



**St Albans Local Plan**  
**Publication**  
**Sustainability Appraisal Report**

**September 2018**



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**Publication**  
Sustainability Appraisal Report

**Prepared for: St Albans City and District Council**

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# 1 Introduction

## 1.1 Background to Sustainability Appraisal/Strategic Environmental Assessment

Regulations require Local Planning Authorities to have up to date Local Plans. St Albans' Local Plan must be subject to both Sustainability Appraisal and Strategic Environmental Assessment under the Planning and Compulsory Purchase Act (2004) and The Environmental Assessment of Plans and Programmes Regulations (2004) which implement European Directive 2001/42/EC, known as the Strategic Environmental Assessment (SEA) Directive.

Both the SA and the SEA processes help planning authorities to fulfil the objective of contributing to the achievement of sustainable development in preparing their plans through a structured assessment of the objectives and Plan against key sustainability issues.

Although the requirement to carry out both an SA and SEA is mandatory, it is possible to satisfy the requirements of both pieces of legislation through a single appraisal process. Government guidance<sup>1</sup> for undertaking SEA and for SA of Local Plans details how the SA and SEA should be integrated into one process. The final output of the process is a combined Sustainability Appraisal and SEA Environmental Report which meets the regulatory requirements for SA and SEA and which will be published alongside the plan. For simplicity this report is referred to as the SA Report.

### 1.1.1 Purpose of this Sustainability Appraisal Report

This Sustainability Appraisal Report (SA Report) is being published for the Regulation 19 Publication stage of St Albans Local Plan in accordance with SEA Regulations and SA Guidance. It documents the Sustainability Appraisal/Strategic Environmental Assessment process that has been undertaken during the preparation of the Local Plan, including a summary of the earlier stages of SA, the findings of the appraisal of the strategic policies included in the Publication Local Plan and recommendations for mitigation and enhancement.

The work on both the Local Plan and the SA/SEA has been informed by the large amount of evidence collection and policy development previously undertaken in respect of the drafts of the Strategic Local Plan (SLP) and Detailed Local Plan (DLP) which have been superseded by this new Local Plan.

SA/SEA was undertaken at all stages of development of the SLP (formerly the Core Strategy) and DLP, with a range of reports and working notes having been produced alongside the planning documents. In order to ensure consistency with the previous SA, the SA framework and the SA approach used for this new round of SA are consistent with those previously applied.

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<sup>1</sup> <https://www.gov.uk/government/collections/planning-practice-guidance>

## 1.2 Sustainability Appraisal (SA)

Sustainability Appraisals (SAs) are a process of evaluating the social, environmental, and economic implications of emerging strategies, policies and plans. This process is intended to make certain that plans and their goals<sup>2</sup> and policies are in accordance with the underlying principles of sustainable development. SA seeks to ensure that the five principles and four agreed priorities for sustainable development are addressed<sup>3</sup>:

Principles:

- Living within environmental limits;
- Ensuring a strong healthy and just society;
- Achieving a sustainable economy;
- Promoting good governance; and
- Using sound science responsibly.

Priorities:

- Sustainable consumption and production;
- Climate change and energy;
- Natural resource protection and environmental enhancement; and
- Sustainable communities.

## 1.3 Strategic Environmental Assessment (SEA)

European Union Directive 2001/42/EC requires a formal Strategic Environmental Assessment (SEA) of all plans and programmes which are likely to have significant effects on the environment. It aims: *"...to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment"* (Article 1).

The Directive defines environmental assessment as a procedure comprising:

- The preparation of an Environmental Report on the likely significant effects of the draft plan or programme;
- Carrying out consultation on the draft plan or programme and the accompanying Environmental Report;
- Taking into account the Environmental Report and the results of consultation in decision making; and
- Providing information when the plan or programme is adopted showing how the results of the environmental assessment have been taken into account.

SEA is required to be undertaken alongside the preparation of the plan to which it relates to allow strategic alternatives to be formally incorporated into it at the earliest opportunity. This process, in conjunction with the requirements of the SA, should ensure

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<sup>2</sup> Note that the term "objective" is used throughout this document in reference to SA/SEA objectives to be consistent with the vocabulary outlining these processes, despite the fact that they are not truly objectives.

<sup>3</sup> As set out in "Securing the Future: Delivering a UK sustainable development strategy", DEFRA 2005



that the environmental, social, and economic implications are fully integrated into emerging policies and strategies.

## **1.4 Report Structure**

This SA Report is structured as follows:

- Section 1 provides an introduction to the SA/SEA process;
- Section 2 provides an outline of the contents and main objectives of the Local Plan, describes how the SA/SEA meets regulatory requirements, and summarises the findings of the Habitats Regulations Assessment (HRA) process;
- Section 3 sets the proposed scope for the SA/SEA, provides details of the other relevant plans, programmes and strategies that have been taken into consideration as part of the scoping stage and provides a summary of the baseline characterisation relating to the SA/SEA topics. This section provides a summary of the key sustainability issues based on the baseline research and the framework of SA/SEA objectives that are proposed for the assessment stage of the SA/SEA. It also includes analysis of whether the SA/SEA objectives are compatible with each other;
- Section 4 details the different stages that have been undertaken during the development of the Local Plan and the accompanying SA/SEA and describes how options/alternatives have been considered when developing the Local Plan;
- Section 5 describes the methodology used for undertaking the prediction and assessment of effects and provides details of the findings of the assessment of the Local Plan;
- Section 6 provides information on the monitoring measures envisaged for the Local Plan; and
- Section 7 provides details on the next steps for the SA/SEA.

Appendices are contained within separate volumes:

- Appendix A: includes the review of other policies, plans and programmes;
- Appendix B: provides baseline information for each of the sustainability topics;
- Appendix C: provides the full Sustainability Appraisal Framework;
- Appendix D: describes how comments from earlier consultation have been taken into account;
- Appendix E: provides details on the assessment of options/alternatives at the previous stages;
- Appendix F: provides the detailed findings of the SA/SEA assessment process for the Publication Local Plan.

## 2 Background

### 2.1 The Local Plan

The Local Plan 2020-2036 sets out the planning policies and proposals for the future development of the City and District of St Albans. It establishes the Council's long term spatial planning strategy for delivering and managing development and infrastructure, and for environmental protection and enhancement, from 2020 to 2036.

The Local Plan is a statutory Development Plan Document (DPD). It must comply with legal requirements. The Local Plan must have regard to the Government's national planning policy, principally in the National Planning Policy Framework (NPPF). It also needs to be based on proportionate and justifiable evidence.

Development of the Local Plan has involved a number of previous stages of plan making and consultation. This included work to develop a 'Strategic Local Plan', which was previously termed a 'Core Strategy' and initial work on a Detailed Local Plan'. Work on the new Local Plan commenced in 2017, although as the Strategic Local Plan and Detailed Local Plan were not adopted, the Local Plan is in effect a continuation of the same strategic planning process to replace the 1994 Local Plan, rather than being a completely 'new plan'. Section 4 provides information on all the previous plan making stages.

#### 2.1.1 Local Plan Vision and Objectives

The Local Plan includes a Vision as follows:

##### **Vision**

The vision for the District is of:

A thriving community, which is a great place to live and work and has a vibrant economy

The Vision is supported by the following five objectives:

##### **Objectives**

To deliver the Vision through:

1. An overall strategy that sets out the pattern and scale of development
2. Sufficient homes, workplaces and more affordable housing, of the types needed locally, in the right locations
3. Appropriate retail, leisure and other commercial development
4. Infrastructure and Community Facilities to support and enhance the lives of communities
5. Design, Conservation and Enhancement of the natural, built and historic environment

#### 2.1.2 Policies

The policies that make up the Local Plan, grouped by Local Plan chapter, are as follows:

##### **Development Strategy and Metropolitan Green Belt**

Policy S1 Spatial Strategy and Settlement Hierarchy

Policy S2 Development Strategy  
Policy S3 Metropolitan Green Belt

### **Homes, Affordable Homes and Workplaces**

Policy S4 Housing Strategy and Housing Requirement/Target  
Policy S5 Economic Development Strategy and Employment Land Provision  
Policy S6 Broad Locations for Development  
Policy S6 i) East Hemel Hempstead (North) Broad Location  
Policy S6 ii) East Hemel Hempstead (Central) Broad Location  
Policy S6 iii) East Hemel Hempstead (South) Broad Location  
Policy S6 iv) North Hemel Hempstead Broad Location  
Policy S6 v) East St Albans Broad Location  
Policy S6 vi) North St Albans Broad Location  
Policy S6 vii) North East Harpenden Broad Location  
Policy S6 viii) North West Harpenden Broad Location  
Policy S6 ix) West of London Colney Broad Location  
Policy S6 x) West of Chiswell Green Broad Location  
Policy S6 xi) Park Street Garden Village Broad Location  
Policy L1 Housing Size, Type, Mix and Density  
Policy L2 Older Persons Housing and Special Needs Housing  
Policy L3 Provision of and Contributions towards Affordable Housing  
Policy L4 Affordable housing development in the Green Belt (rural exceptions sites)  
Policy L5 Small Scale Development in Green Belt Settlements and the Green Belt  
Policy L6 Extension or Replacement of Dwellings in the Green Belt  
Policy L7 Gypsies, Travellers and Travelling Show People  
Policy L8 Primarily Residential Areas  
Policy L9 Primarily Business Use Areas  
Policy L10 Strategic Office Locations  
Policy L11 Special Employment Locations in the Green Belt - BRE, Bricket Wood  
Policy L11 Special Employment Locations in the Green Belt - Rothamsted Research, Harpenden

### **Retail, Leisure and Commercial Uses and Development**

Policy L12 Centres for Retail, Services and Leisure  
Policy L13 Attractive and vibrant cultural and civic areas  
Policy L14 Location of Non-residential uses serving residential areas  
Policy L15 Leisure Uses  
Policy L16 Mixed Use Opportunity Areas

### **Infrastructure and Community Facilities**

Policy L17 Infrastructure  
Policy L18 Transport Strategy  
Policy L19 Highways / Access Considerations for New development

Policy L20 New Development Parking Guidance and Standards

Policy L21 Education

Policy L22 Community, Leisure and Sports Facilities

**Design, Conservation and Enhancement of the natural, built and historic environment**

Policy L23 Urban Design and Layout of New Development

Policy L24 Development Amenity Standards

Policy L25 Energy and Environmental Performance of New Development

Policy L26 Local Green Space

Policy L27 Green Space Not Designated as Local Green Space

Policy L28 Green Space Standards and New Green Space Provision

Policy L29 Green and Blue Infrastructure, Countryside, Landscape and Trees

Policy L30 Historic Environment

**2.2 SA/SEA Methodology**

The key stages of the SA/SEA process are broadly presented in Table 2-1. For purposes of completeness this table includes all the work undertaken on the Core Strategy and Strategic Local Plan. The stages and documents associated with the work on the new Local Plan are shown in ***bold italic*** text.

**Table 2-1: Stages in the SA/SEA and St Albans Local Plan**

Local Plan	SA/SEA Stages	SA documents/outputs and Dates
Begin document preparation	<p>Stage A: Setting the context, establishing the baseline and deciding on the scope.</p> <p>A1: Identify other relevant policies, plans and document programmes, and sustainability objectives.</p> <p>A2: Collecting baseline information.</p> <p>A3: Identifying sustainability issues and problems.</p> <p>A4: Developing the SA framework.</p> <p>A5: Consulting on the scope of the SA (<b>Scoping Report</b>).</p>	<p>SA Scoping Report, prepared February 2006.</p> <p>Consultation on Scoping Report February 2006.</p> <p><b>Consultation on the scope of the SA/SEA April 2018</b></p>
<p>Consultation on Issues and Options (2006 &amp; 2007) and Emerging Core Strategy (2009)</p> <p>Develop Spatial Strategy Options and Consultation on the Strategy for Locating Future Development in the District (2010)</p> <p><b>Local Plan Issues and Options consultation January 2018</b></p>	<p>Stage B: Developing and refining options and assessing of effects.</p> <p>B1: Testing the Local Plan objectives against the SA framework.</p> <p>B2: Developing the Local Plan options including reasonable alternatives.</p> <p>B3: Evaluate the likely effects of the Local Plan and alternatives.</p> <p>B4: Considering ways of mitigating adverse effects and maximising beneficial effects.</p> <p>B5: Proposing measures to monitor the significant effects of implementing the Local Plan.</p>	<p>Issues &amp; Options (I&amp;O) SA Working Note October 2006.</p> <p>Consultation on further Issues and Options July 2007 with accompanying SA Working Paper.</p> <p>Consultation on the Emerging Core Strategy in August 2009 with accompanying SA Working Note (June 2009).</p> <p>Preparation of SA Working Note for Spatial Strategy Options (September 2010)</p> <p>Consultation on the Strategy for Locating Future Development in the District (December 2010) with accompanying SA Working Note.</p> <p><b>Preparation of SA Working Note for Issues and Options consultation (January 2018)</b></p> <p><b>Preparation of SA Working Note to assess alternatives for housing growth levels and broad locations (May 2018)</b></p> <p><b>Preparation of SA Working Note for Council (June 2018)</b></p>
Draft Pre-submission Document	<p>Stage C: Preparing the Sustainability Appraisal Report.</p> <p>C1: Preparing the <b>SA Report</b>.</p>	Preparation of SA Report for the Draft Pre-Submission Strategic Local Plan November 2012 (not published).
Strategic Local Plan Options Consultation on Draft Strategic Local Plan (2014)	Further consideration of options (Stages B2-B4)	Preparation of SA Working Note for Development Strategy Options, Housing Requirement/Target Options; and Strategic Sub-Area Options (June 2014)
Publication of Pre-submission Document for SLP (2015)	<p>Stage C: Preparing the Sustainability Appraisal Report.</p> <p>C1: Preparing the <b>SA Report</b>.</p>	Preparation of SA Report for the Publication Strategic Local Plan December 2015. SA Report Addendum (July 2016) <b>Preparation of SA Report for the Publication Local Plan (this report) September 2018<sup>1</sup>.</b>
<p>Submission of Local plan to Secretary of State</p> <p>Examination</p>	<p>Stage D: Seek representations on the SA Report from consultation bodies and the public</p> <p>Consultation on any major modifications arising from the Examination (if required)</p>	<p>Consultation on the Publication SA Report for the SLP (2016)</p> <p><b>Consultation on the Publication SA Report for the Local Plan (2018)</b></p> <p>Update to the SA Report if required to assess and report on implications of any major modifications</p>
Adoption of the Local Plan	<p>Stage E: Post adoption reporting and monitoring</p> <p>E1: Prepare and publish <b>post-adoption statement</b></p> <p>E2: Monitor significant effects of implementing the Local Plan.</p> <p>E2: Responding to adverse effects.</p>	To be completed when the Local Plan is adopted.

<sup>1</sup> This is the Environmental Report that is required by the SEA Regulations.

The documents produced (see Table 2-1) are available to download at URL:

<http://www.stalbans.gov.uk/planning/Planningpolicy/local-plan.aspx>

## **2.3 Compliance with the SEA Regulations**

The SEA Regulations set out certain requirements for reporting the SEA process, and specify that *“The Environmental Report required by the SEA Directive can be included in an assessment report on the wider effects of the plan or programme, such as a Sustainability Appraisal Report. However it must clearly show that the Directive has been complied with, for example by signposting to enable the components that meet the requirements for the Environmental Report to be readily identified.”* Consequently, the requirements for reporting the SEA process are set out below, and the section of the report that includes each requirement is indicated.

*An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes:*

- Section 2.1 of this report sets out the contents and main objectives of the Local Plan document. The relationship with other relevant plans is summarised in Section 3.2 and detail is provided in Appendix A.

*The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme:*

- Section 3.3 of this report summarises the relevant baseline conditions for sustainability in St Albans. Appendix B sets out this information in more detail. The likely evolution of current conditions is also summarised in Section 3.4 and detail provided in Appendix B.

*The environmental characteristics of areas likely to be significantly affected:*

- Where relevant and available, information regarding particular areas has been included in Appendix B. Good practice guidance specifies that the contents and level of detail of information required should be relevant to the particular plan being assessed. Accordingly, baseline information is provided at a range of different scales where available and appropriate. The environmental characteristics of areas likely to be significantly affected have also been documented in the assessments of area specific policies in Appendix F (e.g. Policy S6 i-xi and Policy L11) – as summarised in Section 5.

*Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 2009/147/EC (Conservation of Wild Birds) and 92/43/EEC (Habitats Directive):*

- Section 3.5 of this report summarises existing sustainability problems for St Albans. Issues relating to Natura 2000 sites (designated by the above directives) are outlined in Section 2.6.

*The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation:*

- Section 3.2 outlines the environmental protection objectives relevant for sustainability in St Albans, and the implications of these objectives for the St Albans Local Plan.

*The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects:*

The SA Framework of objectives presented in Section 3.6 of this report covers all of the topics in the SEA Regulations, and progresses them through SA objectives. This assures that all of the issues are considered during the assessment of the Local Plan Policies. The likely effects of the Local Plan Policies (including environmental effects, as well as an indication of the nature of that effect) are summarised in Section 5 of this report and detailed in Appendix F.

*The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme:*

- Recommendations have been provided throughout the development of the Local Plan to help improve the Plan's sustainability performance. Section 5.7 provides details.

*An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information:*

- Section 4 summarises the assessments conducted on options considered at earlier stages of the Local Plan's development. In addition, Appendix E provides further details on the consideration and assessment of options, with the previous SA documents (see Section 2.1) providing additional detailed assessments – as summarised in Appendix E.
- Section 5 provides a summary of the assessment of the Local Plan. The detailed assessment matrices are presented in Appendix F.
- The difficulties encountered in compiling information are summarised in Section 5.6 of this report.

*A description of measures envisaged concerning monitoring in accordance with Regulation 17:*

- Measures envisaged for the monitoring of the sustainability effects (including environmental effects) arising from implementing the Local Plan Policies are provided in Section 6 of this report.

*A non-technical summary of the information provided under the above headings:*

- The non-technical summary has been produced as a standalone document.

*Consultation:*

- The results of the consultation at previous stages during the development of the Local Plan can be found in Section 2.4 and Appendix D.

## **2.4 Consultation**

The SEA Directive requires consultation of documents at various stages of the SA process, as indicated in Table 2-1. To date consultation has been undertaken at several stages as outlined below.

### **2.4.1 Pre-Local Plan consultation**

The first round of consultation was undertaken at the end of the scoping stage in February 2006. The SEA Regulations and SA Guidance requires that the Scoping Report consultation and the Preferred Options Appraisal be carried out with stakeholders the Council finds appropriate to consult with, and four statutory environmental consultees i.e. Countryside Agency, English Nature (both now merged as Natural England), English Heritage (now Historic England) and the Environment Agency. The aim of the scoping consultation was to ensure that all the relevant issues were identified and discussed at an early stage of the process so that they could be addressed during the SA and plan making. The list of those who responded, along with a summary of the comments received and how they have been addressed are included in Appendix D.

Consultation was then carried out on the Issues and Options SA Working Note (in July 2007) and on the Emerging Core Strategy SA Working Note (in June 2009). Some consultation responses were received that made reference to the Sustainability Appraisal. These are summarised in Appendix D.

During December 2010, consultation was carried out on the SA Working Note of the Strategy for Locating Future Development in the District. Again, the list of those who responded, along with a summary of the comments received and how they have been addressed are included in Appendix D.

In October 2014 consultation was undertaken on the Draft Strategic Local Plan. This consultation was accompanied by an SA Working Note (June 2014) for Development Strategy Options, Housing Requirement/Target Options, and Strategic Sub-Area Options. It was noted in the SA Working Note that as the revised Draft Strategic Local Plan (October 2014) was largely based on the content of the pre-publication draft considered by Council in late 2012, for which a full SA Report was prepared but not formally published, this new SA Working Note, which provided an update to the relevant parts of that SA Report, should be read alongside the earlier SA Report. Comments received in relation to the Sustainability Appraisal, both for the SA Working Note and the November 2012 SA Report, are summarised in Appendix D.

In late 2016 a Regulation 18 consultation was undertaken for the Detailed Local Plan (DLP). That consultation was accompanied by an SA Working Note (November 2016). Details of the representations received on that SA Working Note (from Harpenden Green Belt Association and Redbourn Parish Council) and responses to those comments are provided in Appendix D.

### **2.4.2 Local Plan SA/SEA consultation**

#### **2.4.2.1 Issues and Options Consultation: Local Plan 'Have your say!' (January 2018)**

At the Regulation 18 stage of the Local Plan making process a consultation was undertaken (9<sup>th</sup> January to 21<sup>st</sup> February 2018) to seek residents' views in relation to six key areas related to the Local Plan's scope, as follows:



- Building homes in the right place
- Building the right kind of homes
- Providing local jobs
- Protecting the Green Belt
- Protecting our historic buildings, wildlife sites and areas of natural beauty
- Getting the transport, schools and other infrastructure we need

An SA Working Note was produced to examine the sustainability credentials for the various approaches that were being considered during this new phase of work on the Local Plan. It built on the findings of the previous SA activities for the SLP, which had also assessed options for scale, distribution and location of new development.

The SA Working Note (January 2018) accompanied the Regulation 18 consultation and representations relating to the SA Working Note were received from seven respondents:

- Redbourn Parish Council
- Legal and General
- Goodman Logistics Development UK Ltd
- Abbey Precincts Residents' Association
- Martin Grant Homes and Kearns Land Ltd
- DHSC & Bloor Homes
- Hallam Land Management Ltd and St Albans School

Full details of the representations and how they have been taken on board in the SA process are provided in Appendix D.

#### *2.4.2.2 Additional Scoping Consultation (April 2018)*

In April 2018 an additional scoping consultation was undertaken with the three statutory consultees (Environment Agency, Historic England and Natural England) in order to requesting confirmation that the approach taken in the previous stages of SA/SEA on the Strategic Local Plan (formerly Core Strategy) and Detailed Local Plan remains appropriate for identifying and reporting the likely significant effects of implementing the Local Plan.

In the document that was sent to the statutory consultees some minor changes to the SA Framework were proposed to provide additional/amended sub-objectives which reflected updates that the statutory consultees had proposed for the SA Frameworks of neighbouring south-west Hertfordshire authorities.

Full details of the responses for the statutory consultees and how they have been taken on board in the SA process are provided in Appendix D.

#### *2.4.2.3 Local Plan Publication and SA Report (September 2018)*

This SA Report will accompany the Publication Local Plan for the Regulation 19 consultation in September/October 2018. Representations received in relation to this SA Report will be considered in finalising the SA prior to the Submission of the Local Plan to the Secretary of State for examination in public.

## 2.5 Geographic and Temporal Scope

The spatial scope for the assessment is largely local (St Albans District); however the assessment takes into account potential regional impacts (such as on neighbouring local authorities) and national impacts, wherever appropriate. For example, the effect on CO<sub>2</sub> emissions is likely to have both local and national implications as any reduction will contribute to national targets, whereas effects on surface water quality may be most relevant to the regional water bodies as well as local water bodies, depending on presence of any such water features and on their existing quality.

The SA/SEA examines plans across three temporal scales:

- Short term effects: effects expected in the next 1-10 years;
- Medium term effects: effects expected in the next 10-20 years; and
- Long term effects: effects expected in the next 20+ years (after the life of the plan).

## 2.6 Habitats Regulations Assessment

In November 2007, a draft Screening Report was prepared to inform the Appropriate Assessment as part of Habitat Regulations Assessment (HRA). This report was finalised in April 2008. Screening is required where a plan, alone or 'in combination' with other plans, could affect Natura 2000 Sites (Special Protection Areas for birds – SPAs, Special Areas of Conservation for habitats - SACs) following Article 6(3) of the European Habitats Directive. These are sites which are designated by the EC Directive on the Conservation of Wild Birds 79/409/EEC and the EC Directive on the Conservation of Natural Habitats of Wild Fauna and Flora 92/43/EC. This screening report was finalised in April 2008.

The first phase of this screening involved an analysis of St Albans Core Strategy Issues and Options and the joint St Albans/Dacorum Councils' Core Strategies Supplementary Issues and Options Paper: 'Growth at Hemel Hempstead' to ascertain any likely significant effects that may compromise the conservation objectives of nearby Natura 2000 sites. In agreement with Natural England, the statutory consultee for Appropriate Assessment screening, it was decided that Chilterns Beechwoods SAC was the only site of relevance to this screening. The next phase of the AA screening involved examining all other plans, programmes and projects that may affect the Chilterns Beechwoods SAC in conjunction with the St Albans Issues and Options. This included the Issues and Options papers of neighbouring council area, including Dacorum Borough Council, Three Rivers District Council and Watford Borough Council, and regional planning documents.

The screening process concluded, in agreement with Natural England, that any likely potential impacts of the St Albans Issues and Options (including the combined Dacorum/St Albans Issues and Options for Hemel Hempstead growth), either alone or in combination with other plans and programmes, are not considered to be significant, providing that Option 21(c) in the St Alban's Issues and Options, "*Seeking to increase net out-commuting, by meeting the need for new employment land outside the district*", is only pursued under certain circumstances. Mitigation measures were nevertheless recommended as being necessary if these options were pursued. These would need to be agreed with Natural England and could also be used as best practice to limit recreational pressure on Chilterns Beechwoods SAC even if the above options were not pursued.

In light of the assessment it was concluded that it would not be necessary to undertake a full Appropriate Assessment on the St Albans Core Strategy Issues and Options DPDs.

Changes were then made to the Strategic Local Plan after this HRA work was undertaken in 2008 and therefore the HRA was revisited at each additional stage to ascertain whether the HRA's assessment and conclusions still stood or whether there was need for them to be updated. At the Publication stage it was considered that the findings of the 2008 HRA remained applicable to the level of new development and the broad locations that were proposed in the Publication Strategic Local Plan. Therefore the conclusion of 'no likely significant effects' remained applicable. The same conclusion was drawn in relation to the Regulation 18 stage of the Detailed Local Plan.

As the Strategic Local Plan and Detailed Local Plan were never adopted, the new Local Plan is in effect a continuation of the same strategic planning process to replace the 1994 Local Plan, rather than being a 'new plan'. The HRA Screening for the SLP and DLP is therefore considered to remain a valid ('live') element of the strategic planning process. However given the 'passage of time' since the publication of the HRA Screening Report in April 2008 it is necessary to revisit the HRA Screening to confirm whether or not the conclusions remain unchanged.

An HRA Screening Update is provided as Annex 1 to this SA Report. That update considers new evidence and case law since the earlier HRA screening was undertaken. The Screening Update concludes that it is considered that it remains the case that the findings of the 2008 HRA remain valid and the replacement to the St Albans Local Plan 1994, namely the Publication Draft St Albans Local Plan 2018, will not have likely significant effects on the Chilterns Beechwoods SAC, either alone or in combination with other plans and projects.

## **3 Environmental and Sustainability Planning Context**

### **3.1 Introduction**

This section summarises the findings from the SA scoping stages. The scoping process seeks to ensure that the Sustainability Appraisal encompasses the key sustainability issues relevant to the District in the context of the development plan system. This section provides the environmental and sustainability context by:

- Examining the relationship of the Local Plan with other policies, plans and programmes, to identify all relevant environmental protection objectives and to identify potential conflicts to be addressed within the plan-making process; and
- Assembling baseline data on the current and future state of the District for the environment and sustainability topics which may be affected by the Local Plan.

### **3.2 Review of Policies, Plans and Programmes**

#### **3.2.1 Introduction**

The SEA process requires authorities to review the requirements of policies, plans and programmes (PPPs) relevant to the content of the Plan to outline:

- The relationship of the Development Plan (Local Plan) with other relevant plans and programmes; and
- The environmental protection objectives- established at international, community or Member State level- relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.

To fulfil this requirement, a review of the relevant plans, policies and programmes (henceforth referred as PPP review) has been carried out to identify environmental objectives which may provide constraints or synergies with the plan being formulated. The PPP review has covered international conventions and EU policies through to local plans and strategies. A detailed PPP review was presented in the Scoping Report. Appendix A presents an updated PPP review taking into account changes subsequent to issue of the Scoping Report. A summary of the PPP review is presented in this chapter.

#### **3.2.2 Summary of Review of other Plans and Programmes**

Together, plans can be constraints (i.e. set formal limitations, policy contexts, requirements) or can be sources of useful background information as part of evidence gathering. These act together in a hierarchy where a sequence of precedence is established in a nesting, or tiering of plans. A review of other relevant policy documents is required to establish environmental, economic and social objectives that they contain, and it allows opportunities and synergies to be identified, as well as potential conflicts between aims, objectives or detailed policies. This review also highlighted sustainability drivers relevant to the Local Plan.

The Local Plan has a direct or indirect relationship with number of national, regional and local policies, plans and programmes and is likely to support or interact with these policies.

At an international level various environmental policies such as Kyoto Protocol, EU Policies on greenhouse gas emissions, EU Second Climate Change Programme are for the Local Plan to consider. Other supra-national conventions such as the Habitats Directive should be considered in the Local Plan in relation to protection and enhancement of biodiversity. The Water Framework Directive is a major European policy that requires its Member states to achieve 'good ecological status' of all natural inland water bodies and protection/ enhancements to ground waters. As a result all Member states are required to prepare River Basin Management Plans. Although these plans are under production, the Local Plan will need to consider implications of these plans.

At a national level the National Planning Policy Framework (2018), supported by the National Planning Practice Guidance (NPPG), is particularly relevant to the Local Plan, with the introduction of the original NPPF in 2012 requiring a change in direction/strategy for the earlier SLP (see Section 4.2.6).

The Local Plan is also related to a number of regional and local plans and policies such as the Hertfordshire Biodiversity Action Plan, Hertfordshire Local Transport Plan 4, Level 1 Strategic Flood Risk Assessment for Dacorum, St Albans, Three Rivers and Watford, London Arc Employment Land Study, Hertfordshire Economic Development Strategy and various other plans and strategies developed by St Albans City and District Council.

A detailed review of all relevant PPP documents was discussed in the Scoping Report. This review has been updated in 2012, 2015 and again in 2018 with additional policies adopted subsequent to issue of the Scoping Report. The review is presented in Appendix A and in addition the implications of the PPPs are discussed in the individual SA topic sections in Appendix B (see Section 3.3).

NB: This does not provide an exhaustive review. There are a variety of other studies that have been used to provide the evidence base for the development of the Local Plan which have not been included in this review. A full list of these can be found at:

<http://www.stalbans.gov.uk/planning/Planningpolicy/local-plan.aspx>

### **3.3 Baseline Data**

A key step in the SA process is establishing the current state of the environment and its likely evolution in the future without implementation of any plan. This process assists in the identification of sustainability and environmental issues/opportunities in the District. It is also important to consider the implications of the Local Plan in its wider context. Baseline data is required to establish the present state of the District and its surrounding area and will be used subsequently for comparative purposes when monitoring and evaluating the Local Plan.

A practical approach is generally taken to data collection bearing in mind data availability and trend analysis, following which the actual data and gaps in information to consider in the future are reported at the scoping stage. This reporting also takes into account uncertainties in the data. The original Scoping Report issued in February 2006 reported baseline information. This information was updated in 2012 and again in 2015 for the Publication of the Strategic Local Plan.

For this new SA Report to accompany the Publication Local Plan the baseline information has been updated, using a revised format which provides reference to the relevant PPPs in Appendix A and rationalises the number of topic headings. Information is now organised under the following headings – Air Quality; Biodiversity and Geodiversity;

Climatic Factors; Historic Environment; Landscape; Material Assets; Soil; Water; Population; Health and Wellbeing; Housing; Transport and Accessibility; and Economy, Employment and Education.

The baseline data provides an evidence base for identifying sustainability issues in St Albans, as well as a mechanism for identifying alternative ways of dealing with them. The information has helped the development of the SA Framework, and has provided a basis for predicting and monitoring the effects of the Plan. In order to assess how the Local Plan will contribute to sustainable development, it is essential to understand the present economic, environmental and social baseline of the District, and to predict how they may progress without implementation of the Plan. Prediction of future trends can be highly uncertain but key trends identified from the available baseline data, and therefore potential sustainability issues have been identified. Key issues and opportunities are discussed in Section 3.5.

The Baseline Review is provided in Appendix B.

NB: As with the PPP review this baseline review does not provide an exhaustive review of information but aims to identify the information most relevant to the SA and Local Plan.

### **3.4 Evolution of the baseline without the plan**

The SEA Regulations require that information is provided on "...the relevant aspects of the current state of the environment and the *likely evolution thereof without implementation of the plan*". It is recognised that the future baseline or the 'business as usual' scenario is difficult to describe, as trend data is often not available. However where possible the trends in the future baseline have been described for each of the SA/SEA topic areas in the baseline review (Appendix B).

In forecasting the 'business as usual' scenario it is necessary to determine what this means and what assumptions the scenario has been based on. Within this SA the business as usual scenario has been taken to mean a continuation of the current Local Plan.

### **3.5 Identifying Environmental and Sustainability Issues**

The review of plans and programmes affecting the District, and the collation of the baseline data informed the identification of a series of environmental problems or issues that could be addressed by, or affect the strategies, policies and allocations developed in the Local Plan. Such issues, problems and opportunities have been confirmed through:

- Review of the baseline data;
- Tensions/ inconsistencies with other plans, programmes and sustainability objectives;
- Scoping Workshop held in February 2006;
- Discussions with the St Albans Council Officers;
- Response to the Scoping Report consultation and subsequent consultations on SA/SEA documents;
- Sustainable Community Strategy for St Albans City & District; and

- Additional work on the sustainability appraisal during the post-scoping stages, for both the Strategic Local Plan and the new Local Plan.

The issues and opportunities that have been identified during these stages are provided at the end of each of the Topic sections in the Baseline Review (see Appendix B). Issues identified include, amongst others:

- Whilst the condition and management of both national and local sites designated for biodiversity in the District has generally been improving more could still be done to improve the quality of these sites
- The CO<sub>2</sub> per capita emissions for St Albans have shown an overall decline since 2005 but are higher than the average figures for Hertfordshire and the East of England.
- In 2014 transport contributed around 56% of CO<sub>2</sub> emissions within the District.
- The main source of air pollution within St Albans District is generated from vehicle emissions.
- Whilst levels of nitrogen oxides (NO<sub>x</sub>), nitrogen dioxide (NO<sub>2</sub>) and particulates (PM<sub>10</sub>) have fallen over the last decade, there remain areas in the District where air pollution levels exceed the limits set in the UK Air Quality Strategy. These are generally associated with road traffic.
- Three Air Quality Management Areas have formally been declared within the District in relation to the annual mean air quality objective for nitrogen dioxide.
- Light pollution is increasingly an issue, as is the decreasing amount of tranquillity.
- A large proportion of the District lies in the Metropolitan Green Belt. The need to protect the Green Belt is a very important issue to residents.
- The District contains many heritage assets, and there are three scheduled monuments within St Albans that are on the 2017 Heritage at Risk Register.
- Waste production and disposal is a growing problem. Production of waste and disposal of this waste is becoming increasingly difficult, with diminishing numbers of suitable sites for landfill disposal. There is however, an increasing move towards Energy Recovery Facilities (ERF) facilities rather than landfill.
- Waste water treatment works may be near capacity thresholds by the 2030's.
- Previously developed land is a finite source that is being depleted over time. This will put greater pressure to build on greenfield sites and to increase housing densities on these sites.
- The District includes areas classified as the Best and Most Versatile Agricultural Land.
- There are some issues with river water quality in St Albans, with the status of a number its rivers considered to be 'moderate' or 'poor'.
- Over abstraction of water resources is an issue in the county and region.
- Water consumption per capita in the county is above the national average.
- Whilst there is generally a low flood risk, parts of the District are at risk from flooding, which may expand with climate change.

- The population is forecast to increase from 147,000 in 2014 to 165,000 in 2041.
- An ageing population means that there are fewer economically active people to support an increasing number of people coming up to retirement age.
- The District has a high proportion of residents who are highly skilled and educated, but there are also pockets of deprivation and exclusion.
- Whilst the general health and fitness of St Albans' residents is better than the national average there are health inequalities within St Albans which should be reduced and there are also issues with childhood and adult obesity and inactivity.
- Whilst the number of noise complaints being made to the Council is showing a general decline, there are issues with noise relating to Luton airport.
- There is a wide variation in the audit scores of the District's parks and gardens and the Green Spaces Strategy suggests a need to enhance a number of these spaces.
- In St Albans District, the forecast growth is from 57,000 households in 2012 to 73,000 households in 2037.
- House prices are high and there is a high demand for more affordable housing, particularly for those on low incomes and first time buyers.
- Demand for housing is going to increase as the number of households is forecast to grow.
- The need for specialist housing for older people is expected to increase along with an ageing population.
- There is high car usage in the District and as a result traffic congestion is an issue.
- Pressures due to population growth which leads to increasing levels of traffic, which in turn exacerbates congestion, particularly during peak times.
- All the key roads in south-west Hertfordshire are under pressure from heavy levels of traffic, and associated congestion, which has adverse effects on air quality, quality of life and the local economy.
- Expansion of Luton Airport could put increased pressure on M1, motorway junctions and wider road network.
- About 40% of the resident workforce commutes out of the District for work
- The District's cycling network needs to be improved.
- The District has very little employment development land and its existing employment areas are coming under pressure for other uses.
- Whilst employment rates in the region remain high, with the professional scientific and technical sectors accounting for the largest proportion of businesses some pockets of deprivation and exclusion exist in relation to income and employment.
- There is forecast to be a shortfall in secondary school places from 2019/20.



### **3.6 Environmental and Sustainability Objectives**

Current guidance on SA/SEA of land use and spatial plans advocates the use of objectives in the appraisal process. This section provides an outline of the objectives, criteria and indicators, organised under a SA Framework that was developed during the Scoping Stage and used in subsequent stages to appraise the Local Plan. This framework includes broad sustainability objectives, criteria explaining the broader objective in a more localised manner and indicators.

The purpose of the framework for the SA/SEA, set out in Table 3-1, is to provide a way in which the effects of the plan can be described, analysed, and compared. This involves considering the Local Plan elements against identified SA/SEA objectives. A more detailed framework which links the objectives to additional criteria (sub-objectives) is presented in Appendix C.

### **3.7 Inter-relationships between SA/SEA objectives**

During the SA/SEA assessment the SA/SEA objectives should not be considered in isolation as many inter-relationships exist that need to be taken into account. Some of these relationships are clear cut and easy to understand, for example reduced greenhouse gas emissions and improved air quality which would both result from transport modal shift to sustainable travel modes. Others however can be less obvious, but are equally important and need to be understood when assessing the Strategic Local Plan. For example there are inter-relationships between climate change adaptation measures and improvement in human health, from improved safety associated with reducing the risk of properties flooding, through to reduced levels of stress and improved well-being resulting from improvements to energy efficiencies of homes.

Close inter-relationships exist between environmental topics such as air quality, water quality, soil and biodiversity, with improvements or degradation to one often resulting in a similar effect on the other related media/topics. For example increased air pollution can have adverse effects on soil, water quality, and biodiversity through acidification. These effects can then cause issues relating to landscape degradation.

**Table 3-1: SA Framework**

<b>SA/SEA Objectives</b>
1. To protect, maintain and enhance biodiversity and geodiversity at all levels, including the maintenance and enhancement of Biodiversity Action Plan habitats and species in line with local targets
2. To protect, maintain and enhance water resources (including water quality and quantity) while taking into account the impacts of climate change
3. Ensure that new developments avoid areas which are at risk from flooding and natural flood storage areas
4. Minimise development of land with high quality soils and minimise the degradation/loss of soils due to new developments
5. Reduce the impacts of climate change, with a particular focus on reducing the consumption of fossil fuels and levels of CO <sub>2</sub>
6. Ensure that developments are capable of withstanding the effects of climate change (adaptation to climate change)
7. Achieve good air quality, especially in urban areas
8. Maximise the use of previously developed land and buildings, and the efficient use of land
9. To use natural resources, both finite and renewable, as efficiently as possible, and re-use finite resources or recycled alternatives wherever possible
10. To identify, maintain and enhance the historic environment, heritage assets and their settings and cultural assets
11. To conserve and enhance landscape and townscape character and encourage local distinctiveness
12. To encourage healthier lifestyles and reduce adverse health impacts of new developments
13. To deliver more sustainable patterns of location of development
14. Promote equity & address social exclusion by closing the gap between the poorest communities and the rest
15. Ensure that everyone has access to good quality housing that meets their needs
16. Enhance community identity and participation
17. Reduce both crime and fear of crime
18. Achieve sustainable levels of prosperity and economic growth
19. Achieve a more equitable sharing of the benefits of prosperity across all sectors of society and fairer access to services, focusing on deprived areas in the region
20. Revitalise town centres to promote a return to sustainable urban living

### 3.8 Compatibility of SA/SEA and Local Plan Objectives

A compatibility assessment of the SA/SEA objectives with the Local Plan Vision and Objectives has been undertaken and the results of this assessment are shown in Table 3-2.

**Table 3-2: Compatibility between SA/SEA Objectives and Local Plan Vision and Objectives**

Key		Local Plan Objectives						
(-) No significant relationship		VISION	1 An overall strategy that sets out the pattern and scale of development	2 Sufficient homes, workplaces and more affordable housing, of the types needed locally, in the right locations	3. Appropriate retail, leisure and other commercial development	4. Infrastructure and Community Facilities to support and enhance the lives of communities	5. Design, Conservation and Enhancement of the natural, built and historic environment	
(C) Compatible								
(?) Uncertain								
(N) Potentially incompatible								
SA Objectives (Abridged)	1	Biodiversity	-	-	N	?	?	C
	2	Water quality and quantity	-	-	N	-	-	C
	3	Flood risk	-	-	-	-	-	-
	4	Soils	-	-	N	?	-	-
	5	CO <sub>2</sub> emissions	-	-	N	N	?	-
	6	Climate change proof	-	-	-	-	-	-
	7	Air quality	-	-	N	N	-	-
	8	Use of brownfield land	-	-	-	-	-	-
	9	Resource efficiency	-	-	-	-	C	-
	10	Historic environment	-	-	?	?	?	C
	11	Landscape & townscape	-	-	N	?	?	C
	12	Health	C	-	C	C	C	C
	13	Sustainable locations	-	-	-	-	-	-
	14	Equity and social inclusion	-	-	C	C	C	-
	15	Good quality housing	C	-	C	-	-	-
	16	Community identity	C	-	-	C	C	C
	17	Crime	-	-	-	-	C	-
	18	Sustainable prosperity	C	-	-	C	C	-
	19	Fairer access to jobs	C	-	-	C	C	-
	20	Revitalise town centres	C	-	-	C	C	C

The Compatibility Matrix indicates that generally, the Local Plan Vision and Objectives are compatible with the social and economic SA/SEA objectives, but there are some potential incompatibilities and some uncertainties with the environmentally related SA/SEA objectives.

Where potential incompatibilities have been identified the Local Plan includes a series of policies aimed at protecting and enhancing the environment and public realm and

helping towards achievement of associated Local Plan objectives. These policies will help towards mitigating the negative effects associated with new development that are identified in the sustainability appraisal.

An analysis of the compatibility of each objective is provided below.

## **Vision**

*"The vision for the District is of:*

*A thriving community, which is a great place to live and work and has a vibrant economy"*

The Vision is compatible with the majority of the social SA/SEA objectives and all the economic objectives. There is no clear link with the environmental SA/SEA objectives, although by association 'a great place' could be seen to be compatible with some of the environmental objectives.

## **Local Plan Objectives**

*Objective 1: "An overall strategy that sets out the pattern and scale of development"*

This objective is procedural in nature and so no compatibilities with the SA/SEA objectives have been identified.

*Objective 2: "Sufficient homes, workplaces and more affordable housing, of the types needed locally, in the right locations"*

This objective is potentially incompatible with a number of the SA objectives:

The level of housing development required in the District will require development of greenfield land which is potentially incompatible with biodiversity due to landtake, potential habitat fragmentation and urban pollution issues. Development on greenfield land would also result in soil sealing and result in impacts on local landscapes.

Providing new homes in the District will put direct pressure on water resources.

Housing development will result in increases in greenhouse gas emissions from new housing and associated activities. It will also contribute to background emissions through an increase in the number of vehicles on the road thereby reducing air quality.

The objective is compatible with the 'health', 'equity and social inclusion' and 'good quality housing' SA/SEA objectives

The objective has uncertain compatibilities with the 'historic environment' objective as new development could have impacts, but on a site specific basis.

*Objective 3: "Appropriate retail, leisure and other commercial development"*

The objective is compatible with the three economic SA/SEA objectives as it supports economic development. The support for leisure facilities adds further compatibilities relating to the 'health, 'equity and social inclusion', and 'community identity' objectives.

This objective is potentially incompatible with the SA/SEA objectives on greenhouse gas emissions and air quality as activities relating to commercial development, such as transport and travel, will result in increases in greenhouse gas emissions and other airborne emissions.

The objective has uncertain compatibilities with a the SA/SEA objectives for 'biodiversity', 'soils', 'historic environment' and 'landscape & townscape' as new retail, leisure and commercial development has the potential to have effects against these objectives but this will be dependent on the nature, scale and location of the development.

Objective 4: *"Infrastructure and Community Facilities to support and enhance the lives of communities"*

This Local Plan objective has been found to be compatible with most of the social and economic objectives as the provision of infrastructure and facilities will benefit communities and the economy. Compatibility with the SA/SEA objective for 'resource use' has also been identified as provision of infrastructure will help to meet that objective.

As with Objective 3, the objective has uncertain compatibilities with a the SA/SEA objectives for 'biodiversity', 'soils', 'historic environment' and 'landscape & townscape' as effects will be dependent on the type, scale and location of the new infrastructure and facilities.

Objective 5: *"Design, Conservation and Enhancement of the natural, built and historic environment"*

Objective 5 is compatible with a range of environmental, social and economic SA/SEA objectives, covering those objectives that Objective 5 would specifically provide positive effects.

No potential incompatibilities or uncertain compatibilities were identified.

## 4 Development of the Local Plan

### 4.1 Introduction

The consideration and appraisal of alternative options is an integral part of the plan making and SA processes. The SA needs to consider reasonable alternatives for delivering the objectives of a plan and provide information to the plan makers to be used in the decision making process when selecting the preferred alternatives. It is not the purpose of the SA to decide the alternative to be chosen for the plan. Sustainability Appraisal is a decision aiding tool rather than a decision making one and the contents of this report should therefore be considered in this light.

The Environmental Assessment of Plans and Programmes Regulations 2004<sup>4</sup> require that the SEA shall:

*"... identify, describe and evaluate the likely significant effects on the environment of -*

*(a) implementing the plan or programme; and*

*(b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme."* Article 11 (2).

and that the Environmental Report (the Publication SA Report in the case of the St Albans Local Plan) should include:

*"8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information."* Schedule 2.

It should be noted that the role of the SA/SEA in this process is to provide assessments of the alternatives being considered, not to make the decision as to which alternatives are taken forward. This is made clear in Government guidance on SEA<sup>5</sup>:

*"It is not the purpose of the SEA to decide the alternative to be chosen for the plan or programme. This is the role of the decision-makers who have to make choices on the plan or programme to be adopted. The SEA simply provides information on the relative environmental performance of alternatives, and can make the decision-making process more transparent".* (Paragraph 5.B.7)

The guidance provides further details on how to consider alternatives as summarised in the following extracts:

- Identifying alternatives

*"Only reasonable, realistic and relevant alternatives need to be put forward. It is helpful if they are sufficiently distinct to enable meaningful comparisons to be made of the environmental implications of each".*

- Assessing alternatives

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<sup>4</sup> Statutory Instrument 2004 No. 1633

<sup>5</sup> A Practical Guide to the Strategic Environmental Assessment Directive. ODPM, 2005

*"The assessment of alternatives may be made in broad terms against the SEA objectives, provided there is sufficient detail to identify the significant environmental effects of each alternative. Where appropriate any cumulative, secondary and synergistic, short, medium, and long-term effects need to be highlighted, indicating whether they are likely to be permanent or temporary".*

This section of the SA Report provides a summary of the assessments of options undertaken during the various stages of the development of the St Albans Local Plan and where appropriate provides the reasons for selecting the options taken forward to the next stage of the planning process.

During the development of the Strategic Local Plan (formerly Core Strategy) a wide range of both strategic and more detailed options were considered and assessed through the sustainability appraisal process. That work has been used to inform the development of the new Local Plan and therefore the options considered in these earlier stages of planning have been included in this section. In addition the work undertaken during the development of the Detailed Local Plan has also fed into the new Local Plan and so is also covered in this section (see Section 4.3), whilst the further work undertaken during the development of the Local Plan in 2017 and 2018 is also summarised in this section (see Section 4.4).

The iterative plan making process stages and accompanying sustainability appraisal outputs are summarised in Figure 4-1.

<b>Date</b>	<b>Local Plan (including SLP and DLP)</b>	<b>Sustainability Appraisal</b>
May 2006	Consultation on Issues & Options	SA Working Note, October 2006
November 2006	Consultation on Joint Supplemental Issues & Options Paper - Growth at Hemel Hempstead	SA Working Note, November 2006
July 2007	Consultation on further Issues and Options	SA Working Note, July 2007
August 2009	Consultation on the Emerging Core Strategy	SA Working Note, July 2009
September 2010	Spatial Strategy Options Development	SA Working Note, September 2010
December 2010	Consultation on the Strategy for Locating Future Development in the District	SA Working Note, December 2010
November 2012	Publication of the Strategic Local Plan (not consulted on due to reconsideration of Plan direction / Strategy in response to revised national Planning policy (NPPF))	SA Report, November 2012
October 2014	Consultation on the Draft Strategic Local Plan	SA Working Note, June 2014
January 2016	Pre-Submission Publication of the Strategic Local Plan	SA Report, December 2015
July 2016	Submission of Strategic Local Plan	SA Report Addendum, July 2016
November 2016	Consultation on Detailed Local Plan (Regulation 18 stage)	SA Working Note, November 2016
January 2018	Consultation on Local Plan (Regulation 18 stage)	SA Working Note, January 2018
May 2018	Consideration of Local Plan alternatives	SA Working Note, May 2018
September 2018	Pre-Submission Publication of the Local Plan	SA Report, September 2018

**Figure 4-1: Stages in Developing the Local Plan**

NB: in undertaking the SA for the SLP and Local Plan some of the options have been considered and assessed at more than one stage in the plan making / SA process, or in some cases a report has reiterated assessments provided in a previous report. This means that there is some repetition in the information provided in Sections 4.2 to 4.4, however for purposes of completeness in the explanation of the work undertaken at each stage the 'repeated information' has been retained or where relevant cross-referenced.



## **4.2 Strategic Local Plan options**

During the development of the Strategic Local Plan a wide range and large number of options were considered for delivering the plan objectives across the full range of spatial planning issues that are within the scope of the Strategic Local Plan. All of the options considered throughout the development of the Strategic Local Plan have been subject to sustainability appraisal.

The following sections provide a brief summary of the various options considered, how and when they were appraised and information on where these assessments can be accessed. More detailed summaries are included in Appendix E, whilst the full SA Working Notes are available in the Local Plan Evidence Base on the St Albans City and District Council website:

<http://www.stalbans.gov.uk/planning/Planningpolicy/local-plan.aspx>

### **4.2.1 Assessment of Issues and Options (2006 and 2007)**

The Council consulted on an 'Issues and Options' paper in May 2006 that covered the three main proposed Development Plan Documents (Core Strategy, Site Allocations and Development Control Policies). Taking on board comments received from the Government Office for the East of England (Go-East) regarding the need to better define the scope and content of each DPD, the Council decided to carry out a second round of consultation on Issues and Options specifically relating to the Core Strategy DPD. This second stage of consultation on Core Strategy Issues and Options was undertaken in summer 2007.

These two sets of Issues and Options were assessed against the SA Framework agreed at the Scoping Report stage in order to identify the potential effects that would be associated with the implementation of the various options. The Issues and Options SAs identified positive, negative and uncertain affects for the options and made recommendations, wherever appropriate to strengthen options to achieve a sustainable development.

In addition to the May 2006 and June 2007 consultations, a 'Supplemental Issues and Options' consultation was undertaken in November 2006. This considered how the potential expansion of Hemel Hempstead, as recommended by the independent panel report on the draft East of England Plan, could be delivered. As there was the possibility that some of the potential expansion of Hemel Hempstead could take place in St Albans District, this consultation paper was prepared jointly by Dacorum Borough Council and St Albans City and District Council to inform both of their emerging Core Strategies.

See Appendices E1, E2 and E3 for further details.

### **4.2.2 Assessment of the Emerging Core Strategy (July 2009)**

Taking into account feedback received during the two rounds of Issues and Options consultations, the findings of the sustainability appraisal and the results of new evidence gathering, and following an iterative process of analysis by the Council Officers, discussions with stakeholders and decisions by Council Members, an Emerging Core Strategy was produced and consulted on in August 2009.

The Emerging Core Strategy was based around two separate visions, one for the city of St Albans (City vision) and the other referred to as the Rural Vision, with these visions

being supported by a series of objectives. Building on the vision and objectives, the Emerging Core Strategy set out the Council’s suggested approach to the location of development and associated infrastructure requirements. The document also provided commentary and information on the likely content of core policies which were seen as essential for delivering the development needs of the District.

An assessment was undertaken of the suggested policy areas contained within each ‘policy’ chapter of the Emerging Core Strategy. Some of these chapters included potential strategic sites for housing, employment and other community facilities. Whilst general issues resulting from developing these sites were included in each relevant chapter assessment, the more detailed assessment of these sites was undertaken and reported separately.

See Appendix E4 for further details.

#### **4.2.3 Spatial Strategy Options for Growth (September 2010)**

Through the summer of 2010 the Council considered a variety of options for levels of housing growth that could potentially be provided in the District through to 2028. This process included the holding of ‘*Shaping Our Community - Core Strategy Consultation Resident and Stakeholder Workshops*’ run by the Council in July 2010, at which options for growth were tested with different local groups, including schools, residents and District and Parish Councillors.

Three options for growth emerged from this process and these were assessed against the SA objectives in order to provide an understanding of the likely effects of implementing the different options and to help inform the process of selecting the preferred spatial strategy. The three options were those as shown in Table 4-1.

**Table 4-1: Spatial Strategy Housing Growth Options**

<b>Time Horizon</b>	<b>Option 1</b>	<b>Option 2</b>	<b>Option 3</b>
<b>2001 to 2021</b>	7,200 (360 p/a)	7,200 (360 p/a)	8,600 (360p/a 2001-11; 500p/a 2011-21)
<b>2021 to 2028</b>	2,520 (360 p/a)	1,750 (250 p/a)	3,500 (500 p/a)
<b>Total 2001 to 2028</b>	<b>9,720</b>	<b>8,950</b>	<b>12,100</b>

None of the three options considered at this stage were taken forward to the next stage of consultation on the Core Strategy. Instead, a lower level of 250 dwellings per annum was considered by the Council to be the most appropriate to meet the requirements of delivering 100 affordable houses per annum, whilst at the same time continuing to protect the District’s Green Belt.

See Appendix E5 for further details.

#### **4.2.4 Assessment of the Strategy for Locating Future Development in the District (December 2010)**

Consultation on the Strategy for Locating Future Development in the District took place in December 2010. It provided the Council’s preferred option for housing growth of 250 dwellings per annum, and included strategic sites proposed to help towards delivering

this level of growth. In addition, a wide range of infrastructure and non-residential development proposals were also considered in this consultation. A Sustainability Appraisal Working Note was produced to accompany this consultation and this provided an assessment of the sustainability performance of this revised strategy.

See Appendix E6 for further details.

#### **4.2.5 Assessment of the Draft Strategic Local Plan (November 2012)**

During 2012 a draft Strategic Local Plan was developed that took forward the 'Strategy for Locating Future Development in the District' from the December 2010 consultation supported by a range of Strategic Policies and Broad Locations. This version of the SLP was developed for publication and a full SA Report was therefore prepared. However the publication was postponed so that a Strategic Green Belt Review could be undertaken and the SA Report was therefore never formally published – other than as part of Council committee meeting reports.

See Appendix E7 for further details.

#### **4.2.6 Assessment of Strategic Local Plan Options – June 2014**

In 2014 a new phase of work was undertaken on the SLP in order to take account of changes to the planning system through the Localism Act 2011 and publication of the NPPF. This new system requires an assessment of local housing needs rather than reliance on targets in Regional Spatial Strategies (RSS) which were derived on the basis of urban capacity. This necessitated the consideration of a range of options relating to housing numbers, as well as the assessment of the suitability of sites to deliver the required housing growth, and options for distributing development across the District.

The new round of sustainability appraisal that was undertaken at this stage involved assessing the sustainability implications for a range of options covering the following topics:

- Housing Requirement / Target Options;
- Strategic Sub Area Options; and
- Development Strategy Options

The findings of the assessments which were documented in an SA Working Note (June 2014) are summarised in the following sub-sections, with further detail provided in Appendix E8. The full SA Working Note, including the detailed assessments, which are provided in three separate appendices to that SA Working Note, are available at the following weblink:

<http://www.stalbans.gov.uk/planning/Planningpolicy/local-plan.aspx>

#### **Housing Requirement / Target Options**

The NPPF requires that the number of new homes to be included in a Local Plan should be based on an assessment of local housing need. An independent assessment of this need was undertaken by consultants Housing Vision, with their findings being provided in a report entitled 'Independent Assessment of Housing Needs and Strategic Housing Market Assessment'.

Using the levels of housing requirement identified in this study, along with other reasonable alternatives, seven options for the level of housing provision were put forward as illustrative approaches to setting a Plan housing requirement / target. These seven options were as follows:

- 1) Meet full need and make additional provision for unmet need from region/sub-region/ London; **900 dwellings per annum (dpa)** - Strategy seeks to meet full need\*, plus some overspill from adjoining/nearby areas on basis of Duty to Cooperate (DTC), draft National Planning Policy Guidance (NPPG) on market adjustment and long term safeguarding of land for future development. Requires Green Belt (GB) releases beyond SKM recommendations.
- 2) Meet full need (high migration and household formation rates) **750 dpa** - Strategy seeks to meet full need\* as set out as highest in range considered by Housing Vision. Requires GB releases amounting to all SKM recommendations at a higher density of 50 dph (and possibly more beyond).
- 3) Meet full need (SHMA 5 year forecast base and ONS/DCLG projections) **550 dpa** - Strategy seeks to meet full need\* as projected by Housing Vision and ONS/DCLG. Requires significant GB releases with limited choices possible from SKM recommendations.
- 4) Meet full need (SHMA 10 year period base); **450 dpa** - Strategy seeks to meet full need\*. Based on 10 year trend as a more valid basis than 5 years, particularly given 20, 30 and 40 year history and the exceptional nature of migration in last 5 baseline years. Requires significant GB releases, but some choices possible from SKM recommendations.
- 5) Meet part of need only; **350 dpa** - Strategy seeks to meet part of need only based on significant GB policy constraint – still some substantial development in GB.
- 6) Green Belt policy constraint led; **250 dpa** - Strategy seeks to meet part of need only based on severe GB policy constraint – level of development in GB limited to Previously Developed Land (PDL) and minor adjustments (i.e. as set out in 2012 draft SLP).
- 7) Green Belt policy constraint wholly maintained and restrictive policies for use of urban land/PDL; **200 dpa** - Strategy seeks to meet part of need only based on severe GB policy constraint – no green field development in GB and restrictive policies on use/reuse of urban land and Green Belt PDL for residential use.

#### Notes

All suggested figures presented are rounded to nearest 50dpa.

Dwelling stock vacancy and contingency allowance included in requirement / target figure in cases indicated with \* above. Based on Census data, vacancy rate might be reasonably assumed at 3% of total dwellings to be provided.

The findings of the assessment undertaken on these seven options are provided in Appendix E8.

### **Strategic Sub Area Options**

SKM were commissioned by SADC to undertake a Green Belt Sites and Boundaries Study. The first phase of this work involved a District-wide examination of land parcels in

the Green Belt, with an assessment of their contribution to the following five Green Belt purposes:

**National purposes**

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns from merging;
- To assist in safeguarding the countryside from encroachment; and
- To preserve the setting and special character of historic towns.

**Hertfordshire purpose**

- Maintaining existing settlement pattern.

The results of this work were reported in a Part 1 Report (November 2013).

Eight strategic sub-areas were identified by SKM as contributing least towards the five Green Belt purposes and more detailed assessments were undertaken for each of these sub-areas. The findings of this second phase of Green Belt review were reported in the Part 2 Report (February 2014).

These eight sub-areas were considered in more detail in the new phase of SLP development. The sub-areas were as follows:

- SA-S1 – Land enclosed by east Hemel Hempstead and M1 (North);
- SA-S2 – Land enclosed by east Hemel Hempstead and M1 (South);
- SA-S3 – Area enclosed by residential development at east St Albans along Sandpit Lane;
- SA-S4 – Enclosed land at north St Albans along Sandridgebury Lane;
- SA-S5 – Enclosed land at north Harpenden in vicinity of Luton Road, Cooters End Lane and Ambrose Lane;
- SA-S6 – Enclosed land at northeast Harpenden along Lower Luton Road and extending to the vicinity of Whitings Close;
- SA-S7 – Land south and south west of London Colney; and
- SA-S8 – Enclosed land at Chiswell Green Lane at Chiswell Green.

The findings of the assessment undertaken on these eight options are provided in Appendix E8.

**Development Strategy Options**

Four illustrative development strategy options that might be proposed to fill the Plan requirement / target 'gap' were developed. Variations on these options were also considered to show how different levels of development could be achieved and the sensitivity implications of different housing density assumptions. Generally a 40 dwellings per hectare density assumption was favoured in developing the options.

The four options described below provide different approaches to the utilisation of the sites identified through the Green Belt review process to meet the District's housing needs. It should be noted that the starting point (baseline) for all these options was the

provision of housing through: completions from the 2011 plan base date; currently identified land supply in the form of planning permissions; general urban capacity; and some limited recycling of Previously Developed Land (PDL) in the Green Belt. These were common to all the options and should deliver 250 dwellings per annum (dpa). The options for how this baseline will be built on through release of sites from the Green Belt are as follows:

- **Option 1 a) Mixed Location / Scale Development;** This is a combination of limited releases from the SKM recommendations list to meet shorter term needs and development of east Hemel Hempstead in the medium and long term. This option offers reasonable prospects of delivery and also allows for some site choices from within the SKM recommendations. As east Hemel Hempstead is included, it offers a prospect of addressing sub-regional housing 'need' and sub-regional employment 'need'/ambition over the long term and the safeguarding of land beyond the Plan period. Duty to Co-operate issues identified by Dacorum's Plan Inspector would also be able to be addressed.
- **Option 1 b) Mixed Location / Scale Development with Smaller, but More, Sites;** A variant of the above that relies on using more strategic sites, but including some at a smaller scale than their total areas identified in the SKM studies. This would necessitate more work on detailed Green Belt Boundaries to see what might be appropriate as smaller scale alternatives in some of the selected locations.
- **Option 2 Dispersed Development;** This approach relies on using all of the recommended SKM Green Belt release areas except east Hemel Hempstead. This offers reasonable prospects of delivery, but does not address sub-regional housing or economic development 'need'/ambition. There would also be no likelihood of safeguarded land beyond the Plan period. Duty to Co-operate issues identified by Dacorum's Plan Inspector would not be able to be addressed. Higher densities than the 40 dph assumed elsewhere would need to be considered.
- **Option 3 Concentrated Development;** This approach relies very largely on expansion of east Hemel Hempstead as the main method of meeting housing need, with only limited development elsewhere in the District. There is some uncertainty about the capacity of east Hemel Hempstead to actually deliver dwellings at the required rate within the Plan period. It will also rely very heavily on Duty to Co-operate joint planning with Dacorum Borough Council. As in Option 1 (a) and (b) as east Hemel Hempstead is included, it offers a prospect of addressing sub-regional housing 'need' and sub-regional employment 'need'/ambition over the long term and the safeguarding of land beyond the Plan period. Duty to Co-operate issues identified by Dacorum's Plan Inspector would also be able to be addressed.

The findings of the assessment undertaken on these four options are provided in Appendix E8.

#### **4.2.7 Strategic Local Plan Publication – January 2016**

Based on the work undertaken on the options in summer 2014 and taking into account the consultation on the Draft SLP in late 2015 the preferred options that were included in the Publication SLP were as follows.

##### **Housing Requirement / Target Options**

The housing requirement / target included in the Publication SLP was 436 dwellings per annum (dpa) which is in line with the option for 450 dpa considered in 2014. This option was selected as it fully met the identified need for new housing, whilst at the same time

minimising the amount of development required in the Green Belt. The options for lower levels of housing delivery were rejected as they would not meet the identified housing need, whilst the options for levels higher than 450 dpa were rejected as they would have resulted in more Green Belt development than that absolutely necessary to meet the housing need.

### **Development Strategy Options**

The Council's preferred approach for inclusion in the Publication SLP was based on Option 1a. This approach was selected as it was an option which would locate the majority of new development at the edge of the main settlements which are the most sustainable locations in terms of reducing the need to travel to access services and facilities. It also included large strategic sites that would provide the best opportunities for infrastructure provision and planning gain, including biodiversity enhancements, when compared to a larger number of smaller developments (i.e. Option 1b and Option 2). Option 1a was also selected because by delivering significant levels of growth east of Hemel Hempstead it was one of the options which would have the greatest potential economic benefits as it would help to support the regeneration of Hemel Hempstead which is a key aim of Hertfordshire's Strategic Economic Plan (March 2014).

Option 1b was rejected as it did not provide the same level of larger sites and so would not have the same levels of infrastructure and planning gain as Option 1a. Option 2 was rejected for the same reason, but also because the dispersed pattern of development would not be as sustainable. Option 3 was rejected as it relied very largely on expansion of east Hemel Hempstead as the main method of meeting housing need, with only limited development elsewhere in the District, which would mean that the specific housing needs of the major settlements within St Albans District would remain unmet.

### **Strategic Sub Area Options**

The strategic sub areas which were selected for inclusion in the Publication SLP were as follows: Site S1 – east Hemel Hempstead (North); Site S2 – east Hemel Hempstead (South); Site S3 – Sandpit Lane, St Albans; and Site S5 – north Harpenden.

The four sub areas which were not taken forward were: Site S4 – north St Albans; Site S6 – northeast Harpenden; Site S7 – west of London Colney; and Site S8 – west of Chiswell Green.

These four sub areas that were included in the Publication Local Plan were selected because they performed better against the economic, social and environmental criteria set out in the Councils 'Detailed Site Selection Officer Evaluation' (DSSOE) than the other four sub areas.

See Appendix E9 for further details.

## **4.3 Detailed Local Plan (November 2016)**

Following the submission of the SLP for Examination, work was undertaken to develop a Detailed Local Plan (DLP) to complement the SLP by providing a Policies Map showing geographically where various policies will apply and detailing policies related to development management issues that arise from the SLP.

An SA Working Note was prepared to accompany the draft DLP during its consultation under Regulation 18. It included a preliminary overview assessment of the policies and allocations in the DLP. As the DLP was not a stand-alone Local Plan, but a 'daughter

document' to the SLP, as such, it was appropriate for certain matters to be assessed in the SA/SEA of the SLP and not duplicated in the SA of the DLP.

As a daughter document of the SLP, the policies in the DLP provide development management detail in support of the more strategic level SLP policies. In doing so the DLP therefore does not introduce any new proposals for development for which alternatives need to be considered in this SA/SEA. For example the Broad Locations (Policy DLP13) that were included in the DLP were established in the SLP and it was during the development of the SLP that reasonable alternative areas for the Broad Locations were considered.

Notwithstanding the above, there was however one policy where options were provided as part of the consultation. This related to the North West Harpenden Broad Location where two options were provided for the main land uses and essential parameters for the developments. Option A included all the 'hard' development within the site footprint identified in Figure 6 of the Strategic Local Plan, whilst Option B included a new primary school site in an area beyond that identified in Figure 6 of the SLP.

The SA Working Note provided an assessment of how the two options performed against the sustainability appraisal objectives.

Option B was the option selected for inclusion in the new Local Plan (see Section 4.4 and Section 5 because it performed better in terms of site capacity in the context of higher housing targets, and site planning for open space provision and an accessible new primary school.

See Appendix E10 for further details.

## **4.4 Development of the new Local Plan**

### **4.4.1 Regulation 18 SA Working Note – January 2018**

A Regulation 18 consultation was undertaken in Jan-Feb 2018. The Local Plan document was accompanied by an SA Working Note which provided a broad assessment of the range of topics covered by the Issues and Options questionnaire.

Given the 'high level' form and content of the Issues and Options questionnaire, during this stage of the SA there was no new detailed assessment against the SA framework. Where relevant the assessments that were undertaken for the equivalent topics and policies during the development of the draft Strategic Local Plan were reiterated and cross-referenced in order to identify the potential effects that could result if certain approaches are taken forwards against others. This included the options for distributing housing development, where the SA Working Note identified that the assessment carried out in 2014 remained relevant for the new Local Plan.

At that earlier stage the Council considered four options for distributing new housing development within the District, as follows:

- Option 1a): Mixed Location / Scale Development;
- Option 1 b): As 1a) with smaller, but more, sites;
- Option 2: Dispersed Development; and
- Option 3: Concentrated Development.



An assessment of these options was undertaken and reported in an SA Working Note (September 2014) (see Section 4.2.6 and Appendix E8). The findings of the assessment are summarised in Table 4-2. The detailed assessment for each option is provided in Appendix E8 to this SA Report.

**Table 4-2: Summary of Assessment of Development Strategy Options**

Option	SA Objectives																			
	1. Biodiversity	2. Water resources	3. Flood risk	4. Soils	5. GHG Emissions	6. Climate Change Proof	7. Air Quality	8. Previously developed land	9. Resource Efficiency	10. Historic/ Cultural Assets	11. Landscape/Townscape	12. Health	13. Sustainable Locational Development	14. Equality/ Social Inclusion	15. Good Quality Housing	16. Community Identity and Participation	17. Crime and Fear of Crime	18. Sustainable Prosperity and Growth	19. Fairer Access to Services	20. Revitalise Town Centres
Option 1 a) Mixed Location / Scale Development	x	-	-	xx	x	-	x	x	✓	-	xx	✓	✓✓	✓✓	✓	?	-	✓✓	-	✓✓
Option 1 b) As 1a) with smaller, but more, sites	x	-	-	?	x	-	x	x	-	?	x	-	✓	✓	✓	?	-	✓	-	✓
Option 2 Dispersed Development	x	-	-	?	x	-	x	x	-	?	x	-	✓	✓	✓	?	-	-	-	✓
Option 3 Concentrated Development	x	-	-	xx	x	-	x	x	✓	-	xx	✓	✓✓	✓✓	✓	?	-	✓✓	-	✓

In summary, the two strategy options that would deliver significant levels of growth east of Hemel Hempstead (Options 1a and 3) were assessed as providing the greatest potential economic benefits as they would help to support the regeneration of Hemel Hempstead which is a key aim of Hertfordshire’s Strategic Economic Plan (March 2014). However the scale of development at east Hemel Hempstead under these two options was predicted to have significant adverse effects on landscape, and as the two sites at east Hemel Hempstead contain best and most versatile agricultural land, significant adverse effects were also predicted against the soil objective.

Options 1a and 3 would locate the majority of new development of the edge of the main settlements which are the most sustainable locations in terms of reducing the need to travel to access services and facilities. These two options have also been identified as providing the greatest potential benefits in terms of facilitating the provision of new services and facilities, as well as providing the potential for meeting the needs of the gypsy and traveller communities. Significant positive effects were therefore predicted against the ‘sustainable locations’ and ‘equality & social exclusion’ SA objectives.

As Options 1b and 2 would provide the housing requirement through the utilisation of more dispersed patterns of development across smaller sites, so there would be fewer opportunities for major benefits to arise either from within the developments themselves

or across the wider communities. However these two options were predicted as having less impact on the natural environment due to the smaller scale of the sites that would be used to deliver the options. No significant adverse effects were identified for these two options.

The Council's preferred approach was based on Option 1a and this was therefore taken forward when developing the draft SLP which was subject to consultation in late-2014. The principles included in the assessment above from 2014 were considered to remain valid as the start point for the Local Plan 2020-2036.

In relation to the level of housing growth, the SA Working Note pointed out that the principles included in the SLP assessments from 2014 will remain valid for the Local Plan 2020-2036. These are that in general terms the higher the level of housing development the greater will be the positive social and economic effects but the greater will also be the negative environmental effects. However this is a simplistic view and it should be acknowledged that in some cases new development can have adverse social effects, for example by overloading existing services and facilities but can also have positive environmental effects, for example where a large new development provides new community open space or biodiversity enhancements. The actual effects that result from delivering any level of growth will be dependent on the location and characteristics of the development sites allocated

The SA for the Local Plan will assess the reasonable alternatives for sites to deliver the development strategy, these sites being identified from future Plan analysis, as well as from availability /deliverability information from the Strategic Housing Land Availability Assessment (SHLAA) and from a new call for additional sites. This assessment will consider the effects that might result from development at each site, taking account of environmental, social and economic constraints and opportunities. As with previous SA work it will be recognised that the larger strategic sites provide the best opportunities for infrastructure provision and planning gain opportunities, including biodiversity enhancements, when compared to a larger number of smaller developments. The SA undertaken on the reasonable alternatives will inform the selection of sites to be included in the Publication Local Plan.

### **Build homes in the right place**

The 'Build homes in the right place' section of the Issues and Options document listed five ways that new homes could be provided in the District. The sub-sections below provide a sustainability commentary for the each of these approaches.

#### *'Add more homes into existing built-up areas'*

This is a sustainable approach in that it would make the most efficient use of land and reduce the need to travel to access jobs and services. It would also reduce the level of new development required on greenfield sites in the Green Belt. Potential disadvantages of this approach would be that the increased density, including the potential for taller buildings, could have adverse effects on the District's historic environment and on local townscapes. In addition the smaller size of sites that would be delivered under this approach, when compared to large new sites in the Green Belt, would mean that opportunities to provide environmental and infrastructure gains (development gains) would not be available to the same extent as would be the case in large developments.

#### *'Build on 8 areas that least meet Green Belt purposes'*

Eight areas of the District were identified in the independent Green Belt Review in 2013/14 as being those that least met Green Belt purposes. These eight 'Broad Locations' were assessed by the SA during the consideration of options in 2014 , with four being assessed in greater detail when they were included in the previous draft Strategic Local Plan and in the Detailed Local Plan (November 2016) .

These extensions to the existing urban areas provide the best opportunities to make best use of and to support central services and facilities, as well as reducing the need to travel, thereby helping to minimise transport impacts.

At this new Regulation 18 stage in the development of the Local Plan there has been no new assessment of sites or wider broad locations. This work will be undertaken during the SA that is undertaken as part of the development of the Publication Local Plan.

*'Expand existing villages into the Green Belt'*

Expanding existing villages, particularly through medium or large scale development, would generally be a less sustainable option for locating new development than the expansion of towns. This is because development at villages would not provide the access to a wide range of services and facilities, which would be the case for development at towns, and would result in an increased need to travel with associated adverse effects in relation to greenhouse gas emissions and air quality. In addition, generally medium and large scale developments at villages are less likely to be in keeping with the local landscape and 'villagescape' and could put increased demand on existing small local services and facilities that might not be able to cope. However, some positive effects could arise from development at existing villages, for example by increasing the level of support for the local economy and local services/facilities, as well as increasing the viability of public transport provision.

As with the other approaches the effects against many of the environmental SA objectives would be dependent on the characteristics of the development locations chosen.

*'Further expand existing towns into the Green Belt (500 – 5,000 homes)'*

This approach would be similar to that for the majority of the 'Broad Locations' which, with the exception of a location adjacent to Chiswell Green and London Colney , were located on the edge of existing towns (St Albans, Harpenden, and Hemel Hempstead).

As for the eight 'Broad Locations' (Section 4.3.3.3) the principle of allocating development sites at existing towns is a more sustainable approach than allocating sites at villages as the new homes would be located closer to key services, facilities and employment opportunities.

As with the other approaches the effects against many of the environmental SA objectives would be dependent on the characteristics of the development locations chosen.

*'Create new 'Garden Village(s)' in the Green Belt (1,500 – 10,000 homes)'*

The creation of new Garden Village(s) would provide an opportunity to incorporate sustainability principles into a new community (e.g. energy efficient homes, the use of district heating systems, planning to encourage use of public transport, walking and cycling etc.). However, the level of effects against the SA objectives would be dependent on the location of the new settlements and the level of new services and facilities that it provides. If the settlement was located a notable distance from the District's key centres

then new residents would need to travel further to access major services, facilities and employment.

The larger the size of the Garden Village, the greater will be the opportunities for meeting day to day needs of new residents from within the settlement, thereby reducing the need to travel. In addition it would also increase the viability for public transport provision to larger settlements, whether within or outside the District. However, with a larger development there would also be a greater potential for adverse effects on the local environment.

As with the other approaches the effects against many of the environmental SA objectives would be dependent on the characteristics and location of the development sites chosen.

In addition to 'Build homes in the right place' the Regulation 18 consultation also included the Council's proposed approach for the other topics of 'Building the right kind of homes', 'Provide local jobs', 'Protect the Green Belt', 'Protect our historic buildings, wildlife sites and areas of natural beauty', and 'Get the transport, schools and infrastructure we need'.

The SA Working Note provided a brief commentary as to the implications of these approaches, providing references to the related SLP policy assessments where appropriate.

See Appendix E11 for further details.

#### **4.4.2 Options for Housing Number and Broad Locations SA Working Note – May 2018**

Following on from the Regulation 18 stage, a second SA Working Note (May 2018) was prepared to report the findings of the assessment of options that were being considered for Broad Locations and also to consider the implications of a new potential reasonable alternative of 1,200 dwellings per annum (dpa).

1,200 dpa was included in the assessment in order to provide consideration of either choosing to prioritise even higher levels of housing delivery and/or potentially helping neighbouring or nearby authorities to meet any unmet need in their area.

The findings of the assessment are summarised in Table 4-3. The detailed assessment for each site is provided in Appendix E12.

**Table 4-3: Summary of Assessment of Housing Requirement**

Option	SA Objectives																			
	1. Biodiversity	2. Water resources	3. Flood risk	4. Soils	5. GHG Emissions	6. Climate Change Proof	7. Air Quality	8. Previously developed land	9. Resource Efficiency	10. Historic environment	11. Landscape/ Townscape	12. Health	13. Sustainable Locations	14. Equality/ Social Inclusion	15. Good Quality Housing	16. Community Identity and Participation	17. Crime and Fear of Crime	18. Sustainable Prosperity and Growth	19. Fairer Access to Services	20. Revitalise Town Centres
200 dpa			-			-				?		-	?			?	-	-	?	
250 dpa			-			-				?		-	?			?	-	-	?	
350 dpa			-			-				?		-	?			?	-	?	?	
450 dpa			-			-				?		✓	?			?	-	?	?	
550 dpa			-			-				?		✓	?			?	-	?	?	
750 dpa			-			-				?		✓	?			?	-	✓	?	
900 dpa			-			-				?		✓	?			?	-	✓	?	
1,200 dpa			-			-				?		✓	?			?		✓	?	

The assessment of the options for the level of housing provision, that have been considered during the development of the Strategic Local Plan / Local Plan, identified that the higher levels of growth could have significant adverse effects against several of the environmental SA objectives but could also result in significant positive effects against some of the social and economic SA objectives. Conversely the lower levels of growth would have less impact on the natural environment but at the same time would not provide the housing levels necessary to meet the identified need in the District.

For this assessment it was not possible to identify the exact levels of growth at which the effects predicted become significant. For this reason an approach to the ‘scoring’ of the effects against some of the objectives used a sliding scale to illustrate how the magnitude of the effect changes as the potential housing levels increase.

The higher housing levels would have greater environmental effects through increased land-take having direct impacts on biodiversity, soils and landscape, and through the increased population resulting in greater water usage, resource use, greenhouse gas emissions and other vehicle pollutant emissions. In general, these effects would all be reduced with lower housing numbers. The assessment did not identify any environmental limits that could be exceeded when moving from one housing level to another – i.e. whereby an increase from one housing level to the next highest would exceed such a threshold with a resulting step-change of the effects on the environmental topic/resource.

It should be noted however that new development can also result in positive effects against the environmental objectives, particularly in relation to the large development sites, for example through habitat creation/enhancement and ecological network links;

provision of open space and enhanced walking and cycling routes; and the provision of public transport improvements.

In relation to the social and economic objectives, the higher housing levels would result in greater positive effects by contributing the most towards ensuring that everyone has access to good quality housing that meets their needs, with the associated development and higher population contributing towards supporting the viability of local centres and town centres and resulting in the provision of improved community services and facilities. However it should be acknowledged that in some cases new development can have adverse social effects, for example by overloading existing services and facilities.

The actual effects that result from delivering any level of growth will be dependent on the location and characteristics of the development sites allocated.

In relation to the Broad Locations the assessment considered 12 potential locations. These locations were those were identified as potential Broad Locations following the Council's three stage Site Selection Evaluation process. That process used a Red Amber Green (RAG) system to assess sites against three stages and eight criteria as follows:

*Stage 1*

- 1. Green Belt Review (GBR) evaluation*

*Stage 2*

- 2. Suitability*
- 3. Availability*

*Stage 3*

- 4. Unique contribution to improve public services and facilities*
- 5. Unique contribution to enhancing local high quality job opportunities*
- 6. Unique contribution to other infrastructure provision or community*
- 7. Deliverable / Achievable*
- 8. Overall Evaluation*

Seventy sites capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land were considered at Stage 1, and of these 12 received either a Green or Amber rating and passed through to Stage 2. At Stage 2 all those 12 sites received a Green rating in relation to 'suitability' and 'availability' and passed through to Stage 3.

At the end of Stage 3 the evaluation forms concluded that 8 of the 12 sites had an overall evaluation of Green. These are the same 8 sites that were concluded in the Green Belt Review as making the least contribution towards Green Belt purposes. These sites are East Hemel Hempstead (North), East Hemel Hempstead (South), Land at Chiswell Green, North East Harpenden, North West Harpenden, North St Albans and East St Albans.

The evaluation forms concluded that the remaining 4 sites had an overall evaluation of Amber. These sites are South East Hemel Hempstead, North Hemel Hempstead, the Former Radlett Aerodrome (Park Street Garden Village) and North East Redbourn.

The findings of the assessments of these 12 sites are summarised in Table 4-4. The detailed assessment for each site is provided in Appendix E12.

**Table 4-4: Summary of Assessments of Broad Location Options**

Option	SA Objectives																			
	1. Biodiversity	2. Water resources	3. Flood risk	4. Soils	5. GHG Emissions	6. Climate Change Proof	7. Air Quality	8. Previously developed land	9. Resource Efficiency	10. Historic environment	11. Landscape/ Townscape	12. Health	13. Sustainable Locations	14. Equality/ Social Inclusion	15. Good Quality Housing	16. Community Identity	17. Crime and Fear of Crime	18. Sustainable Prosperity and Growth	19. Fairer Access to Services	20. Revitalise Town Centres
East Hemel Hempstead (North)	*	-	-	**	✓	-	✓	*	✓	?	*	✓	✓	✓	✓	✓	-	✓	✓	✓
	✓	-	-	**	*	-	*	*	✓	?	✓	?	✓	✓	✓	✓	-	✓	✓	✓
East Hemel Hempstead (South)	*	-	-	*	✓	-	✓	*	✓	?	*	✓	✓	✓	✓	✓	-	✓	✓	✓
	*	-	-	?	*	-	*	*	✓	?	✓	?	✓	✓	✓	✓	-	✓	✓	✓
South East Hemel Hempstead	*	-	-	*	✓	-	✓	*	✓	?	*	✓	✓	✓	✓	✓	-	✓	✓	✓
	*	-	-	?	*	-	*	*	✓	?	✓	?	✓	✓	✓	✓	-	✓	✓	✓
North Hemel Hempstead	*	-	-	*	✓	-	✓	*	✓	?	*	✓	✓	✓	✓	✓	-	✓	✓	✓
	*	-	-	?	*	-	*	*	✓	?	✓	?	✓	✓	✓	✓	-	✓	✓	✓
East St Albans	*	-	*	**	✓	-	✓	*	✓	?	*	✓	✓	✓	✓	✓	-	✓	✓	✓
	✓	-	*	**	*	-	*	*	?	?	✓	?	✓	✓	✓	✓	-	✓	✓	✓
North St Albans	*	-	-	**	✓	-	✓	*	✓	-	*	✓	✓	✓	✓	-	-	✓	✓	✓
	*	-	-	**	*	-	*	*	✓	-	✓	✓	✓	✓	✓	-	-	✓	✓	✓
North West Harpenden	*	-	-	*	✓	-	✓	*	✓	?	*	✓	✓	✓	✓	-	-	✓	-	✓
	*	-	-	?	*	-	*	*	✓	?	✓	✓	✓	✓	✓	-	-	✓	-	✓
North East Harpenden	*	-	?	*	✓	-	✓	*	✓	-	*	✓	✓	✓	✓	-	-	✓	-	✓
	*	-	?	?	*	-	*	*	✓	-	✓	?	✓	✓	✓	-	-	✓	-	✓
West of London Colney	*	-	*	*	✓	-	✓	*	✓	*	*	✓	✓	✓	✓	✓	-	✓	-	✓
	*	-	*	?	*	-	*	*	?	*	✓	?	✓	✓	✓	✓	-	✓	-	✓
West of Chiswell Green	*	-	-	*	✓	-	✓	*	✓	-	*	✓	-	✓	✓	-	-	✓	-	✓
	*	-	-	?	*	-	*	*	✓	-	✓	✓	✓	✓	✓	-	-	✓	-	✓
Park Street Garden Village	*	-	*	*	✓	-	✓	?	✓	?	*	✓	✓	✓	✓	✓	-	✓	✓	✓
	✓	-	*	?	*	-	*	*	✓	?	✓	?	✓	✓	✓	✓	-	✓	✓	✓
North East of Redbourn	*	-	*	*	✓	-	✓	*	✓	*	*	✓	-	✓	✓	-	-	✓	-	✓
	*	-	*	?	*	-	*	*	✓	*	✓	?	✓	✓	✓	-	-	✓	-	✓

Significant positive effects were identified against the SA Objective for housing (SA15) for the ten sites which would deliver greater than 500 new dwellings. Minor positive effects were predicted for most of the other social and economic objectives as the new developments will bring a range of socio-economic benefits, particularly the larger sites that are likely to provide a range of services and facilities that will benefit the whole community, not just new residents.

Significant positive effects were identified against the sustainable locations objective (SA13) for two of the sites to the east of Hemel Hempstead due to their close proximity to the Maylands Business Park and Hemel Hempstead Industrial Estate. The other sites are also in relatively sustainable locations on the edge of towns and were therefore 'scored' with a minor positive for SA 13, with the exception of the two 'edge of village' sites at Chiswell Green and Redbourn which had a mixed neutral/minor positive assessment given that development on the edge of these villages would not provide the access to a wide range of services and facilities, which would be the case for development at towns.

A significant positive effect was identified against the equality objective (SA14) for the East St Albans site, as new development would enable significant improvements to the education and training provision at Oaklands College as well as other wider community benefits.

Significant positive effects were identified against the SA Objective for greenhouse gas emissions (SA5) for the Park Street Garden Village as its development has the potential to result in significant improvements to rail infrastructure and rail services which would encourage the increase in use of sustainable modes of travel. All the sites had a mixed negative/positive assessment for SA5, and also SA7 (Air Quality), as whilst new development will inevitably result in increased energy consumption and private vehicle use, with associated increases in emissions, the sites are relatively close to existing facilities and services and/or would provide additional new facilities/services as part of the new developments – this factor helping to counter the adverse effects.

Significant adverse effects were identified for three sites (East Hemel Hempstead (North), East St Albans, and North St Albans) on the basis that they include areas of best and most versatile (BMV) agricultural land that could be lost through new development. For the other sites there is some uncertainty as to the amount of BMV associated with the site, if any, and therefore uncertain effects have been identified at this stage in the SA/SEA.

Four sites (East St Albans, London Colney, Park Street and NE Redbourn) have areas of flood risk within their boundary and a minor adverse effect was found for these sites. In all cases the area in the flood risk zone is not significant and the design of the developments should be able to avoid any flood risk issues. The site at North East Harpenden includes a very small area in the flood risk zone and therefore uncertain effects were predicted.

For the landscape objective (SA11) all the sites were identified as having mixed negative and positive effects, as whilst development in all cases would result in the loss of greenfield land on the edge of settlements, with associated adverse effects, the new developments could also deliver new open space, Country Parks and countryside access links. The largest sites have the greatest potential for providing such enhancement.

Mixed effects were also predicted for all the sites against the 'greenhouse gas emission' and 'air quality' objectives, because whilst the sites are closely related to existing settlements of various scales (positive effects), they are all located on the edge of settlements at some distance from the main services and facilities so this is likely to result in increased vehicle trips, with associated greenhouse gas and other airborne emissions (negative effects).



Two sites (London Colney and NE Redbourn) were identified as having potential minor adverse effects on the historic environment objective SA10, as the sites include heritage assets/designations. These will need to be taken into account in the design of the developments. The majority of the other sites have an uncertain assessment against this objective due to the proximity of heritage assets/designations to the sites. New development could adversely affect their settings.

Other uncertainties that were identified in the assessment are as follows:

- 'Resource efficiency' (SA9) for sites at East St Albans and London Colney) – as whilst both sites are in the sand and gravel belt minerals consultation area, they are located in areas where it is unlikely that extraction would be permitted;
- 'Soils' (SA4) and 'Previously developed land' (SA8) for the Park Street Garden Village site, as there is the potential for development to remediate any contaminated land associated with the site's former use as an aerodrome.
- 'Health' (SA11) for those sites that have rights of way running through them (East Hemel Hempstead (South), North Hemel Hempstead, East St Albans, NE Harpenden, London Colney and NE Redbourn) – where new development could adversely affect users of these rights of way. There are also uncertainties relating to noise issues for those sites situated close to motorways.

See Appendix E12 for further details of the SA.

Of the 12 potential (Green / Amber rated) Broad Locations considered in detail, 11 were selected for inclusion in the Publication Draft Local Plan. The one Broad Location which was not taken forward was North East of Redbourn. This was because the advantages of the other three sites which had received an Amber rating in the Council's Strategic Site Selection process were considered to be greater than those for North East of Redbourn.

#### **4.4.3 Planning Policy Committee (PPC) meeting 12<sup>th</sup> June 2018 - Park Street Garden Village Broad Location Re-evaluation**

In relation to the Park Street Garden Village Broad Location, following the overall site selection process and the findings, the Council undertook a re-evaluation to look more specifically at the relative importance and merits of using the site either for housing or as a Strategic Rail Freight Interchange<sup>6</sup>. This has some general relevance for the selection of Local Plan Broad Locations for housing, as the re-evaluation looked at six alternative strategies for delivering elsewhere the level of housing that could be delivered at Park Street Garden Village. These alternative strategy options were as follows: North East Redbourn; Using Red rated sites; Different delivery trajectories; Other LPAs delivering development; Neighbourhood Plans; and Development of a number of smaller sites currently in the Green Belt.

Of these six alternative strategies, five were not considered by the Council to be reasonable alternatives because they involved reliance on development that was contrary to the strategy set for the plan (minimisation of adverse impacts on Green Belt

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<sup>6</sup>St Albans Planning Policy Committee meeting 12<sup>th</sup> June 2018. Agenda Item 10.  
<http://stalbens.moderngov.co.uk/documents/s50035482/PPC%20June%202018%20-%20Draft%20Local%20Plan%20-%20Appendix%201%20-%20Re-evaluation%20of%20approach%20FINAL.pdf>

purposes (Green Belt review led) and / or greater dispersal of development, with less favourable outcomes for community benefits and infrastructure improvement. They were therefore not subject to SA. The one exception was the site/alternative strategy option to develop the site at North East Redbourn Broad Location which had previously been considered to be a reasonable alternative in the wider context of the Local Plan site evaluation process and had therefore been subject to SA alongside the 11 other 'Green' and 'Amber' rated sites (see Section 4.4.3). However, as noted above the advantages of the other sites were considered to be greater than those for North East of Redbourn. Additionally, in relation to the particular consideration of that site being an alternative to Park Street Garden Village, the Council considered that the North East Redbourn option would not deliver the equivalent quantum of housing development required within the Plan period and it would also not generate as many other significant benefits as those identified in association with the Park Street Garden Village.

#### **4.5 Summary of the consideration of alternatives**

As described in Sections 4.2 to 4.4 there has been extensive and detailed consideration of options throughout the development of the Local Plan, including that for the Strategic Local Plan (formerly Core Strategy). The sustainability appraisal has provided continual input into this process, through helping to develop and refine options and emerging policies and by reporting the findings of the assessments undertaken at each stage of the plan making process. These assessments have provided the decision makers with information on the likely sustainability implications of pursuing one option over another and have therefore been an important part of both the evidence base and the decision making process itself, when deciding the preferred options for including in the Plan.

It should be noted however that the reasons for taking forward some options and rejecting others are not restricted to the findings of the sustainability appraisal but also cover wider planning issues such as deliverability, views of the local community and infrastructure availability/constraints. The findings of the technical studies undertaken by SADC on the potential Broad Locations are an example of such an influencing factor for selecting preferred options and rejecting others.

Due to the change in planning context and the 'passage of time' some of the options considered at the earlier stages during the development of the SLP and Local Plan can no longer be considered as reasonable alternatives. For example some of the locations considered for inclusion in the Plan have already been developed or granted planning permission, whilst others have a limited capacity which falls below the criterion for a Broad Location that does not make them appropriate for inclusion in the Local Plan.

Conversely, the change in context that resulted from the publication of the NPPF (as described in Section 4.2.6) has meant that some of the options that were previously rejected have now been reconsidered as being reasonable alternatives to deliver the strategy. This is the case for some Broad Locations which have been brought back into consideration given the significantly higher level of growth that is now proposed when compared to the Core Strategy that was consulted on in December 2010. In addition, the further technical work that has been undertaken has meant that the relative performance of Broad Locations may have changed over time and this may have influenced the selection of one option over another when considering which broad location to include in the Plan.

The options that have been selected for inclusion in the Publication Local Plan are those that are considered to be the most appropriate, based on studies and assessments, to deliver the objectives of the Plan, whilst the options that have not been taken forward are those that have not performed as well against the criteria in the studies and assessments that have been undertaken to inform the development of the Plan.

Assessments for the preferred options that have been taken forward into the Publication Local Plan are included in Appendix F, whilst Appendix E provides summaries of the assessments of those options that are not included in the Publication Local Plan.

All of the detailed Sustainability Appraisal documents that have been prepared during the development of the Publication Local Plan can be found on the SADC Local Plan website page:

<http://www.stalbans.gov.uk/planning/Planningpolicy/local-plan.aspx>

## 5 Assessment of the Publication Local Plan

### 5.1 Introduction

A Publication Local Plan has been prepared informed by the previous consideration of options for strategies, policies and broad locations for development and taking account of the consultation comments received. This Publication Local Plan has now been appraised.

The appraisal used the assessment criteria as outlined in Figure 5-1. The effects were also forecast in terms of their:

- Permanence (permanent or temporary);
- Scale (local (within the District), regional (affecting local neighbouring authorities and London), national/international (affecting UK or a wider global impact)); and
- Timescale (in the short term (0-10 years), medium term (10-20 years) or long term (After the life of the plan)).

Where appropriate the assessment also identified cumulative/synergistic effects, cross-boundary effects and interrelationships between the SA objectives. All of the SA Objectives have been afforded the same value in this assessment with no weighting of objectives being used.

Significance Assessment	Description
✓✓	Very sustainable - Option is likely to contribute significantly to the SA/SEA objective
✓	Sustainable - Option is likely to contribute in some way to the SA/SEA objective
?	Uncertain – It is uncertain how or if the Option impacts on the SA/SEA objective
-	Neutral – Option is unlikely to impact on the SA/SEA objective
x	Unsustainable – Option is likely to have minor adverse impacts on the SA/SEA objective
xx	Very unsustainable – Option is likely to have significant adverse impacts on the SA/SEA objective

**Figure 5-1: Assessment Criteria**

Based on the methodology described above, all Local Plan policies and Broad Locations were assessed and the results presented as detailed assessment matrices in Appendix F.

### 5.2 Summary of the Assessment

The sections that follow summarise the results of the assessments for each Local Plan element followed by a summary of the assessment by SA objective (including any cumulative, synergistic and secondary effects). In addition, cross boundary effects are discussed in Section 5.4.

## 5.2.1 Development Strategy and Metropolitan Green Belt

Option	SA Objectives																			
	1. Biodiversity	2. Water resources	3. Flood risk	4. Soils	5. GHG Emissions	6. Climate Change Proof	7. Air Quality	8. Previously developed land	9. Resource Efficiency	10. Historic environment	11. Landscape/ Townscape	12. Health	13. Sustainable Locations	14. Equality/ Social Inclusion	15. Good Quality Housing	16. Community Identity	17. Crime and Fear of Crime	18. Sustainable Prosperity and Growth	19. Fairer Access to Services	20. Revitalise Town Centres
Policy S1 Spatial Strategy/Settlement Hierarchy	✓	-	-	✓	✓	-	✓	✓	-	✓	✗	✓	✓	✓	✓	-	-	✓	✓	✓
Policy S2 Development Strategy	-	-	-	-	✓	-	✓	-	✓	-	✓	✓	✓	✓	-	?	-	-	-	✓
Policy S3 Metropolitan Green Belt	✓	✓	?	✓	✓	✓	✓	✓	-	?	✓	✓	✓	✓	-	✓	-	✗	✗	?
	?										?							✓	✓	

### 5.2.1.1 Policy S1 Spatial Strategy and Settlement Hierarchy

The Spatial Strategy and Settlement Hierarchy provides a balance between focusing the majority of development in the key settlements, whilst at the same time allowing for some limited development in the smaller settlements that may help them to maintain their vitality and retain existing services. It also promotes a new Garden Village at Park Street. The growth in the most sustainable locations at the larger urban centres will help to support certain regeneration needs in the City/ towns and improve levels of community vitality, with associated social and economic benefits. It will also help to service the needs of surrounding areas.

By giving priority to urban locations for new developments, particularly the larger urban centres, the impacts on the District's natural environment, in particular the wider Green Belt will be minimised. There will also be a reduced need to travel, which will help to reduce the growth in greenhouse gas emissions, as well as provide increased opportunities for people to take up healthy travel options, such as walking and cycling.

### 5.2.1.2 Policy S2 Development Strategy

The Development Strategy (Policy S2) has generally been found to have positive effects in relation to the SA objectives as by focusing development at the 11 Broad Locations on the edge of major settlements it will help to reduce the need to travel to access services and facilities and will also provide the greatest opportunity for improving public transport provision and the delivery of appropriate renewable energy production and supply mechanisms. In addition, by focusing development on a few large sites, rather than a larger number of smaller sites, the strategy provides the best opportunity for the provision of new supporting infrastructure, services, facilities and open space, with associated benefits for the 'social' SA objectives.

The assessment has identified potential negative effects for GHG emissions and local air quality relating to the potential for traffic congestion issues being created or exacerbated

if new development is concentrated at Broad Locations on the edge of major settlements. However this would be the case whatever strategy is used for distributing the scale of new housing planned for the District. The assessment also identified a negative effects relating to the landscape objective, as large new housing developments on the edge of the main urban centres and at the proposed Park Street Garden Village are likely to result in adverse effects on local landscapes.

#### *5.2.1.3 Policy S3 Metropolitan Green Belt*

The policy of protecting the Green Belt from inappropriate development will have a positive effect on the majority of the environmental objectives, including those for 'biodiversity' and 'soil', for example through the protection of greenfield land, although there is some uncertainty relating to the site specific effects that may result from any new development that is permitted in the Green Belt (e.g. schools or transport infrastructure). Restricting development in the Green Belt should have a significant positive effect on the 'landscape and townscape' objective as development in the Green Belt would have inevitable adverse effects on the District's landscapes, including the erosion of gaps between settlements. In addition, restricting development in the Green Belt can encourage more development taking place in existing urban areas. This would minimise urban sprawl and should reduce the need to travel, thereby reducing growth in greenhouse gas and airborne emissions and supporting the related SA objectives.

Concentrating development in urban areas will also result in increased population densities within these areas and this should mean that homes, employment and other services are within close proximity thereby potentially encouraging travel by more healthy modes, such as walking and cycling, with an associated positive effect on the health of the local community. It will also result in improved accessibility for those without access to a private car. Positive effects are therefore predicted for the 'health', 'sustainable locations' and 'equality & social inclusion' objectives. As the Green Belt is valued by the local community, its protection will therefore have a positive effect on the 'community identity & participation' objective.

Some adverse effects have been identified in relation to the economic objectives as restricting development in the Green Belt will result in restricted opportunities for the growth of business activity in more rural parts of the District, with potential effects on job provision. However Green Belt policy allows for appropriate agricultural / forestry and other rural land related development which will help to reduce these effects.

## 5.2.2 Homes, Affordable Homes and Workplaces

Option	SA Objectives																			
	1. Biodiversity	2. Water resources	3. Flood risk	4. Soils	5. GHG Emissions	6. Climate Change Proof	7. Air Quality	8. Previously developed land	9. Resource Efficiency	10. Historic environment	11. Landscape/ Townscape	12. Health	13. Sustainable Locations	14. Equality/ Social Inclusion	15. Good Quality Housing	16. Community Identity	17. Crime and Fear of Crime	18. Sustainable Prosperity and Growth	19. Fairer Access to Services	20. Revitalise Town Centres
Policy S4 Housing Strategy / Housing Requirement/Target	x	x	-	x	x	-	x	x	x	?	x	✓	x	✓	✓	?	-	✓	✓	✓
	?	?	-	x	?	-	?	x	x	?	?	?	✓	✓	✓	?	-	✓	✓	✓
Policy S5 Economic Devt Strategy and Emp Land Provision	?	?	-	x	✓	-	✓	✓	✓	?	?	✓	✓	✓	-	-	-	✓	✓	✓
Policy S6 i) East Hemel Hempstead (North)	x	-	-	xx	✓	-	✓	x	✓	?	x	✓	✓	✓	✓	✓	-	✓	✓	✓
	✓	-	-	xx	x	-	x	x	?	?	?	?	✓	✓	✓	✓	-	✓	✓	✓
Policy S6 ii) East Hemel Hempstead (Central)	x	-	-	xx	✓	-	✓	x	✓	?	x	?	✓	✓	✓	-	-	✓	✓	-
	x	-	-	xx	x	-	x	x	✓	?	✓	?	✓	✓	✓	-	-	✓	✓	-
Policy S6 iii) East Hemel Hempstead (South)	x	-	-	x	✓	-	✓	x	✓	?	x	✓	✓	✓	✓	✓	-	✓	✓	✓
	x	-	-	x	x	-	x	x	✓	?	✓	?	✓	✓	✓	✓	-	✓	✓	✓
Policy S6 iv) North Hemel Hempstead	x	-	-	x	✓	-	✓	x	✓	?	x	✓	✓	✓	✓	✓	-	✓	✓	✓
	x	-	-	x	x	-	x	x	✓	?	✓	?	✓	✓	✓	✓	-	✓	✓	✓
Policy S6 v) East St Albans	x	-	?	x	✓	-	✓	x	✓	?	x	✓	✓	✓	✓	✓	-	✓	✓	✓
	✓	-	?	x	x	-	x	x	✓	?	✓	?	✓	✓	✓	✓	-	✓	✓	✓
Policy S6 vi) North St Albans	x	-	-	xx	✓	-	✓	x	✓	-	x	✓	✓	✓	✓	-	-	✓	✓	✓
	✓	-	-	xx	x	-	x	x	✓	-	✓	✓	✓	✓	✓	-	-	✓	✓	✓
Policy S6 vii) North East Harpenden	x	-	?	x	✓	-	✓	x	✓	-	x	✓	✓	✓	✓	-	-	✓	-	✓
	x	-	?	?	x	-	x	x	✓	-	✓	?	✓	✓	✓	-	-	✓	-	✓
Policy S6 viii) North West Harpenden	x	-	-	x	✓	-	✓	x	✓	?	x	✓	✓	✓	✓	-	-	✓	-	✓
	x	-	-	?	x	-	x	x	✓	?	✓	✓	✓	✓	✓	-	-	✓	-	✓
Policy S6 ix) West of London Colney	x	-	?	x	✓	-	✓	x	✓	x	x	✓	✓	✓	✓	✓	-	✓	✓	✓
	x	-	?	?	x	-	x	x	?	x	?	?	✓	✓	✓	✓	-	✓	✓	✓
Policy S6 x) West of Chiswell Green	x	-	-	x	✓	-	✓	x	✓	-	x	✓	-	✓	✓	-	-	✓	-	✓
	x	-	-	?	x	-	x	x	✓	-	✓	✓	✓	✓	✓	-	-	✓	-	✓
Policy S6 xi) Park Street Garden Village	x	-	x	x	✓	-	✓	?	✓	?	x	✓	✓	✓	✓	✓	-	✓	✓	✓
	✓	-	x	?	x	-	x	?	✓	?	✓	?	✓	✓	✓	✓	-	✓	✓	✓

### *5.2.2.1 Policy S4 Housing Strategy and Housing Requirement/Target*

Significant positive effects have been identified for the 'good quality housing' objective as the provision of an average of 913 net dwellings per annum will meet the Council's Local Housing Requirement / Target, including the Council's target for the provision of affordable homes as well as providing a mix of family homes.

Whilst a positive effect has been identified for the 'health' objective in relation to helping to meet the housing needs of the local population and reduce issues of overcrowding and stress related to any inadequacy of housing provision, there is also uncertainty relating to whether the levels of housing proposed will put pressure on existing health care facilities or whether opportunities for the provision of new healthcare facilities may improve the current situation.

A positive effect has been identified for the 'equality & social inclusion' objective in relation to the improved services and facilities that could result from the levels of developer contributions. For the 'sustainable locations' objective both positive and negative effects are identified. In terms of positive effects, the policy recognises that smaller sites, including those of half a hectare or less, have been and will continue to be an important source of housing land supply. These will come from a range of sources (as identified in Appendix 2 and Appendix 5 of the Draft Publication Local Plan), with the bulk being in highly sustainable urban locations, thereby supporting this objective. In terms of negative effects, opportunities to locate the scale of development which will be required to fully meet this level of housing growth, within urban areas close to town centre facilities, are no longer available in the District. This means that the edge of town sites that are the next most sustainable locations would be at a distance from the town centre facilities and services – although to counter this the scale of developments that would need to be taken forward to deliver the number of new dwellings would be more likely to incorporate a range of local facilities thereby reducing the need to travel to access everyday needs.

The level of housing growth proposed should result in community facilities being provided through developer contributions. However it may also put additional strain on existing facilities, particularly in the short term, although in some cases the growth could help to maintain the viability of a particular facility. The effects against the 'community identity & participation' objective are therefore uncertain.

In relation to the environmental objectives the level of housing proposed will result in some negative environmental effects, particularly in relation to any encroachment into the Green Belt that will be required to deliver this growth.

Housing growth will result in an increase in greenhouse gas emissions, will contribute to background emissions through an increase in the number of vehicles on the road, will put some demands on natural resources and will result in increased waste generation. In addition there will be a need to develop on greenfield sites. Negative effects have therefore been identified for the associated SA objectives ('soils', 'greenhouse gas emissions', 'air quality' and 'resource efficiency').

Negative effects have been identified for the 'use of brownfield sites' objective as delivery of 14,600 additional homes in the period 2020-36 will inevitably result in the use of sites that are not classified as previously developed land.

As St Albans District is within an area already identified as 'over-abstracted' in terms of water supply any addition to the number of dwellings in the District will increase this



pressure on water resources. As a result negative effects have been predicted for the 'water' objective. The effect is likely to become more significant over time as more dwellings are built and the risk of periodic water shortages increases. There is some uncertainty whether the local waste water treatment works will be able to accommodate this level of growth post-2030. Any overload of the sewerage system could result in adverse effects on water quality. Much will depend on the location and phasing of new developments and any associated upgrades to infrastructure.

The number of new dwellings proposed will need to rely on development on greenfield Green Belt sites, which would bring with them landscape impacts. Effects on local landscapes and townscapes will be site dependent. Whilst greenfield sites will be required to deliver the number of new dwellings, the effects against the biodiversity objective are uncertain as they will be dependent on the specific sites taken forward for development. Similarly, housing development could have adverse effects on known or undiscovered heritage assets and again effects will be dependent on the specific sites taken forward for development.

The scale of development that would be required to deliver the growth could however provide some potential benefits in relation to some of the environmental objectives. For example through the new housing development there will be some opportunities to improve local green infrastructure to the benefit of biodiversity, and the scale of development required to meet this level of new housing provision would enable opportunities for installing Combined Heat and Power systems that would benefit the 'greenhouse gas emissions' objective.

In terms of the economic objectives positive effects have been identified for the 'sustainable prosperity & growth' and 'fairer access to jobs & services' objectives as providing new homes will support the economy by providing necessary dwellings for local workers and create jobs in construction and the level of housing growth proposed should help to enable people to remain living in the area and therefore have improved access to newly created employment opportunities. Positive effects have also been identified for the 'revitalise town centres' objective as the level of growth will help to support the viability of local centres and town centres.

#### *5.2.2.2 Policy S5 Economic Development Strategy and Employment Land Provision*

Significant positive effects against the economic objectives have been identified for this policy, as protecting and expanding employment opportunities in the District will support the local economy, provide more local employment opportunities and could also help to avoid increases in the levels of out-commuting. The policy requires that employment land and floorspace in St Albans and Harpenden must be retained to enable continued opportunities in St Albans and Harpenden for local service businesses to locate close to customers. This will support the 'revitalise town centres' objective.

This policy supports the objective on 'use of brownfield sites'. It also supports the 'resource efficiency' objective due to the ability to use existing infrastructure. Safeguarding existing employment land in urban areas may also reduce the need to travel by private car to access these employment opportunities thereby helping to reduce social exclusion and to reduce the growth in greenhouse gas and airborne emissions, with associated positive effects. However to counter this, activities relating to the new employment sites, e.g. transport, are however likely to result in some increases

in greenhouse gas emissions and airborne vehicle emissions, and therefore adverse effects have also been identified against these two objectives.

The development of new employment sites would result in soil loss, with associated adverse effects against this objective. Developing new employment sites could also have an adverse effect on biodiversity, although this will be dependent on the nature of the site chosen. Effects on biodiversity are therefore considered to be uncertain. Developing new employment sites could have an effect on the 'landscape & townscape' and 'historic environment' objectives, however this is dependent on the nature and location of the sites chosen. The redevelopment of employment sites does however provide an opportunity to improve the townscape and historic environment in some areas. Additional uncertain effects have also been identified on water, due to current levels of over abstraction in the area.

#### *5.2.2.3 Policy S6 Broad Locations for Development*

#### *5.2.2.4 Policy S6 i) East Hemel Hempstead (North) Broad Location*

The development of a minimum of 1,650 new homes in this Broad Location has been identified as having adverse effects against several of the environmental objectives, including significant adverse effects on the 'soils' objective, given that greater than 25% (approximately 28%) of the total site area is known to be located on best and most versatile (BMV) agricultural land (Grade 2 and Grade 3a). Adverse effects are also predicted for the 'biodiversity' and 'use of brownfield sites' objectives given the greenfield nature of the site and for the 'landscape' objective due a predicted high degree of landscape impact along with the erosion of the gap between Hemel Hempstead and Redbourn, although no designated landscapes would be affected. Furthermore adverse effects have been identified for 'greenhouse gas emissions' and 'air quality' objectives in relation to additional vehicle trips from the new development. In addition, development in this location could exacerbate air quality issues in 'St Albans AQMA No.2' which is adjacent to the junction of the M1 and A414.

However the assessment also identified some potential positive effects relating to some environmental objectives, including the potential for biodiversity gains ('biodiversity'), the potential for improved public transport, coupled with the proximity to existing employment and local centres and the development of a new neighbourhood centre ('greenhouse gas emissions' and 'air quality') and the delivery of strategic and public open space, recreation space and countryside access links ('landscape'). Positive effects have also been identified for the 'resource efficiency' objective as the development will be required to deliver appropriate renewable energy production and supply mechanisms.

There is uncertainty in relation to the effects on 'historic environment' as whilst the site is not subject to any significant heritage or archaeological constraint it contains three Grade II listed buildings associated with Wood End Farm and development would impact on the setting of these buildings.

Positive effects have been predicted for the majority of the social objectives, including significant positive effects for the 'sustainable locations' and 'good quality housing' objectives.

In relation to 'sustainable locations', whilst the site is some distance from Hemel Hempstead town centre, the scale of development that could be provided at this site

would enable the delivery of a new neighbourhood and local centre. Development of this site could complement and improve community facilities to deliver a more coherently functioning neighbourhood, in conjunction with any development in Dacorum Borough at Spencers Park. This would reduce the need to travel to access day to day needs. The site is close to the significant existing employment area at the Maylands Business Park and Hemel Hempstead Industrial Estate. This area is a focus for future growth and regeneration.

For the 'housing' objective, development at the site could provide a minimum of 1,650 new homes with the potential to meet a variety of accommodation needs and to deliver significant levels of affordable homes.

Positive effects have been identified for the 'health' objective as the development would be required to deliver strategic and public open space, recreation space and countryside access links, including a new Country Park which will all enable the take-up of active lifestyles. There is some uncertainty for health and well-being because a small area of the site lies within the Buncefield Oil Storage Depot HSE Consultation Zone, oil and gas pipelines and electricity transmission lines cross the site and would need to be taken into consideration in planning the layout of development, and the site is close to the M1 motorway and there could therefore be noise disturbance for the new residents in the south-eastern part of the site which would be closest to the motorway.

For the 'equality & social inclusion' objective, the scale of development that this site would deliver provides the potential to develop new facilities (education, health, community etc.) that would be accessible to the new and nearby existing population. The development would be required to deliver a primary school, a secondary school, community facilities (including health provision) and new neighbourhood and local centres.

Positive effects are also predicted for the 'community identity & participation' objective given the potential to develop new facilities (education, health, community etc.) that would be accessible to the new and nearby existing population.

In terms of the economic objectives positive effects are predicted for the 'sustainable prosperity & growth' and 'fairer access to jobs & services' objectives as large scale housing development would help support the local economy and development of this site would support growth at Maylands Business Park which would help to encourage local provision of and access to jobs. In addition, provision of new secondary education facilities will contribute to the provision of appropriate training opportunities and help local people acquire the skills needed to find and remain in employment. Positive effects have also been identified for the 'revitalise town centres' objective as whilst development at this edge of town location does not directly support the objective to focus new development in the centre of urban areas, the scale of the site and its relationship to the town means that development would support the overall economy of the town and its centre. It would also help support nearby local centres as well as resulting in the development of a new local centre.

#### Mitigation of significant adverse effects

SA4 Soils: Policy L29 (Green and Blue Infrastructure, Countryside, Landscape and Trees) includes a requirement that a detailed survey should be undertaken where development on agricultural land is proposed. This will help to inform the design of the developments and the mitigation measures required. Any specific effects will need to be mitigated by

the use of Construction Environmental Management Plans (or equivalent) during the development phase.

#### *5.2.2.5 Policy S6 ii) East Hemel Hempstead (Central) Broad Location*

The commercial development at this Broad Location has been identified as having adverse effects against several of the environmental objectives, including significant adverse effects on the 'soils' objective, given that greater than 25% (approximately 29%) of the total site area is known to be located on best and most versatile (BMV) agricultural land (Grade 2 and Grade 3a). Adverse effects are also predicted for the 'biodiversity' and 'use of brownfield sites' objectives given the greenfield nature of the site and for the 'landscape' objective due a predicted high degree of landscape impact, although no designated landscapes would be affected. Furthermore adverse effects have been identified for the 'greenhouse gas emissions' and 'air quality' objectives in relation to additional vehicle trips from the new development and the potential effects on the Air Quality Management Area which is adjacent to the junction of the M1 and A414. However for the 'greenhouse gas emissions' and 'air quality' objectives positive effects were also identified as the development will be required to deliver a multi-modal transport interchange which should help to reduce private car usage. In addition the scheme would be required to deliver large scale solar power generation.

A significant positive effect was identified for the 'resource efficiency' objective, as in accordance with the aims and status of the Hertfordshire Enviro-Tech Enterprise Zone the development would be required to deliver environmentally friendly buildings. In addition the development would be required to deliver a Combined Heat & Power system and large scale solar power generation.

There is uncertainty in relation to the effects on 'historic environment' as whilst the site is not subject to any significant heritage or archaeological constraint it contains a Grade II listed building and development would impact on the setting of this building.

Positive effects have been predicted for several of the social objectives, including significant positive effects for the 'sustainable locations' objective.

In relation to 'sustainable locations', by making use of the area that is in the Buncefield housing exclusion zone for providing employment opportunities, development of this site provides opportunities to reduce the need to travel through closer integration of housing, jobs and services. The sustainability of the location will be improved by the requirement to deliver a multi-modal transport interchange.

Positive effects have been identified for the 'equality & social inclusion' and 'good quality housing' objectives as development at this location would be required to provide a new 15 pitch Gypsy and Traveller site.

There is some uncertainty for 'health and well-being' because the site lies mostly within the Buncefield Oil Storage Depot HSE Consultation Zone (housing would not be permitted in this zone) and oil and gas pipelines cross the site and would need to be taken into consideration in planning the layout of development.

In terms of the economic objectives significant positive effects are predicted for the 'sustainable prosperity & growth' and 'fairer access to jobs & services' objectives as development of this site would result in a significant amount of high quality economic growth in line with the aims of Hertfordshire's Strategic Economic Plan (March 2014) and the Hertfordshire Enviro-Tech Enterprise Zone and in addition the development of the

site should provide approximately 10,000 new jobs over time, including a mix of employment types.

#### Mitigation of significant adverse effects

SA4 Soils: Policy L29 (Green and Blue Infrastructure, Countryside, Landscape and Trees) includes a requirement that a detailed survey should be undertaken where development on agricultural land is proposed. This will help to inform the design of the developments and the mitigation measures required. Any specific effects will need to be mitigated by the use of Construction Environmental Management Plans (or equivalent) during the development phase.

#### *5.2.2.6 Policy S6 iii) East Hemel Hempstead (South) Broad Location*

The development of a minimum of 2,400 new homes in this Broad Location has been identified as having adverse effects against several of the environmental objectives, including 'biodiversity' due to the greenfield nature of the site and the proximity of the Westwick Row Wood wildlife site; 'soils' (as the site contains some best and most versatile (BMV) agricultural land (Grade 2 and Grade 3a) and 'use of brownfield sites', also due to the greenfield nature of the site and the soil sealing that would result from new development; and 'landscape', as development of this area would affect the openness of landscape character and lead to a high degree of landscape impact and views from the right of way that runs through the site would be affected by new development. However no designated landscapes would be affected. Furthermore, adverse effects have been identified for 'greenhouse gas emissions' and 'air quality' objectives in relation to additional vehicle trips from the new development, although the potential for public transport service improvement would help to mitigate adverse effects. In addition, development in this location could exacerbate air quality issues in 'St Albans AQMA No.2' which is adjacent to the junction of the M1 and A414.

Uncertain effects have been identified for the 'historic environment' objective as development could affect the settings of Listed Buildings both within and adjacent to the site. In addition development of the site would also have the potential to impact upon the setting of Gorhambury Grade II Registered Park and Garden and its associated heritage assets.

However the assessment also identified some potential positive effects relating to some environmental objectives, including: 'greenhouse gas emissions' and 'air quality' due to the potential for improved public transport, coupled with the proximity to existing employment and local centres and the development of a new neighbourhood centre; 'resource efficiency' in relation to the development being required to deliver excellence in energy efficiency and appropriate renewable energy production and supply mechanisms; and 'landscape' as the development would be required to deliver strategic and public open space, recreation space and countryside access links, including a new Country Park.

Positive effects have been predicted for the majority of the social objectives, including significant positive effects for the 'sustainable locations' and 'good quality housing' objectives.

In relation to 'sustainable locations', whilst the site is some distance from Hemel Hempstead town centre, the scale of development that could be provided at this site would enable the delivery of new neighbourhood and local centres. The site is also very

close to the significant existing employment area at the Maylands Business Park and Hemel Hempstead Industrial Estate which is a focus for future growth and regeneration.

For the 'housing' objective, development at the site could provide a minimum of 2,400 new homes with the potential to meet a variety of accommodation needs and to deliver significant levels of affordable homes.

Positive effects have been identified for the 'health' objective as the development would be required to deliver strategic and public open space, recreation space and countryside access links which will provide the opportunity for new residents to live active lifestyles. There is some uncertainty for health and well-being because the site is close to the M1 motorway and there could therefore be noise disturbance for the new residents in the eastern part of the site. In addition, development of this site would adversely affect the public right of way that crosses the site and may result in less people using it for recreational purposes.

For the 'equality & social inclusion' objective, the scale of development that this site would deliver provides the potential to develop new facilities (education, health, community etc.) that would be accessible to the new and nearby existing population. The development would be required to deliver primary schools, community facilities (including health provision) and new neighbourhood and local centres. In addition, inclusion of a Gypsy and Traveller site will help to meet the needs of gypsy and traveller communities, in terms of access to services and facilities.

Positive effects are also predicted for the 'community identity & participation' objective given the potential to develop new facilities (education, health, community etc.) that would be accessible to the new and nearby existing population.

In terms of the economic objectives positive effects are predicted for the 'sustainable prosperity & growth' and 'fairer access to jobs & services' objectives as large scale housing development would help support the local economy and development of this site would support growth at Maylands Business Park which would help to encourage local provision of and access to jobs. In addition, new neighbourhood / local centres and potential commercial opportunities will help support the local economy and offer new employment opportunities. Positive effects have also been identified for the 'revitalise town centres' objective as whilst development at this edge of town location does not directly support the objective to focus new development in the centre of urban areas, the scale of the site and its relationship to the town means that development would support the overall economy of the town and its centre. It would also help support nearby local centres as well as resulting in the development of a new local centre.

#### *5.2.2.7 Policy S6 iv) North Hemel Hempstead Broad Location*

The development of a minimum of 1,500 new homes in this Broad Location has been identified as having adverse effects against several of the environmental objectives, including 'biodiversity' due to the greenfield nature of the site; 'soils' (as the site contains some best and most versatile (BMV) agricultural land (Grade 2 and Grade 3a) and 'use of brownfield sites', also due to the greenfield nature of the site and the soil sealing that would result from new development; and 'landscape', as development would affect the openness and character of the landscape in this location and would be visually intrusive from the surrounding area, although no designated landscapes would be affected. Development would also erode the gap between Hemel Hempstead and

Redbourn and views from the right of way that runs through the site would be affected by new development.

Furthermore, adverse effects have been identified for 'greenhouse gas emissions' and 'air quality' objectives in relation to additional vehicle trips from the new development, although the potential for public transport service improvement would help to mitigate adverse effects. In addition, as for the East Hemel Hempstead Broad Locations, development in this location could exacerbate air quality issues in 'St Albans AQMA No.2' which is adjacent to the junction of the M1 and A414.

Uncertain effects have been identified for the 'historic environment' objective as development could affect the settings of Listed Buildings which are in close proximity.

However the assessment also identified some potential positive effects relating to some environmental objectives, including: 'greenhouse gas emissions' and 'air quality' as the proximity of employment opportunities and the local centre at Woodhall Farm to the residential development would reduce the need to travel thereby limiting growth in greenhouse gas emissions. Also, the size of development proposed at this location could result in public transport service improvement; 'resource efficiency' in relation to the development being required to deliver excellence in energy efficiency and appropriate renewable energy production and supply mechanisms; and 'landscape' as the development would be required to deliver strategic and public open space, recreation space and countryside access links, including a new Country Park.

Positive effects have been predicted for the majority of the social objectives, including significant positive effects for the 'sustainable locations' and 'good quality housing' objectives.

In relation to 'sustainable locations', whilst the site is some distance from Hemel Hempstead town centre, the scale of development that could be provided at this site would enable the delivery of new neighbourhood and local centres. The site is also very close to the significant existing employment area at the Maylands Business Park and Hemel Hempstead Industrial Estate which is a focus for future growth and regeneration.

For the 'housing' objective, development at the site could provide a minimum of 1,500 new homes with the potential to meet a variety of accommodation needs and to deliver significant levels of affordable homes.

Positive effects have been identified for the 'health' objective as the development would be required to deliver strategic and public open space, recreation space and countryside access links which will provide the opportunity for new residents to live active lifestyles. There is some uncertainty for health and well-being because development of this site would adversely affect the public right of way that crosses the site and may result in less people using it for recreational purposes.

For the 'equality & social inclusion' objective, the scale of development that this site would deliver provides the potential to develop new facilities (education, health, community etc.) that would be accessible to the new and nearby existing population. The development would be required to deliver a primary school, community facilities (including health provision) and new neighbourhood and local centres.

Positive effects are also predicted for the 'community identity & participation' objective given the potential to develop new facilities (education, health, community etc.) that would be accessible to the new and nearby existing population.



In terms of the economic objectives positive effects are predicted for the 'sustainable prosperity & growth' and 'fairer access to jobs & services' objectives as large scale housing development would help to support the local services in Hemel Hempstead, maintaining their viability and boosting the local economy. In addition, new neighbourhood / local centres and potential commercial opportunities will help support the local economy and offer new employment opportunities. Positive effects have also been identified for the 'revitalise town centres' objective as whilst development at this edge of town location does not directly support the objective to focus new development in the centre of urban areas, the scale of the site and its relationship to the town means that development would support the overall economy of the town and its centre. It would also help support nearby local centres as well as resulting in the development of a new local centre.

NB: The Housing Trajectory in Appendix 2 of the Draft Local Plan identifies that this site will not be developed until 2031/32. As a result there have been no effects predicted for the 'short-term' timescale (0-10 years).

#### *5.2.2.8 Policy S6 v) East St Albans Broad Location*

The development of a minimum of 900 new homes in this Broad Location has been identified as having adverse effects against several of the environmental objectives, including the 'soils' objective, as the site contains some best and most versatile (BMV) agricultural land (Grade 2 and Grade 3a and the soil sealing that would result from new development. Adverse effects are also predicted for the 'biodiversity' and 'use of brownfield sites' objectives given the greenfield nature of the site and with Home Wood local wildlife site and ancient woodland being located adjacent to the site. Adverse effects have also been identified for the 'landscape' objective as development would affect the openness and character of the landscape in this location, although the site is not in an area designated as a Landscape Conservation Area. It is also of relatively low landscape sensitivity and is 'urban fringe' in character. Furthermore, adverse effects have also been predicted for the 'greenhouse gas emissions' and 'air quality' objectives in relation to additional vehicle trips from the new development.

However the assessment also identified some potential positive effects relating to some environmental objectives, including on 'biodiversity' due to the potential for delivering significant green infrastructure improvements; 'landscape' in relation to the development being required to deliver strategic and local public open space and recreation space; and 'greenhouse gas emission' and 'air quality' in relation to the site being relatively accessible to services and facilities.

Positive effects have been identified for the 'resource efficiency' objective as the development would be required to deliver excellence in energy efficiency and appropriate renewable energy production and supply mechanisms, including a site wide Combined Heat & Power system. In addition, whilst the site is located within the sand and gravel belt minerals consultation area, the development will be required to make the best and most appropriate use of existing sand and gravel resources on site, rather than by prior extraction.

There is also uncertainty in relation to the effects on 'historic environment' as whilst the site is not subject to any significant heritage or archaeological constraint, the findings of archaeological studies in nearby areas suggest that there may be some archaeological



interest in the sub-area. In addition Grade II Listed Buildings are in close proximity to the site.

Uncertain effects have been identified for the 'flood risk' objective as approximately 1.5% of the site, in the north-east corner of the site (that has been identified as an education site), lies within in flood risk zones 2 and 3 relating to Butterwick Brook and there would therefore be a potential flood risk for new development. However, the majority of both the wider site and the education allocation is in the lower risk flood zone 1 and therefore the flood risk area could be avoided.

Positive effects have been predicted for the majority of the social objectives, including significant positive effects for the 'equality & social inclusion' and 'good quality housing' objectives.

In relation to 'equality & social inclusion' objective, the development would be required to deliver a primary school, community facilities (including health provision) and a new neighbourhood centre, which would be accessible to the new and nearby existing population. New development would also enable significant improvements to the education and training provision at Oaklands College as well as other wider community benefits and therefore significant positive effects have been identified for this objective.

For the 'housing' objective, development at the site could provide a minimum of 900 new homes with the potential to meet a variety of accommodation needs and to deliver significant levels of affordable homes.

Positive effects have been identified for the 'health' objective, as the site is close to a number of open spaces and existing walking and cycling routes which would provide the opportunity for new residents to live active lifestyles. In addition, the site has been identified as having the potential for delivering significant green infrastructure improvements which could encourage people to come into contact with and enjoy the natural environment. However development of this site would adversely affect the public right of way that crosses the site and may result in less people using it for recreational purposes.

Positive effects have also been identified for the 'sustainable locations' objective, as the edge of City location makes this site a relatively accessible and sustainable location for housing and there are local shops, services, education and employment opportunities within walking distance and there are bus stops close by. Development of a new neighbourhood centre will further support this objective.

The improvements to Oaklands College that would result from new development would provide social and community facilities that could help to improve participation and therefore positive effects have also been identified for the 'community identity & participation' objective.

In terms of the economic objectives positive effects are predicted for the 'sustainable prosperity & growth' and 'fairer access to jobs & services' objectives. The provision of new housing and improvements to Oaklands College that would result from new development could increase economic activity in the local area and support the local economy, whilst new housing at this site could result in developments at Oaklands College that would help to support this objective. In addition, provision of new secondary education facilities and improvements to Oaklands College will contribute to the provision of appropriate training opportunities and help local people acquire the skills needed to find and remain in employment.

Positive effects have also been identified for the 'revitalise town centres' objective as whilst development at this edge of City location does not support the objective to focus new development in the centre of urban areas, it would help support the City centre and nearby local centres as well as resulting in the development of a new local centre.

#### *5.2.2.9 Policy S6 vi) North St Albans Broad Location*

The development of a minimum of 1,100 new homes in this Broad Location has been identified as having adverse effects against several of the environmental objectives, including a significant adverse effect on the 'soils' objective, given that greater than 25% (approximately 57%) of the total site area is known to be located on best and most versatile (BMV) agricultural land (Grade 2 and Grade 3a) and the soil sealing that would result from new development. Adverse effects are also predicted for the 'biodiversity' objective due to the greenfield nature of the site and the proximity of the Long Spring and Soothouse Wood local wildlife site and ancient woodland which could be adversely affected. However positive effects have also been identified for this objective as the development would be required to provide managed woodland and ecological network links.

Adverse effects have been predicted for the objectives 'use of brownfield sites' due to the greenfield nature of the site; and 'landscape', as development involve the loss of unspoilt countryside, with some long distance views, although no designated landscapes would be affected. Development would also impact on views from the right of way that runs around the south east and north east boundaries of the area.

Furthermore, adverse effects have been identified for 'greenhouse gas emissions' and 'air quality' objectives in relation to additional vehicle trips from the new development given its distance for the city centre, although the potential for public transport service improvement would help to mitigate adverse effects.

However the assessment also identified some potential positive effects relating to some environmental objectives, including: 'greenhouse gas emissions' and 'air quality' as the site is located relatively close to local shops and bus services on Harpenden Road which will help to reduce the need to travel by private car and improvements to bus frequency may be feasible as a result of any new development; 'resource efficiency' in relation to the development being required to deliver excellence in energy efficiency and appropriate renewable energy production and supply mechanisms; and 'landscape' as the development would be required to deliver strategic and public open space.

Positive effects have been predicted for the majority of the social objectives, including significant positive effects for the 'good quality housing' objective as development at the site could provide a minimum of 1,500 new homes with the potential to meet a variety of accommodation needs and to deliver significant levels of affordable homes.

In relation to 'sustainable locations', whilst the site is some distance from the city centre and local facilities, it has good access to local employment opportunities and a number of schools and is served by a regular bus service to St Albans and Harpenden. Development of a new neighbourhood centre will further support this objective.

Positive effects have also been identified for the 'health' objective as the development would be required to deliver strategic and public open space which will provide the opportunity for new residents to live active lifestyles. There is some uncertainty for health and well-being because development of this site would adversely affect the public

right of way that crosses the site and may result in less people using it for recreational purposes. For the 'equality & social inclusion' objective, the development would be required to deliver a primary school, community facilities (including health provision) and a new neighbourhood centre. There may also be some potential to exploit links with adjoining leisure and education uses to create community facilities and improved open space..

In terms of the economic objectives positive effects are predicted for the 'sustainable prosperity & growth' and 'fairer access to jobs & services' objectives as the provision of new housing would help to support the local services in St Albans, maintaining their viability and boosting the local economy. In addition, a new neighbourhood centre and potential commercial opportunities will also help support the local economy and offer new employment opportunities. Positive effects have also been identified for the 'revitalise town centres' objective as whilst development at this edge of city location does not support the objective to focus new development in the centre of urban areas it would help support nearby local centres as well as resulting in the development of a new local centre.

#### Mitigation of significant adverse effects

SA4 Soils: Policy L29 (Green and Blue Infrastructure, Countryside, Landscape and Trees) includes a requirement that a detailed survey should be undertaken where development on agricultural land is proposed. This will help to inform the design of the developments and the mitigation measures required. Any specific effects will need to be mitigated by the use of Construction Environmental Management Plans (or equivalent) during the development phase.

#### *5.2.2.10 Policy S6 vii) North East Harpenden Broad Location*

The development of a minimum of 760 new homes in this Broad Location has been identified as having adverse effects against several of the environmental objectives, including for 'biodiversity' due to the greenfield nature of the site; 'soils' and 'use of brownfield sites' due to the greenfield nature of the site and the soil sealing that would result from new development; and 'landscape', as the site is in an area designated as a Landscape Conservation Area within the SADC Local Plan Review 1994 and development would have local visual impacts as well as visual effects on the opposite side of the Lea Valley. In addition development would affect people using the Public Rights of Way that cross the site and run along the boundary. For the 'soils' objective uncertain effects have also been identified, as it is unknown whether or not the site contains any best and most versatile (BMV) agricultural land (Grade 2 and Grade 3a).

Furthermore, adverse effects have been identified for 'greenhouse gas emissions' and 'air quality' objectives in relation to additional vehicle trips from the new development given its distance for the town centre and main supermarkets. There are also some topography and distance disadvantages for walking and cycling access to rail and the town centre.

However the assessment also identified some potential positive effects relating to some environmental objectives, including: 'greenhouse gas emissions' and 'air quality' as the site is in a relatively sustainable location with good access to local facilities in Harpenden and close to bus routes, which will help to reduce private car usage; 'resource efficiency' in relation to the development being required to deliver excellence in energy efficiency

and appropriate renewable energy production and supply mechanisms; and 'landscape' as the development would be required to deliver recreation space and public open space.

Uncertain effects have been identified for the 'flood risk' objective as the site is adjacent to the flood zone of the River Lea, which runs on the other side of the Lower Luton Road, although there is a very small area of flood zone 2 encroaching onto the site.

Positive effects have been predicted for the majority of the social objectives, including significant positive effects for the 'good quality housing' objective as development at the site could provide a minimum of 760 new homes with the potential to meet a variety of accommodation needs and to deliver a large number of affordable homes in the north of the District. In relation to 'sustainable locations', as the site is in a relatively sustainable location with good access to services and facilities and the railway station in Harpenden and close to bus routes. For 'equality' there may be some potential to create new small scale local community facilities and improved open space.

Positive effects have also been identified for the 'health' objective as the development would be required to provide recreation space and public open space which will provide the opportunity for new residents to live active lifestyles. There is some uncertainty for health and well-being because there are some topography and distance disadvantages for walking and cycling access to the railway station and the town centre and development of this site would adversely affect the public right of way that crosses the site and may result in less people using it for recreational purposes. For 'equality' there may be some potential to create new small scale local community facilities and improved open space. In addition, the development would be required to a site for and appropriate contributions towards a new primary school.

In terms of the economic objectives positive effects are predicted for the 'sustainable prosperity & growth' objective as the provision of new housing would help to support the local services in Harpenden, maintaining their viability and boosting the local economy. Positive effects have also been identified for the 'revitalise town centres' objective as the relative proximity of the site to Harpenden town centre means that development should help to support the vibrancy of the town centre and nearby local centres.

#### *5.2.2.11 Policy S6 viii) North West Harpenden Broad Location*

The development of a minimum of 580 new homes in this broad location has been identified as having adverse effects against several of the environmental objectives, including 'biodiversity', 'soils' and 'use of brownfield sites' objectives given the greenfield nature of the site. For the 'soils' objective uncertain effects have also been identified, as it is unknown whether or not the site contains any best and most versatile (BMV) agricultural land (Grade 2 and Grade 3a).

Adverse effects were also identified for the 'greenhouse gas emissions' and 'air quality' objectives in relation to additional vehicle trips from the new development, however for the same objectives positive effects were also identified given the site being in a relatively sustainable location with good access to local facilities and close to bus routes. This will help to reduce private car usage. In addition there is a requirement for the development to provide significant improvements to existing and/or new walking and cycling facilities.

Adverse effects were also identified for the 'landscape' objective as the site is in an area designated as a Landscape Conservation Area and there would be some visual impacts of

a development in this location. However positive effects for the same objective, relating to the development being required to deliver recreation space and public open space, have also been predicted.

There is uncertainty in relation to the effects on 'historic environment' as The site contains the Grade 2 Listed Building at Cooters End Farm and could impact on its settings. The Old Bell PH (Grade 2) is also close to the site.

A significant positive effect has been predicted for the 'good quality housing' objective as development at the site would provide a minimum of 580 new homes with the potential to meet a variety of accommodation needs and to deliver affordable homes in the north of the District.

Positive effects have been predicted for the social objectives relating to 'health', 'sustainable locations', and 'equality & social inclusion'.

In relation to 'health' as the site is located close to footpaths and cycle routes which provides the opportunity for new residents to live active lifestyles. In addition there is a requirement for the development to provide significant improvements to existing and/or new walking and cycling facilities; for 'sustainable locations' as the site is in a relatively sustainable location with good access to services and facilities and close to bus routes; for 'equality & social inclusion' objective as there may be some potential to create new small scale local community facilities and improved open space and in addition the development would be required to a site for and appropriate contributions towards a new primary school.

In terms of the economic objectives positive effects are predicted for the 'sustainable prosperity & growth' and 'revitalise town centres' objective as the provision of new housing would help to support the local services in Harpenden, maintaining their viability and boosting the local economy, and the relative proximity of the site to Harpenden town centre means that development should help to support the vibrancy of the town centre and nearby local centres.

#### *5.2.2.12 Policy S6 ix) West of London Colney Broad Location*

The development of a minimum of 440 new homes in this broad location has been identified as having adverse effects against several of the environmental objectives, including 'biodiversity' given the greenfield nature of this site. In addition Broad Colney Lakes Nature Reserve is situated in the wider sub-area and could be affected by new development and the potential increase in those using it for recreation. Adverse effects have also been identified for 'soils' and 'use of brownfield sites' objectives given the greenfield nature of the site and for the 'greenhouse gas emissions' and 'air quality' objectives as the distance of the site from the town centres and railway stations and the relatively easy access to the M25 may encourage car use, rather than sustainable modes of transport, affecting greenhouse gas emissions and airborne emissions. However for these same two objectives positive effects were also identified given that the site is in a relatively sustainable location with good access to local facilities in London Colney and close to bus routes which will help to reduce private car usage. In addition this site is a flat level walk or cycle from the local centre which would encourage walking and cycling to access facilities.

Adverse effects were also identified for the 'landscape' objective as development at this site could affect the landscape setting of Napsbury Park and Conservation Area. However

positive effects for the same objective, relating to the development being required to deliver recreation space and public open space, have also been predicted. Further adverse effects were identified for the 'historic environment' objective as development at this location could affect the setting of Napsbury Park which is designated as a Registered Historic Park and Garden and a Conservation Area and which is situated adjacent to the north of the area identified for housing and partly within the area identified as an education site. In addition, the 'Colne Chapel moated site' Scheduled Ancient Monument is situated to the south of the site and development could affect its setting.

Uncertain effects have been identified for the 'flood risk' objective as just over 1% of the site, near the southern boundary of the associated education site, is in flood zone 2 associated with the River Colne. However, the whole of the housing area and the majority of the education site are in the lower risk flood zone 1 and therefore the flood risk area could be avoided. For the 'soils' objective uncertain effects have also been identified, as it is unknown whether or not the site contains any best and most versatile (BMV) agricultural land (Grade 2 and Grade 3a).

In relation to the social objectives a positive effect has been predicted for the 'good quality housing' objective as development at the site would provide a minimum of 440 new homes with the potential to meet a variety of accommodation needs and to deliver affordable homes in this part of the District.

Positive effects have also been predicted for the social objectives relating to 'health', 'sustainable locations', and 'equality & social inclusion'. In relation to 'health' as development could result in substantial woodland planting, public open space and improved access to the countryside. This would benefit both the new and existing residents in the local area. Also, this site is a flat level walk or cycle from the local centre which would encourage walking and cycling to access facilities. For 'sustainable locations' as whilst being some distance from the main city/town centres, the site is in a relatively sustainable location with good access to services and facilities and close to bus routes. It is also close to a major supermarket. For the 'equality & social inclusion' objective as there may be some potential to create new small scale local community facilities and improved open space. In addition, the development would be required to a site for and appropriate contributions towards a new 'all through' school.

In terms of the economic objectives positive effects are predicted for the 'sustainable prosperity & growth' objective as the provision of new housing would help to support the local services in London Colney, maintaining their viability and boosting the local economy, and the 'fairer access to jobs & services' objective as the provision of new secondary education facilities will contribute to the provision of appropriate training opportunities and help local people acquire the skills needed to find and remain in employment. Positive effects have also been identified for the 'revitalise town centres' objective as whilst development in this location does not support the objective to focus new development in the centre of urban areas, it would help support the vibrancy of the local centre.

#### *5.2.2.13 Policy S6 x) West of Chiswell Green Broad Location*

The development of a minimum of 365 new homes in this broad location has been identified as having adverse effects against several of the environmental objectives, including 'biodiversity', 'soils' and 'use of brownfield sites' objectives given the greenfield

nature of the site. For the 'soils' objective uncertain effects have also been identified, as it is unknown whether or not the site contains any best and most versatile (BMV) agricultural land (Grade 2 and Grade 3a).

Adverse effects were also identified for the 'greenhouse gas emissions' and 'air quality' objectives as the site is some distance from city/town centres which will result in additional vehicle trips, with associated greenhouse gas emissions and airborne emissions. However for the same objectives positive effects were also identified as the site is within walking distance of bus stops in Watford Road and the northern part of the area is close to the local shopping centre. This will help to reduce the need to use a private car, with subsequent benefits in terms of limiting the increase in greenhouse gas emissions.

Adverse effects were also identified for the 'landscape' objective as whilst the land parcel is well related to Chiswell Green and has more of an urban fringe character than an open countryside one, much of the area lies on a prominent ridge, with long views to the south west, although the site is not in an area designated as a Landscape Conservation Area. However positive effects for the same objective, relating to the development being required to deliver recreation space and public open space, have also been predicted.

In terms of the social objectives, a positive effect has been predicted for the 'good quality housing' objective as development at the site would provide 365 new homes with the potential to meet a variety of accommodation needs and to deliver affordable homes in this part of the District.

Positive effects have been predicted for the social objectives relating to 'health', 'sustainable locations', and 'equality & social inclusion'. In relation to 'health' as the topography of the area would enable walking and cycling to access services facilities and new recreation space provided as part of any development would further support this objective. For the 'sustainable locations' objective, whilst the site is some distance from the main city/town centres, it is within walking distance of bus stops in Watford Road and the northern part of the area is close to the local shopping centre. However new development in Chiswell Green would not provide the access to a wide range of services and facilities, which would be the case for development at towns and therefore a mixed neutral /minor positive effect has been predicted against this objective. For the 'equality and social inclusion' objective positive effects have been identified as there may be some potential to create new small scale local community facilities and improved open space. In addition, the development would be required to a site for and appropriate contributions towards a new primary school.

In terms of the economic objectives, positive effects are predicted for the 'sustainable prosperity & growth' objective as the provision of new housing would to support the local services in Chiswell Green, maintaining their viability and boosting the local economy, and for the 'revitalise town centres' objective, as whilst development in this location does not support the objective to focus new development in the centre of urban areas, it would help support the vibrancy of the local centre.

#### *5.2.2.14 Policy S6 xi) Park Street Garden Village Broad Location*

The development of a minimum of 2,300 new homes in this Broad Location has been identified as having adverse effects against several of the environmental objectives, although positive effects have also been identified.



For 'biodiversity' adverse effects have been identified as the largely greenfield nature of this site means that there will be some loss of habitats. In addition the site includes areas of grassland and wetland used by breeding, wintering and wading birds. However for the same objective positive effects have been identified in relation to the fact that the size of the development would provide opportunities for biodiversity gains. The development would be required to provide managed woodland and ecological network links and countryside access links will encourage people to come into contact with, understand, and enjoy nature.

Adverse effects have been identified for the 'flood risk' objective as approximately 7.5% of the site is in the flood risk zones 2 and 3 associated with the River Ver which runs through the north west corner of the site. There would therefore be a flood risk for new development. However, the Local Plan Policies Map indicates that the north-west area of the site is allocated for 'L18 Transport Strategy (improvements in Green Belt)' (of which approximately 25% is in flood zones). As the majority of the site is in the lower risk flood zone 1 the flood risk area could be avoided for new built development.

Adverse effects have also been identified for the 'soils' objective due to the soil sealing that would result from new development. Uncertainty has also been identified for this objective as it is unknown whether or not the site contains any best and most versatile (BMV) agricultural land (Grade 2 and Grade 3a) and in addition development could provide the potential to remediate any contaminated land associated with the site's former use as an aerodrome. As part of the site is previously developed land uncertain effects have also been identified for the 'use of brownfield sites' objective.

Further adverse effects have been identified in relation to the 'landscape' objective development of this site would result in the loss of open countryside. However the site is relatively well screened from the local area and is not in an area designated as a Landscape Conservation Area. For the same objective positive effects have also been identified as the development would be required to deliver strategic and public open space, recreation space and countryside access links, including a new Country Park. In addition, the principle behind the garden village concept, which requires them to be locally led and include consultation with the local community, should provide a high quality of layout and building design.

Positive effects have been identified for the 'resource efficiency' objective as the development would be required to deliver excellence in energy efficiency and appropriate renewable energy production and supply mechanisms.

Significant positive effects have been identified for the 'greenhouse gas emissions' objective as the potential scale of development would require the provision of a range of facilities and services in the new neighbourhood and local centres (e.g. schools and shops) thereby reducing the need to travel for many day to day needs. This would help reduce the growth in greenhouse gas emissions that would inevitably result from any new development. In addition, the site is next to a rail station with direct connection to Watford & St Albans. In addition the development would be required to provide a new park and rail facility, as well as exploring opportunities for other rail related enhancements, all of which would provide alternatives to private car use. Minor negative effects have been identified for the same objective as this site is located some distance from the city/town centres (St Albans and Watford) which will result in increased car use and growth in the level of greenhouse gas emissions.



Mixed positive and negative effects have also been identified for the 'air quality' objective. The positive effects relate to the fact that the site is relatively accessible to some services, facilities and open space, which should help reduce the need to travel and minimise increases in airborne emissions. Development of new neighbourhood and local centres will further support this. In addition the site is next to a rail station with direct connection to Watford & St Albans. In addition the rail-related improvements that would be associated with this site could help to reduce car usage and limit the increase in airborne emissions in the wider sub-region. The negative effects relate to the site being located some distance from the city/town centres which will result in additional vehicle trips with associated airborne emissions. In addition development in this location could exacerbate air quality issues in 'St Albans AQMA No.3' which encompasses a number of domestic properties in Frogmore on Radlett Road and Colney Street in the vicinity of the M25.

There is uncertainty as to the effects on the 'historic environment' objective as a relatively small area near the western boundary of the site lies within the Park Street and Frogmore Conservation Area and there is a Grade II Listed Building (Toll Cottage, Burydell Lane, Park Street) in the same area of the site. The settings of these heritage assets may be affected by any new development, although the topography and existing screening should minimise any adverse effects. Development could also affect the settings of the 'Colne Chapel moated site' Scheduled Ancient Monument and Napsbury Park which is designated as a Registered Historic Park and Garden and a Conservation Area – both of which are on the other side of the railway to this site.

Positive effects have been predicted for the majority of the social objectives, including significant positive effects for the 'good quality housing' objective, as development at the site could provide a minimum of 2,300 new homes with the potential to meet a variety of accommodation needs and to deliver affordable homes in this part of the District. Development at this location would be required to provide two new 15 pitch Gypsy and Traveller sites which would help meet the housing need of the gypsy and traveller community.

Positive effects have been identified for the 'sustainable locations' objective, as whilst this site is located some distance from the city/town centres there are new neighbourhood and local centres planned as part of the development which will meet some day to day needs and help reduce the need to travel. In addition the development could provide rail improvements which could be used by new and existing residents and provide opportunities to avoid car use.

The principle behind the garden village concept, which requires them to be locally led and include consultation with the local community, should provide the new services and facilities and improved open space that meet the needs of the whole community. The development would be required to deliver a primary school, a secondary school, community facilities (including health provision) and new neighbourhood and local centres. Inclusion of a Gypsy and Traveller site will help to meet the needs of gypsy and traveller communities, in terms of access to services and facilities. Positive effects have therefore been predicted for the 'equality' and 'community identity & participation' objectives.

Positive effects have been identified for the 'health' objective as development is required to provide countryside access links including improved footpaths, as well as walking and cycling links. These will provide the opportunity for new residents to live active lifestyles.

In addition, the level nature of the site and its surrounding area make walking and cycling viable options. There is some uncertainty for health and well-being as the southern part of the site is close to the M25 motorway and there could therefore be noise disturbance for the new residents.

In terms of the economic objectives positive effects are predicted for the 'sustainable prosperity & growth' and 'fairer access to jobs & services' objectives as development of a new garden village provides the potential for the provision of new local services and some new commercial development – which will help to support the local economy.

In addition the provision of new housing would help to support the local services in Park Street, maintaining their viability and boosting the local economy. Furthermore, new neighbourhood / local centres and potential commercial opportunities would offer new employment opportunities. In addition, provision of new secondary education facilities will contribute to the provision of appropriate training opportunities and help local people acquire the skills needed to find and remain in employment.

Positive effects have also been identified for the 'revitalise town centres' objective as whilst development in this location does not support the objective to focus new development in the centre of urban areas, it would result in a new sustainable local community.

Option	SA Objectives																			
	1. Biodiversity	2. Water resources	3. Flood risk	4. Soils	5. GHG Emissions	6. Climate Change Proof	7. Air Quality	8. Previously developed land	9. Resource Efficiency	10. Historic environment	11. Landscape/ Townscape	12. Health	13. Sustainable Locations	14. Equality/ Social Inclusion	15. Good Quality Housing	16. Community Identity	17. Crime and Fear of Crime	18. Sustainable Prosperity and Growth	19. Fairer Access to Services	20. Revitalise Town Centres
Policy L1 Housing Size, Type, Mix and Density	✓	-	-	✓	✓	-	-	-	✓	✓	✓	-	✓	✓	✓	✓	-	-	-	✓
Policy L2 Older Persons Housing and Special Needs Housing	-	-	-	-	-	-	-	-	-	-	-	✓	-	✓	✓	-	-	-	-	-
Policy L3 Provision of and Contributions towards Affordable Housing	-	-	-	-	-	-	-	-	-	-	-	✓	-	✓	✓	✓	-	-	-	-
Policies L4, L5 and L6 – Green Belt developments	-	-	-	✓	-	-	-	✓	-	✓	?	-	✓	-	✓	✓	-	-	-	-
Policy L7 Gypsies, Travellers and Travelling Show People	?	-	-	-	-	-	-	-	-	?	?	-	✓	✓	✓	✓	-	-	-	-
Policy L8 Primarily Residential Areas	-	-	-	-	-	-	-	-	-	-	-	✓	-	✓	✓	-	-	-	-	-
Policy L9 Primarily Business Use Areas and Policy L10 Strategic Office Locations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-
Policy 11 - BRE, Bricket Wood	?	-	-	-	x	-	x	✓	✓	-	-	✓	x	✓	-	✓	-	✓	✓	-
Policy 11 - Rothamsted Research, Harpenden	x	-	-	x	✓	-	✓	✓	-	?	✓	✓	✓	-	-	-	-	✓	✓	✓

#### *5.2.2.15 Policy L1 Housing Size, Type, Mix and Density*

Positive effects have been forecast against several of the SA objectives in relation to this policy.

In terms of the social objectives, requiring all housing sites to provide a mix of house types and styles should progress the objectives on 'housing', 'equality & social inclusion', and 'community identity & participation'. For example, the provision of a mix of housing should help to enable the younger and more elderly groups to remain living in the community. In addition, the promotion of an affordable housing mix in a development that broadly reflects the market housing on that same development will help to integrate the affordable housing element and therefore help to increase equality and reduce social exclusion.

The building of more small to medium size units, which the policy encourages, is more resource efficient than construction of larger detached units and therefore positive effects have been forecast in relation to the objective on 'resource efficiency'. In addition, encouraging small to medium size units which can be accommodated in town centres could help support the vitality of these centres.

This policy, which will ensure that all new housing is developed at a density that is consistent with achieving high quality, sustainable design and does not compromise the distinctive character of the area in which it is situated, has been identified as having positive effects on both the 'historic environment' and 'landscape & townscape' objectives. The policy's support for higher density developments in accessible urban locations also supports the objectives on 'biodiversity', 'soils', 'greenhouse gas emissions', 'resource efficiency' and 'sustainable locations'.

#### *5.2.2.16 Policy L2 Older Persons Housing and Special Needs Housing*

Positive effects have been forecast for Policy L2 against the SA objectives for 'health', 'equality' and 'housing' as setting minimum levels of provision of housing for older people and those with special needs will help to provide the specialist housing required to meet the needs of these groups and improve the wellbeing of those people who will be able to remain independent.

There are no predicted effects against the environmental or economic objectives.

#### *5.2.2.17 Policy L3 Provision of and Contributions towards Affordable Housing*

This policy has been forecast as having a significant positive effect against the 'housing' objective, as requiring the provision of 40% affordable homes as a proportion of overall development for all housing developments of 10 (net) or more homes and which set targets for both social rent/affordable rent (60%) and subsidised home ownership (40%) directly supports this SA objective.

Positive effects have been forecast in relation to the 'health' objective, as the provision of a range of affordable housing type should help to reduce the likelihood of lower income households living in deteriorating housing and poorer living conditions, which can have negative effects on health and wellbeing. Positive effects have also been identified for the 'equality' objective, because for developments over 100 dwellings the policy requires the integration of affordable housing into the community by requiring it to be provided on-site alongside market housing. In addition, the policy also includes a target

to provide approximately 60% of the affordable housing in the 'social rent'/'affordable rent' categories, which will help to meet the needs of the least affluent groups in society.

Delivery of affordable homes will provide housing for local communities and help towards meeting identified needs. This will help in the retention of younger people and disadvantaged groups within the communities in which they have grown up, thereby contributing to retention of community identity. As a result positive effects have also been identified for the 'community identity & participation' objective.

*5.2.2.18 Policy L4 Affordable housing development in the Green Belt (rural exceptions sites); Policy L5 Small Scale Development in Green Belt Settlements and the Green Belt; and Policy L6 Extension or Replacement of Dwellings in the Green Belt*

Minor positive effects have been identified for the 'soils', 'use of brownfield sites' and 'historic environment' objectives as Policy L5 requires that land should be previously developed or part of a previously developed property area and should reflect the character of the settlement. There are uncertain effects against the 'landscape' objective as there is the potential for some adverse effects on local landscapes associated with development in Green Belt settlements that would be permitted under Policies L5, L6 and L7, although to counter this Policy L5 requires that development should reflect the character of the settlement and Policy L6 considers the implications of new development in terms of visibility from public viewpoints.

In terms of the social objectives, minor positive effects have been identified for the 'sustainable locations' objective as allowing the development of affordable homes on rural exception sites (Policy L4) will help those who work in the countryside to live close to their place of employment; the 'housing' objective, as allowing for small scale affordable housing schemes in Green Belt settlements that meets the priority need for social rented housing will help to support this objective; and the 'community identity & participation' objective, as allowing for small scale affordable housing schemes in Green Belt settlements that meets the priority need for social rented housing will help in the retention of younger people and disadvantaged groups within the communities in which they have grown up, thereby contributing to retention of community identity.

*5.2.2.19 Policy L7 Gypsies, Travellers and Travelling Show People*

Providing pitches for Gypsies, Travellers and Travelling Show People should improve accommodation for these minority groups and therefore a positive effect has been identified against the 'housing' objective. Positive effects are also identified for the SA objectives on 'equality' and 'community identity & participation', with the policy recognising the needs of these different groups and making it easier for these groups to be able to access services, whilst also restricting sites to a maximum of 15 pitches which should help with wider community cohesion. The provision of two 15 pitch sites at the East Hemel Hempstead Broad Locations and two sites at Park Street Garden Village will help to support the 'sustainable locations' objective, given the proximity of those locations to services and facilities.

The effects of the policy on a number of the environmental objectives ('biodiversity', 'landscape & townscape', 'historic environment') are uncertain, these being dependent on the characteristics of the specific locations chosen.

There are no predicted effects against the economic objectives.

#### *5.2.2.20 Policy L8 Primarily Residential Areas*

Positive effects have been forecast for Policy L8 against the SA objectives for 'health' and 'equality' as the policy should help to ensure that the amenity of existing residents is not adversely affected by any new non-residential development and will allow older persons housing and care homes to be located in Primarily Residential Areas, thereby helping to reduce social exclusion. Positive effects have also been identified for the 'housing' objective as it supports the provision of new homes and the retention of existing dwellings.

There are no predicted effects against the environmental or economic objectives.

#### *5.2.2.21 Policy L9 Primarily Business Use Areas; and Policy L10 Strategic Office Locations*

Positive effects have been forecast for Policy L9 and Policy L10 against the SA objectives for 'sustainable prosperity' as Policy L9 protects employment land in Primarily Business Use Areas from being lost to residential development and protects land and premises in Class B use. Policy L9 also supports high-speed broadband and next-generation telecommunications, whilst Policy L10 prevents the loss of office space in Strategic Office Locations which will also support this objective. Positive effects have also been forecast for the 'fairer access to jobs & services' objective, as protecting employment land and uses, as well as office space, from loss will help to retain employment and training opportunities.

There are no predicted effects against the environmental or social objectives.

#### *5.2.2.22 Policy L11 Special Employment Locations in the Green Belt - BRE, Bricket Wood*

Development at this site should help to support the local economy, by retaining and supporting a key employer in the District. Positive effects have therefore been identified for the 'sustainable prosperity & growth' and 'fairer access to jobs & services' objectives.

In terms of the social objectives, both positive and negative effects have been predicted. Positive effects are predicted for the 'health' objective as the requirement for the provision of improved pedestrian and cycle links to Bricket Wood Station would help to enable active travel modes; and for the 'equality' and 'community identity & participation' objectives as the policy encourages development that opens parts of the site to public access and community related uses. However, the location of the site in the middle of a residential area, away from main roads, makes this site a relatively unsustainable location for employment and therefore a negative effect has been identified in relation to the 'sustainable locations' objective, however it is long established at this location which cannot be changed.

Given the relatively isolated nature of this site increased car usage is likely, thereby resulting in increased greenhouse gas and airborne emissions and therefore negative effects have been identified for the associated SA objectives. However, given the nature of the work undertaken by BRE (they are world leaders in low, zero and positive carbon construction) the new development should be of high environmental standards. Some positive effects have therefore been forecast for the 'greenhouse gas emissions' and 'resource efficiency' objectives. The requirement for the provision of improved pedestrian

and cycle links to Bricket Wood Station would help to enable sustainable travel and reduce growth in GHG and airborne emissions and therefore additional positive effects have been identified for the relevant objectives. The site is previously developed and therefore a positive effect has also been identified for the 'use of brownfield sites' objective.

The site is in close proximity to Bricket Wood Common (a Site of Special Scientific Interest) and the woodlands to the north, east and south (ancient woodland), which are designated as County Wildlife Sites. The effects on these areas from new employment development are uncertain against the 'biodiversity' objective.

#### *5.2.2.23 Policy L11 Special Employment Locations in the Green Belt - Rothamsted Research, Harpenden*

Positive effects have been forecast against the economic objectives. Rothamsted is an important local business and international organisation and expansion of the site to include complementary research and development activities would help to retain and increase the provision of knowledge based jobs in the District. Any development, redevelopment or extension of this Special Employment Location in the Green belt could result in the retention of existing jobs and a net increase in jobs at this site. Further economic related development of this site is likely to enhance the local economy and support other local businesses that are involved in servicing and supporting the new enterprises. The site is within close proximity to the town centre and therefore its development supports the objective to 'revitalise town centres'.

This is a relatively accessible and sustainable location for employment provision, being well served by buses running along St Albans Road and with the railway station within 800m. Many people live within walking and cycling distance of the site which should provide sustainable travel options for those who work at the new site, thereby promoting healthier lifestyles and reducing greenhouse gas and airborne emissions related to travel to work. Positive effects have therefore been identified for the related SA objectives.

Development at this location would require encroachment into the Green Belt, however the land is not of high landscape quality and development of the site would not reduce the Green Belt gap with neighbouring settlements nor would it make a significant difference to the strength of the Green Belt boundary at this location. Despite the site's close proximity to the common, the presence of existing development to the east of the land parcel at West Common, results in no visual impact. The land parcel is very well related to Harpenden and maintains some rural / open countryside character. Positive effects have therefore been identified on the 'landscape & townscape' objective. Part of the site is in the Harpenden Conservation Area and the site contains a Listed Building. It is therefore uncertain as to whether there will be any adverse effect on these from the new development. The greenfield nature of the site means that development may have adverse effects on 'biodiversity' and 'soils'. A mixed positive/negative effect has been identified for the 'use of brownfield sites' objective, as whilst the site is mainly brownfield, some of the area of the Rothamsted site that will be developed is greenfield in nature.

### 5.2.3 Retail, Leisure and Commercial Uses and Development

Option	SA Objectives																			
	1. Biodiversity	2. Water resources	3. Flood risk	4. Soils	5. GHG Emissions	6. Climate Change Proof	7. Air Quality	8. Previously developed land	9. Resource Efficiency	10. Historic environment	11. Landscape/ Townscape	12. Health	13. Sustainable Locations	14. Equality/ Social Inclusion	15. Good Quality Housing	16. Community Identity	17. Crime and Fear of Crime	18. Sustainable Prosperity and Growth	19. Fairer Access to Services	20. Revitalise Town Centres
Policy L12 Centres for Retail, Services and Leisure	-	-	-	-	✓	-	✓	✓	-	-	-	✓	✓	✓	-	✓	-	✓	✓	✓
Policy L13 Attractive and vibrant cultural and civic areas	-	-	-	-	?	-	?	-	-	✓	✓	✓	✓	✓	-	✓	✓	✓	✓	✓
Policy L14 Location of Non-residential uses serving residential areas	-	-	-	-	-	-	-	-	-	-	-	✓	✓	✓	-	✓	✓	-	-	-
Policy L15 Leisure Uses	-	-	-	-	-	-	-	-	-	-	✓	✓	-	-	-	-	-	-	-	-
Policy L16 Mixed Use Opportunity Areas	?	-	-	✓	✓ x	-	✓ x	✓	-	?	✓	-	✓ x	✓	✓	✓	-	✓	✓	✓ x

#### 5.2.3.1 Policy L12 Centres for Retail, Services and Leisure

Positive effects have been forecast for the majority of the social and economic objectives in relation to this policy.

Protecting and enhancing the vitality and viability of the town district, and local centres has been identified as having significant positive effects against the 'revitalise town centres' objective and will help to support the economy and maintain access to shops for local people. Maintaining the retail hierarchy should progress the 'sustainable locations' and 'equity and social inclusion' objectives by ensuring a provision of retail facilities close to main areas of population. Focusing retail development in St Albans should provide accessible shopping for a large proportion of the population as approximately 50% of the District's population live within the City. Maintaining retail opportunities across the District should also make the urban areas attractive places to live, work and visit, with positive effects on 'community identity & participation'.

Positive effects have also been identified for the 'health' objective as the policy includes the consideration of amenity and noise/smells when determining applications for hot food takeaways which should help to avoid adverse effects on wellbeing of local residents. In addition, the policy will not allow an over-concentration of A5 uses (hot food takeaways) in proximity to local secondary schools, which should contribute towards healthier lifestyles.

Maintaining the retail hierarchy should progress the 'greenhouse gas emissions' and 'air quality' objectives, as town centre shopping centres are likely to be more accessible by sustainable modes of transport thereby reducing the growth in greenhouse gas and airborne emissions. In addition, the local and district centres will help to meet day to day needs and thereby reduce the need to travel. Focusing retail development in the town



centres should have a positive effect on the 'use of brownfield sites' objective as it favours development on previously developed land.

### *5.2.3.2 Policy L13 Attractive and vibrant cultural and civic areas*

Positive effects have been forecast for the majority of the social and economic objectives in relation to this policy.

Significant positive effects have been identified against the 'revitalise town centres' objective as Policy L13 directly supports this objective by encouraging improvements to the public realm in civic areas and improving the facilities available to residents and visitors alike. Minor positive effects have been predicted for the other economic objectives as creating attractive and vibrant centres and encouraging new cultural and entertainment facilities will support the local economy by continuing to make the District an attractive place to work and live. Improvements to the Cathedral Quarter, which attracts a significant number of visitors per year, will also support the local economy as will additional and improved hotel provision and improvements to the St Albans street market. Furthermore, provision of new cultural and entertainment facilities and additional and improved hotel provision will provide additional employment opportunities.

In terms of the social objectives positive effects have been identified for: 'health', as improving the attractiveness of civic areas, through for example public realm improvements and landscaping should help to improve community well-being; 'sustainable locations' through the provision of accessible cultural and entertainment facilities; 'equality' through creating and improving cultural and entertainment facilities and the provision of enhanced facilities for community activities; and 'crime' through improvements to the public realm. Positive effects have also been identified for the 'community identity & participation' objective by encouraging cultural activities, which celebrate the District's culture, community and history, creating vibrant centres which should help to improve the quality of life for residents by making the City a more attractive place in which to live and work, and by making improvements to the area around the Cathedral, the Cathedral being considered to be integral to the identity of the City.

Significant positive effects have been identified for the 'historic environment' objective as this policy directly supports this SA objective, for example by enhancing the Cathedral Quarter and encouraging cultural activities which celebrate the District's culture, community and history. Creating a cultural cluster in St Albans city centre, including improving the facilities for museums, should also have a positive effect on this objective by encouraging greater interest in the historic environment and cultural heritage.

Enhancing the public realm, greenspaces and setting of the Abbey, as well as the enhancement of the Cathedral Quarter, will also have a positive effect on the 'landscape and townscape' objective.

There is uncertainty with regards to the effects of this policy on the 'greenhouse gas emissions' and 'air quality' objectives. Provision of new cultural and leisure facilities may reduce greenhouse gas and airborne emissions by reducing the need for residents to travel outside the District to access such facilities, however, increasing the visitor economy, supporting the enhancement of existing tourism facilities and encouraging the growth of the local tourism sector may have an adverse effect by inducing more car



trips. The effect will be dependent on type, scale and location of the development and the levels of use of sustainable travel options.

#### *5.2.3.3 Policy L14 Location of Non-residential uses serving residential areas*

Positive effects have been forecast for Policy L14 against most of the social SA objectives. For 'health' the policy includes the consideration of health and wellbeing when determining applications for non-residential uses serving residential areas, which should help to avoid adverse effects on wellbeing of local residents, whilst for 'sustainable locations' the policy enables small scale services and facilities to serve residential areas which will promote a closer integration between housing and services and improve access to these facilities. For 'equality' the policy enables small scale services and facilities to serve residential areas which will ensure facilities and services are accessible for those without access to a private car, whilst for 'community identity & participation' the policy enables small scale services and facilities to serve residential areas which should help to enhance community interaction. Finally for 'crime' the policy includes the consideration of safety and security when determining applications for non-residential uses serving residential areas which should help to reduce adverse effects on local residents.

There are no predicted effects against the environmental or economic objectives.

#### *5.2.3.4 Policy L15 Leisure Uses*

Positive effects have been forecast for Policy L15 against the 'landscape' and 'health' SA objectives. For 'landscape' the policy requires that landscaping and land restoration proposals for all leisure uses should enhance their setting, and also limits the types of development that would be allowed in the open countryside. Both support this objective.

For the 'health' objective the policy would allow the development of leisure uses, where appropriate for the particular type of location, which would provide opportunities for healthy lifestyles.

There are no predicted effects against the other SA objectives.

#### *5.2.3.5 Policy L16 Mixed Use Opportunity Areas*

By encouraging the development and redevelopment of the Civic Centre (Opportunity Site) CCOS, the Colney Fields Retail Centre / Ridgeview, London Colney and Griffiths Way, St Albans for a mix of uses including retail / service uses, offices and residential, the policy should help to support the local economy, provide new employment opportunities and result in an enhancement of the city's central area vitality and viability. Positive effects have therefore been identified in relation to the objectives 'sustainable prosperity & growth', 'fairer access to jobs & services' and 'revitalise town centres'. However the out-of-City/town locations of the sites at Griffith Way in St Albans and Colney Fields in London Colney mean that they do not support the 'revitalise town centres' objective and therefore negative effects have also been identified for that objective.

Positive effects have been identified against the majority of the social SA objectives as the new development / redevelopment would provide a residential element ('housing'), provide enhanced and additional retail opportunities in the District which should improve access to these services ('equality') and enhance the public realm ('community identity').

Positive effects have also been identified for the 'sustainable locations' objective, as supporting mixed use development would reduce the need to travel through closer integration of housing, jobs and services. In addition, the CCOS and the site at Griffiths Way are also easily accessible /relatively accessible. A minor adverse effect has been identified for the Colney Fields location as would be part of an out-of-town development and is most easily accessed by car, although the site is accessible by public transport.

In relation to the environmental objectives, uncertain effects have been identified on biodiversity as the Colney Fields site contain trees covered by tree preservation orders. Positive effects have been identified on the soil objective as redevelopment of the site at Griffiths Way in St Albans could enable any existing contaminated land to be remediated. Focusing mixed-use development at the three locations should have a positive effect on the 'use of brownfield sites' objective as they are all previously developed.

Positive effects have also been identified for the 'greenhouse gas' and 'air quality' objectives as The City centre location of the Civic Centre (Opportunity Site) CCOS makes the site very accessible to a large proportion of the District's population and would provide alternatives to retail in neighbouring town's thereby reducing the need to travel with related positive effects in terms of reducing growth in greenhouse gas emissions and airborne emissions. The Griffiths Way site is also in a relatively sustainable location, with good access using sustainable modes of transport. However, as for the objectives for 'sustainable locations' and 'revitalise town centres', negative effects have also been identified for 'greenhouse gas' and 'air quality' given that the out-of-town centre location makes the Colney Fields site in London Colney unsustainable in terms of transport and travel, although it is close to bus routes which may partly help to minimise increases in gas emissions and airborne emissions.

Further positive effects have been identified for the 'landscape' objective, as redevelopment of the Civic Centre Opportunity Site will provide an opportunity to enhance the townscape and public realm of the area, as will the redevelopment of the site at Griffiths Way.

Uncertain effects have been identified for the 'historic environment' objective as the Civic Centre Opportunity Site lies within the St Albans Conservation Area and an Area Subject to Recording Condition (archaeology). Redevelopment could have adverse effects on the setting of two listed buildings that are immediately adjacent to the site. However, to counter this, the design of any new development could conserve and enhance the appearance of the conservation area and respect the setting of the listed buildings. A small part of the Griffiths Way site also lies in the St Albans Conservation Area.

## 5.2.4 Infrastructure and Community Facilities Thriving Economy

Option	SA Objectives																			
	1. Biodiversity	2. Water resources	3. Flood risk	4. Soils	5. GHG Emissions	6. Climate Change Proof	7. Air Quality	8. Previously developed land	9. Resource Efficiency	10. Historic environment	11. Landscape/ Townscape	12. Health	13. Sustainable Locations	14. Equality/ Social Inclusion	15. Good Quality Housing	16. Community Identity	17. Crime and Fear of Crime	18. Sustainable Prosperity and Growth	19. Fairer Access to Services	20. Revitalise Town Centres
Policy L17 Infrastructure	?	✓	-	-	-	-	-	-	✓	?	?	✓	✓	-	-	✓	-	✓	-	-
Policy L18 Transport Strategy	?	-	-	?	✓	-	✓	?	-	✓	✓	✓	✓	✓	-	✓	-	✓	✓	✓
Policy L19 Highways / Access Considerations for New development	-	-	-	-	✓	-	✓	-	-	-	-	✓	-	-	-	-	-	-	-	-
Policy L20 New Development Parking Guidance and Standards	-	-	-	-	?	-	-	-	-	✓	✓	-	-	-	-	-	-	-	-	-
Policy L21 Education	?	-	-	?	-	-	-	?	-	?	?	✓	-	✓	-	-	-	-	✓	✓
Policy L22 Community, Leisure and Sports Facilities	?	-	-	?	✓	-	✓	?	-	?	?	✓	✓	✓	-	✓	?	-	✓	✓

### 5.2.4.1 Policy L17 Infrastructure

Policy L17 has been assessed as having a mix of positive and uncertain effects against some of the environmental objectives, as follows. Uncertain effects have been identified for the 'biodiversity', 'historic environment' and 'landscape' objectives as effects will depend upon the type and scale of the new infrastructure and the particular characteristics of the specific locations where the infrastructure is provided. For 'biodiversity' there is a related positive effect as any provision of new green infrastructure could result in some biodiversity gain.

Positive effects have also been identified for the 'water' objective, as by requiring the provision of new physical infrastructure, water quality should be protected by avoidance of overloading of waste water treatment works, and for the 'resource efficiency' objective as the policy supports new physical infrastructure to meet the needs of new development and to address the infrastructure deficit.

In relation to the social objectives, positive effects have been identified for the 'health' objective as the provision of new green and social infrastructure should help to encourage healthy lifestyles and provision of healthcare facilities; the 'sustainable locations' objective as the provision of new social infrastructure should help to reduce the need to travel through closer integration of services with housing and jobs; and the

'community identity & participation' objective given that the delivery of new social infrastructure should improve the provision of community facilities.

The provision of infrastructure, including utilities and improved broadband, should whilst new physical infrastructure will help support the local economy and therefore a positive effect has been identified for the 'sustainable prosperity' objective. There are no predicted effects against the other economic objectives.

#### *5.2.4.2 Policy L18 Transport Strategy*

The requirement that new development should be concentrated in accessible locations thereby reducing the need to travel, encourage walking and cycling, and where good public transport can be provided or connected into, should have a positive effect on 'greenhouse gas emissions' and 'air quality' by reducing growth in emissions from transport. In addition, the wide range of measures outlined in the policy to encourage sustainable travel (public transport, walking and cycling), reduce traffic congestion and the required production of travel plans (for all major developments) should also have positive effects on these objectives. Uncertain effects have also been identified for these two objectives as the potential for significant highway improvements could result in an increase in overall traffic levels – through induced traffic.

Uncertain effects have been identified for the 'biodiversity', 'soils', 'use of brownfield sites', 'historic environment' and 'landscape' objectives as effects will depend on the type and scale of any new transport infrastructure for example at the M1/A414 interchange identified in the Policies Map, and the characteristics of the specific locations where the infrastructure is provided or enhanced. For the 'historic environment' and 'landscape' objectives positive effects could also result, as reducing traffic congestion and associated air pollutants (from HGVs) in the City centre should help to protect and maintain the City's historic environment and also enhance townscape character.

Positive effects have been identified on the majority of the social and economic objectives as a result of the transport strategy policy. In terms of the health objective, measures to encourage more active forms of travel such as increasing use of public transport, walking and cycling could allow for increased daily physical activity, whilst reducing traffic congestion in the City centre may reduce vehicular emissions therefore leading to improved air quality and associated health benefits for the local community.

The requirement that new development should be concentrated in accessible locations supports the objective on 'sustainable locations'. Measures to increase use of public transport, walking and cycling, including requiring new development to be concentrated in accessible locations, could improve access to facilities for those without access to a car, therefore having positive effects on 'equality'.

Reducing traffic congestion caused by HGVs and measures to encourage the use of sustainable transport should improve the quality of the urban environment and improve access to employment with associated positive effects for 'sustainable prosperity'. The wide range of measures to increase use of public transport, walking and cycling could improve access to employment opportunities, with positive effects for the 'fairer access to jobs & services' objective, whilst reduced traffic congestion in the town centre caused by HGVs should improve the quality of the urban environment, with associated positive effects for the 'revitalise town centres' objective.

#### *5.2.4.3 Policy L19 Highways / Access Considerations for New development*

Positive effects have been forecast for Policy L19 against the SA objectives for 'greenhouse gas emissions', 'air quality' and 'health' as the requirement for new developments to provide new and improved connections to local Rights of Way and local foot/cycle paths will help to encourage sustainable travel modes which will reduce the growth in greenhouse gas emission and airborne emissions as well as encourage active travel modes and improve health and wellbeing. For the 'health' objective the policy also requires the facilitation of access to disabled and other disadvantaged groups, which will improve their health and wellbeing, and in addition the policy also considers road safety aspects relating to roads associated with, or affected by, new developments.

There are no predicted effects against the other SA objectives.

#### *5.2.4.4 Policy L20 New Development Parking Guidance and Standards*

Positive effects have been forecast for Policy L19 against the SA objectives for 'historic environment' and 'landscape & townscape' as the requirement developments to provide on-site parking should help to minimise adverse effects on the historic environment and townscapes that could result from increased levels of on-street parking that might arise if on-site parking were not to be provided.

There are uncertain effects for the 'greenhouse gas emissions' objective as whilst the policy requires that the provision of electric vehicle charging points in new communal parking areas be considered, effects would be dependent on the levels of provision and whether they are sufficient to encourage people to use electric vehicles.

There are no predicted effects against the other SA objectives.

#### *5.2.4.5 Policy L21 Education*

In terms of the economic objectives, significant positive effects have been identified for 'fairer access to jobs & services' as Policy L21 will enable the provision of new and enhanced educational facilities which will contribute to the provision of appropriate training opportunities to help local people acquire the skills needed to find and remain in employment.

For the social objectives, the provision of new or expanded educational facilities should have a positive effect on the 'equality & social inclusion' objective, as the new or expanded schools will provide facilities that can be used by the wider community. Effects on the 'health' objective should also be positive as the policy requires that, in relation to the expansion of existing schools, appropriate local infrastructure to encourage cycling and walking and a Travel Plan will be required to seek to encourage a reduction in car-based journeys. This should help to enable the take up of active travel modes.

Uncertain effects have been identified in relation to some of the environmental objectives ('biodiversity', 'soils', 'use of brownfield sites', 'historic environment' and 'landscape') as the effects will be dependent on the specific characteristics/constraints of the locations of the new or expanded schools. In relation to the new education allocation at London Road, St Albans the assessment has not identified any significant constraints or effects.

#### 5.2.4.6 *Policy L22 Community, Leisure and Sports Facilities*

The provision of new community, sport and recreation facilities is identified as having positive effects on the majority of social and economic objectives, with significant positive effects for the 'health' objective. Encouraging new and enhanced leisure and sports facilities should directly progress this objective by encouraging and enabling people to take part in healthy activities. The Policies Map identifies both Harpenden Sports Centre and Westminster Lodge in St Albans as a 'Leisure Facilities Enhancement Opportunity'. The policy also supports the principle of the development of a new stadium and training facilities for St Albans City Football Club, which could bring potential health benefits associated with a thriving football club.

Minor positive effects have been identified for the 'sustainable locations' objective, as the policy requires that new sport and recreation facilities will be concentrated in sustainable and accessible locations and the 'equality' objective, in relation to the provision of new community, leisure and sports facilities, as well as the creation of new places of worship at Local Centres in the Broad Locations and the policy's support for the retention of public houses; should have a positive effect on this objective. Positive effects have also been identified for the 'community identity & participation' objective, as the provision of new community, leisure and sports facilities, as well as the creation of new places of worship and the policy's support for the retention of public houses should help to improve both community interaction and the quality of life for residents by making the District a more attractive place in which to live and work. In addition, the policy supports the principle of the development of a new stadium and training facilities for St Albans City Football Club and recognises the potential community benefits that would arise from a thriving football club. Finally, positive effects have also been identified for the social objective relating to 'crime and fear of crime', as provision and enhancement of new community, leisure and sports facilities may help to reduce anti-social behaviour by providing a range of activities in which to participate.

In relation to the economic objectives, positive effects have been identified for the 'fairer access to jobs & services' objective, as the provision of new community, leisure and sports facilities will provide some local employment opportunities, whilst for the 'revitalise town centres' the positive effects relate to the provision of new community, leisure and sports facilities in sustainable locations helping to promote the role of local centres as centres for sustainable development.

Positive effects have been identified in relation to the environmental objectives for 'greenhouse gas emissions' and 'air quality' as the policy requires that new sport and recreation facilities should be concentrated in sustainable and accessible locations reducing the need for car journeys and this would therefore help to reduce growth in greenhouse gas and airborne emissions. In addition, the provision of new community, leisure and sports facilities should reduce the need to travel outside the District to access such facilities with associated positive effects on greenhouse gas emissions.

Uncertain effects have been identified in relation to some of the other environmental objectives ('biodiversity', 'soils', 'use of brownfield sites', 'historic environment' and 'landscape') as the effects will be dependent on the specific characteristics/constraints of the locations of any new facilities. No significant effects have been identified in relation to the expansion of the cemetery at London Road, St Albans.

## 5.2.5 Design, Conservation and Enhancement of the natural, built and historic environment

Option	SA Objectives																			
	1. Biodiversity	2. Water resources	3. Flood risk	4. Soils	5. GHG Emissions	6. Climate Change Proof	7. Air Quality	8. Previously developed land	9. Resource Efficiency	10. Historic environment	11. Landscape/ Townscape	12. Health	13. Sustainable Locations	14. Equality/ Social Inclusion	15. Good Quality Housing	16. Community Identity	17. Crime and Fear of Crime	18. Sustainable Prosperity and Growth	19. Fairer Access to Services	20. Revitalise Town Centres
Policy L23 Urban Design and Layout of New Development	✓	✓	✓	-	✓	✓	✓	-	✓	✓	✓✓	✓	-	-	✓	✓	✓✓	✓	✓	✓
Policy L24 Development Amenity Standards	-	-	-	-	-	-	-	-	-	-	✓	✓	-	-	-	-	-	-	-	-
Policy L25 Energy and Environmental Performance of New Development	?	✓✓	✓	-	✓✓	✓	-	-	✓✓	?	?	✓	-	-	✓	-	-	-	-	-
Policy L26 Local Green Space Policy L27 Green Space Not Designated as Local Green Space Policy L28 Green Space Standards and New Green Space Provision	✓	-	✓	✓	✓	-	✓	-	-	-	✓	✓	✓	✓	-	✓	-	-	-	✓
Policy L29 Green and Blue Infrastructure, Countryside, Landscape and Trees	✓✓	✓✓	✓	✓	✓	✓	✓	-	-	✓	✓✓	✓✓	-	✓	-	✓	-	-	-	✓
Policy L30 Historic Environment	-	-	-	-	?	-	-	-	-	✓✓	✓✓	-	-	-	-	✓	-	✓	-	✓

### 5.2.5.1 Policy L23 Urban Design and Layout of New Development

This policy has been identified as having positive effects on the majority of the environmental SA objectives, with significant positive effects being identified for the 'landscape & townscape' objective, as follows.

The design principles and wide range of detailed design requirements that are included in the policy will contribute towards improvements to townscapes. In addition, the policy requires all new development to be based on a thorough site appraisal of opportunities and to be designed to create attractive and successful places where people enjoy living and working should have a positive effect on this objective by ensuring that developments take into account local context and character. Encouraging the delivery of high quality architecture and landscaping, innovative and outstanding design supports

this objective, as does the encouragement of public realm improvements. In addition the policy requires consideration to be given to the need for greater tranquillity in rural or semi-rural settings.

Positive effects have been identified against the 'biodiversity' objective, as the Hertfordshire Building Futures Guide, the requirements of which are referenced in Policy 23, provides guidance for integrating biodiversity into new development which could result in some biodiversity gain compared to a 'standard' development and for the 'water' objective, as the policy requires that all applications for 'major development' must include a detailed drainage, surface water management and flooding assessment / strategy which will help to avoid adverse effects on the water environment. In addition the Hertfordshire Building Futures Guide provides guidance on minimising water consumption, managing surface water drainage and improving water quality. Where this guidance is put into practice there will be positive effects for this objective.

For the 'flood risk' objective positive effects relate to the policy requiring that all applications for 'major development' must include a detailed drainage, surface water management and flooding assessment / strategy which will help to avoid adverse effects relating to flood risk. In addition, the Hertfordshire Building Futures Guide provides guidance on minimising water consumption, managing surface water drainage and climate change adaptation, which has also resulted in a positive effect being identified for the 'climate change proof' objective.

Elements of the policy seek to enable permeable developments that will enable walking and cycling to be a realistic alternative to car-use, with associated positive effects for 'air quality' and 'greenhouse gas emissions', whilst for the latter objective the energy efficiency measures and use of sustainable construction methods that are covered by the Hertfordshire Building Futures Guide will also help to reduce greenhouse gas emissions from new development. The Hertfordshire Building Futures Guide also provides guidance on the sustainable use of materials as well as on waste. Positive effects against the 'resource efficiency' objective have therefore also been identified. Finally for the environmental objectives, positive effects have been identified for the 'historic environment' objective as the policy requires all new development to take into account local context and character. This should help to avoid adverse effects on the historic environment and potentially provide enhancements. In addition the requirement for the skyline / skyline features of the District's historic buildings (e.g. St Albans Cathedral) to be respected further support this objective.

In relation to the social objectives, significant positive effects have been identified for the 'crime' objective as the policy supports the creation of safe environments which address physical aspects of crime prevention. Minor positive effects have been identified for the 'health', 'good quality housing', and 'community identity & participation' objectives based on the requirement of the policy that all new development should be designed to create attractive places, including through the creation of safe and accessible environments, where people enjoy living and working.

Positive effects have also been identified for the economic objectives 'sustainable prosperity', 'fairer access to jobs & services' and 'revitalise town centres' as requiring all new development to be designed to create attractive places where people enjoy living and working and ensuring that new development integrates with existing development and is easily navigable should support the local economy, improve access to employment



locations, particularly for those without access to a private car, and improve the vitality of town centres.

#### *5.2.5.2 Policy L24 Development Amenity Standards*

Positive effects have been forecast for Policy L24 against the SA objectives for 'landscape & townscape', as the policy requires the consideration of landscape quality, and 'health', as the development amenity standards should help to maintain the general wellbeing of residents in neighbouring properties.

There are no predicted effects against the other objectives.

#### *5.2.5.3 Policy L25 Energy and Environmental Performance of New Development*

Significant positive effects have been identified in relation to the 'water', 'greenhouse gas emissions' and 'resource efficiency' objectives as a result of this policy on energy and environmental performance of new development.

For the 'water' objective the Plan applies the optional national water efficiency standard for housing, which along with guidance in the Hertfordshire Building Futures Guide should have a significant positive effect on this SA objective. In addition, the Hertfordshire Building Futures Guide also includes guidance which could help to improve water quality by managing surface water run-off and encouraging the use of SUDS. Designing housing developments which avoid, reduce and delay the discharge of rainfall to public sewers and watercourses will protect watercourses and reduce the risk of localised flooding, pollution and other environmental damage.

In terms of 'greenhouse gas emissions' the policy supports the provision of renewable energy proposals, both stand-alone and also those associated with large new developments. In addition the energy efficiency measures and use of sustainable construction methods that are covered by the Hertfordshire Building Futures Guide will help to reduce GHG emissions from new development. Similarly, for 'resource emissions' the policy supports the provision of renewable energy proposals, both stand-alone and also those associated with large new developments. In addition, the policy includes requirements related to minimisation of waste and the re-use and recycling of materials. In addition the Hertfordshire Building Futures Guide provides guidance on the sustainable use of materials as well as on waste.

For the 'resource efficiency' objective the policy supports the provision of renewable energy proposals, both stand-alone and also those associated with large new developments. In addition, the policy includes requirements related to minimisation of waste and the re-use and recycling of materials. In addition the Hertfordshire Building Futures Guide provides guidance on the sustainable use of materials as well as on waste. Significant positive effects have therefore been identified for this objective.

Minor positive effects have been identified for the environmental objectives for 'flood risk' and 'climate change proof' as the Hertfordshire Building Futures Guide provides guidance on SUDS and climate change adaptation in new developments which should help to reduce flood risk. The policy also requires the use of water efficiency measures which could help new developments to cope with drier summers.

There is uncertainty for the environmental objective relating to 'biodiversity', as depending on the types, design and location of stand-alone renewable energy schemes there may be adverse effects on this objective. However, the Hertfordshire Building

Futures Guide, which is referred to in the policy, provides guidance for integrating biodiversity into new development which could result in some biodiversity gain compared to a 'standard' development. There is also uncertainty for the objectives on 'historic environment' and 'landscape & townscape' as the effects will be dependent on the types, design and location of renewable energy or low carbon energy schemes used in developments and the characteristics/constraints of the specific locations. The Hertfordshire Building Futures Guide provides guidance on design and also landscape and so positive effects have also been identified for the 'landscape & townscape' objective.

For the social objectives, positive effects have been identified for the 'health' objective, as the Hertfordshire Building Futures Guide provides guidance on reducing noise when constructing and living in new developments, and the 'housing' objective as the policy should ensure the provision of high quality housing.

There are no predicted effects against the economic objectives.

#### *5.2.5.4 Policy L26 Local Green Space; Policy L27 Green Space Not Designated as Local Green Space; and Policy L28 Green Space Standards and New Green Space Provision*

As a result of the requirements of Policies L24, L25 and L26 for the retention of existing green spaces and development of new green spaces, positive effects have been forecast for the SA environmental objectives for 'biodiversity', 'flood risk', 'soils', 'greenhouse gas emissions', 'air quality' and 'landscape & townscape'.

In terms of the social objectives, positive effects have been predicted for the 'health' objective as Policies L26 and L27 prevent the loss of designated Local Green Spaces and some other valued green spaces to other uses or development and the Green Space Standards, and New Green Space provisions in Policy L28 will ensure that all the District's residents have access to green spaces for leisure and contribution towards living healthy lifestyles. Positive effects have also been predicted for the 'equality' objective, as the policies require the retention and provision of green spaces that serve new and existing developments and which are accessible to all sections of the community, as well as the 'community identity & participation' objective as the policies require the retention and provision of green spaces that serve new and existing developments and which are accessible to all sections of the community, which will help to maintain community cohesion.

For the economic objectives, positive effects have been predicted for the 'revitalise town centres' objective as the retention and provision of green spaces in local centres and town centres will help to support this objective.

#### *5.2.5.5 Policy L29 Green and Blue Infrastructure, Countryside, Landscape and Trees*

Significant positive effects have been identified as a result of this policy on three of the environmental SA objectives.

Firstly, significant positive effects have been predicted for the 'biodiversity' objective through the Council's aim to actively support the creation, enhancement and conservation of and access to the District's green infrastructure network and in addition, by seeking a net gain in biodiversity from new development, preferably on-site, where development that affects biodiversity is unavoidable - all of which should have a positive

effect on biodiversity. Conserving, enhancing and managing designated sites and sites of local importance and taking opportunities to link or reconnect habitats should also progress this objective. In addition, encouraging river restoration, such as naturalisation and the removal of culverts; conserving watercourses and their settings for their biodiversity value; and improving water quality to meet standards set out in River Basin Management Plans will further support this objective. Conserving and managing areas of importance for geodiversity in the District also progress this objective.

Secondly, significant positive effects have been predicted for the 'water' objective through the Council's aim to actively support the creation, enhancement and conservation of and access to the District's green infrastructure network and in addition, by seeking a net gain in biodiversity from new development, preferably on-site, where development that affects biodiversity is unavoidable - all of which should have a positive effect on biodiversity. Conserving, enhancing and managing designated sites and sites of local importance and taking opportunities to link or reconnect habitats should also progress this objective. In addition, encouraging river restoration, such as naturalisation and the removal of culverts; conserving watercourses and their settings for their biodiversity value; and improving water quality to meet standards set out in River Basin Management Plans will further support this objective. Conserving and managing areas of importance for geodiversity in the District also progress this objective.

Thirdly, significant positive effects have been predicted for the 'landscape & townscape' objective as the policy aims to conserve, manage and where appropriate enhance the District's landscapes. In addition, the character of local areas will also be considered when considering applications to develop on residential garden land. Furthermore, green infrastructure often plays an important role in an area's landscape/townscape character; therefore protecting this infrastructure should have a positive effect on this objective. In addition, supporting the delivery of the Watling Chase Community Forest Plan and the establishment of Heartwood Forest should protect and enhance these landscape features.

Minor positive effects have also been identified in relation to the environmental objectives on 'flood risk', 'soils', 'greenhouse gas emissions', 'climate change proof', 'air quality' and 'historic environment', as follows.

For 'flood risk' as the policy seeks to avoid development in areas at risk from flooding and ensuring that water and flood risk are fully addressed by new development. Requiring SUDS, including flood storage areas, to be incorporated into new developments should also progress this objective, and in addition, supporting the creation and enhancement of green infrastructure could have a positive effect on this objective by providing for flood alleviation.

For 'soils' as by (normally) refusing development that would result in the loss of the best and most versatile (BMV) agricultural land (grades 1, 2, or 3a) supports this objective. In addition, protecting and enhancing biodiversity, watercourses and landscapes could indirectly help to progress this objective, for example through the protection of soils within nature conservation sites. Furthermore, protecting greenspaces and recreational land from development should prevent soil sealing in these areas.

For 'greenhouse gas emissions', supporting the creation, enhancement and conservation of green infrastructure, seeking opportunities for continued implementation of the Watling Chase Community Forest Plan, the establishment of Heartwood Forest, and the 'greening' of the urban environment should all help to increase carbon sequestration and

have a positive effect on this objective. Additionally for 'greenhouse gas emissions', but also for 'air quality', the provision of a green infrastructure network should also help to encourage use of sustainable modes of transport thereby reducing GHG and airborne emissions. The St Albans 'Green Ring' which aims to make the City centre more accessible, encourage park and walk schemes, and cycling should also progress these objectives.

For 'climate change proof', as requiring SUDS, including flood storage areas, to be incorporated into new developments should progress this objective. The policy also aims to create new wildlife routes which should help progress this objective by helping biodiversity adapt to the changing climate. In addition, the promotion of green infrastructure and encouraging greening of the urban environment (through tree planting, green roofs and green walls) will help with adaptation to climate change through urban cooling and the attenuation of flooding.

For 'historic environment', as by making reference to Historic Landscape Characterisation and Heritage Partnership Agreements when enhancing and managing the District's landscapes there are potential benefits for the historic environment. In addition, encouraging the enhancement of Verulamium Park in accordance with the approved Conservation Management Plan should also have a positive effect on this objective.

In terms of the social objectives, significant positive effects have been predicted for the 'health' objective as through the protection and enhancement of landscapes, biodiversity and watercourses this policy should have a positive effect on this objective by encouraging active lifestyles and improving well-being. In addition, protecting greenspaces and recreational land from development could encourage participation in healthy activities. Green infrastructure often provides places for outdoor play and relaxation and therefore the protection and enhancement of this infrastructure, as well as improving its accessibility, particularly through the implementation of Rights of Way Improvement Plans, should help to support the health and wellbeing of local communities. The creation of the St Albans 'Green Ring', which aims to encourage walking and cycling and new green recreation should also have positive effects on this SA objective.

Minor positive effects have also been identified in relation to the social objectives on 'equality', as by encouraging the creation, enhancement and conservation of and access to green infrastructure there should be improved access to recreation areas, and 'community identity & participation', as this policy should encourage high quality design in new developments, for example through the need to manage and enhance landscapes and achieve a net gain in biodiversity. Residential amenity will also be considered when considering applications to develop on residential garden land. In addition, promoting the creation of a network of green infrastructure and greening of the urban environment should improve the quality of life in urban areas, by making them more attractive environments.

In terms of the economic objectives minor positive effects have also been identified in relation to the 'revitalise town centres' objective given that conserving, enhancing and expanding the District's green infrastructure should help to improve the vitality of local centres and town centres – where the green infrastructure is located in those areas.

#### **5.2.5.6 Policy L30 - Historic Environment**

A number of positive and significant positive effects have been identified in relation to this policy which aims to conserve, enhance and ensure the enjoyment of the District's historic environment. For instance, the policy's direct support of the 'historic environment' objective and the townscape section of the 'landscape & townscape' objective has resulted in significant positive effects being identified for these two environmental objectives.

For the 'greenhouse gas emissions' objective as there is uncertainty as to whether this policy will have implications for the installation of renewable energy equipment and infrastructure (e.g. solar panels or wind turbines). If the policy results in restrictions on the amount/type of renewable energy equipment and infrastructure that is allowed on a location by location basis, there could be implications for the greenhouse gas emissions reductions that are achievable.

In terms of the social objectives, minor positive effects have been identified for the 'community identity & participation' objective as the policy should help to improve the quality of life in urban areas and help to create local identity and encourage a sense of community pride.

For the economic objectives, minor positive effects have been identified for the 'sustainable prosperity' objective, as preserving and, where possible, enhancing the District's historic environment and townscape character will help to support local tourism and support the economy with a high quality environment. For the 'revitalise town centres' objective minor positive effects relate to improving the historic environment and townscape character, which will help to create and maintain viable and attractive town centres.

### **5.3 Assessment by SA/SEA Topic Areas**

The following section summarises the assessment of the Local Plan by SA/SEA objectives. This includes the consideration of cumulative, synergistic and secondary effects, both as a result of the Local Plan as a whole, as well as relating to effects resulting from other neighbouring plans.

#### **5.3.1 Biodiversity (SA Objective 1)**

The Spatial Strategy/Settlement Hierarchy (Policy S1) to give priority to urban locations for new developments, particularly the larger urban centres, and requiring higher density developments will help to reduce the amount of greenfield land required to deliver the levels of growth in the Local Plan, thereby reducing levels of adverse effects on biodiversity. It should be recognised that some urban previously developed sites can have a high biodiversity value and therefore the effects of implementing the strategy will be very site dependent.

To deliver the level of housing growth included in the Local Plan there will inevitably be the need for development of greenfield land which could have adverse impacts on habitats and species due to landtake, habitat fragmentation and urban pollution issues – again the nature and magnitude of these effects will be dependent on a development site's individual characteristics. In relation to the 11 broad locations (Policies S6 i) to xi)) there are some potential site specific adverse effects identified but these are not considered to be significant. The mitigation of any adverse effects will need to be

undertaken at a location by location level, informed by other policies in the Local Plan, in particular *Policy L29 Green and Blue Infrastructure, Countryside, Landscape and Trees*. Through development at the broad locations, particularly the larger ones, there are opportunities for biodiversity gains from integrating green infrastructure into the new developments.

There could be some possible adverse secondary effects on biodiversity as a result of increased pressure on water resources that would result from additional dwellings in the District as well as in neighbouring local authorities and therefore cumulatively there is the potential for adverse effects on biodiversity from implementing the Spatial Strategy and the supporting policies for housing, employment, infrastructure etc.

To counter these potential adverse effects, significant positive effects against the biodiversity objective have been forecast in relation to *Policy L29 Green and Blue Infrastructure, Countryside, Landscape and Trees* which seeks to actively support the creation, enhancement and conservation of and access to the District's green infrastructure network and in addition, by seeking a net gain in biodiversity from new development, preferably on-site, where development that affects biodiversity is unavoidable. Conserving, enhancing and managing designated sites and sites of local importance and taking opportunities to link or reconnect habitats should also progress this objective. In addition, encouraging river restoration, such as naturalisation and the removal of culverts; conserving watercourses and their settings for their biodiversity value; and improving water quality to meet standards set out in River Basin Management Plans will further support this objective. Conserving and managing areas of importance for geodiversity in the District also progress this objective.

### **5.3.2 Water, Flood Risk and Soil (SA Objectives 2, 3 & 4)**

St Albans District is within an area already identified by the Environment Agency as being 'over-abstracted' in terms of water resources. Providing the levels of additional housing proposed in the Local Plan and those of neighbouring authorities will put direct pressure on scarce water resources with the effect likely to become more significant over time as more dwellings are built and risk of periodic water shortages increase. There is also uncertainty as to whether the local waste water treatment works will be able to accommodate the levels of proposed growth post-2030, with any resulting overload of the sewerage system potentially resulting in adverse effects on water quality. This is an issue that will need to be resolved through the future work on the Infrastructure Delivery Plan. Housing growth will also result in greater areas of impermeable surfaces with a corresponding increase in the risk of polluted run-off entering watercourses, although the requirement for SUDS to be incorporated in new development (*Policy L29 Green and Blue Infrastructure, Countryside, Landscape and Trees*) will help to reduce any such risk.

Significant positive effects on the SA objective relating to water quality/quantity have been identified in relation to *Policy L25 Energy and Environmental Performance of New Development* which applies the optional national water efficiency standard for housing and requires new developments to incorporate water efficiency measures; and *Policy L29 Green and Blue Infrastructure, Countryside, Landscape and Trees* which will conserve watercourses and their settings for their biodiversity value and improve water quality to meet standards set out in River Basin Management Plans and require SUDS to be incorporated into new developments. The requirement for new development to be informed by the Hertfordshire Building Futures Guide will also help to deliver

improvements in new developments, as it provides guidance on minimising water consumption, managing surface water drainage and improving water quality.

In relation to flood risk (SA objective 3), by seeking to avoid development in areas at risk from flooding, ensuring that water and flood risk are fully addressed by new development and requiring SUDS, including flood storage areas, to be incorporated into new developments (*Policy L29 Green and Blue Infrastructure, Countryside, Landscape and Trees*) there should be a positive effect against this objective. In addition, supporting the creation and enhancement of green infrastructure (also Policy SL29) which could provide for flood alleviation will also help support the achievement of the objective.

In relation to the 'Soils' objective (SA4), significant adverse effects have been identified in relation to the Broad Locations S6 i); East Hemel Hempstead (North); S6 ii) East Hemel Hempstead (Central); and S6 vi) North St Albans, as these locations have been identified as having >25% of their area composed of best and most versatile (BMV) agricultural land (Grade 2 and 3a). Developing in these areas would therefore result in the loss of this high quality agricultural land.

NB: in relation to best and most versatile (BMV) agricultural land (Grade 2 and 3a), the level of detail for the information on the different locations was not consistent, with some sites (or parts of sites) being mapped for a detailed classification of Agricultural Land Quality, whilst for others the only information available to inform the assessment was from broad-scale regional level mapping. This has resulted in uncertainty as to how much BMV would be affected, both at an individual site level and at a Local Plan level - if all the Broad Locations are allocated in the adopted Local Plan.

*Policy L29 Green and Blue Infrastructure, Countryside, Landscape and Trees* has a requirement that a detailed survey should be undertaken where development on agricultural land is proposed. This will help to inform the design of the developments and the mitigation measures required. Any specific effects will need to be mitigated by the use of Construction Environmental Management Plans (or equivalent) during the development phase. The requirements in Policy L29, along with the overall Spatial Strategy (Policy S1) make efficient use of land should help to preserve the natural environment which could lead to indirect positive effects on soils. Nevertheless, the level of proposed housing and economic development will inevitably result in some soil sealing and soil loss as a result of development on greenfield land.

### **5.3.3 Greenhouse gas emissions (SA Objective 5)**

The new development proposed in the Local Plan will inevitably result in an increase in greenhouse gas emissions from energy used in new developments and associated activities including increases in traffic and therefore negative effects have been identified. However new employment development could help to offset this to a certain extent if it results in lower levels of out-commuting.

Significant positive effects against SA5 have been forecast in relation to *Policy L25 Energy and Environmental Performance of New Development*, which supports the provision of renewable energy proposals, both stand-alone and also those associated with large new developments - the policy requires that the Broad Locations at East and North Hemel Hempstead, East and North St Albans and Park Street Garden Village must provide opportunities to deliver renewable / low-carbon energy supply. In addition the energy efficiency measures and use of sustainable construction methods that are



covered by the Hertfordshire Building Futures Guide will help to reduce greenhouse gas emissions from new development, and energy efficiency measures and use of sustainable construction methods.

The Spatial Strategy/Settlement Hierarchy (Policy S1) to give priority to urban locations for new developments, particularly the larger urban centres, should help to reduce the need to travel and the average distances travelled to access facilities which could have a positive effect on reducing the growth of greenhouse gas emissions from transport. By concentrating new development at 11 Broad Locations on the edge of major settlements, rather than at a larger number of small sites, the Plan will provide increased opportunities for reducing the need to travel through provision of on-site services and facilities, improving public transport provision, as well as increasing the opportunity for combined heat and power and on-site energy generation, both of which will support a reduction in the level of growth of greenhouse gas emissions. Significant positive effects in relation to SA5 have been identified for the Park Street Garden Village Broad Location (Policy S6 xi)) as the development would be required to provide a new park and rail facility, as well as exploring opportunities for other rail related enhancements, all of which would provide alternatives to private car use.

Both positive and negative effects have been described above, however in the absence of detailed modelling of greenhouse gas emissions it is not possible to determine what the overall cumulative effect of implementing the Local Plan will be in relation to climatic factors.

#### **5.3.4 Climate change adaptation (SA Objective 6)**

*Policy S3 Metropolitan Green Belt* seeks to proactively manage the Green Belt in relation to climate change adaptation, whilst the *Policy L23 Urban Design and Layout of New Development*, makes reference to the Hertfordshire Building Futures Guide which provides guidance on climate change adaptation in new developments. In addition *Policy L25 Energy and Environmental Performance of New Development* requires the use of water efficiency measures which could help new developments to cope with drier summers, whilst *Policy L29 Green and Blue Infrastructure, Countryside, Landscape and Trees* aims to create new wildlife routes which should help progress this objective by helping biodiversity adapt to the changing climate. In addition, the promotion of green infrastructure and encouraging greening of the urban environment (through tree planting, green roofs and green walls) will help with adaptation to climate change through urban cooling and the attenuation of flooding.

#### **5.3.5 Air quality (SA Objective 7)**

Transport is a key source of air pollution. The provision of new housing and economic development, combined with that in neighbouring local authorities, will contribute to background emissions through an increase in vehicles on the road therefore having an adverse effect on air quality. However, similar to greenhouse gas emissions, focusing housing and economic development in the main settlements and making developments accessible should help to reduce the need to travel and the average distance travelled which should help to reduce growth in airborne emissions. In addition, as the overall vehicle fleet is replaced over time by new vehicle types with reduced levels of pollutant emissions, as well as electric vehicles, so air quality should improve accordingly.



Encouraging the use of more sustainable modes of transport such as walking, cycling and passenger transport over the use of private car (*Policy L18 Transport Strategy*) as well as requirements to improve walking and cycling links at the four broad locations should have a positive effect on reducing pollutants from transport.

### **5.3.6 Use of Brownfield Sites and Resource Efficiency (SA Objectives 8 & 9)**

The focus of the Spatial Strategy to give priority to urban locations for new developments, particularly the larger urban centres, and requiring higher density developments will help to reduce the amount of greenfield land required to deliver the levels of growth in the Local Plan and therefore support the 'use of brownfield sites' objective. Nevertheless, the level of proposed housing and economic development will inevitably result in development on greenfield sites at the Broad Locations. As a result negative effects have been identified for the specific Broad Locations.

Significant positive effects have been identified against the resource efficiency objective for *Policy L25 Energy and Environmental Performance of New Development* as the policy supports the provision of renewable energy proposals, both stand-alone and also those associated with large new developments. In addition, the policy includes requirements related to minimisation of waste and the re-use and recycling of materials. Furthermore the Hertfordshire Building Futures Guide provides guidance on the sustainable use of materials as well as on waste. A significant positive effect has also been identified for the East Hemel Hempstead Broad Location (*Policy S6 ii*) as in accordance with the aims and status of the Hertfordshire Enviro-Tech Enterprise Zone the development would be required to deliver environmentally friendly buildings and in addition the development would be required to deliver a Combined Heat & Power system and large scale solar power generation.

### **5.3.7 Historic environment (SA Objectives 10)**

For SA10 significant positive effects were identified in relation to *Policy L30 Historic Environment and Townscape Character* given that the policy directly supports this SA objective by recognising the importance of designated and non-designated heritage assets and requiring their protection and, where possible, enhancement of the assets as well as their settings. Significant positive effects were also identified in relation to *Policy L13 Attractive and vibrant cultural and civic areas* as this policy directly supports this SA objective, for example by enhancing the Cathedral Quarter and encouraging cultural activities, which celebrate the District's culture, community and history. Creating a cultural cluster in St Albans city centre, including improving the facilities for museums, should also have a positive effect on this objective by encouraging greater interest in the historic environment and cultural heritage

Other, minor positive effects were identified against some plan policies, in particular *Policy L23 Urban Design and Layout of New Development* as the policy requires all new development to take into account local context and character, which should help to avoid adverse effects on the historic environment and potentially provide enhancements. In addition the requirement for the skyline / skyline features of the District's historic buildings (e.g. St Albans Cathedral) further support this objective.

However across many of the other the Local Plan policies there is some uncertainty over the effects of the policies on this objective. Some of these relate to specific Broad Locations where there are some heritage related constraints which could be affected,

whilst other uncertainties are related to the fact that effects will be dependent on the sites taken forward for development (e.g. new school sites or infrastructure) and whether those sites have heritage related constraints.

None of the Broad Locations have any significant constraints but all have some associated or nearby heritage assets that will need to be taken into consideration during the masterplanning process. Minor adverse effects were identified for the West of London Colney Broad Location (Policy S6 ix)) given the specific constraints in proximity to that location.

### **5.3.8 Landscape & Townscape (SA Objective 11)**

The assessment of the Local Plan policies against SA11 identified a number of mixed negative/positive effects given that the scale and location of new development will inevitably have effects on local landscapes, but at the same time the Local Plan seeks to minimise the amount of greenfield land required for new development and also to provide mitigation within the individual developments. These mixed effects are described below.

Negative effects relate to inclusion in the Local Plan of the 11 Broad Locations that will be required to deliver the growth in the Local Plan where future development needs cannot be accommodated within existing urban areas and other previously developed sites has resulted in some adverse effects being identified in relation to SA11 for *Policy S1 Spatial Strategy/Settlement Hierarchy, Policy S2 Development Strategy and Policy S4 Housing Strategy and Housing Requirement/Target* as well as for all 11 of the Broad Locations, although at each location positive effects have also been identified, for example through the delivery of strategic and public open space, recreation space, countryside access links and green infrastructure improvements.

Positive effects relate to the Spatial Strategy/Settlement Hierarchy (Policy S1) giving priority to urban locations for new developments, particularly the larger urban centres, and requiring higher density developments will help to the reduce the amount of greenfield land required to deliver the levels of growth in the Local Plan. This will help to protect landscape character and reduce impacts on the District's landscapes. Encouraging lower housing densities in the villages and other settlements should help them to retain their local character and distinctiveness. Significant positive effects against SA11 have been identified for four of the Local Plan policies, as follows.

*Policy S3 Metropolitan Green Belt*, through restricting development in the Green Belt, as development in the Green Belt would have inevitable adverse effects on the District's landscape, including the erosion of gaps between settlements. The policy also aims to proactively manage the Green Belt to protect and create attractive landscapes. In addition, supporting productive and sustainable farming and forestry could enhance landscape quality.

*Policy L23 Urban Design and Layout of New Development*, as the design principles and wide range of requirements relating to detailed design and public realm improvements that are included in the policy will contribute towards improvements to townscapes, and in addition the policy requires consideration to be given to the need for greater tranquillity in rural or semi-rural settings.

*Policy L29 Green and Blue Infrastructure, Countryside, Landscape and Trees*, by aiming to conserve, manage and where appropriate enhance the District's landscapes, as well as protect green infrastructure.

Policy L30 Historic Environment and Townscape Character as the policy will help to protect and enhance townscape character.

Other minor positive effects have been identified in relation to several of the policies covering green space and the public realm, as well as in relation to *Policy L16 Mixed Use Opportunity Areas* as redevelopment of the Civic Centre Opportunity Site will provide an opportunity to enhance the townscape and public realm of the area, as will the redevelopment of the site at Griffiths Way.

### **5.3.9 Health and wellbeing (SA Objective 12)**

On the whole, the Local Plan should help towards improving the health and wellbeing of the District's communities, including through policies to deliver improvements to housing, health, education, green infrastructure and community/cultural/ recreational facilities. Positive cumulative effects are therefore forecast in relation to the health objective. There is however some uncertainty as to whether the new housing development will put pressure on existing health care facilities.

A significant positive effect has been predicted in relation to *Policy L22 Community, Leisure and Sports Facilities*, as new and enhanced leisure and sports facilities should directly progress this objective by encouraging and enabling people to take part in healthy activities. Significant positive effects have also been identified for *Policy L29 Green and Blue Infrastructure, Countryside, Landscape and Trees* as the policy should contribute towards providing increased and improved opportunities for undertaking outdoor leisure, with its associated benefits for health.

The policies aimed at focusing development in the most sustainable locations should provide opportunities for physical activity by promoting access to recreation and by providing walkable and cycleable neighbourhoods, thereby encouraging healthy lifestyles. In addition, promoting more sustainable modes of transport and giving priority to healthy forms of transport over the private car (*Policy L18 Transport Strategy*) should encourage more active travel such as walking and cycling and should also help to improve air quality with associated health benefits.

Positive effects have also been identified in relation to *Policy S4 Housing Strategy and Housing Requirement/Target* as provision of the level of housing growth required by the policy will help to meet the housing needs of the local population and reduce issues of overcrowding and stress related to any inadequacy of housing provision

Overall there are potential positive synergistic effects on health and wellbeing where policy elements such as new footpaths/cycleways link in to new and improved open space provision, potentially resulting in more healthy lifestyles than would be the case for the elements in isolation.

### **5.3.10 Sustainable locations (SA Objective 13)**

The assessment mainly identified positive effects in relation to SA13 as the Local Plan aims to provide development in the most sustainable locations and to improve the sustainability of those locations currently not well served by public transport. Significant positive effects have been identified for the three Broad Locations at East Hemel

Hempstead (Policy S6 i), ii) and iii)) as the developments provide opportunities to reduce the need to travel through closer integration of housing, jobs and services. The sustainability of the location will also be improved by the requirement to deliver a multi-modal transport interchange. Positive effects were also identified for *Policy S4 Housing Strategy and Housing Requirement/Target* as the policy recognises that smaller sites, including those of half a hectare or less, have been and will continue to be an important source of housing land supply, with the bulk being in highly sustainable urban locations.

However minor adverse effects were identified for three of the policies, as follows: *Policy S4 Housing Strategy and Housing Requirement/Target* given opportunities to locate the scale of development which will be required to fully meet the level of housing growth within urban areas close to town centre facilities are no longer available in the District, which means that the edge of town sites that are the next most sustainable locations would be at a distance from the town centre facilities and services - although this negative effect was countered by a positive assessment because the scale of development that would need to be taken forward to deliver the number of new dwellings would be more likely to incorporate a range of local facilities thereby reducing the need to travel to access everyday needs; *Policy L11 Special Employment Locations in the Green Belt - BRE, Bricket Wood* given the site's relatively unsustainable location, although it 'is where it is', which cannot be changed; and as it is not within easy reach of town centres or public transport networks; and *Policy L16 Mixed Use Opportunity Areas* in relation to the site at Colney Fields which would be part of an out-of-town development most easily accessed by car, although the site is accessible by public transport.

### **5.3.11 Equity (SA14), Communities (SA16) and Crime (SA17)**

In general positive effects have been forecast in relation to these social objectives from across the full range of Local Plan policies, although there is some uncertainty arising from whether the planned levels of growth would put additional strain on existing services and facilities. The provision of, amongst others, new housing to meet the needs of all sections of the population, new and enhanced education, community and recreational facilities, improvements to the public realm and natural environment, and sustainable transport measures will all help to meet the needs of the community in general. No adverse effects were identified against these three SA objectives.

Significant positive effects have been forecast against SA14 for the East St Albans Broad Location (Policy S6 v)) as new development would enable significant improvements to the education and training provision at Oaklands College as well as other wider community benefits. In addition, significant positive effects have been forecast against SA17 for *Policy L23 Urban Design and Layout of New Development* which specifically supports the creation of safe environments which address physical aspects of crime prevention.

No issues have been identified in relation to the Local Plan potentially discriminating on the basis of disability, gender or ethnic minority. The provision of affordable housing, employment opportunities and community services will not necessarily benefit particular groups but should ensure increased access and opportunities for all.

### **5.3.12 Housing (SA Objective 15)**

The level of housing proposed in the Local Plan will meet the Council's Local Housing Requirement / Target. The Housing Vision "Independent Assessment of Housing Needs and Strategic Housing Market Assessment" identifies that lower income families will be at a severe disadvantage in accessing suitable housing in the St Albans' housing market, not just by affordability but by the profile of the housing stock available. This level of growth should provide the opportunity for meeting local housing needs, particularly the need for affordable homes, and provide the appropriate mix of housing types. Significant positive effects have been identified for *Policy S4 Housing Strategy and Housing Requirement/Target* and *Policy L3 Provision of and Contributions towards Affordable Housing*, with additional positive effects being predicted against the other supporting policies relating to housing. Significant positive effects have also been identified for the Broad Locations which will deliver in excess of 500 new dwellings.

### **5.3.13 Economic Factors (SA Objectives 18, 19 & 20)**

The Local Plan is forecast to have a positive cumulative effect on economic factors, including 'sustainable prosperity' (SA18), 'fairer access to services' (SA19) and 'revitalising town centres' (SA20). Providing for economic growth in the District should help to develop the local economy, through the provision of employment opportunities close to the major residential areas in the District and should contribute to improving the viability and vitality of the City/town centres. Significant positive effects have been forecast for SA18 and SA19 in relation to *Policy S5 Economic Development Strategy and Employment Land Provision*, supported by other policies including, but not limited to, *Policy L9 Primarily Business Use Areas*, *Policy L10 Strategic Office Locations*, *Policy L11 Special Employment Locations in the Green Belt* and *Policy L16 Mixed Use Opportunity Areas*. Significant positive effects against SA18 and SA19 have also been identified in relation to the East Hemel Hempstead (Central) Broad Locations (Policies S6 ii)) as development of this site would result in a significant amount of high quality economic growth in line with the aims of Hertfordshire's Strategic Economic Plan (March 2014) and the Hertfordshire Enviro-Tech Enterprise Zone, and should provide approximately 10,000 new jobs over time, including a mix of employment types.

Further significant positive effects have been identified for SA19 in relation to *Policy L21 Education* as the policy will enable the provision of new and enhanced educational facilities which will contribute to the provision of appropriate training opportunities and help local people acquire the skills needed to find and remain in employment.

Limiting employment development in the Green Belt (Policy S3) could have adverse effects through restricting opportunities for the growth of business activity in more rural parts of the District. However Green Belt policy allows for appropriate agricultural / forestry and other rural land related development.

The range of policies aimed at improving the public realm and building on the 'cultural offering' of the District should attract people to the area, and thus help to improve the local economy. A significant positive effect has been identified for *Policy L12 Centres for Retail, Services and Leisure* as the policy has regard to protecting and enhancing the vitality and viability of the town district, and local centres. Significant positive effects against SA20 have also been identified for *Policy L13 Attractive and vibrant cultural and civic areas* given that this policy directly supports this objective by encouraging

improvements to the public realm in civic areas and improving the facilities available to residents and visitors alike.

#### **5.4 Cross Boundary Effects**

Any housing and economic growth could have an effect on neighbouring areas through an increase in resources and infrastructure pressures and associated environmental and social impacts. Any effects associated with the development at the Broad Locations in East Hemel Hempstead would be felt in both Dacorum Borough and St Albans District, whilst development at East St Albans would result in some effects being felt in Welwyn Hatfield Borough. Similarly any major new development at Park Street could result in effects on Hertsmere Borough.

Due to the inter-connected nature of the water environment which links many rivers, streams and groundwater, any negative effects on water resources could be felt in the surrounding areas. Joint working with adjoining authorities is taking place on water cycle issues. A number of other pieces of technical work have been undertaken jointly with other authorities to ensure that cross-boundary issues are assessed, for example Green Belt, employment and housing studies.

In addition to the potential for the implementation of St Albans Local Plan resulting in effects being felt in neighbouring areas, so the reverse is also the case, with development in neighbouring areas having the potential to have effects on St Albans District. Some such effects have been considered in this SA Report as part of the consideration of cumulative effects (see Section 5.3).

Housing and economic development in neighbouring authorities could contribute towards cumulative effects with the development proposed in St Albans Local Plan. A summary of the current and emerging status of local planning in neighbouring local authorities is provided in Appendix A. Of particular relevance to St Albans District, the Regulation 18 Issues and Options report for Dacorum Borough identifies potential 'Key Site Options' in the Green Belt or Rural Area for either housing and/or employment use, including sites at North Hemel Hempstead, adjacent to St Albans District, whilst the Regulation 18 Issues and Options report for Hertsmere included an area of search for a potential new Garden Village which includes the area to the south-east of London Colney, adjacent to St Albans District. If these, or other development next to the St Albans District boundary were to progress to a later stage in the planning process, future iterations of the St Albans Local Plan SA would need to consider it in an appropriate manner.

#### **5.5 Inter-relationships**

The SA/SEA topics cannot be considered in isolation from one another, as there are a variety of inter-relationships that exist. Air quality is a topic which cuts across several other SA/SEA topics, with proven links between air quality and human health (respiratory problems). It can also have effects on biodiversity, soil and water quality, and the condition of heritage assets and there is a direct link between traffic emission causing poor air quality and the emissions of CO<sub>2</sub>.

The development of sites (residential, employment, retail etc.) may show inter-related effects on criteria such as biodiversity, air quality, greenhouse gas emissions, landscape and townscape depending on where the sites are located, how the development takes shape/is designed, and how it is accessed.



Positive effects can also occur from inter-relationships, for example, protecting landscape quality and/or soil, may lead to habitats and species being indirectly protected.

## **5.6 Difficulties encountered in undertaking the assessment**

Given the strategic nature of many of the elements of the Local Plan and the uncertainty in terms of the actual effects that might result from the implementation of the Local Plan policies, there is some uncertainty as to the direction and significance of some 'Policy v. SA objective' relationships. Professional judgment has been used to predict the nature of likely effects and their potential significance. However, a range of uncertainties in the assessment remains and where these uncertainties relate to potentially significant effects, monitoring will be required (see Section 6).

In relation to the assessments of the Broad Locations, the varying detail of the available information relating to Agricultural Land Quality at each location, in particular in relation to the presence/absence and proportion of Best and Most Versatile agricultural land, meant that it was difficult to assess the locations on like-for-like basis.

Whilst the Local Plan can provide the framework for seeking to achieve sustainable development, much will be dependent on whether there are the requisite behavioural changes needed to achieve this goal. For example, the Local Plan can require the integration of sustainable transport measures as part of new development; however the success of such a requirement is entirely dependent on people changing travel behaviours to make use of such measures. Such a factor means that the SA/SEA can never be entirely accurate in the predictions of effects.

## **5.7 Mitigation and Recommendations**

A key role of the SA/SEA is to provide recommendations as to how the sustainability performance of a plan can be improved. The Local Plan includes a range of policies that seek to prevent and where possible enhance the environment and overall sustainability of development. The SA/SEA has built on this by identifying a range of recommendation as to how the Local Plan can maximise its performance against the range of sustainability topics. Some of these recommendations seek to mitigate potential adverse effects, whilst others look to build on some of the opportunities that are provided by the District's natural environment.

Where specific mitigation has been identified / recommended to prevent, reduce and as fully as possible offset any significant adverse effects, this has been detailed alongside the assessments of the policies for which the adverse effects have been identified (see Section 5.2). In addition they have also been documented in the relevant topic assessment summary in Section 5.3.

The assessment of the Local Plan has been undertaken on 'policy by policy' basis, and aims to identify the effects of each policy in isolation – i.e. without considering the potential mitigation and/or enhancements of effects that are included in other policies. As a result many of the potential adverse effects identified in the 'development enabling' policies (such as 'S4 - Housing Strategy and Housing Requirement/Target'; 'S5 - Economic Development Strategy and Employment Land Provision'; and 'S6 - Broad Locations for Development') will be avoided or mitigated by the requirements set out in the 'development controlling' type policies (such as 'L23 - Urban Design and Layout of

New Development'; 'L29 - Green and Blue Infrastructure, Countryside Landscape and Trees'; and 'L30 - Historic Environment'). The SA objective topic assessment summaries in Section 5.3 provide an assessment as to likely effects on that topic from the Local Plan when considered as a whole.

### **5.7.1 SA/SEA influence on the development of the Local Plan**

To date the SA/SEA has had a range of influences on the development of the Local Plan. Close liaison between the planning officers and SA/SEA consultants has meant that the SA/SEA has provided input at many stages during the development of the Local Plan.

When the Local Plan is adopted it will be accompanied by an SEA Adoption Statement which will need to describe how the Local Plan has been influenced by the SA/SEA. Influences to date, including those related to the previous SA/SEA work on the Strategic Local Plan (and formerly Core Strategy), include the following:

- A Scoping Workshop attended by a wide range of stakeholders provided a useful forum for discussing environmental and other sustainability issues and how the LDF could respond to these issues. The workshop also helped in determining the scope of the SA/SEA;
- Production of the SA/SEA Scoping Report identified issues that the Strategic Local Plan needed to help address. The information within the Scoping Report also contributed to the LDF evidence base;
- Input into the development of the Strategic Local Plan objectives;
- Assessment of a number of Issues and Options and other emerging policy documents, which assisted in the process of formulating the Draft Core Strategy;
- Several rounds of comments on working drafts of the Emerging Strategy;
- Provision of on-going input in relation to the development of the Strategic Local Plan and its detailed policies and sites, including working alongside officers in the Council offices;
- Providing input into the development of the Strategic Site Assessment Methodology;
- Assessment of the Pre-Submission Strategic Local Plan and providing recommendations for additions and changes;
- Assessment of a range of options covering the following topics: Housing Requirement / Target Options; Strategic Sub Area Options; and Development Strategy Options;
- Assessment of the Publication Strategic Local Plan and providing recommendations for additions and changes;
- Providing input during the development of the Regulation 18 Local Plan 'Have your Say!', including the production of an SA Working Note (January 2018);
- Post-Regulation 18 assessment of Local Plan options, including the production of a second SA Working Note (May 2018) and an 'SA Note for Council' (June 2018) to provide information on the initial findings of the SA assessments of draft Plan policies.



## **6 Monitoring**

### **6.1 Introduction**

The SEA Directive requires that the significant environmental effects of implementing a plan are monitored so that appropriate remedial actions can be taken if required.

The monitoring put in place needs to fulfil the following requirements:

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

The monitoring measures recommended in this report should be considered draft as this is based on assessment of the Publication Local Plan, which may be altered after the public examination or the baseline position may change at the time of adoption of this framework. Additionally the framework should be flexible to adapt to any changes in monitoring methods.

### **6.2 Approach to Monitoring**

The SEA Directive (Article 10 (1)) allows 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.

Monitoring measures need not always relate to quantitative indicators, but could include, for example, monitoring to ensure that any Environmental Impact Assessments of major projects incorporate the recommendations made in the SEA.

A range of potential monitoring indicators are described below in Table 6-2 based on the indicators identified in the SA Framework. Indicators identified for monitoring the Local Plan will also be considered for inclusion in the monitoring framework where appropriate.

The monitoring measures are likely to require alteration as the plan develops. Any such alterations will be documented in the SA/SEA Statement which will be prepared to accompany the adoption of the Local Plan.

### **6.3 Monitoring Requirements**

The monitoring requirements typically associated with the SA/SEA process are recognised as placing heavy demands on authorities with SA/SEA responsibilities. For this reason, it is proposed that the monitoring framework will focus on those aspects of the environment that are likely to be significantly impacted upon, or where the impact is uncertain.

A number of significant positive effects were identified, as summarised in Table 6-1.

**Table 6-1: Summary of likely significant effects**

	<b>Reference Term</b>	<b>SA Objective</b>	<b>Significant effects identified</b>
1	Biodiversity	To protect, maintain and enhance biodiversity and geodiversity at all levels, including the maintenance and enhancement of Biodiversity Action Plan habitats and species in line with local targets	✓✓ in relation to Policy L29 Green and Blue Infrastructure, Countryside, Landscape and Trees
2	Water quality/ quantity	To protect, maintain and enhance water resources (including water quality and quantity) while taking into account the impacts of climate change	✓✓ in relation to Policy L25 Energy and Environmental Performance of New Development and Policy L29 Green and Blue Infrastructure, Countryside, Landscape and Trees.
3	Flood risk	Ensure that new developments avoid areas which are at risk from flooding and natural flood storage areas	No significant effects identified
4	Soils	Minimise development of land with high quality soils and minimise the degradation/loss of soils due to new developments	✗✗ in relation to Broad Locations S6 i) East HH (north); S6 ii) East HH (central); and S6 vi) North St Albans.
5	Greenhouse gas emissions	Reduce the impacts of climate change, with a particular focus on reducing the consumption of fossil fuels and levels of CO <sub>2</sub>	✓✓ in relation to Broad Location S6 xi) Park Street Garden Village; and Policy L25 Energy and Environmental Performance of New Development
6	Climate change proof	Ensure that developments are capable of withstanding the effects of climate change (adaptation to climate change)	No significant effects identified
7	Air Quality	Achieve good air quality, especially in urban areas	No significant effects identified
8	Use of brownfield sites	Maximise the use of previously developed land and buildings, and the efficient use of land	No significant effects identified
9	Resource efficiency	To use natural resources, both finite and renewable, as efficiently as possible, and re-use finite resources or recycled alternatives wherever possible	✓✓ in relation to Broad Location S6 ii) East HH (central); and Policy L25 Energy and Environmental Performance of New Development
10	Historic environment	To identify, maintain and enhance the historic environment and heritage assets and their settings and cultural assets	✓✓ in relation to Policy L13 Attractive and vibrant cultural and civic areas and Policy L30 Historic Environment and Townscape Character
11	Landscape & Townscape	To conserve and enhance landscape and townscape character and encourage local distinctiveness	✓✓ in relation to Policy S3 Metropolitan Green Belt; Policy L23 Urban Design and Layout of New Development; Policy L29 Green and Blue Infrastructure, Countryside, Landscape and Trees; and Policy L30 Historic Environment and Townscape Character
12	Health	To encourage healthier lifestyles and reduce adverse health impacts of new developments	✓✓ in relation to Policy L22 Community, Leisure and Sports Facilities; and Policy L29 Green and Blue Infrastructure, Countryside, Landscape and Trees

	<b>Reference Term</b>	<b>SA Objective</b>	<b>Significant effects identified</b>
13	Sustainable locations	To deliver more sustainable patterns of location of development.	✓✓ in relation to Broad Locations S6 i) East HH (north); S6 ii) East HH (central); and S6 iii) East HH (south)
14	Equality & social inclusion	Promote equity & address social exclusion by closing the gap between the poorest communities and the rest	✓✓ in relation to Broad Locations S6 v) East St Albans
15	Good quality housing	Ensure that everyone has access to good quality housing that meets their needs	✓✓ in relation to Policy S4 Housing Strategy and Housing Requirement / Target Broad Locations; Policy L3 Provision of and Contributions towards Affordable Housing; and all the Broad Locations in Policy S6 which would allocate > 500 homes.
16	Community Identity & participation	Enhance community identity and participation	No significant effects identified
17	Crime and fear of crime	Reduce both crime and fear of crime	✓✓ in relation to Policy L23 Urban Design and Layout of New Development
18	Sustainable prosperity and growth	Achieve sustainable levels of prosperity and economic growth	✓✓ in relation to Policy S5 Economic Development Strategy and Employment Land Provision; and Broad Location S6 ii) East HH (central)
19	Fairer access to jobs & services	Achieve a more equitable sharing of the benefits of prosperity across all sectors of society and fairer access to services, focusing on deprived areas in the region	✓✓ in relation to Policy S5 Economic Development Strategy and Employment Land Provision; Broad Location S6 ii) East HH (central); and Policy L21 Education.
20	Revitalise town centres	Revitalise town centres to promote a return to sustainable urban living	✓✓ in relation to Policy L12 Centres for Retail, Services and Leisure; and Policy L13 Attractive and vibrant cultural and civic areas

Potential monitoring indicators for the significant effects are included in the SA Framework in Table 6-2.

The intended monitoring framework for the Local Plan draws from the SA framework. It is included in the draft Local Plan (as Local Plan Appendix 3) and will be referred to (in final form) in the SA/SEA Adoption Statement, which is required to provide the measures that are to be taken to monitor the significant environmental effects of the implementation of the Local Plan.

SA / Plan monitoring will be published as part of the Authority's Monitoring Report for the Local Plan which will be the responsibility of St Albans City and District Council.

**Table 6-2: Potential Monitoring Indicators**

(Indicators in italics from proposed Local Plan Monitoring Framework)

SA Objective	Potential Indicators
1. To protect, maintain and enhance biodiversity and geodiversity at all levels, including the maintenance and enhancement of Biodiversity Action Plan habitats and species in line with local targets	<i>Change in areas of biodiversity importance</i> <i>Condition of Sites of Special Scientific Interest</i> <i>Delivery of green infrastructure projects as set out in infrastructure delivery schedule</i>
2. To protect, maintain and enhance water resources (including water quality and quantity) while taking into account the impacts of climate change	<i>Number of planning permissions granted contrary to advice of the Environment Agency on flood and water quality grounds</i> <i>Delivery of Sustainable drainage measures incorporated into major new developments</i> <i>Water quality status of waterbodies</i>
4. Minimise development of land with high quality soils and minimise the degradation/loss of soils due to new developments	<i>Number / percentage of additional dwellings on previously developed land</i>
5. Reduce the impacts of climate change, with a particular focus on reducing the consumption of fossil fuels and levels of CO <sub>2</sub>	<i>Installation of new renewable energy capacity</i> <i>District per capita reduction in carbon dioxide emissions</i> <i>Percentage of renewable energy generation in new homes</i> <i>Delivery of energy conservation / generation improvements in major developments</i> <i>Journeys to work by modal choice</i> <i>District transport CO<sub>2</sub> emissions per capita</i>
9. To use natural resources, both finite and renewable, as efficiently as possible, and re-use finite resources or recycled alternatives wherever possible	<i>Number / percentage of additional dwellings on previously developed land</i> <i>Delivery of energy conservation / generation improvements in major developments</i> <i>Installation of new renewable energy capacity</i> <i>District per capita reduction in carbon dioxide emissions</i> <i>Percentage of renewable energy generation in new homes</i>
10. To identify, maintain and enhance the historic environment, heritage assets and their settings and cultural assets	<i>Number of heritage buildings considered "at risk"</i> <i>Loss of locally listed buildings</i> <i>Design quality of development in conservation areas</i>
11. To conserve and enhance landscape and townscape character and encourage local distinctiveness	<i>Area of Green Belt</i> <i>New dwellings permitted in the Green Belt</i> <i>New employment floorspace permitted in the Green Belt</i>
12. To encourage healthier lifestyles and reduce adverse health impacts of new developments	<i>Delivery of new community and leisure and sports facilities</i> Quantity of new publically accessible open space provided (by type)

13. To deliver more sustainable patterns of location of development	<p><i>Proportion of housing development delivered in Broad locations, Towns, Villages, Green Belt Settlements and the Rest of the Green Belt</i></p> <p><i>Proportion of employment development delivered in Broad locations, Towns, Villages, Green Belt Settlements and the Rest of the Green Belt</i></p>
14. Promote equity & address social exclusion by closing the gap between the poorest communities and the rest	<p><i>New community facilities and infrastructure in or close to more deprived wards</i></p> <p><i>Net gain of primary and secondary forms of entry</i></p>
15. Ensure that everyone has access to good quality housing that meets their needs	<p><i>Percentage of gross annual completions that are affordable</i></p> <p><i>Affordable housing completions by type</i></p>
17. Reduce both crime and fear of crime	<p><i>Reported levels of crime</i></p>
18. Achieve sustainable levels of prosperity and economic growth	<p><i>Change in employment (B use class - B1 / B2 / B8) floor space stock (by type - office / industrial and warehousing 'shed' - and by main employment location)</i></p> <p><i>Average incomes of St Albans' residents and workers</i></p>
19. Achieve a more equitable sharing of the benefits of prosperity across all sectors of society and fairer access to services, focusing on deprived areas in the region	<p><i>Qualification levels</i></p> <p><i>Unemployment levels</i></p>
20. Revitalise town centres to promote a return to sustainable urban living	<p><i>Town centres use floorspace completed in town centres</i></p> <p><i>Change in retail / service / leisure floor space stock (by centre / frontage and by type - retail / food and drink / other services)</i></p>

## **7 Next Steps**

### **7.1 Submission of the Local Plan**

The publication of this SA Report signifies the start of the process whereby key stakeholders and the public are given the opportunity to make formal representations on the contents of both the Publication Local Plan and the SA Report. Following this period, the Council intends to submit the plan to the Secretary of State for examination in public. If the examination inspector requires changes to be made to the plan, a sustainability appraisal of these changes will be undertaken if they are likely to affect the findings detailed in the original SA Report (this report).

### **7.2 SA/SEA Adoption Statement**

When the Local Plan is adopted it will be accompanied by a SA/SEA Statement.

In line with the SEA Regulations, the SA/SEA Adoption Statement will provide the following information:

- How environmental considerations have been integrated into the plan;
- How the SA Report has been taken into account;
- How opinions expressed in relation to the consultations on the plan/ programme and SA 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.

### **7.3 Post Adoption**

Following the adoption of the Local Plan there will be a need to undertake SA/SEA monitoring of the significant effects identified. It is envisaged that this monitoring will take place as part of overall monitoring of the Local Plan and be published as part of the Authority's Monitoring Report for the Local Plan which will be the responsibility of St Albans City and District Council.

## Glossary of terms and abbreviations

<b>AA</b>	Appropriate Assessment is part of the Habitats Regulations Assessment (HRA) process.
<b>Alternatives</b>	These are different ways of achieving the plan objectives. Also referred to as options.
<b>AONB</b>	Area of Outstanding Natural Beauty. A landscape area of high natural beauty which has special status, and within which major development will not be permitted, unless there are exceptional circumstances. Designated under the 1949 National Parks and Access to the Countryside Act.
<b>AQMA</b>	Air Quality Management Area. An area identified by local authorities where statutory UK air quality standards are being, or are expected to be breached up to the end of 2005.
<b>Conservation Area</b>	An area designated under the Planning (Listed Buildings And Conservation Areas) Act 1990 as being of special architectural or historic interest, the character and interest of which it is desirable to preserve and enhance.
<b>Cumulative Effects</b>	The effects that result from changes caused by a project, plan, programme or policy in association with other past, present or reasonably foreseeable future plans and actions. Cumulative effects are specifically noted in the SEA Directive in order to emphasize the need for broad and comprehensive information regarding the effects.
<b>DCLG</b>	Department for communities and local government, formerly the ODPM.
<b>DLP</b>	Detailed Local Plan (now included in the Local Plan)
<b>DPD</b>	Development Plan Document
<b>EC</b>	European Commission.
<b>GHG</b>	Greenhouse Gas.
<b>HRA</b>	Habitats Regulations Assessment. Required to identify likely impacts on Natura 2000 sites.
<b>HSE</b>	Health and Safety Executive
<b>Indicator</b>	A means by which change in a system or to an objective can be measured.
<b>Mitigation</b>	Measures to avoid, reduce or offset the significant adverse effects of the plan on sustainability.
<b>Monitoring</b>	Activities undertaken after the decision is made to adopt the plan or programme to examine its implementation. For example, monitoring to examine whether the significant sustainability effects occur as predicted or to establish whether mitigation measures are implemented.
<b>Natura 2000 Sites (N2K)</b>	<p>Natura 2000 is the European Union-wide network of nature conservation sites to be established under the Council Directive on the conservation of natural habitats and of wild fauna and flora (92/43/EEC) – The EC Habitats Directive (on Europa website).</p> <p>Natura 2000 comprises Special Areas of Conservation (SACs) designated under that Directive and Special Protection Areas (SPAs) classified under the Council Directive on the conservation of wild birds (79/409/EEC) – The EC Wild Birds Directive.</p>
<b>NTS</b>	Non Technical Summary
<b>Objective</b>	A statement of what is intended, specifying the desired direction of change.
<b>Options</b>	See Alternatives.
<b>PPP</b>	Plans, Policies and Programmes.
<b>SA</b>	Sustainability Appraisal. A form of assessment used in the UK (primarily for

Regional Planning Guidance and development plans) since the late 1990s. Sustainability Appraisal considers social and economic effects as well as environmental effects.

<b>SAC</b>	Special Area of Conservation as designated under the European Union Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora.
<b>SAM</b>	Scheduled Ancient Monument. A nationally important archaeological site included in the Schedule of Ancient Monuments maintained by the Secretary of State for the Environment under the Ancient Monuments and Archaeological Areas Act 1979.
<b>Scoping</b>	The process of deciding the scope and level of detail of the SEA. This also includes defining the environmental / sustainability effects and alternatives that need to be considered, the assessment methods to be used, the structure and contents of the Environmental / Sustainability Report.
<b>Screening</b>	The process of deciding whether a plan or programme requires SEA or an appropriate assessment.
<b>SEA</b>	Strategic Environmental Assessment. A systematic method of considering the likely effects on the environment of policies, plans and programmes.
<b>SEA Directive</b>	Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment".
<b>SLP</b>	Strategic Local Plan (now included in the Local Plan)
<b>SPZ</b>	Source Protection Zones.
<b>SSSI</b>	Site of Special Scientific Interest. The best sites for wildlife and geological features in England as designated under the Wildlife and Countryside Act 1981.
<b>SUDS</b>	Sustainable Drainage Systems.