



Centre for Sustainability

Dacorum Borough Council
Hemel Hempstead Town Centre Masterplan
2011 - 2021

Sustainability Appraisal Adoption Statement

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1 Introduction

1.1 Background

A sustainability appraisal (incorporating the requirements of the Strategic Environmental Assessment (SEA) Regulations) has been undertaken on Dacorum Borough Council's Hemel Hempstead Town Centre Masterplan.

The Masterplan provides the direction for the future of the town centre and aims to enable transformation and regeneration to proceed as quickly as possible. It takes its lead from, and builds upon, the Hemel Hempstead Place Strategy which is set out in the Core Strategy, a central document in the Local Planning Framework.

Consultation on the Masterplan was undertaken in August 2012. Since the consultation some minor changes have been made to the Masterplan.

The Hemel Hempstead Town Centre Masterplan was formally adopted by Dacorum Borough Council on January xxx 2013 [TBA].

The SEA Regulations require that a 'statement' be made available to accompany¹ the adopted plan or programme which must contain information on:

- How environmental considerations have been integrated into the plan or programme;
- How the Environmental Report has been taken into account;
- How opinions expressed in relation to the consultations on the plan/programme and Environmental Report have been taken into account;
- The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
- The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

This Sustainability Appraisal Adoption Statement has been produced to fulfil this regulatory requirement, and has been widened to cover all aspects of sustainability, not just those relating to the environment.

¹The Regulations require that the statement should be made available "As soon as reasonably practicable after the adoption of a plan or programme..." (SI 2004 No. 1633 Article 16 (1)).

The statement also provides information on how the changes made to the Masterplan between the draft (consultation) and final versions have changed or influenced the original findings of the SA/SEA, as described in the SA Report (September 2011).

This statement is structured as follows:

- Section 2 describes the SEA activities that have been undertaken following consultation on the draft Masterplan and SA Report;
- Section 3 provides a summary of the SA/SEA process including how sustainability considerations have been integrated into the Masterplan and how the SA Report has been taken into account;
- Section 4 provides an outline of responses to the consultation draft Masterplan and SA Report and how these have been taken into account;
- Section 5 describes the Masterplan alternatives that were considered and provides the reasons why the adopted Masterplan was chosen in light of the other alternatives considered; and
- Section 6 confirms the measures that will be taken for monitoring significant environmental effects of implementing the Masterplan.

2 Post-Consultation SA Update

During the period following the close of consultation and prior to the adoption of the Masterplan, there have been some changes made to the structure and content of the Masterplan.

An additional stage of appraisal has therefore been undertaken to review whether the original findings of the Sustainability Appraisal, as reported in the SA Report (July 2012) still stand, or whether there are new potential significant effects arising from the changes, or alternatively whether any significant effects originally predicted are no longer valid.

It is necessary to carry out this additional round of assessment as the SEA Regulations require that all significant effects of implementing a plan or programme are monitored. There is therefore a need to understand the significant effects likely to result from the Adopted Masterplan, not just those identified for the consultation Draft version – although these are often the same.

The changes made to the Masterplan following consultation are relatively minor, with the majority being of an editorial nature. There are however some changes which have the

potential to influence achievement towards meeting the SA objectives and these are summarised below.

Additions are shown in underlined text with deletions being shown using ~~striketrough~~ text.

2.1 Chapter 3: Aims, Objectives and Principles

Amendments to this chapter that have implications for the sustainability appraisal are as follows:

Regeneration Objectives

- Ensure that future development ~~makes best use of~~enhances the town centre's natural assets and builds upon and complements its unique identity and heritage

Regeneration Principles

- ~~Improve~~Manage traffic circulation and optimise town centre functionality
- ~~Respond positively to~~Enhance natural features including the River Gade and surrounding open spaces

Regeneration Challenges

- Enhance the River Gade to 'good ecological' Water Framework Directive status whilst retaining and restoring the Jellicoe Water Gardens
- Commitment to managing and maintaining an enhanced town centre environment.

Implications for sustainability appraisal: These amendments will have positive implications for the compatibility between the Masterplan's objectives/principles and SA Objectives SA1 (Biodiversity), SA2 (Water quality), SA10 (Cultural Heritage), SA11 (Landscape/Townscape), SA16 (Community Identity/Participation) and SA20 (Revitalise town centres). However there is no requirement to update the sustainability appraisal's original findings as significant effects, either positive or negative, will not result from these changes.

2.2 Chapter 4: Town Centre Vision

Amendments to this chapter that have implications for the sustainability appraisal are as follows:

4.4.6 The approach for the Old Town is to reinforce the historic character of the area. The built environment has special architectural and historical importance. The public realm will

be upgraded and enriched to help meet heritage objectives. Street furniture and surface materials should be in keeping with traditional forms.

4.4.7 With respect to New Town Heritage, the approach is to enhance key frontages of buildings and reinforce the new town character within the Area of Special Character (see zone maps). Proposals also include plans to restore the Water Gardens and create high quality interconnected corridors of public realm between Waterhouse Street and the Marlowes at three strategic points: Bank Court, Bridge Street and Market Square.

4.4.8 A bid has been submitted to the Heritage Lottery Fund to comprehensively restore the Water Gardens to reflect and reinforce their historical significance. This will incorporate an environmental solution to support the objectives of the Water Framework Directive, which is appropriate to the heritage listing of the Gardens. The status of the town centre section of the Gade will be enhanced from 'ecologically moderate' to 'ecologically good'. The other principal natural asset in the town centre is Paradise Fields open space. Connections to Paradise Fields will be improved and an enhanced management regime sought.

Implications for sustainability appraisal: The additions to the Vision will have positive implications for SA Objectives SA1 (Biodiversity), SA2 (Water quality), SA10 (Cultural Heritage), SA11 (Landscape/Townscape), SA12 (Health), SA16 (Community Identity/Participation) and SA20 (Revitalise town centres). The original SA has already predicted positive effects for the Vision in relation to all these objectives and therefore there is no requirement to update the SA based on these changes.

2.3 Chapter 5: Character Zone Strategies

2.3.1 Jellicoe Water Gardens

Local Objectives / Key Opportunities

- Enhance the ecological status of the River Gade
- Enhance New Town heritage assets
- To create additional leisure and cultural uses

Implications for sustainability appraisal: The additions to the strategy will have positive implications for SA Objectives SA1 (Biodiversity), SA2 (Water quality), SA10 (Cultural Heritage), SA12 (Health), SA16 (Community Identity/Participation) and SA20 (Revitalise town centres). The original SA has already predicted positive effects for the strategy in

relation to all these objectives, with a significant positive effect against SA20, and therefore there is no requirement to update the SA based on these changes.

There is however some uncertainty as to how the Jellicoe Water Gardens can be restored to its original condition, maintaining the canalised section of the River Gade, whilst at the same time meeting the requirements of the Water Framework Directive - to improve the River Gade in this area from 'moderate ecological status' to 'good ecological status' by 2015. Discussions between DBC, English Heritage and the Environment Agency are being held with the aim of finding a solution to this issue.

2.3.2 Plough Zone

Local Objectives / Key Opportunities

- Provide recreational facilities for the community at Heath Park

Implications for sustainability appraisal: These new additions would help to progress SA objectives SA12 (Health) and SA16 (Community identity & participation). As positive effects have already been identified for these objectives there is no requirement to update the findings of the SA.

2.4 Chapter 6: Viability and Phasing

Partnership Working

6.11.5 The Council is committed to ongoing partnership working to deliver its key proposals. With respect to the regeneration of the Water Gardens the Council will work with the Environment Agency and English Heritage to bring forward a scheme which improves the ecological status of the river whilst restoring the Water Gardens in line with the original Jellicoe design. Extensive liaison will be carried out with Hertfordshire Highways and key public transport operators to deliver the bus interchange. Other partnerships will be cultivated as necessary to achieve the Masterplan objectives.

Implications for sustainability appraisal: These partnerships would help to progress SA objectives, SA1 (Biodiversity), SA2 (Water quality), SA5 (Greenhouse gas emissions), SA10 (Cultural Heritage), SA11 (Landscape/Townscape), SA12 (Health), SA16 (Community Identity/Participation) and SA20 (Revitalise town centres). Positive effects have already been identified for these objectives, and the changes will not result in any changes to the SA 'scores'. There is therefore no requirement to update the findings of the SA.

2.5 Public Realm Design Guide

Since the consultation on the draft Masterplan a Public Realm Design Guide has been finalised. This includes details of the surface materials, street furniture and landscaping that should be used in the different town centre character zones of:

- Old Town Zone;
- Gade Zone and Original Marlowes Zone;
- Jellicoe Water Gardens Zone, to include Heath Park, Gadebridge Park, and the River Gade Walk and Cycle Way;
- Marlowes Shopping Zone; and
- Plough Zone and Hospital Zone.

The high quality and tailored approach to the design of the public realm will have positive implications for the SA Objectives for landscape/townscape (SA11), community participation (SA16) and revitalise town centres (SA20). The encouragement for tree planting will help to mitigate any air quality issues and help with urban cooling, thereby supporting objectives for climate change adaptation (SA6) and air quality (SA7).

The Public Realm Design Guide encourages the use of sustainable materials, which has positive implications for the resource efficiency objective (SA9), and other sustainable design features such as green walls and green roofs which will support SA objectives for biodiversity (SA1), greenhouse gas emissions (SA5), climate change adaptation (SA6) and air quality (SA7).

3 How sustainability considerations have been integrated into the Masterplan and how the SA Report has been taken into account

The Masterplan includes a range of guiding principles and measures that will help to enhance the sustainability of any new development/refurbishment and the regeneration in Hemel Hempstead town centre. These cover environmental, social and economic sustainability including topic areas such as:

- Enhancing the natural environment;
- Protecting and enhancing the historic environment and local townscapes associated with the different town centre character zones;

- Improving connectivity through the town centre area to encourage walking, cycling and public transport use;
- Encouraging the use of sustainable design principles;
- Improving the public realm to create a safe and pleasant environment; and
- Promoting a vibrant and prosperous economy.

The SA Report included a series of recommendations against the SA topics to help improve the sustainability of the Masterplan as well as sustainability into the future when the Masterplan has been taken forward on the ground. It was recommend that:

- Arrangements should be put in place for the long-term maintenance of new and enhanced green spaces, the wider public realm, including footpaths and cycle ways, in order to ensure that improvements are retained into the future;
- Measures such as the integration of green walls, green roofs and roof gardens into new developments should be encouraged;
- Green Travel Plans should be required as part of development proposals;
- High standards of energy efficiency for all new developments should be specified, along with integration of renewable energy generation systems;
- Buildings should be designed to adapt to climate change, for example through orientation, use of natural ventilation, incorporation of green roofs and grey water recycling and through being resilient to flood risk;
- High quality design and materials should be required in all developments, including those to the public realm.

The Masterplan, including the Urban Design Guide, has been updated to take account of some of these recommendations and now recognises the importance of the commitment to managing and maintaining the town centre environment; encourages the use of design which fulfils sustainability objectives, such as green walls and green roofs, and encourages the use of sustainable materials and design techniques wherever possible.

4 How consultation comments have been taken into account

The SEA Regulations require that the statement produced on adoption of the plan or programme (this statement) should provide information on how the opinions expressed in

response to consultation on “*the relevant documents*” have been taken into account. For this statement the relevant documents are as follows:

- The Hemel Hempstead Town Centre Masterplan– Public Consultation August 2012; and
- The Sustainability Appraisal Report (July 2012).

4.1 Hemel Hempstead Town Centre Masterplan

130 representations, from 24 respondents, were received during the consultation on the draft Masterplan. Full details of these representations and how they have been taken into account in finalising the Masterplan are provided in the Consultation Statement.

A summary of the main issues raised during the consultation along with information on how these have been taken into account when finalising the Masterplan are provided in Table 1.

Table 1: Masterplan Consultation Response Summary

Consultation Issue	Recommended modification
Protection of distinct heritage of the New Town	<p>Additional detail has been added to the Masterplan as to the approach that will be taken to protecting the heritage of the New Town centre.</p> <p>Section 4.4 summarises the Council’s approach. The aim is to enhance key frontages of buildings within Areas of Special Character such as Bank Court and buildings around Bridge Street, when sites come forward for redevelopment.</p> <p>The Council will also seek to reinforce the New Town character within the Areas of Special Character. Proposals include plans to restore the Water Gardens, key frontage enhancements and the creation of high quality interconnected corridors of public realm between Waterhouse Street and the Marlowes at three strategic points; Bank Court, Bridge Street and Market Square.</p>
Ecological status of the River Gade	<p>The draft Masterplan sought to make best use of the town centre’s natural assets. This final report has a stronger aim of enhancing the town centre’s natural assets.</p> <p>Regeneration Objective 9 in section 3.4.1 has been amended as follows: “Ensure that future development enhances the town centre’s natural assets and builds upon and complements its unique identity and character.”</p> <p>The Regeneration Principle in section 3.5.4 has been amended in line with this as follows: “Enhance</p>

	<p>natural features including the River Gade and surrounding open spaces.”</p> <p>A Regeneration Challenge has been added to section 3.5.5 as follows: “Enhance the River Gade to ‘good ecological’ Water Framework Directive status whilst retaining and restoring the Jellicoe Water Gardens.” This follows concerns about the ecological status of the river and how this will be impacted by restoration of the Water Gardens.</p> <p>The following have been added to the Character Zone Strategy for the Jellicoe Water Gardens Zone :</p> <ul style="list-style-type: none"> • A local objective in section 5.3.2.2 to “Enhance the ecological status of the River Gade”. • A key opportunity in section 5.3.2.3 “To enhance the ecological status of the River Gade.”
Protection of Paradise Fields	<p>The draft Masterplan sought to make best use of the town centre’s natural assets. This final report has a stronger aim of enhancing the town centre’s natural assets.</p> <p>Regeneration Objective 9 in section 3.4.1 has been amended as follows: “Ensure that future development enhances the town centre’s natural assets and builds upon and complements its unique identity and character.”</p> <p>The Regeneration Principle in section 3.5.4 has also been amended in line with this as follows: “Enhance natural features including the River Gade and surrounding open spaces.”</p> <p>Local objective in section 4.1 has been amended to reflect the need to retain the majority of Paradise Fields as open space. This refers to the land identified as a Hertfordshire County Council Wildlife Site shown in the amended context diagram in Figure 10.</p> <p>Section 6.5 has also been amended to provide further information on delivery mechanisms for greater detail and mix of uses.</p>
Future management of the town centre	<p>The consultation raised a few issues in terms of future management of the town centre, particularly Paradise Fields open space. In response, a Regeneration Challenge has been added in section 3.5.5 as follows: “Commitment to managing and maintaining an enhanced town centre environment.”</p>
Clarification required as to how partnership working will be	<p>The Viability and Phasing chapter of the Masterplan now states explicitly that the Council will bring</p>

<p>taken forward in delivering key proposals, specifically the re-development of Hemel Hempstead hospital and regeneration of the wider zone, the regeneration of the Jellicoe Water Gardens balancing environmental and heritage objectives and the creation of a new bus interchange on Marlowes</p>	<p>together key stakeholders at an early stage to shape proposals and facilitate their delivery. Mention is made of the feasibility study that has been jointly commissioned with Hertfordshire County Council, the West Herts Hospital Trust and the HCA to consider options for redeveloping Hemel Hempstead Hospital and regenerating the wider Hospital Zone.</p> <p>In addition the Council's commitment to ongoing partnership working to regenerate the Water Gardens and deliver a new bus interchange is stated. The Masterplan sets out that the Council will work with the Environment Agency and English Heritage to bring forward a scheme which improves the ecological status of the river whilst restoring the Water Gardens in line with the original Jellicoe design. It also outlines that extensive liaison will be carried out with Hertfordshire Highways and key public transport operators to deliver the bus interchange. The final report states that other partnerships will be cultivated as necessary to achieve the Masterplan objectives.</p>
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4.2 SA Report

Three SA related representations were received following the consultation on the SA Report in July 2012. These are set out in Table 2 below along with a response that describes how the representation has been taken into account.

Table 2: SA Related Representations and Responses

Representation	Response
Environment Agency	
<p><i>The River Gade is severely impacted through Hemel Hempstead. Despite part(c) of policy CS32 of your draft core strategy stating that water quality standards will be improved in line with The Water Framework Directive (WFD) this is not mentioned at all within the Masterplan or the sustainability appraisal.</i></p>	<p>The Masterplan has been updated and now provides an emphasis on enhancing the River Gade. This further supports the sustainability appraisal's original finding of a positive effect against the water quality objective.</p>
<p>2.5.3 <i>Some of the criteria within table 5 has been crossed out. In particular 'To improve chemical and biological quality and flow of rivers and encourage practices which reduce nitrate levels in groundwater' and 'To improve flow of rivers'. We would consider these points to be key to the Masterplan area and would recommend that they</i></p>	<p>2.5.3 - Noted. However in undertaking the assessment the effects against the broader objective "To protect, maintain and enhance water resources (including water quality and quantity) while taking into account the impacts of climate change" were considered. The effects were detailed in Appendix A</p>

<p><i>are fully considered.</i></p> <p>3.5.2 <i>Through the Gade zone the impact on water quality is stated as being uncertain. We would expect any redevelopment to be designed to have a positive impact on the water environment.</i></p> <p>3.5.3 <i>We disagree with the statement that the strategy for the Jellicoe Water Gardens would have a positive impact on environmental objectives including biodiversity and water quality.</i></p> <p>3.6.2 <i>We support the fact that green roofs, green walls and water efficiency measures are being promoted. We would suggest that these are mentioned within the Masterplan itself.</i></p>	<p>of the SA Report.</p> <p>3.5.2. and 3.5.3- The Masterplan has been updated and now provides an objective and a commitment to enhance the ecological status of the River Gade. There is still however some uncertainty as to how the Jellicoe Water Gardens can be restored whilst at the same time meeting the requirements of the Water Framework Directive (to improve the River Gade in this area from 'moderate ecological status' to 'good ecological status' by 2015). Discussions between DBC, English Heritage and the Environment Agency are being held with the aim of finding a solution to this issue.</p> <p>3.6.2 – Green roofs and green walls are now included in the Public Realm Design Guide 2012.</p>
<p>Hertfordshire Biological Records Centre – Hertfordshire County Council</p>	
<p><i>The SEA seems thorough although some areas of biodiversity compatibility could be questioned; if the Water Gardens restoration is faithful exactly to the original, the river environment will be lost again to a series of sluggish, silted pools with no or little marginal vegetation. I consider more details ARE needed before compatibility can be claimed. The minor positive effect within the Hospital Zone should be seen in the context of loss of open grasslands to development; improved access will lead to increased disturbance, and there is nothing regarding management; this aspect cannot therefore possibly be considered compatible let alone positive, although other improvements will obviously be positive. The cumulative positive effects on biodiversity as claimed (3.6.1) cannot be justified on the basis of the existing strategy as it lack sufficient detail and proposals to demonstrate this.</i></p>	<p>The assessment for the Hospital Zone reflects the aims of two of the sub-objectives for SA Objective SA1 as follows:</p> <p><i>To recognise the social/environmental value and increase access to woodlands, wildlife & geological sites and green spaces particularly near/in urban areas.</i></p> <p><i>To encourage people to come into contact with, understand, and enjoy nature.</i></p> <p>The original finding of cumulative positive effects against the biodiversity objective remains valid, particularly now that the Masterplan has been strengthened in relation to enhancing natural features, in particular the ecological status of the River Gade.</p>

5 Reasons why the adopted Masterplan was chosen in light of the other alternatives considered

The sustainability appraisal considered the alternative of a 'business-as-usual' scenario in which there would not be any coordinated redevelopment in the town centre.

5.1 Business-as-Usual Option

The SA found that without the redevelopment proposed in the Masterplan Hemel Hempstead Town Centre this area will continue to be outdated, generally of poor environmental quality and underperform economically, particularly during the evening. Public transport, pedestrian and cycle linkages, and navigational aids will continue to be sub-standard and their will remain poor connectivity between the zones, in particular the Old Town with the Marlowes Shopping Zones.

5.2 Hemel Hempstead Town Centre Masterplan

The SA for the Masterplan identified that if the proposals and conditions that are included in the Masterplan are all realised there could be positive effects against a wide range of the SA objectives as follows:

- Biodiversity - Through the emphasis to be given to the natural assets of the town centre during its regeneration, along with objectives in several of the character zones to protect or enhance their open/green spaces, provide additional green links and encourage street planting;
- Water quality - The Masterplan has been strengthened to include an objective to enhance the ecological status of the River Gade;
- Climatic factors and air quality - Positive cumulative effects are forecast for the objectives on both 'greenhouse gas emissions' and 'air quality' as a result of the overarching strategy and objectives within each of the character zones encouraging greater use of sustainable modes of transport thereby reducing emissions from transport;
- Historic & cultural assets and landscape/townscape - The overarching strategy which requires emphasis to be given to the cultural assets of the town centre during its regeneration, along with objectives in several of the character zones to protect or enhance their historic and cultural assets, in particular the Jellicoe Water Gardens, should result in minor positive cumulative effects on 'historic & cultural assets'. The protection afforded to vistas of the Old Town from the adjacent character zones

should also result in positive cumulative effects. Improvements to the public realm and providing a high quality environment, which are objectives in each of the character zones, should have a minor positive cumulative effect on the 'landscape & townscape' objective. The result should be a much improved streetscape across the whole of the Masterplan area;

- Population and human health - Implementation of the Masterplan is likely to have positive cumulative effects on the 'human health' objective. Promoting the use of more sustainable modes of travel in each of the character zones, for example by improving pedestrian and cycle links, should encourage more sustainable travel thereby leading to healthier lifestyles. In particular, delivering the River Gade Walk and Cycle Way which runs the length of the Masterplan area and through several of the zones should have positive cumulative effects;
- Equality, housing, communities and crime - Implementation of the Masterplan could transform the town centre, significantly improving quality of life for those who live, work and visit the area. Providing new and enhanced retail, leisure, health care, education and open spaces across the Masterplan area in mixed use developments, should improve everyone's access to high quality facilities, thereby resulting in positive cumulative effects on the 'equality & social exclusion' objective; and
- Economic factors - Implementation of the vision, overarching strategy and the objectives within the individual character zones will make a significant contribution to the local economy and therefore significant cumulative effects have been identified for the objectives on 'sustainable prosperity & growth' and 'revitalise town centres'. Providing new and enhanced retail, housing, leisure, health care, education, and open spaces across the Masterplan area, in mixed use developments, as well as enhancing the quality of the public realm should improve the attractiveness of the town centre, encouraging its use and helping it to reach its economic potential. Providing improved pedestrian and cycle links and navigational links across the whole Masterplan area should encourage more integrated use of the individual zones and linked visits, for example links between the Old Town in the north and the main retail areas in the south, should increase footfall throughout the area, thereby boosting the economy.

5.3 Preferred option

The range of potential positive effects that have been identified in Section 5.2 support the decision made by DBC to progress the Masterplan. The alternative would be for the town

centre to remain as an underperforming area with a largely out-dated fabric and a poor quality public realm.

6 Measures for monitoring the significant effects of implementing the Masterplan

The SEA Regulations require that the responsible authority shall monitor the significant (adverse and positive) environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action. The combined SA/SEA process expands this to include other significant sustainability effects of the implementation of the plan (i.e. to also include significant social and economic effects).

The monitoring put in place should fulfil the following requirements:

- To monitor the significant effects of the Masterplan;
- To monitor any unforeseen effects of the Masterplan;
- To ensure that action can be taken to reduce/offset the significant effects of the Masterplan; and
- To provide baseline data for the next SA/SEA and to provide a picture of how the environment / sustainability criteria of the area are evolving.

The SEA Regulations allow for existing monitoring arrangements to be used if appropriate. Monitoring may cover several plans or programmes as long as sufficient information about environmental effects is provided for the individual plans or programmes.

For monitoring the effects related to the Masterplan, measures will be required in relation to the topic areas for which significant effects have been identified in the assessment as well as those topics where there is uncertainty over the resulting effects.

The SA objectives and the associated measures that will be monitored as the Masterplan is progressed are shown in Table 3.

Table 3 Monitoring Measures

SA Objective	Monitoring Measure
SA1 - Biodiversity	Ecological status of the River Gade
SA2 - Water quality/quantity	Ecological status of the River Gade
SA3 - Flood risk	A % of new dwellings built on flood plains and/or contrary to EA advice
SA7 - Air quality	Existing town centre air quality monitoring
SA11 - Landscape & townscape	70% or more of sustainable statement assessments to achieve a green scoring each year through AMR
SA16 - Community identity and participation and SA20 - Revitalise town centres	Improvements to public realm (Satisfaction Survey) Sustainability Statements - 70% or more of all sustainability assessments should achieve the 'green' scoring level each year.
SA17 - Crime and fear of crime	Town centre crime statistics provided by Police
SA18 - Sustainable prosperity and growth	Net gain in retail floorspace and regular audit of vacant units
SA19 - Fairer access to services	Delivery of Access & Movement strategy

Monitoring measures required in relation to the implementation of the Masterplan will be incorporated into the Authority's Monitoring Report that is required for the Local Plan.