if' section that the Council will seek to delay or even oppose development of the site if transport problems prove insuperable. While this is not overly reassuring from the employment perspective, in the circumstances the inclusion of the site as an AoS rather than a strategic allocation can be justified, pending a full update of the A10 study (see below).
38. There is some evidence that both the PPW and MFW sites may have some importance as feeding ground for migratory birds, for golden plovers in particular. The sites have no statutory nature conservation designation and there has been no objection to the AoS proposals from Herts & Middlesex Wildlife Trust, Natural England or any other statutory body. The Habitat

Regulations Assessment (HRA) identified no significant environmental effects that were likely to arise. The occupation is transient and it could well be that other areas nearby in the Lee valley (not necessarily in Broxbourne) are also used by or available for the birds. In the circumstances I consider the AoS proposals for the business parks are justified. If any additional survey work were to identify potential significant effects on the birds when the sites are considered during preparation of the Site Allocations DPD, it would be possible to address the need for any necessary mitigation at that stage.

Is the policy for the protection of existing employment sites appropriate? Have the right sites been identified for protection?

39. There is no intended change to a saved Local Plan Policy EMP1 which permits changes of use within Class B categories at a number of existing key employment sites in the Borough, such as Hoddesdon Business Park and Lea Road/Britannia Road in Waltham Cross. This would provide some flexibility for business while retaining an employment base. The extension of Policy CS5 to protect smaller employment sites identified in the Employment Land Review, which may be under pressure from higher value uses, would also be beneficial for the Borough's economic base in providing for as wide a range of job opportunities as possible. This sound approach is consistent with PPS4 and the planning for growth agenda.

Issue 5 - Retail and Town Centres, Greater Brookfield

Is the proposal to expand Brookfield justified and supported by sound evidence?

Scene setting

40. The proposal to expand the out of centre retail facilities at Greater Brookfield is a major element of the CS. Following the development of the Tesco and Marks and Spencer stores in the mid 1980s, further retail development was permitted by the Council on the west side of Halfhide Lane. These stores comprise in total about 28,000 sq m of floorspace (gross). The traffic and other problems resulting from the mixture of uses in the area, including the Council depot, industrial estate and the travellers site were documented during the previous Local Plan inquiry in 2004. At that time a reduced limit on the amount of new retail warehouse development (up to 8,000 sq m) was set out, although a number of issues remained unresolved.
41. The Council's current approach in the CS is to propose a major expansion of retailing immediately north of the existing stores to provide about 50,000 sq m gross of primarily comparison floorspace, together with an additional 15,000 sq m gross of leisure development. 200 houses are proposed in the green belt north of Halfhide Lane and a 'silver village' of 100 homes for the over 55s next to the retail warehouses. The scale of this expansion would create a new retail area that would be the dominant centre in Broxbourne, effectively in my view a new sub-regional centre in an out of centre position.
42. The strategic allocation would not comply with Policy E5 of the EEP, which directs major new retail development, which I consider a scheme of this scale to be, to a number of identified regional or town centres. Greater Brookfield is not included in that hierarchy. The policy sets out criteria for higher order retail provision and states that new regional centres should only be brought

forward through a review of the RSS. Given the clear intention of the government to revoke the RSS, such a review is highly unlikely to occur. All parties at the hearing agreed that the CS examination was the only appropriate forum at which the proposed strategic allocation could be publicly scrutinised.

43. Paragraph 4.22 of the EEP refers to the Brookfield centre as being of local importance and to the need for DPDs to define the future role of such centres, including whether they should remain purely retail centres or develop with a fuller range of provision. The Council argued that its intention was not to alter the regional retail hierarchy but to 'reinforce' the role of Greater Brookfield as a 'Borough centre'. However, I have no doubt that the amount of new floorspace proposed would make a clear and significant change in the sub regional hierarchy. In essence the strategic allocation is for a major retail and leisure development, not a new town centre with a range of other uses, which has to be assessed in terms of impact against the policy framework of PPS4.

Is the retail impact assessment accurate; are the assumptions justified?

Demand – population estimates, retail growth projections

44. The retail study supporting the strategic allocation was prepared by GVA Grimley and updated in July 2010 - Retail and Town Centres: Evidence Base Bridging Report.¹³ Nevertheless, at a time of continuing economic uncertainty, the assumptions underpinning the estimates of retail expenditure in the catchment area remain open to considerable debate. Projected population growth was based on average household size of 2.3 persons per dwelling (ppd). It is possible that this ratio may increase for those parts of the catchment within Broxbourne if the planned shift in policy towards larger family dwellings is achieved. However, in broad terms the estimates of population increase are consistent with Office of National Statistics figures and appear reasonably robust.
45. Projected expenditure growth for comparison goods is less straightforward. The new floorspace has a design year of 2018, with projections given up to 2026. Three scenarios were tested based to some extent on past trends but employing what are essentially guesses about future economic growth. Along with most parties at the hearing, I consider a continuation of average annual growth of 4.7% (over the last four decades) into the long term, the 'trend' scenario, is very unlikely. Even a 'base growth' scenario of 3.8% pa from 2007 onwards appears unduly optimistic and has already proved to be wrong for the last three years. The 'cautious' scenario in the Bridging Report assumes growth of 1.5% to 2013, 2.8% from 2013 to 2018 and reverts to the past trend of 4.7% pa from 2018 to 2026.
46. The outcomes of impact assessments are very sensitive to this particular assumption; for example, there is a roughly 10% difference between the 'base' and 'cautious' assessments and the 'trend' catchment expenditure estimate is nearly 30% more than the 'cautious' one. As the Council accepted, in these circumstances the lowest growth scenario provides the most robust method of assessing the impact of the proposed allocation on trading patterns in the various centres likely to be affected. Even that projection assumes that

¹³ CD – ESRet1

past levels of growth of nearly 5% pa will take place between 2018 and 2026, which is far from certain. Therefore the Council's estimate of spare retail capacity of at least £910 million should itself be treated with caution. Other factors such as a continuing increase in the share of on-line expenditure may also affect the need for retail space.

Turnover/sq m; net/gross ratios; floorspace efficiency

47. Some representors argued that the estimated turnover of the new retail development, at £5,000 per sq m, is very conservative. This figure may be representative of a mixed bag of high street retailers but might well underestimate the potential takings, particularly if a better net to gross sales area than the similarly conservative 70% is achieved. The Bridging Report also assessed a more robust assumption of £5,500 per sq m as part of sensitivity testing. This would increase the projected new turnover from £175 million to about £192.5 million. Together with a 75% net to gross ratio it would generate over £200m. These elements of the impact assessment are not quite as sensitive as expenditure growth and provide a reasonable basis for calculation, with the caveat that a higher, rather than lower, turnover may be achieved and hence a stronger trade draw to Brookfield from other centres.

Market share/Catchment zones/Trade draw

48. The Bridging Report assumes that nearly 40% of Broxbourne expenditure will go to the new Brookfield when it opens in 2018, compared with just 17% to the existing centre. The apportionment of existing trade to various centres in the sub region was based on a standard household survey method and was not seriously challenged. However, the expected draw rate from each of the various zones to the greater attraction of the new retail floorspace was questioned. Significant parts of the expenditure would come from the outer zones of the identified catchment. This is a matter of judgement, based on the experience of different professional analysts representing the Council and objectors.
49. The size of the catchment area was not changed but the greater attraction of a larger retail facility is not expected to have any real effect on trading patterns outside the catchment. The proposal is predicated on a very significant change in retention of expenditure in Broxbourne Borough, from 36% to 57%. That is the clear intention of the allocation and in general terms the modelling of changed market share appears robust. It is possible however, that the greatly improved retail offer would prove even more attractive than expected and result in greater impact on existing centres.

Sequential test

50. The Council argued that there are no alternative sites of a size to create the critical mass for a centre capable of clawing back significant levels of trade from outside the Borough. No evidence to dispute that point was put forward to the examination. Other sites outside Borough may be available, eg at Harlow. However, the dispersal of floorspace from Brookfield to other centres outside the catchment would perpetuate existing travel patterns the CS intends to break. There are no suitable sites in Hoddesdon or Waltham Cross. The Tower Centre buildings in Hoddesdon are to be taken over for a convenience store but are nothing like the size of the Greater Brookfield

proposals.

51. Government policy in PPS4, EC3.1 requires planning authorities to define a network and hierarchy of centres that is resilient to future economic changes, to meet the needs of their catchments. In this case no other sites in an enlarged catchment area, including Harlow for example, were investigated, because they did not meet the objective of the allocation. Enfield has only 20,000 sq m of potential extra floorspace capacity. No other site has been put forward in the sub-region that would make a 'statement' and provide enough critical mass to attract high quality retailers with the pull to break existing shopping patterns, as the proposals intend.

What will be the impact on town centres in Broxbourne and neighbouring authorities?

52. The 'cautious' scenario of the Bridging Report¹⁴ indicates the following potential trade impacts in 2018:
- Cheshunt 1.9%
 - Hoddesdon 3.8%
 - Waltham Cross 7.6%
 - Enfield 8.8%
 - Harlow 9.1%
 - Welwyn GC 6.6%

It is quite conceivable that this would not be the worst outcome, if say turnover per sq m were higher, net to gross ratios changed and less trade was diverted from centres other than those identified. Looking at these impacts in turn, a judgement on the vitality and viability of the centres contains some element of subjectivity. Taking Hoddesdon as an example, an impact of about 4% appears minimal. But in the context of what appears to be a frail centre, containing few national multiples any loss of trade would be serious. The Tower Centre has been vacant for some time but a commitment for redevelopment/ further refurbishment anchored by a foodstore would be a major step in stemming the decline of the centre. Nonetheless, despite the Council's investment in improvements, the role of Hoddesdon will be further diminished to a local convenience centre, even if the wording of the commitment in the CS not to provide for more convenience floorspace at Greater Brookfield were strengthened.

53. The effect on Waltham Cross would be even more serious. This is a centre which is acknowledged to be in decline, with relatively high vacancy rates, poor trader representation of national comparison stores, and a lack of interest in a significant development site at Sturlas Way. It is difficult to imagine the centre being able to compete effectively with the type and scale of attraction envisaged for Greater Brookfield and its health would in all probability be severely prejudiced by the CS allocation. The loss of trade of 7.6%, which could well be more, would exacerbate the severe problems of lack of investment and the lack of more than one comparison anchor store. Greater Brookfield may well result in the demise of Waltham Cross as a significant comparison goods centre.
54. The allocation would result in higher percentage impacts in adjoining LPAs, at

¹⁴ App 14, Table 11

Harlow and Enfield. Enfield is a relatively healthy centre and may be able to withstand a loss of about 9%. At Harlow, the repercussions are likely to be more severe. The town centre already had a 17% vacancy rate at the time of the hearings. The planned investment on the Water Gardens site in the town centre could be severely prejudiced. I share the concerns of both adjoining authorities, who made strong objections to this part of the CS, that impacts of this level would unacceptably harm the vitality and viability of their centres. In summary, the CS strategic allocation would draw trade from established town centres to an out of centre location, in conflict with established principles of retail policy in the EEP and Policy PPS4.

Evening economy

55. The potential impact of the allocation on the evening economies of existing centres in the Borough is also of real concern. Although there are no firm details, the proposals allow for bars and restaurants as well as larger leisure uses such as a multiplex cinema and possibly a bowling rink. These outlets would further drain vitality from Hoddesdon and Waltham Cross. The major leisure elements are intended to cater for sub-regional demand but could divert investment from existing town centres. It is difficult to envisage what retail and leisure role these town centres would play in future, despite the Council's commitment to their regeneration. The provision of the proposed leisure elements would not help to promote competitive town centres in accordance with Policies EC4.1.a and E4.2.a of PPS4.

Employment

56. Greater Brookfield is expected to generate about 2,000 jobs, including part-time jobs, mainly in retailing and leisure facilities. However, in general these are unlikely to be of a type critical to the employment strategy to create higher-order, knowledge-based employment. The reliance on projected trade draw would be likely to result in job losses or constrained growth in nearby centres such as Harlow, Enfield and Welwyn Garden City, as well as the Borough's own town centres such as Hoddesdon and Waltham Cross. This is not therefore a very weighty consideration in favour of the proposal.

Retail conclusions

57. I recognise that a case can be made for growth, in accordance with government economic policy. However, growth should not compromise the key sustainable development principles set out in national planning policy and economic benefits have to be balanced against other disadvantages. The planning policy context has to be considered in the round and other issues have to be taken into account. Government policy in PPS4 remains primarily to direct new retail growth to town centres and to sustain their vitality and viability. This important thrust of policy is carried forward into the NPPF.
58. The existing problems at Brookfield still need to be addressed. However the strategic allocation as proposed on Map 6, the indicative concept plan, would not deal with some of those, particularly the poor pedestrian links between new and existing retail elements. The absence from the 'centre' of other social and civic facilities that one would normally expect to find in a town centre is another significant drawback. The proposal would function primarily as a retail and leisure stand-alone development, with a limited walk-in catchment.

59. The outflow of expenditure to other centres is an accepted part of the retail hierarchy. The benefits of reducing some car travel to other centres would be partially offset by increases in travel from those outside the Borough and possibly from outer zones of the catchment area to Greater Brookfield. Although the increased size of the retail centre would support potential improvements to public transport, the transport modelling shows that a large proportion of shoppers would travel by car. The location is not inherently sustainable, in contrast to the Borough's town centres, where a robust strategy to encourage investment would accord much more closely with government policy objectives to promote sustainable development.
60. Suggested highway improvements would accommodate expected flows to and from the centre; however, the cumulative impact of all proposed development in the CS, including all the proposed housing to 2026 and major employment sites at the southern end of the A10 corridor have not been fully assessed, costed and apportioned to all development, including the green belt housing sites (see Issue 7 below).
61. The retail hierarchy in any area need not be fixed in time, and retailing patterns must retain some fluidity. A significant part of the expected trade in the centre would be drawn from the outer parts of the catchment. However, all Broxbourne residents live within 10 minutes of a sub-regional or town centre. The lack of a major centre in Broxbourne (other than the substantial trade that already occurs at Brookfield) is not a severe disadvantage to residents. Further improvements to the offer at existing town centres should be achievable as expenditure grows over time, albeit at a slower pace than that over past decades.
62. I consider the arguments about critical mass and the amount of retail floorspace proposed are not fully justified. The Localism agenda, carried forward into the draft NPPF, also requires co-operation between local authorities but in this case there are strong objections from within the Broxbourne community and immediately adjoining Councils. The adverse impact on the Borough's already fragile town centres and on nearby towns of Harlow (with a potential threat to new investment), Enfield and to a lesser extent Welwyn Garden City is a compelling reason that prevails against this part of the plan. The clear conflict with government policy in PPS4 because of unacceptable impact on nearby centres leads me to conclude that the strategic allocation for this amount of retail and leisure floorspace is neither justified nor consistent with government policy and is therefore unsound.

Can the proposed allocation be delivered; will relocation/any flood risk issues be resolved?

Waste site/Council depot/Trading estate

63. A number of uses would have to be relocated for the successful implementation of the scheme. The Council have signed a full co-operation agreement with Bayfordbury Estates with regard to its own land holdings and reached a similar resolution with Hertfordshire County Council (HCC) in relation to its holdings. A statement of common ground has been signed with HCC to relocate the household waste re-cycling centre. I understand that the Council has bought land at Hoddesdon Business Park for the relocation of the

depot. There are no objections in principle on highways grounds or to the proposed access across the New River. There are no serious impediments to delivery from these aspects therefore.

Travellers site

64. The existing travellers' site at Halfhide lane is proposed for relocation to an area of green belt at Hell Wood. The site is not far from the current one and would provide space for larger plots. It is apparent from the difficulties of finding suitable sites to meet the required provision for gypsies and travellers already discussed that no suitable urban sites are available or deliverable. The need to provide an acceptable alternative site would constitute the exceptional circumstances required to justify the release of part of the green belt, as allowed for in the EEP. I have some doubts about the desirability of retaining the green belt designation for the new travellers site but recognise the benefits of keeping the present defensible boundary.

Flood risk

65. There is some evidence of flooding from the Turnford Brook on the northern part of the site allocated for housing. However, only a small part of the site lies within Flood Zone 3A; 96% falls in Zone 1. There is adequate space for the housing numbers proposed, subject to a suitably well designed layout, employing a SUDS system of surface water drainage. There would be no conflict with PPS25 and the site could be delivered. The planning principles of releasing a green belt site as an allocation for development within the first five years of the plan period are considered below.

Other requirements, eg education

66. The provision of additional housing in the Turnford area would add pressure to already strained schools in the locality. 100 homes for the over 55s would not generate any demand for school places but the 200 houses would require the equivalent of a one half form entry primary school. The local education authority is seeking land to be made available within the allocation area, on the grounds that there are no suitable sites elsewhere in the locality. The lack of alternative sites is disputed by the Council, although no real possibilities have been put forward in evidence so far. The need for places could possibly be addressed by other means although scope for enlarging existing schools is apparently limited. This would appear to be a better solution, because any new school within the allocation would be separated from its main catchment by busy roads.

Is the allocation of housing in the green belt justified?

67. The proposed housing would in effect be a stand-alone estate separated from the main retail and leisure area by a busy access to car parking. The dwellings would not be mixed in with other uses in a traditional way. Clearly the housing element would provide a substantial benefit towards the viability of the whole scheme, through its contribution to some infrastructure costs, such as new highways. On its housing merits, I see no real justification for the release of this part of the green belt for housing in advance of other sites, such as West of Hoddesdon, for example. Despite its proximity to new retail development, the site is not more sustainable in terms of access to a range of

town centre and community facilities, including education. While the link road would create a new defensible boundary for the green belt, there are no exceptional circumstances for its release. The site should be considered for release in comparison with other areas of the green belt that will be required to meet local housing needs.

Transportation effects

68. A number of local highway improvements, including revisions to the Turnford junction of the A10, would be required to accommodate the substantial traffic increases that would result from a major retail and leisure development of this size. The Highway Authority raises no objection in principle to the Transport Assessment and the draft schemes proposed. The proposals for the strategic allocation include a new link road to the Turnford interchange on the A10, to cope locally with maximum projected increased traffic flows, which would generally be outside of normal peak hours. However, the issue of the cumulative impact of all CS proposals on the strategic network along the A10 and at the junction with the M25 had not been resolved at the hearings, as discussed in the infrastructure section below.
69. The reduction in emissions through reduced travel to centres outside the Borough will be a benefit. However, a very large proportion of visitors will travel by car. The 3,000 spaces proposed would provide parking at a rate only marginally lower than past standards, implying that as many as 90% of visitors would arrive by car. Policy CS7 encourages modal change, and there would be a transport plan, which would provide for new bus services. However, the walking and even cycling catchment areas are restricted and the location would not have clear advantages over existing town centres in terms of accessibility, other than by the car.

Overall conclusion

70. While the Council may not aspire to create a step change in sub-regional shopping patterns the amount of new retail and leisure development proposed in the strategic allocation would have that effect. Generating retail growth in Broxbourne by expanding Greater Brookfield accords to an extent with the government's growth agenda but conflicts with other important aspects of government policy, namely the strong support for town centres which forms a major thread of PPS4, continued in the NPPF. The amount of retail and leisure floorspace proposed has not been adequately justified. The creation of a new sub-regional centre would not accord with Policy E5 of the EEP. The new centre would have significant adverse retail impacts on Hoddesdon, Waltham Cross and neighbouring town centres at Harlow, Enfield and Welwyn Garden City. The site is large enough to be identified in the CS as a strategic allocation of major significance. It follows that the deletion of this key element of the plan would necessitate at the very least an early review of the strategy for the Borough's town centres. I recommend that Policy CS7 and other references to the Greater Brookfield allocation be deleted. Other consequent changes to the wording of the retail and town centres chapter and Policy CS6 are also necessary. A review of the retail and town centre strategy should be carried out as a matter of urgency. This should seek to strengthen the role of the town centres, to prevent further flows of trade out of the

Borough and provide for a review of the role of Brookfield which does not lead to their further decline. **[IC4]**

Issue 6 – Environment

Will the CS be effective in protecting the Borough's environmental assets?

71. While there is understandable local concern about the release of some green belt over the plan period, this is essential to meet local housing needs and the employment growth agenda, as the EEP acknowledges. There is no need for a specific green belt policy, which would merely repeat existing government guidance in PPG2. The testing of options for release of the green belt would have to take place during the preparation and examination of the Site Allocations DPD, when all detailed environmental constraints would be taken into account. Concerns about particular sites, including a detailed assessment of glasshouse areas, can be addressed at that stage, together with further analysis of SHLAA sites against established sustainability criteria.

Will requirements for open space be met adequately?

72. The open space standards are set out in broad terms and are justified by the evidence base of a local Open Space Study¹⁵. The major areas of public open space, such as green belt to the west of the A10 and the Lee Valley Regional Park to the east, would be adequately protected by Policy CS8, which is framed in an adequately robust way.

Issue 7 – Infrastructure

Has the CS adequately addressed the Borough's infrastructure needs?

73. A significant defect of the CS is the lack of an infrastructure delivery plan (IDP). The schedule in the appendices to the CS gives some indication of likely agencies for implementation but is not specific, particularly concerning funding mechanisms. The Council has said that it intends to introduce a CIL regime by 2014 but in the interim it will seek to ensure necessary infrastructure is funded through Section 106 obligations with relevant parties. Significant gaps remain, as discussed below. The Council is preparing a Local Investment Plan but at the time of the hearings it was not yet in draft form. However, in general terms the effectiveness of the CS could be addressed by a change stating a commitment to an IDP.

Education

74. The local education authority's specific concerns about primary school provision have been discussed in the Greater Brookfield section above. Policy CS9 contains a clear commitment to work with the County Council to ensure that education needs are met fully. One of the bullet points in Policy CS10 requires appropriate contributions to community infrastructure; this is an

¹⁵ Open Space Study

adequate safeguard to allow negotiations for sufficient funding where necessary.

Transportation – funding and co-ordinated delivery

75. The Transport Modelling study (MVA)¹⁶ tested various scenarios to assess the likely road traffic impacts on the Strategic Road Network (SRN) and local highway network at critical points along the A10. However, the study did not test the full range of options included for the whole plan period, up to 2026. At present, there is no certainty that the SRN can accommodate the key developments proposed in the CS without some very expensive highway schemes, required by the county highway authority and the Highways Agency (HA). Preliminary results of the A10 Route Management Study¹⁷ indicate that significant investment in the SRN would be required to cater for traffic growth associated with all elements of the CS, including the major employment schemes at Park Plaza West and Maxwells Farm West.
76. I recognise that the particular highways impacts of the Greater Brookfield allocation could be mitigated in the short to medium term. Because Greater Brookfield is some distance north of M25, the proposed allocation is likely to have a less significant effect on the A10 corridor than other schemes. However, the CS acknowledges that there are some fundamental questions about the capacity of the SRN to accommodate all of the development proposed up to 2026 which have not been resolved. Further work is currently under way through the A10 Route Management Study¹⁸ but is not complete. Even if the general principles of the strategic allocation were sound, I would have reservations about endorsing such a commitment in advance of a comprehensive transport plan for all development affecting the A10 corridor, including housing and major employment development up to 2026.

Can the cumulative impact of all CS proposals on the A10 corridor be mitigated?

77. The most significant impact is likely to be on Junction 25 of the M25, if required, where according to the HA the costs of improvement could be as high as £60 million at 2011 prices. Measures to encourage greater use of public transport, cycling and walking are contained within the CS, but these will not be sufficient to address the serious capacity problems likely to arise. During the examination the Council proposed a change to the supporting text in paragraph 142 of the CS which clarifies that transport plans for major developments should include fair and proportionate mechanisms for dealing with these transport issues effectively. A pragmatic approach would suggest that it is unrealistic to expect all outcomes to be predicted many years into the future and that the phasing of major development as proposed in the CS is appropriate. Although I retain doubts that the implementation mechanisms would be effective in delivering housing and employment components which are fundamental to the success of the CS, the approach appears to be the best that can be achieved at this point in time.

¹⁶ Broxbourne Transport Modelling, MVA consultancy, July 2010 – ES Inf1

¹⁷ See REP/010/11

¹⁸ See REP/010/11

Should the CS have more explicit proposals for phasing of various key elements, particularly green belt housing releases, Greater Brookfield, Park Plaza West and Maxwells Farm West?

78. Bearing in mind the uncertainties that remain concerning the need for highway improvements and their delivery, the proposed phasing arrangements set out in the CS for housing and employment growth in the middle and final 5 year periods of the plan are probably the best that can be achieved at this stage. The deletion of the Greater Brookfield allocation would have some effect on traffic flows along the A10 corridor, which would have to be re-assessed when monitoring the phasing of the Park Plaza West and Maxwells Farm West employment proposals.

Does the CS indicate adequate mechanisms for monitoring?

79. The schedules appended to the CS contain information about a number of indicators which the Council will use to monitor progress of the strategy. These include the Annual Monitoring reports, the SHLAA and the Hertfordshire Transport Plan among others. While more detail could have been included, this is not critical to delivery and the CS is sound in this respect.

Issue 8 – Other matters

Does the CS address issues of climate change satisfactorily, with sufficient emphasis?

80. From discussions at the hearing there is no evidence to support more stringent energy saving requirements in Broxbourne than elsewhere in the east of England. While the EA states that the area suffers less rainfall than the UK average there is no justification for different water efficiency standards than those required by the Building Regulations for other areas in eastern England. There is no strong evidence that Policy CS1 should include more specific requirements for sustainable building construction and the flexible wording of the policy is sound.

Legal Requirements

81. My examination of the compliance of the Core Strategy with the legal requirements is summarised in the table below. I conclude that the Core Strategy meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Core Strategy is identified within the approved LDS September 2009 which sets out an expected adoption date of January 2011. The Core Strategy's content and timing are broadly compliant with the LDS, given the delayed submission to the SoS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in 2006 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed minor changes (PC)
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	The Habitats Regulations AA Screening Report (July 2010) sets out which policies were screened and the measures necessary to avoid any significant effect on European Sites.
National Policy	The Core Strategy complies with national policy except where indicated in respect of PPS3, PPS4 and Circular 1/06; ICs 1-4 remedy these defects.
Regional Strategy (RS)	The Core Strategy as submitted was not in general conformity with the EEP. The recommended changes to revise the housing target, delete Policy CS4 and delete Policy CS7 and paragraphs 108 to 117 and Map 6 are all necessary to achieve legal compliance, in addition to soundness.
2004 Act and Regulations (as amended)	The Core Strategy complies with the Act and the Regulations.

Overall Conclusion and Recommendation

82. I conclude that with the changes that I recommend, set out in Appendices B and C, the Broxbourne Core Strategy DPD satisfies the requirements of s20(5) of the 2004 Act and meets the criteria for soundness in PPS12. Therefore I recommend that the plan be changed accordingly. And for the avoidance of doubt, I endorse the Council's proposed minor changes, set out in Appendix A.

Geoff Salter

Inspector

Appendix C – Changes that the Inspector considers are needed to make the plan sound

Inspector Change No.	Policy/Paragraph/Page	Change
IC1	<p>Table 2</p> <p>50</p> <p>54</p> <p>Policy CS2</p>	<p>Change target 2021 -26 to 1400 & totals</p> <p>Delete last two sentences</p> <p>Delete</p> <p>Delete Greater Brookfield 300 & 2nd bullet</p> <p>Change green belt medium term to 645</p> <p>Change green belt long term to 880</p>
IC2	Policy CS3	<p>1st bullet: delete after 'on-site provision'. Add new sentence '<i>Off site provision may be allowed in exceptional circumstances where it is clearly not feasible on site.</i>'</p>
IC3	<p>Paragraph 77</p> <p>Policy CS4</p>	<p>Delete last sentence. Add '<i>Site provision for gypsies, travellers and travelling showpeople to meet the minimum requirements set out in the EEP will be considered in the Site Allocations DPD.</i>'</p> <p>Delete</p>
IC4	<p>Paragraphs 108 to 117</p> <p>Policy CS7</p> <p>Paragraph 107</p> <p>Policy CS6</p> <p>Para 142</p>	<p>Delete, including Map 6</p> <p>Delete, including Map 7</p> <p>Delete after '<i>...cycling</i>'. Add : '<i>The Council will review the role of the Brookfield Centre while preparing the Site Allocations DPD.</i>'</p> <p>Delete 1st bullet</p> <p>Delete 'Greater Brookfield'</p>

	Implementation section	Delete CS7 section
IC5	Put in commitment to IDP	