



St Albans Local Plan

Publication

Sustainability Appraisal Report

September 2018

Appendices – Volume 1

Appendix A: Review of other Policies, Plans and Programmes

Appendix B: Baseline Review

Appendix C: Sustainability Appraisal Framework

Appendix D: Consultation Responses

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Appendix A: Review of Policies, Plans and Programmes

September 2018

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 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.

For the SA of the St Albans Plan the PPP review has been widened beyond environmental protection objectives to also cover wider sustainability objectives from arrange of PPPs, including strategies and guidance.

The PPP review is presented by SA topic in the sections below.

1 Overarching documents

Åarhus Convention (2001)
<p>The Åarhus Convention establishes a number of rights of the public (citizens and their associations) with regard to the environment. Public authorities (at national, regional or local level) are to contribute to allowing these rights to become effective. The Convention provides for:</p> <p>The right of everyone to receive environmental information that is held by public authorities. This can include information on the state of the environment, but also on policies or measures taken, or on the state of human health and safety where this can be affected by the state of the environment. Public authorities are obliged, under the Convention, to actively disseminate environmental information in their possession;</p> <p>The right to participate from an early stage in environmental decision-making. Arrangements are to be made by public authorities to enable citizens and environmental organisations to comment on, for example, proposals for projects affecting the environment, or plans and programmes relating to the environment</p> <p>The right to challenge, in a court of law, public decisions that have been made without respecting the two aforementioned rights or environmental law in general.</p>
Objectives, Targets, Indicators
<p>The Convention creates obligations in three fields or 'pillars':</p> <ul style="list-style-type: none">• Public access to environmental information• Public participation in decision-making on matters related to the environment: provision• Access to justice (i.e. administrative or judicial review proceedings) in environmental matters
EU Sustainable Development Strategy (2006)
<p>In June 2001, the European Council at Göteborg discussed a strategy for Sustainable Development proposed by the European Commission ("A sustainable Europe for a better world: A European strategy for Sustainable Development") This strategy proposed measures to deal with important threats to our wellbeing, such as climate change, poverty, and emerging health risks, which had been identified in a consultation paper in March 2001.</p>
Objectives, Targets, Indicators
<p>Combating poverty and social exclusion</p> <p>Dealing with the economic and social implications of an ageing society</p> <p>Limit climate change and increase the use of clean energy</p> <p>Address threats to public health</p> <p>Manage natural resources responsibly</p> <p>Improve the transport system and land use management</p>

England Rural Strategy (2004)
The Rural Strategy 2004 sets out the Government's approach to policy and delivery of the rural white paper.
Objectives, Targets, Indicators
<p>It identifies three key priorities for rural policy.</p> <p>Economic and Social Regeneration – supporting enterprise across rural England, but targeting greater resources at areas of greatest need.</p> <p>Social Justice for All – tackling rural social exclusion wherever it occurs and providing fair access to services and opportunities for all rural people.</p> <p>Enhancing the Value of our countryside - protecting the natural environment for this and future generations.</p>

National Planning Policy Framework (2018)
<p>The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied¹. It provides a framework within which locally-prepared plans for housing and other development can be produced.</p> <p>At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development.</p> <p>For plan-making this means that:</p> <ul style="list-style-type: none"> a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: <ul style="list-style-type: none"> i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. <p>For decision-taking this means:</p> <ul style="list-style-type: none"> c) approving development proposals that accord with an up-to-date development plan without delay; or d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless: <ul style="list-style-type: none"> i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. <p>The NPPF contains a set of 12 core planning principles that should underpin both plan-making and decision-taking.</p> <p>The bulk of the NPPF provides the policy in 13 topic areas for 'Achieving Sustainable Development'.</p>

Objectives, Targets, Indicators
<p>The NPPF provides policy detail for the topics listed below. It does not include specific objectives for these topic areas:</p> <ul style="list-style-type: none"> • Delivering a sufficient supply of homes • Building a strong, competitive economy • Ensuring the vitality of town centres • Promoting healthy and safe communities • Promoting sustainable transport • Supporting high quality communications • Making effective use of land • Achieving well-designed places • Protecting Green Belt land • Meeting the challenge of climate change, flooding and coastal change • Conserving and enhancing the natural environment • Conserving and enhancing the historic environment • Facilitating the sustainable use of minerals
National Planning Practice Guidance
Provides up to date planning practice guidance to support the NPPF.
Objectives, Targets and Indicators
Includes planning practice guidance on a wide range of topics, including Air quality, Climate change, Conserving and enhancing the historic environment, Flood risk, Health and well-being, Housing and economic development, Natural environment, Minerals, Rural housing, Open space, Transport, Waste, Water supply, wastewater and water quality. It also provides guidance on Sustainability Appraisal and Strategic Environmental Assessment.
Natural Environment and Rural Communities (NERC) Act (2006)
The Natural Environment and Rural Communities (NERC) Act is designed to help achieve a rich and diverse natural environment and thriving rural communities. The Act also created the Natural England to act as a champion for the natural environment. Section 40 of which places a Biodiversity Duty on all public bodies (including the Council), to have due regard for conserving biodiversity. This includes restoring or enhancing a population or habitat.
Objectives, Targets and Indicators
No objectives or targets.
Securing the Future – UK Government Sustainable Development Strategy (2005)
<p>This strategy aims to promote sustainable development. It contains:</p> <p>Five principles (with a more explicit focus on environmental limits).</p> <p>Four agreed priorities (sustainable consumption and production, climate change, natural resource production and sustainable communities).</p> <p>A new indicator set with new indicators such as on well-being.</p>
Objectives, Targets, Indicators

<p>The new objectives included within the strategy are:</p> <ul style="list-style-type: none"> • Living within environmental limits; • Promoting good governance; and • Using sound science responsibly.
<p>Sustainable Communities Act 2007 (Amendment) Act 2010</p>
<p>The principal aim of the Sustainable Communities Act 2007 is to promote the sustainability of local communities, i.e. to encourage the improvement of the economic, social or environmental wellbeing of the authority's area.</p>
<p>Objectives, Targets and Indicators</p>
<p>The Act imposes a duty on the Secretary of State to assist local authorities in promoting the sustainability of local communities in the ways specified in the Act. Regulations within the Act set out the procedures for dealing with proposals submitted by local authorities. They require local authorities to consult their communities on the Act's proposals before submitting them to the Secretary of State for consideration.</p>
<p>Town and Country Planning (Local Planning) (England) Regulations 2012 and the Localism Act 2011</p>
<p>The Town and Country Planning (Local Planning) (England) Regulations 2012 (the Regulations) sets out how local councils should prepare and consult on their local plans. Following the adoption of the Localism Act 2011 (the Act) the Government is proposing to abolish top-down regional strategies, subject to an environmental assessment which is currently underway. To promote local joint working between public authorities, the Act has introduced a legal duty to cooperate between local authorities, and the powers to specify in the Regulations which bodies are bound. The Regulations and Act ensure that the bodies responsible for developing local plans have a duty to take regard of the views of the local enterprise partnerships in relation to strategic planning matters.</p>
<p>Objectives, Targets, Indicators</p>
<p>The Regulations aim to strengthen the objectives of localism set out within the Act by putting councils back in control of the preparation and examination of their local plans. The Regulations set out the preparation and adoption process for local plans and supplementary planning documents (SPD). The Regulations specifically stipulate that:</p> <ul style="list-style-type: none"> • Local plans should set out a reasoned justification for the policies contained within it • SPD and local plans must not conflict with adopted development plan <p>Local planning authorities must consult specified stakeholders, as well as any further specific affected individuals or groups, during the preparation of a local plan</p>
<p>A Green Future: Our 25 Year Plan to Improve the Environment (2018)</p>
<p>The plan sets out policies to achieve the Government's 25-year goals relating to: 1. Clean air; 2. Clean and plentiful water; 3. Thriving plants and wildlife; 4. A reduced risk of harm from environmental hazards such as flooding and drought; 5. Using resources from nature more sustainably and efficiently; 6. Enhanced beauty, heritage and engagement with the natural environment; 7. Mitigating and adapting to climate change; 8. Minimising waste; 9. Managing exposure to chemicals; 10. Enhancing biosecurity.</p>
<p>Objectives, Targets, Indicators</p>

Clean air:

Meeting legally binding targets to reduce emissions of five damaging air pollutants. This should halve the effects of air pollution on health by 2030;

Ending the sale of new conventional petrol and diesel cars and vans by 2040;and

Maintaining the continuous improvement in industrial emissions by building on existing good practice and the successful regulatory framework.

Clean and Plentiful Water:

Improving at least three quarters of our waters to be close to their natural state as soon as is practicable by:

Reducing the damaging abstraction of water from rivers and groundwater, ensuring that by 2021 the proportion of water bodies with enough water to support environmental standards increases from 82% to 90% for surface water bodies and from 72% to 77% for groundwater bodies;

Reaching or exceeding objectives for rivers, lakes, coastal and ground waters that are specially protected, whether for biodiversity or drinking water as per our River Basin Management Plans;

Supporting OFWAT's ambitions on leakage, minimising the amount of water lost through leakage year on year, with water companies expected to reduce leakage by at least an average of 15% by 2025; and

Minimising by 2030 the harmful bacteria in our designated bathing waters and continuing to improve the cleanliness of our waters. We will make sure that potential bathers are warned of any short-term pollution risks.

Thriving plants and wildlife:

Restoring 75% of our one million hectares of terrestrial and freshwater protected sites to favourable condition, securing their wildlife value for the long term;

Creating or restoring 500,000 hectares of wildlife-rich habitat outside the protected site network, focusing on priority habitats as part of a wider set of land management changes providing extensive benefits;

Taking action to recover threatened, iconic or economically important species of animals, plants and fungi and where possible to prevent human-induced extinction or loss of known threatened species in England and the Overseas Territories; and

Increasing woodland in England in line with our aspiration of 12% cover by 2060: this would involve planting 180,000 hectares by end of 2042.

Reducing the risks of harm from environmental hazards

Making sure everyone is able to access the information they need to assess any risks to their lives and livelihoods, health and prosperity posed by flooding and coastal erosion.

Bringing the public, private and third sectors together to work with communities and individuals to reduce the risk of harm.

Making sure that decisions on land use, including development, reflect the level of current and future flood risk.

Ensuring interruptions to water supplies are minimised during prolonged dry weather and drought.

Boosting the long-term resilience of our homes, businesses and infrastructure.

Using resources from nature more sustainably and efficiently

Maximising the value and benefits we get from our resources, doubling resource productivity⁷ by 2050.

Improving our approach to soil management: by 2030 we want all of England's soils to be managed sustainably, and we will use natural capital thinking to develop appropriate soil metrics and management approaches.

Increasing timber supplies.

Ensuring that all fish stocks are recovered to and maintained at levels that can produce their maximum sustainable yield.

Ensuring that food is produced sustainably and profitably.

Enhancing beauty, heritage and engagement with the natural environment

Safeguarding and enhancing the beauty of our natural scenery and improving its environmental value while being sensitive to considerations of its heritage.

Making sure that there are high quality, accessible, natural spaces close to where people live and work, particularly in urban areas, and encouraging more people to spend time in them to benefit their health and wellbeing.

Focusing on increasing action to improve the environment from all sectors of society.

Mitigating and adapting to climate change:

Continuing to cut greenhouse gas emissions including from land use, land use change, the agriculture and waste sectors and the use of fluorinated gases. The UK Climate Change Act 2008 commits us to reducing total greenhouse gas emissions by at least 80 per cent by 2050 when compared to 1990 levels;

Making sure that all policies, programmes and investment decisions take into account the possible extent of climate change this century; and

Implementing a sustainable and effective second National Adaptation Programme.

Minimising Waste:

Working towards our ambition of zero avoidable waste by 2050;

Working to a target of eliminating avoidable plastic waste by end of 2042;

Meeting all existing waste targets – including those on landfill, reuse and recycling – and developing ambitious new future targets and milestones;

Seeking to eliminate waste crime and illegal waste sites over the lifetime of this Plan, prioritising those of highest risk. Delivering a substantial reduction in litter and littering behaviour; and

Significantly reducing and where possible preventing all kinds of marine plastic pollution – in particular material that came originally from land.

Managing exposure to chemicals – not of relevance for the Local Plan or SA

Enhancing biosecurity - not of relevance for the Local Plan or SA

Hertfordshire Sustainable Communities Strategy – Hertfordshire 2021: A Brighter Future

This Sustainable Community Strategy is about Hertfordshire; its people and its places, and what it means to live and work in the County.

Objectives, Targets, Indicators

The community strategy identified the following as key areas of concern for improvement:

- Jobs, Prosperity and Skills
- Safer and Stronger Communities
- Children and Young People
- An Ageing Population
- Health and Wellbeing
- Housing, Affordable Housing and Quality Neighbourhoods

- Transport and Access
- Sustaining Hertfordshire's Unique Character and Quality of Life
- Promoting Sustainable Development

SW Hertfordshire Joint Strategic Plan. (NB: this is a future plan which has been added here to provide context)

The future South West Herts Joint Strategic Plan will address strategic planning priorities for the SW Herts sub-region, covering Three Rivers District Council, Dacorum Borough Council, Hertsmere Borough Council, St Albans City and District Council and Watford Borough Council.

These strategic planning priorities may cover transport, schools, health, and utilities, to help ensure that infrastructure provision is aligned to the development of the quantum of new homes and employment areas that will be required to be delivered. The Joint Strategic Plan (JSP) will also set the context for each of the separate authorities' Local Plans, including the strategic development framework and shared priorities within which individual Local Plans will be prepared.

Objectives, Targets, Indicators

N/A at this stage

City and District of St Albans Plan Review (adopted November 1994)

In November 1994, St Albans City and District Council formally adopted its District Local Plan, which guides land use and development in the area and is used as a basis for many of the decisions taken by the Council, particularly with regard to individual planning applications.

The emerging the Local Plan will replace this district plan.

Objectives, Targets, Indicators

- Housing: to provide 7,200 new dwellings between 1986-2001 and to seek to influence the types of dwellings provided to help meet the needs of the area.
- Hospital sites: to consider the future use of two sites.
- Employment: to provide sufficient land and floor space to cater for full employment.
- Transport: to consider the transportation needs of the district.
- Shopping: to maintain the viability and vitality of existing shopping centres and to make reasonable provisions for new forms of retailing.
- Environment and Conversation: carefully consider the environmental effects of planning decisions and to conserve and improve the historic, architectural and archaeological fabric of settlements.
- Leisure and Tourism: to make provision for leisure uses especially taking advantage of opportunities to restore mineral sites.
- Countryside: to protect and enhance the natural beauty, amenity and ecology of the countryside and retain high quality agricultural land.

St Albans City and District Corporate Plan (2018-2023)

The Council's work will be based on the outcomes that they want to see locally: a vibrant economy; a thriving community; a great place to live and work; and a cost effective council. These outcomes, and the Corporate Plan itself, provide direction for the Council's work. They provide a framework for decision making, resource planning, and budget allocation. The Corporate Plan sets out where the Council's priorities against each of the 'outcomes' and sets out the priority projects for 2018-19.

<p>Objectives, Targets, Indicators</p> <p>Selected priorities under the four outcomes include:</p> <p>A vibrant economy</p> <p>Deliver the new Economic Development strategy to: encourage new start-ups and business investment; create more skilled jobs in the District; and ensure that local education and further education provision can deliver the required skills</p> <p>Encourage green science industries in collaboration with the Building Research Establishment, Rothamsted Research and University of Hertfordshire (through the 'Green Triangle')</p> <p>Work with neighbouring councils to ensure a complementary and co-ordinated approach to economic development and spatial planning</p> <p>A thriving community</p> <p>Provide new high quality affordable housing</p> <p>Increase the number of affordable houses delivered each year for local people</p> <p>Work with health partners and community groups to provide a stronger voice around health and wellbeing for the District</p> <p>Support Hertfordshire County Council efforts to increase provision of primary (particularly in St Albans) and secondary school places</p> <p>A great place to live and work</p> <p>Put a Local Plan in place to meet the need for housing, jobs, schools and associated infrastructure</p> <p>Protect the Green Belt, the District's environment and green spaces</p> <p>Develop cultural, sport, leisure and heritage facilities with activities that benefit the entire District including a new City centre museum and art gallery</p> <p>Maintain progress in achieving the Council's 20% reduction target in greenhouse gas emissions between 2008/9 and 2020/21</p> <p>Work in partnership with the Hertfordshire County Council to identify schemes to ease traffic congestion and improve air quality, especially for the centre of St Albans</p> <p>Work to develop radial cycle and walking routes in urban parts of the District</p> <p>Work with partners on initiatives to improve public transport and encourage community transport provision</p> <p>A cost effective council</p> <p>Ensure fair and equitable treatment and provision of funds across the District</p>
<p>St Albans Green Belt Review (2014)</p> <p>A strategic review of all Green Belt land across the District that identifies the contribution of the Green Belt towards national Green Belt purposes as set out in the National Planning Policy Framework (NPPF).</p>
<p>Objectives, Targets, Indicators</p> <p>Involves a Green Belt Sites and Boundaries Study.</p> <p>The main objectives of this Green Belt Sites and Boundaries Study are to:</p> <ul style="list-style-type: none"> • Identify potential sites (with boundary lines) within the strategic sub-areas (identified • in the Part 1 study) for potential release from the Green Belt for future development;

- Estimate the potential development capacity of each site; and,
- Rank the sites in terms of their suitability for potential Green Belt release.

St Albans Sustainable Community Strategy (2009)

The Sustainable Community Strategy sets out the vision for the District to 2021 and was produced by St Albans & District Local Strategic Partnership – a group of key local public, business and voluntary/community sector organisations working together to improve the quality of life for everyone in the District.

Objectives, Targets, Indicators

Outlines four key priorities for District:

- Ensuring the district is a great place to be;
- Creating a diverse and sustainable economy for the 21 century;
- Keeping the district healthy; and
- Supporting an active community that had pride in itself and cares for its future.

Environmental Capacity of St Albans City & District: Defining a Sustainable Level of Development (2012)

The study was commissioned to better understand the role and importance of undeveloped land in the District, in order to ascertain what a sustainable level of development, in terms of land use, might entail, including in relation to the justification for a locally derived housing target for the District. The study found that there is overwhelming quantitative evidence that the current level of urban development in St Albans is unsustainable and that further urban development will exacerbate problems with water supply and the challenges of biodiversity, landscape, soil and river catchment management and restoration, which are likely to become more difficult with climate change and increasing energy costs. A Compact City approach is likely to be most successful in preserving the District’s valuable non-urban areas whilst meeting the needs of future generations.

Objectives, Targets, Indicators

n/a

2 Biodiversity

Bern Convention on the Conservation of European Wildlife and Natural Habitats (1979)
<p>The convention aims:</p> <ul style="list-style-type: none"> • To conserve wild flora, fauna and natural habitats • To promote co-operation between states • To give particular attention to endangered and vulnerable species, including endangered and vulnerable migratory species <p>Appendices provide detailed information on species and habitats protected under the convention.</p>
Objectives, Targets, Indicators
<p>Obligations for contracting parties: conservation of wild flora and fauna and all natural habitats in general, by:</p> <ul style="list-style-type: none"> • Promoting national conservation policies • Taking conservation into account in regional planning policies and pollution abatement • Promoting education and information
Bonn Convention on the Conservation of Migratory Species of Wild Animals (1979)
<p>The Bonn Convention aims to improve the status of all threatened migratory species through national action and international Agreements between range states of particular groups of species.</p>
Objectives, Targets, Indicators
<p>To conserve/restore habitats and control other factors that might endanger the listed migratory birds</p>
The Convention on Biological Diversity, Rio de Janeiro (1992)
<p>The convention is designed to conserve biological diversity, ensure the sustainable use of this diversity and share the benefits generated by the use of genetic resources.</p>
Objectives, Targets, Indicators
<p>Each contracting party should (article 6a)</p> <p>Develop national strategies for the conservation and sustainable use of biological diversity</p> <p>Integrate the conservation and sustainable use of biological diversity into relevant sectoral and cross-sectoral plans, programmes and policies</p>
EU Biodiversity Strategy to 2020
<p>This strategy lays down the framework for EU action over the ten years from 2010 in order to meet the 2020 biodiversity headline target set by EU leaders in March 2010.</p>
Objectives, Targets, Indicators
<p>The European Commission has adopted an ambitious new strategy to halt the loss of biodiversity and ecosystem services in the EU by 2020. The six targets cover:</p>

- Full implementation of EU nature legislation to protect biodiversity
- Better protection for ecosystems, and more use of green infrastructure
- More sustainable agriculture and forestry
- Better management of fish stocks
- Tighter controls on invasive alien species
- A bigger EU contribution to averting global biodiversity loss

Biodiversity loss is an enormous challenge in the EU, with around one in four species currently threatened with extinction and 88% of fish stocks over-exploited or significantly depleted.

EU Directive on the Conservation of Wild Birds (79/409/EEC) and The Birds Directive 2009 Directive 2009/147/EC

Directive 79/409/EEC and its amending acts aim at providing long-term protection and conservation of all bird species naturally living in the wild within the European territory of the Member States (except Greenland).

The Birds Directive 2009 is a codified version of Directive 79/409/EEC as amended

Objectives, Targets, Indicators

The EU Directive on the Conservation of Wild Birds imposes duty on Member States to sustain populations of naturally occurring wild birds by sustaining areas of habitats in order to maintain populations at ecologically and scientifically sound levels.

The Birds Directive requires the preservation, maintenance, and re-establishment of biotopes and habitats to include the following measures:

- Creation of protected areas.
- Upkeep and management in accordance with the ecological needs of habitats inside and outside the protected zones.
- Re-establishment of destroyed biotopes.
- Creation of biotopes.

EU Habitats Directive (92/43/EEC)

The aim of this Directive is to contribute towards ensuring biodiversity through the conservation of natural habitats and of wild fauna and flora in the European territory of the Member States to which the Treaty applies. Measures taken pursuant to this Directive are be designed to maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest.

Objectives, Targets, Indicators

Article 3.1: Maintain or restore in a favourable condition designated natural habitat types, and habitats of designated species listed in Annexes I and II respectively of the Directive.

Article 6.2: Take appropriate steps to avoid degrading or destroying natural habitats within SACs, and avoid disturbance of designated species insofar as this would result in further decline in numbers or the loss of habitat that maintains the species.

Article 6.3: Any plan or project not directly concerned with the management of a designated site (SAC/SPA), but which is likely to have a significant impact on it (individually or in combination with other projects), should undergo assessment of its implications for the conservation objectives of the site.

Article 6.4: If the project must proceed in the public interest and in spite of negative conservation impacts, including social or economic

reasons, compensatory measures must be provided for. The Article provides limited scope for development in designated areas. It is only acceptable on grounds of human health and safety (but not economic development) if it affects habitats supporting protected species.

Article 10: Linear structures such as rivers/streams, hedgerows, field boundaries, ponds, etc., that enable movement and migration of species should be preserved.

Biodiversity 2020: A strategy for England's wildlife and ecosystem services (DEFRA, 2011)

It sets out the strategic direction for biodiversity policy for the next decade on land (including rivers and lakes) and at sea.

Objectives, Targets, Indicators

The strategy aims to guide conservation efforts in England up to 2020, and move from a net biodiversity loss to gain. The strategy includes 22 priorities which include actions for the following sectors: Agriculture; Forestry; Planning and Development; Water Management; Marine Management; Fisheries; Air Pollution; and Invasive Non-Native Species.

The strategy develops ambitious yet achievable goals for 2020 and 2050, based on Aichi Targets set at the Nagoya UN Biodiversity Summit in October 2010.

The Conservation of Habitats and Species Regulations 2017

The Conservation of Habitats and Species Regulations 2017 consolidate the Conservation of Habitats and Species Regulations 2010 with subsequent amendments. The Regulations transpose Council Directive 92/43/EEC, on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive), into national law. They also transpose elements of the EU Wild Birds Directive in England and Wales.

Objectives, Targets and Indicators

The Regulations provide for the designation and protection of 'European sites', the protection of 'European protected species', and the adaptation of planning and other controls for the protection of European Sites.

The Regulations do not include objectives, targets or indicators.

The Geological Conservation Review in the Context of the Wider Earth Heritage Conservation Effort (JNCC, 2011)

Summarises geological sites in the UK.

Objectives, Targets, Indicators

To identify and describe the most important geological sites in Britain by:

- Maintaining geological SSSIs
- Expanding the RIGS network
- Developing conservation techniques
- Improving documentation

UK Post-2010 Biodiversity Framework (2012)

This succeeds the UK Biodiversity Action Plan published back in 1994. The Framework demonstrates how the work of the four countries and the UK contributes to achieving the Aichi Biodiversity Targets, and identifies the activities required to complement the country biodiversity strategies in achieving the targets.

Objectives, Targets, Indicators
<p>To maintain, promote and enhance biodiversity.</p> <p>The framework identifies the activities required to complement the country biodiversity strategies, and where work in the country strategies contributes to international obligations. In total, 23 areas of work have been identified where all the countries have agreed that they want to contribute to, and benefit from, a continued UK focus.</p>
Wildlife and Countryside Act 1981 (as amended)
<p>The act implements the Convention on the Conservation of European Wildlife and Natural Habitats (the 'Bern Convention') and the European Union Directives on the Conservation of Wild Birds and Natural Habitats. The Act is concerned with the protection of wildlife and their habitat (countryside, national parks and designated protected areas).</p>
Objectives, Targets, Indicators
<p>Addresses the problem of species protection and habitat loss by setting out the protection that is afforded to wild animals and plants in Britain.</p>
A Green Future: Our 25 Year Plan to Improve the Environment (2018)
Objectives, Targets, Indicators
<p>Thriving plants and wildlife:</p> <ul style="list-style-type: none"> Restoring 75% of our one million hectares of terrestrial and freshwater protected sites to favourable condition, securing their wildlife value for the long term; Creating or restoring 500,000 hectares of wildlife-rich habitat outside the protected site network, focusing on priority habitats as part of a wider set of land management changes providing extensive benefits; Taking action to recover threatened, iconic or economically important species of animals, plants and fungi and where possible to prevent human-induced extinction or loss of known threatened species in England and the Overseas Territories; and Increasing woodland in England in line with our aspiration of 12% cover by 2060: this would involve planting 180,000 hectares by end of 2042.
Hertfordshire Biodiversity Action Plan 2006
<p>The Hertfordshire BAP was prepared and relaunched by the Hertfordshire Biodiversity Partnership to update the 1998 BAP to incorporate revised habitat and species action plans.</p>
Objectives, Targets, Indicators
<p>Contains habitat action plans for: Woodland; Wetland; Heathland and acid grassland; Neutral grassland; Chalk grassland; Farmland; and Urban.</p> <p>Species action plans include water vole, common dormouse, Natterer's bat, otter, tree sparrow, bittern, stone-curlew, song thrush, great crested newt, chalkhill blue, grizzled skipper, stag beetle, white-clawed crayfish, great pignut, cornflower, river water-dropwort and pasqueflower.</p>

Hertfordshire & Middlesex Wildlife Trust How to build a Living Landscape
<i>"Preserving species in tiny pockets of the landscape, on our nature reserves, will not ensure wildlife's future survival. Our vision must be wider than that. By creating spaces for wildlife to live in amongst houses, businesses, roads, railway lines and fields we can move closer to our vision of an environment rich in wildlife for everyone."</i>
Objectives, Targets, Indicators
The Guide does not include any objectives but instead provides practical solutions for how habitats and species can be restored in towns and cities, on farmland, across our transport networks and on golf courses.
A 50 Vision for the Wildlife and Natural Habitats of Hertfordshire (1998) Revised (2006)
The Hertfordshire BAP was drawn up in response to the UK Biodiversity Action Plan which sets out detailed action plans for threatened habitats and species nationwide. It evaluates the status of habitats and species in the county and identifies key habitats and species of national and local significance and High Biodiversity Areas.
Objectives, Targets, Indicators
<p>Amongst others the following objectives are set out:</p> <ul style="list-style-type: none"> • To establish a plan partnership through identifying and consulting key partners in the process. • To produce an overview of our present knowledge of the biodiversity resource in the county. • To prepare a series of prioritised habitat action plans to guide work on protecting, restoring and recreating a sustainable level of biodiversity in the county. • Within each habitat action plan to identify detailed targets reflecting both national and local importance for the first ten years. • To identify a list of priority species for the preparation of action plans. Concise target statements should be prepared for all chosen species. • Within each habitat and species action plan to identify delivery mechanisms and sources of finance and advice. • To publish the plan and implement the agreed programme of action. • To establish a long term monitoring programme to measure the effectiveness of the Plan in achieving national and local targets.

Hertfordshire Local Nature Partnership Strategic Plan 2013-2016
The Local Nature Partnership strategic plan reflects the ambitions, direction and priorities of the partnership to ensure it delivers its vision for Hertfordshire. It will guide the work of the partnership over the next three years.
Objectives, Targets, Indicators
<p>The strategic plan is structured around 4 strategic objectives which outline how the LNPs vision will be implemented:</p> <ul style="list-style-type: none"> • Healthy and resilient ecological networks • Health and wellbeing through the natural environment • Sustainable economic growth through the natural environment • Water for people and wildlife <p>The strategic plan will be used to communicate the LNP's priorities to current and potential partners, stakeholders and other strategic partnerships in Hertfordshire.</p>
St Albans City and District Urban Wildlife Survey (2001)
In 2000 the Hertfordshire Biological Records Centre undertook two urban surveys of settlements within the District. These surveys identified 95 urban sites which were recorded as being of wildlife interest within an urban context.
Objectives, Targets, Indicators
n/a
St Albans Tree Strategy Review (2010)
This updates the Tree Strategy which was originally produced in 2004. The aim of the tree strategy is to ensure that the trees and woodlands within the District are adequately protected, cared for and supported by new planting so that their extent, quality, biological diversity and contribution to the character and appearance of the District can be sustained and enriched for the benefit and enjoyment of the residents and visitors to St Albans.
Objectives, Targets, Indicators
The strategy includes 34 policies aimed at protecting trees in the District. This includes policies for trees on council land, street trees, woodlands, park, open spaces and railway trails, churchyards and cemeteries, hedgerows, and trees on private land.

3 Climatic Factors

Kyoto Protocol on Climate Change (UN, 1997)
The Kyoto Protocol supports the United Nations Framework Convention on Climate Change which sets an overall framework for intergovernmental efforts to tackle the challenge posed by climate change.
Objectives, Targets, Indicators
Articles 2(a-vii) & Article 3: Applies the Protocol to reduction of ozone-depleting gases produced by the transport sector not covered by the Montreal Protocol (CFCs and fluorocarbons). Article 3 contains the key obligation requiring reduction in anthropogenic CO ₂ levels to at least 5% below 1990 levels by 2012. Article 10(b-1): Requires signatories to implement and publish regular plans detailed how reduction targets will be met in specific sectors, including transport. It might be argued that sustainable transport policies RTSs and LTPs might contribute to this commitment.
IPCC Fifth Assessment Report on Climate Change (2014)
The report provides detailed information on the past, present and future state of global climate change. The three reports include the physical basis, impacts, adaptations and vulnerabilities and mitigation of climate change.
Objectives, Targets, Indicators
To limit and/or reduce all greenhouse gas emissions which contribute to climate change.
European Commission 2030 Climate and Energy Framework
The framework was adopted by EU leaders in October 2014. It builds on the 2020 climate and energy package. It is also in line with the longer term perspective set out in the Roadmap for moving to a competitive low carbon economy in 2050, the Energy Roadmap 2050 and the Transport White Paper.
Objectives, Targets, Indicators
The 2030 climate and energy framework sets three key targets for the year 2030: <ul style="list-style-type: none">• At least 40% cuts in greenhouse gas emissions (from 1990 levels)• At least 27% share for renewable energy• At least 27% improvement in energy efficiency
European Commission Roadmap for moving to a competitive low carbon economy in 2050
The European Commission is looking at cost-efficient ways to make the European economy more climate-friendly and less energy-consuming.
Objectives, Targets, Indicators
The low-carbon economy roadmap suggests that: <ul style="list-style-type: none">• By 2050, the EU should cut greenhouse gas emissions to 80% below 1990 levels• Milestones to achieve this are 40% emissions cuts by 2030 and 60% by 2040• All sectors need to contribute• The low-carbon transition is feasible & affordable.

European Commission Energy Roadmap 2050
The European Commission's 2011 Energy Roadmap set out four main routes to a more sustainable, competitive and secure energy system in 2050: energy efficiency, renewable energy, nuclear energy, and carbon capture and storage. It combined these routes in different ways to create and analyse seven possible scenarios for 2050.
Objectives, Targets, Indicators
N/A
Climate Change Act (2008)
The UK has passed legislation which introduces the world's first long-term legally binding framework to tackle the dangers of climate change. The Climate Change Bill was introduced into Parliament on 14 November 2007 and became law on 26 November 2008. The Climate Change Act creates a new approach to managing and responding to climate change in the UK, by: <ul style="list-style-type: none"> • Setting ambitious, legally binding targets; • Taking powers to help meet those targets; • Strengthening the institutional framework; • Enhancing the UK's ability to adapt to the impact of climate change; and • Establishing clear and regular accountability to the UK Parliament and to the devolved legislatures.
Objectives, Targets, Indicators
Two key aims of the Act: <ul style="list-style-type: none"> • To improve carbon management, helping the transition towards a low-carbon economy in the UK; and • To demonstrate UK leadership internationally, signalling that we are committed to taking our share of responsibility for reducing global emissions in the context of developing negotiations on a post-2012 global agreement at Copenhagen in December 2009. <p>The Act also sets a legally binding target of at least an 80 percent cut in greenhouse gas emissions by 2050, to be achieved through action in the UK and abroad. Also a reduction in emissions of at least 34 percent by 2020. Both these targets are against a 1990 baseline.</p>
The National Adaptation Programme- Making the Country Resilient to a Changing Climate (DEFRA, 2013)
This Programme has been drawn up by the government, industry and other non-government organisations working together. It contains a mix of policies and actions to help us to adapt successfully to future weather conditions, by dealing with the risks and making the most of the opportunities.
Objectives, Targets, Indicators
Objectives have been developed to address the greatest risks and opportunities. These objectives cover 4 main areas across the programme: <ul style="list-style-type: none"> • Increasing awareness

- Increasing resilience to current extremes
- Taking timely action for long-lead time measures
- Addressing major evidence gaps.

The programme is split into seven sectors, each with its own vision:

- Built Environment;
- Infrastructure;
- Healthy and Resilient Communities;
- Agriculture and Forestry;
- Natural Environment;
- Business; and
- Local Government.

A Green Future: Our 25 Year Plan to Improve the Environment (2018)

Objectives, Targets, Indicators

Mitigating and adapting to climate change:

Continuing to cut greenhouse gas emissions including from land use, land use change, the agriculture and waste sectors and the use of fluorinated gases. The UK Climate Change Act 2008 commits us to reducing total greenhouse gas emissions by at least 80 per cent by 2050 when compared to 1990 levels;

Making sure that all policies, programmes and investment decisions take into account the possible extent of climate change this century; and

Implementing a sustainable and effective second National Adaptation Programme.

Climate Change Strategic Framework for Hertfordshire

In early 2008, Hertfordshire Forward agreed to support the development of a Climate Change Strategy for Hertfordshire. The framework has been developed by the Hertfordshire Climate Change Partnership which brings together the county's key organisations as a way in which to develop an integrated, comprehensive and stakeholder-led approach to climate change across the County.

Objectives, Targets, Indicators

- Carbon management – minimising the CO₂ emissions from everything we do;
- Adaptation – ensuring that Hertfordshire is resilient to the impacts of climate change;
- Economy – moving towards a low carbon economy that is resilient to the impacts of climate change;
- Built environment – enabling development that is low carbon and resilient to climate change;
- Natural environment – ensuring that Hertfordshire's flora and fauna are managed to limit the negative impacts of climate change;
- Water resources – ensuring that Hertfordshire's water resources are managed to limit the negative impacts of climate change;
- Community – supporting a society which is coping with the impacts of climate change and taking responsibility for its CO₂ emissions;
- Global responsibility – recognising that we have a global impact that needs to be managed locally; and
- Diversity – recognising the climate change concerns of all sectors of Hertfordshire's community.

4 Air quality

EU Directive on Ambient Air Quality and Management (1996/62/EC) (Air Quality Framework Directive)/ The Air Quality Directive 2008 (2008/50/EC)

The Air Quality Framework Directive describes the basic principles as to how air quality should be assessed and managed in the Member States. It lists the pollutants for which air quality standards and objectives will be developed and specified in legislation.

The Air Quality Directive establishes ambitious, cost-effective targets for improving human health and environmental quality up to 2020.

Objectives, Targets, Indicators

Establishes mandatory standards for air quality and sets limits and guides values for sulphur and nitrogen dioxide, suspended particulates and lead in air.

Air quality: draft Clean Air Strategy (2018)

This draft of the Government's Clean Air Strategy outlines ambitions relating to reducing air pollution in the round, making our air healthier to breathe, protecting nature and boosting the economy. The draft strategy sets a clear direction for future air quality policies and goals. The strategy sits alongside three other important UK government strategies: Industrial Strategy, Clean Growth Strategy, and 25 Year Environment Plan.

Objectives, Targets, Indicators

The strategy includes proposed actions covering the themes of: Protecting the nation's health; Protecting the environment; Securing clean growth and innovation; Action to reduce emissions from transport; Action to reduce emissions at home; Action to reduce emissions from farming; and Action to reduce emissions from industry.

A Green Future: Our 25 Year Plan to Improve the Environment (2018)

Objectives, Targets, Indicators

Clean air:

Meeting legally binding targets to reduce emissions of five damaging air pollutants. This should halve the effects of air pollution on health by 2030;

Ending the sale of new conventional petrol and diesel cars and vans by 2040;and

Maintaining the continuous improvement in industrial emissions by building on existing good practice and the successful regulatory framework.

St Albans Air Quality Action Plan (2003. Updated in 2010)

The AQAP was prepared to meet the Local Authorities requirement to prepare a written Action Plan for any areas designated as Air Quality Management Areas (AQMAs), setting out the actions that they intend to take to achieve the National Air Quality Strategy (NAQS). There are 3 such AQMAs in St Albans District.

Objectives, Targets, Indicators

The Primary Objective of the 2003 AQAP was to achieve the NAQS air quality objective for Nitrogen Dioxide (NO₂) within the St Albans District Air Quality Management Area by the compliance date of December 31st 2005.

The secondary objectives are actions that can be taken which contribute to improving air quality throughout the whole district.

5 Landscape and Townscape

European Landscape Convention (2004)

The European Landscape Convention was developed by the Council for Europe and came into force in 2004. It was signed by the UK in February 2006. The aims of the convention are to promote European landscape protection, management and planning and to organise European co-operation on landscape issues. Nations that sign the Convention agree to take action to raise the standing given to landscape in public policy.

Objectives, Targets, Indicators

The ELC sets out four general measures and five specific measures:

To recognise landscapes in law as an essential component of people's surroundings, an expression of the diversity of their shared cultural and natural heritage, and a foundation of their identity;

To establish and implement landscape policies aimed at landscape protection management and planning;

To establish procedures for participation of the general public, local and regional authorities, and other parties with an interest in the definition and implementation of landscape policies;

To integrate landscape into its regional and town planning policies and in its cultural, environmental, agricultural, social and economic policies, as well as in any other policies with possible direct or indirect on landscape.

Awareness-raising: involves increasing awareness among civil society, private organisations and public authorities of the values of landscape, their role and the changes to them;

Training and education: involves promoting: training for specialists in landscape appraisal and operations, multidisciplinary training programmes in landscape policy, protection, management and planning;

Identification and assessment: involves mobilising the interested parties with a view to improving knowledge of the landscape and guiding the landscape identification and assessment procedures through exchanges of experiences and methodology. Each Party should: identify its own landscapes, analyse their characteristics and the forces and pressures transforming them, take note of change and assess the identified landscapes;

Landscape quality objectives: involves framing landscape quality objectives for the identified landscapes; and

Implementation: involves introducing instruments aimed at protecting, managing and/or planning the landscape.

Countryside and Rights of Way Act – CRoW (ODPM, 2000)
CRoW extends the public's ability to enjoy the countryside whilst also providing safeguards for landowners and occupiers. It creates a new statutory right of access to open country and registered common land, modernise the rights of way system, give greater protection to Sites of Special Scientific Interest (SSSIs), provide better management arrangements for Areas of Outstanding Natural Beauty (AONBs), and strengthen wildlife enforcement legislation. Emphasises the public's right of access to open country and common land, and gives additional protection to Sites of Special Scientific Interest (SSSI).
Objectives, Targets, Indicators
Part I of the Act creates a new right of access to open country and registered common land Part II of the Act modernises the law on public rights of way Part III of the Act gives greater protection to sites of special scientific interest (SSSIs), and strengthens wildlife protection Part IV of the Act provides new powers to set up Conservation Boards for the better management of areas of outstanding natural beauty (AONBs), and requires certain bodies to have regard for AONBs when doing anything which would affect the land in those areas
A Green Future: Our 25 Year Plan to Improve the Environment (2018)
The plan sets out policies to achieve the Government's 25-year goals relating to: 1. Clean air; 2. Clean and plentiful water; 3. Thriving plants and wildlife; 4. A reduced risk of harm from environmental hazards such as flooding and drought; 5. Using resources from nature more sustainably and efficiently; 6. Enhanced beauty, heritage and engagement with the natural environment; 7. Mitigating and adapting to climate change; 8. Minimising waste; 9. Managing exposure to chemicals; 10. Enhancing biosecurity.
Objectives, Targets, Indicators
Enhancing beauty, heritage and engagement with the natural environment Safeguarding and enhancing the beauty of our natural scenery and improving its environmental value while being sensitive to considerations of its heritage. Making sure that there are high quality, accessible, natural spaces close to where people live and work, particularly in urban areas, and encouraging more people to spend time in them to benefit their health and wellbeing. Focusing on increasing action to improve the environment from all sectors of society.
Chilterns AONB Management Plan 2014-2019: A Framework for Action
Management and policy framework for protecting and enhancing the Chilterns AONB. Contains policies and actions which need to be reflected in Local Plans.
Objectives, Targets, Indicators
Measures to safeguard, protect and enhance the Chilterns.
Watling Chase Community Forest Plan Review (2001)

This document reviews and updates the Watling Chase Forest Plan endorsed by the government in March 1995.

Objectives, Targets, Indicators

- Creating well-designed woodland;
- Securing access to, and good management of, existing woodlands which meet the same criteria above;
- Creating and re-opening good quality walking/cycling/riding networks for leisure, recreation and/or commuting;
- Securing involvement in Watling Chase from a wide range of local communities, especially those socially excluded from their environment;
- Securing financial and in-kind investment from local businesses and external sources to support major restoration and recreation projects leading to environmental regeneration, and to develop a woodland economy;
- Creating woodland on sites other than those in 1, where there are significant landscape, heritage and/or biodiversity gains; and

Securing landscape, heritage and biodiversity benefits in the non-wooded parts of Watling Chase where opportunities are presented by new development or on agricultural or reclaimed land, including hedgerow restoration.

Hertfordshire Strategic Green Infrastructure Plan (March 2011)

The Hertfordshire Strategic Green Infrastructure Plan helps bridge the gap between strategic planning and site design and management, providing messages to inform spatial land planning and development management decisions. It identifies further work which will be needed in future to

deliver green infrastructure, and makes appropriate cross references to the district level GI Plans.

Objectives, Targets, Indicators

The plan does not include any objectives but instead: Provides an overview of existing strategic green infrastructure assets within the County, including consideration of assets and proposals which are significant for national and sub national/regional green infrastructure planning; Sets out an assessment, at the strategic level, of the ability of green infrastructure to provide multiple environmental and social and, in some cases economic, functions; Considers opportunities for enhancement and creation of green infrastructure; Outlines a series of potential projects to deliver multiple functions and benefits, and Provides advice on taking green infrastructure proposals forward through spatial planning and practical delivery.

Hertfordshire Rights of Way Improvement Plan 2017/18 – 2027/28 (2017)

The Rights of Way Improvement Plan (RoWIP) for Hertfordshire provides the context for the future management of and investment in the rights of way network and other access activities, to meet people’s needs and demands. RoWIPs are the way that Highway Authorities identify changes and improvements to local rights of way networks in order to meet the Government's aims of better provision for walkers, cyclists, equestrians (horse riders and horse and carriage drivers) and people with disabilities.

Objectives, Targets, Indicators

The plan includes Core Actions relating to the following issues: 1. Develop routes that cater for the needs of people with limited mobility and visual impairments; 2. Develop the Rights of Way network from passenger transport connections; 3. Reduce the number of physical barriers on the network; 4. Promote Hertfordshire’s countryside to residents and visitors; 5. Develop links into the countryside from towns; 6. Create and develop off-road routes linking communities with places of work, schools and other local facilities; 7. Extend the network for cyclists,

horse-riders and horse & carriage drivers; 8. Develop a range of circular off-road routes which support health & wellbeing; 9. Ensure the off-road network is protected, extended and enhanced through development proposals; and 10. Work to improve the safety and attractiveness of the network affected by busy transport routes.

St Albans District Green Infrastructure Plan (2011)

The Green Infrastructure Plan for St Albans District provides an overview of existing green infrastructure assets within the District, sets out an assessment of the ability of green infrastructure to provide multiple environmental and social and in some cases economic functions, considers opportunities for enhancement and creation of green infrastructure, outlines a series of potential projects to deliver multiple functions and benefits, and provides advice on taking green infrastructure proposals forward through spatial planning and practical delivery.

Objectives, Targets, Indicators

The green infrastructure vision for St Albans is:

To conserve and enhance:

- The varied landscapes of the District – farmland, ancient woodland, wooded valley crests, heathlands and commons. Also the intricate network of river valleys, and associated visual relationships with important landmarks such as St Albans Cathedral and the historic City;
- The functionality of the riverine environments of Ver, Colne and Lea, in terms of landscape character, ecology and flows; and
- The strong sense of place created by aspects of historic legacy, such as Roman and medieval settlement.

To improve and create:

- Enhanced landscape and habitat connectivity between river valleys, heathlands and woodlands;
- Accessibility and connections to and along the river valleys;
- Links for a variety of users – walkers, cyclists and riders;
- 'Space for water' - naturalising river courses to reduce the potential for flooding in the District and aid creation of additional recreational water spaces;
- Enhanced links to greenspace, particularly in the larger and higher density settlements such as St Albans and outlying suburbs, and Harpenden, as well as opportunities for urban greening for community benefit and value, such as orchards.

To recognise and value:

- The District's rich heritage and diverse cultural pattern, in particular assets such as the Roman settlement legacy;
- The significance of Community Forestry, the aspirations of Watling Chase Community Forest, and the importance of strategic initiatives such as Heartwood Forest;
- GI for people – the importance of provision for low key and informal recreation to enhance the value of existing green infrastructure, and creating/promoting an improved series of links between settlements, commons and the wider countryside;
- The importance of the green infrastructure network for health and quality of life, seeking to promote awareness and appreciation of the network;
- The need for an appropriate balance between community, access, recreation and biodiversity interests.

6 Historic Environment

Convention for the Protection of the Architectural Heritage of Europe (1985)
This European Convention sets a common policy for the conservation and enhancement of the architectural heritage.
Objectives, Targets, Indicators
Objectives include: <ul style="list-style-type: none"> To take statutory measures to protect architectural heritage; To make provision for the protection of monuments, groups of buildings and sites; and To make the conservation, promotion and enhancement of the architectural heritage a major feature of cultural, environmental and planning policies.
The European Convention on the Protection of Archaeological Heritage (Revised) (1992)
The aim of this (revised) Convention is to protect the archaeological heritage as a source of the European collective memory and as an instrument for historical and scientific study. This convention recognises that archaeology is seriously threatened with deterioration because of the increasing number of major planning schemes, natural risks, clandestine or unscientific excavations and insufficient public awareness. The aim the Convention is to protect the archaeological heritage as a source of the European collective memory and as an instrument for historical and scientific study.
Objectives, Targets, Indicators
The maintenance of an inventory of its archaeological heritage and the designation of protected monuments and areas; The mandatory reporting of archaeological heritage found and making them available for examination; To apply procedures for the authorisation and supervision of excavation and other archaeological activities; To ensure that excavations and other potentially destructive techniques are carried out only by qualified, specially authorised persons; The modification of development plans likely to have adverse effects on the archaeological heritage; The allocation of sufficient time and resources for an appropriate scientific study to be made of the site and for its findings to be published; To ensure that environmental impact assessments and the resulting decisions involve full consideration of archaeological sites and their settings; and To make provision, when elements of the archaeological heritage have been found during development work, for their conservation in situ when feasible.
Planning (Listed Buildings & Conservation Areas) Act 1990
An act to consolidate certain enactments relating to special controls in respect of buildings and areas of special architectural or historic interest with amendments to give effect to recommendations to give effect to recommendations of the Law Commissions.
Objectives, Targets, Indicators
Places a general duty on local authorities for the preservation and enhancement of listed buildings and features of special architectural or historic interest, including the designation of conservation areas.

Ancient Monuments & Archaeological Areas Act 1979
The Act consolidates and amends the law relating to ancient monuments, including; to make provision for the investigation, preservation and recording of matters of archaeological or historical interest and (in connection therewith) for the regulation of operations or activities affecting such matters.
Objectives, Targets, Indicators
Section 61(12) defines sites that warrant protection due to their being of national importance as 'ancient monuments'. These can be either Scheduled Ancient Monuments or " <i>any other monument which in the opinion of the Secretary of State is of public interest by reason of the historic, architectural, traditional, artistic or archaeological interest attaching to it</i> ".
The Heritage Statement (2017)
The Heritage Statement sets out how the government will support the heritage sector and help it to protect and care for England's heritage and historic environment in the coming years, in order to maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it.
Objectives, Targets, Indicators
The Heritage Statement does not include any objectives, targets, or indicators.
Historic England Good Practice Advice in Planning Notes 1-3
The purpose of this Good Practice Advice notes is to provide information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guide (PPG).
Objectives, Targets, Indicators
Advice Note 1, The Historic Environment in Local Plans: This document sets out information to help local planning authorities make well informed and effective local plans. Advice Note 2, Managing Significance in Decision-Taking: This document contains useful information on assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness. Advice Note 3, The Setting of Heritage Assets: document sets out guidance, against the background of the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guide (PPG), on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes.
Enjoy! A Cultural Strategy for Hertfordshire (2002)
This strategy provides the plan for development in the areas defined as 'culture' by the Department for Culture, Media and Sport over the next five years.
Objectives, Targets, Indicators
The aim of Hertfordshire's cultural strategy is to offer everyone the opportunity to improve the quality of their lives by being able to access high-quality cultural and leisure activities.

An Archaeological Strategy for the Historic Centre of St Albans (2005)
This strategy defines what is meant by the historic environment in St Albans and reviews its character and its value for today's and for future generations. 33 key sites have been identified as being of particular significance.
Objectives, Targets, Indicators
The following 8 objectives are not specific to the Strategy but are those for the District Archaeology service as part of its role to support the achievement on the Council's vision and aims: <ol style="list-style-type: none"> 1. To provide a high quality service and strive for excellence through continued improvement. 2. To work in partnership with voluntary, statutory, commercial and community organisations to meet the needs of the whole community. 3. To preserve the heritage of the District and share it widely. 4. To promote and implement environmental good practice. 5. To conserve and improve the character and attractiveness of the environment throughout the District. 6. To promote quality and affordable leisure and arts opportunities for all. 7. To promote St Albans City and District as a tourist destination and as a place for local residents to enjoy. 8. To support learning opportunities for local people.
Conservation Area Character Statements
Character Statements assess the character of a conservation area. They have been prepared for the following Conservation Areas in the District: Amwell; Childwickbury; Cunningham Avenue; Harpenden; London Colney; Mackerye End; Old Bricket Wood; Park Street Frogmore; Potters Crouch; Redbourn; Sandridge; Shafford Mill; Sleapshyde; Sopwell; St Albans; Waterend; and Wheathampstead.
Objectives, Targets, Indicators
The aims of the Character Statements are to show the way in which the form of the conservation area has evolved and to assess its present character; to indicate the principles to be adopted in considering planning applications in the area; and to form a framework within which more detailed proposals may be formulated.

7 Material Assets

EU Directive to promote Electricity from Renewable Energy (2001/77/EEC)
The Renewables Directive aims to promote a substantial increase in the proportion of electricity generated from renewable energy sources across the European Union by 2010. Individual Member States have all been required to take appropriate steps to encourage greater consumption of electricity from renewables, in order that the overall EU target. These national indicative targets should also be consistent with any national commitment made as part of the climate change commitments accepted by the Community under the Kyoto Protocol. Where they use waste as an energy source, Member States must comply with current Community legislation on waste management.
Objectives, Targets, Indicators
National targets on use of electricity from renewable sources should be consistent with the indicative target of 12% of gross domestic energy consumption ((22.1% of electricity) by 2010. Member States are required to implement a scheme for the guarantee of origin of electricity from renewable sources (REGOs).

EU Waste Framework Directive (2008/98/EC)
<p>The Waste Framework Directive (WFD) requires Member States of the EU to establish both a network of disposal facilities and competent authorities with responsibility for issuing waste management authorisations and licenses. Member States may also introduce regulations which specify which waste recovery operations and businesses are exempt from the licensing regimes and the conditions for those exemptions.</p> <p>An important objective of the WFD is to ensure the recovery of waste or its disposal without endangering human health and the environment. Greater emphasis is also placed on the prevention, reduction, re-use and recycling of waste.</p>
Objectives, Targets, Indicators
<p>Article 4: Member States shall take the necessary measures to ensure that waste is recovered or disposed of without endangering human health and without using processes or methods which could harm the environment, and in particular:</p> <ul style="list-style-type: none"> • Without risk to water, air, soil and plants and animals • Without causing a nuisance through noise or odours • Without adversely affecting the countryside or places of special interest
EU Waste to Landfill Directive (99/31/EC)
<p>The Directive aims at reducing the amount of waste landfilled, to promote recycling and recovery and to establish high standards of landfill practice across the EU and, through the harmonisation of standards, to prevent the shipping of waste from one Country to another. The objective of the Directive is to prevent or reduce as far as possible negative effects on the environment from the landfilling of waste, by introducing stringent technical requirements for waste and landfills.</p> <p>The Directive also intends to prevent or reduce the adverse effects of the landfill of waste on the environment, in particular on surface water, groundwater, soil, air and human health. It defines the different categories of waste (municipal waste, hazardous waste, non-hazardous waste and inert waste) and applies to all landfills, defined as waste disposal sites for the deposit of waste onto or into land.</p>
Objectives, Targets, Indicators
<p>Reduction of the amount of biodegradable municipal waste sent to landfill to 75% of the total generated in 1995 by 2006, 50% by 2009 and 35% by 2016.</p>
National Planning Policy for Waste (2014)
<p>Sets out detailed waste planning policies.</p>
Objectives, Targets and Indicators
<p>In preparing their Local Plans, waste planning authorities should, to the extent appropriate to their responsibilities:</p> <ul style="list-style-type: none"> • ensure that the planned provision of new capacity and its spatial distribution is based on robust analysis of best available data and information, and an appraisal of options. Spurious precision should be avoided; • work jointly and collaboratively with other planning authorities to collect and share data and information on waste arisings, and take account of: <ul style="list-style-type: none"> i. waste arisings across neighbouring waste planning authority areas;

- ii. any waste management requirement identified nationally, including the Government’s latest advice on forecasts of waste arisings and the proportion of waste that can be recycled; and
- ensure that the need for waste management facilities is considered alongside other spatial planning concerns, recognising the positive contribution that waste management can bring to the development of sustainable communities.

Waste Management Plan for England (2013)

Provides an analysis of the current waste management situation in England, and evaluates how it will support implementation of the objectives and provisions of the revised WFD.

Objectives, Targets, Indicators

This Plan supersedes the previous waste management plan for England. It meets the requirements in Article 28 of the revised WFD which are broader than the requirements of Article 7 in the preceding WFD. This Plan provides an overview of waste management in England and fulfils the revised WFD Article 28 mandatory requirements, and other required content as set out in Schedule 1 to the Waste (England and Wales) Regulations 2011.

The Plan summarises how the Waste Hierarchy is applied in England and how waste management is regulated by the Environment Agency. The Plan covers municipal waste, industrial waste, construction and demolition waste and hazardous waste.

Waste Prevention Programme for England (2013)

This Programme sets out the Government’s view on how to reduce the amount of waste produced and presents the key roles and actions which should be taken in our transition towards a more resource efficient economy. It also sets out the actions government is taking to support this transition.

Objectives, Targets and Indicators

The aim of the Programme is to improve the environment and protect human health by supporting a resource efficient economy, reducing the quantity and impact of waste produced whilst promoting sustainable economic growth.

A Green Future: Our 25 Year Plan to Improve the Environment (2018)

Objectives, Targets, Indicators

Using resources from nature more sustainably and efficiently

Maximising the value and benefits we get from our resources, doubling resource productivity⁷ by 2050.

Improving our approach to soil management: by 2030 we want all of England’s soils to be managed sustainably, and we will use natural capital thinking to develop appropriate soil metrics and management approaches.

Increasing timber supplies.

Ensuring that all fish stocks are recovered to and maintained at levels that can produce their maximum sustainable yield.

Ensuring that food is produced sustainably and profitably.

Minimising Waste:

Working towards our ambition of zero avoidable waste by 2050;

Working to a target of eliminating avoidable plastic waste by end of 2042;
 Meeting all existing waste targets – including those on landfill, reuse and recycling – and developing ambitious new future targets and milestones;
 Seeking to eliminate waste crime and illegal waste sites over the lifetime of this Plan, prioritising those of highest risk. Delivering a substantial reduction in litter and littering behaviour; and
 Significantly reducing and where possible preventing all kinds of marine plastic pollution – in particular material that came originally from land.

Hertfordshire Waste Core Strategy and Development Management Policies DPD 2011-2026 (Adopted November 2012)

This joint municipal waste management strategy for Hertfordshire sets out how waste problems are to be addressed over the next 2 decades.

Objectives, Targets, Indicators

The Strategy sets out Hertfordshire’s vision to be ‘waste aware and responsible’. Its objective is to promote the waste hierarchy and ensure waste management facilities are “well designed, appropriately sized and sensitively located so that they reduce the environmental and social impacts, meet the needs of communities and businesses, and seek enhancement of the locality”.

Hertfordshire Building Futures

An initiative run in partnership by Hertfordshire’s Local Planning Authorities with support from industry groups and stakeholders.

Objectives, Targets, Indicators

Its purpose is to promote sustainable and high quality development through the planning system in Hertfordshire. It currently does this in three ways:

- Sustainable Design Toolkit
- Hertfordshire Design Review Panel
- Hertfordshire Building Futures Awards

The initiative promotes a holistic and integrated approach to design and construction to ensure new development is sustainable and of a high quality in various regards, across a number of design and construction topics: Air, Climate Change Adaptation, Design, Energy & Climate Change, Landscape & Biodiversity, Materials, Noise, Safety, Waste and Water.

Hertfordshire Minerals and Waste Development Framework: Waste Core Strategy & Development Management Policies DPD 2011-2026 (Adopted November 2012)

The Core Strategy sets out the vision for waste planning in Hertfordshire up to 2026, with a view to providing the basis for a longer term spatial strategy that complements the County’s Waste Management Strategy to 2026. To deliver this vision, the document provides strategic objectives for the County; a spatial strategy; core policies; and a monitoring and implementation framework to test its delivery. The purpose of the Waste Development Policies is to provide guidance in respect of the issues that will be considered when determining planning applications for waste management development. This part of the document provides additional criteria to implement the spatial vision and strategic objectives for the vision for waste planning for the County, enshrined within the Core Strategy to be fulfilled.

Objectives, Targets, Indicators

- To promote the provision of well designed and efficient facilities, that drive waste management practices up the waste hierarchy and are located to ensure no harm to human health and the environment, and which reduce waste volumes to be disposed in landfill;
- To locate waste recycling, handling and reduction facilities as close as practicable to the origin of waste;
- To facilitate the increased and efficient use of recycled waste materials in Hertfordshire (for example as aggregate);
- To facilitate a shift away from road transport to water and rail transport as the principal means of transporting waste;
- To prevent and minimise waste, but where waste cannot be avoided, maximise the recovery value (including energy and heat) from waste;
- To work with all partners in the county to encourage integrated spatial planning, aligning with other local waste strategies and local authority objectives which take account of waste issues, recognising that waste management generates employment and is part of the infrastructure which supports businesses and communities; and
- To work with all neighbouring waste authorities to manage the equivalent of the County's own waste arisings.

Hertfordshire Minerals Local Plan Consultation Draft (2017)

Hertfordshire County Council is the Minerals Planning Authority (MPA) for the county of Hertfordshire. The county council has a statutory responsibility to plan for future minerals supply within Hertfordshire and determine proposals for the extraction of minerals and associated development. The Minerals Local Plan has been prepared to meet these purposes, setting out the spatial portrait of Hertfordshire, draft vision and objectives for minerals development in the county during a 15 year period from 2016-2031, and draft policies to implement the Plan's vision and objectives. It considers the need to contribute to national, sub-national and local mineral requirements and seeks to balance these needs against social, environmental and economic considerations.

Objectives, Targets, Indicators

The plan sets out the objectives that its policies are intended to achieve:

- Obj1: To enable sustainable local economic growth by identifying adequate mineral extraction sites/areas within Hertfordshire sufficient to meet the requirements of the Local Aggregate Assessment and safeguarding existing infrastructure for non-indigenous aggregates to provide the building materials to enable built development and associated infrastructure.
- Obj2: To provide a steady and adequate supply of minerals which includes safeguarding resources for future use, extracting minerals prior to other development taking place and using minerals in construction on the land from which they are extracted.
- Obj3: To encourage the sustainable use of minerals by utilising secondary and recycled aggregates which will reduce the reliance on primary won aggregates.
- Obj4: To conserve sand, gravel and clay resources for current and future generations.
- Obj5: To promote/encourage the sustainable transport of minerals by road, rail and water, including the safeguarding of railheads.
- Obj6: To ensure the sustainable and expedient delivery of mineral extraction while protecting people from harm, positively contributing to the natural, built and historic environments and mitigating against adverse cumulative impacts.
- Obj7: To ensure that mineral development addresses and minimises the impacts it will have on climate change and how climate change may impact upon it.

- Obj8: To positively contribute to the natural, built and historic environments with high quality, progressive and expedient restoration to achieve a beneficial after use. The after use will protect and enhance the environment, including landscape and biodiversity improvements.
- Obj9: To increase public access to the countryside and enhance biodiversity through enhancing the amenity value of land when restoring extraction sites.

Hertfordshire Renewable and Low Carbon Energy Study (2010)

The study identifies opportunities for district heating (and CHP) and wind, and areas of constraint (areas not capable of delivering community or large-scale renewable or low carbon energy resources). An Energy Opportunities Plan presents the outcome of the resource mapping. The key recommendations included:

- A policy recommendation for areas identified with potential for district heating – in these areas new development should be one step ahead of the Code for Sustainable Homes with developments of 10 dwellings or more/ 1000sqm of non-residential or more;
- A policy recommendation that new development in constrained areas should accord with building regulations.

There is also policy guidance for the use of a Carbon Offset Fund and policy guidance for potential large-scale wind opportunity areas in appropriate areas in the Green Belt, if there was clear justification.

Objectives, Targets, Indicators

The main objectives of the study is to meet the policy requirements set by PPS1 and its Supplement, and to identify options for delivering renewable and low carbon opportunities through new development in Hertfordshire. The study also aims to provide evidence-based understanding of the local feasibility and potential for renewable and low carbon technologies, and policy direction for the Core Strategy.

St Albans Energy Policy

The council is committed to improving energy efficiency in the District in order to ensure the comfort and wellbeing of its residents, and to reduce emissions of greenhouse gases, particularly carbon dioxide. In addition, the Council is committed to responsible energy management and will endeavour to practice energy efficiency in Council owned and run buildings.

Objectives, Targets, Indicators

- Tackle fuel poverty through awareness raising of available heating and insulation grant schemes.
 - Create warm and healthy living conditions for all council housing stock.
 - Prioritise the production of affordable homes that are energy efficient and environmentally sustainable.
 - Ensure use of energy efficient technology for council operational buildings and housing stock.
 - Encourage the installation of energy efficient measures in private properties.
- Promote and investigate the use of sustainable energy sources for council buildings and residential properties.

St Albans Energy Opportunities Plan (2010)

This is a map of the District which shows in which areas there is potential for renewable energy development.

Objectives, Targets, Indicators
n/a

St Albans Infrastructure Delivery Plan (2016)
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The purpose of the Infrastructure Delivery Plan (IDP) is to provide a detailed understanding of the future infrastructure needs of the District to support planned growth up to the 2031. The National Planning Policy Framework (NPPF) requires the council to plan for future infrastructure needs as part of the Local Plan preparation process. The IDP provides information on the position of current infrastructure, drawing together collaborative research to set out the existing issues and consider the additional provision required to support the growth set out in the Strategic Local Plan (SLP).

Objectives, Targets, Indicators
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The Plan does not have objectives, but identifies the requirements for a wide range of infrastructure type that will be needed to support planned growth in the District. The infrastructure types covered are as follows:

Social & Community Infrastructure: Health Infrastructure; Health and Community Services; Education Infrastructure; Primary Schools; Secondary Education; Further Education - Oaklands College; Early Education and Child Care Provision; Emergency Services; Leisure and Cultural Facilities; Libraries; Cemeteries; and Youth Provision.

Green Infrastructure: Strategic Green Infrastructure; and Local Green Infrastructure

Physical Infrastructure; Transport; Road Network; Public Transport; and Walking and Cycling Infrastructure.

Utilities Infrastructure: Water Infrastructure; Energy Distribution; Digital Infrastructure; and Waste Infrastructure.

St Albans Brownfield Land Register

The Town and Country Planning (Brownfield Land Register) Regulations 2017 require local planning authorities to prepare and maintain registers of brownfield land suitable for residential development. The Town and Country Planning (Permission in Principle) Order 2017 provides that sites entered on Part 2 of the new Brownfield Land Registers will be granted permission in principle.

St Albans Council consults annually on its draft Brownfield Land Register (BLR). The BLR draws on information about land available for development collected for the Council's Strategic Housing Land Availability Assessment (SHLAA). The final BLR is published as part of the Council's Library of Documents at the end of each year.

Objectives, Targets, Indicators
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N/A

8 Soil

The European Soil Thematic Strategy (2006)
<p>The Thematic Strategy for Soil Protection consists of a Communication from the Commission to the other European Institutions, a proposal for a framework Directive (a European law), and an Impact Assessment.</p> <p>The Communication explains why further action is needed to ensure a high level of soil protection, sets the overall objective of the Strategy and explains what kind of measures must be taken. It establishes a ten-year work program for the European Commission. The proposal for a framework Directive sets out common principles for protecting soils across the EU.</p>
Objectives, Targets, Indicators
<p>The Strategy's objective is to define a common and comprehensive approach, focusing on the preservation of soil functions, based on the following principles:</p> <p>Preventing further soil degradation and preserving its functions:</p> <p>By acting on soil use and management patterns, when soil is used and its functions are exploited,</p> <p>By taking action at source, when soil acts as a sink/receptor of the effects of human activities or environmental phenomena.</p> <p>Restoring degraded soils to a level of functionality consistent at least with current and intended use, thus also considering the cost implications of the restoration of soil.</p>
Safeguarding our Soils: A Strategy for England (2009)
<p>The Strategy highlights those areas related to soils which the government will prioritise and focus attention in tackling degradation threats.</p>
Objectives, Targets and Indicators
<p>The vision of the strategy is: <i>"By 2030, all England's soils will be managed sustainably and degradation threats tackled successfully. This will improve the quality of England's soils and safeguard their ability to provide essential services for future generations"</i>.</p> <p>This Strategy highlights those areas which the government will prioritise and focus attention in tackling degradation threats. The Strategy will be delivered primarily through improving evidence base, providing information and guidance to those who are actively managing soils, and using regulation and incentives where necessary to drive further action.</p>
The First Soil Action Plan for England, 2004-2006 (DEFRA, 2004)
<p>The Action Plan contains 52 actions on issues ranging from soil management on farms to soils in the planning system, soils and biodiversity, contamination of soils and the role of soils in conserving cultural heritage and landscape. All of the actions make a step towards more sustainable soil use and protection.</p>
Objectives, Targets and Indicators
<p>The actions proposed in this plan work towards a common vision that recognises the several vital functions that soils perform for society. The vision is to ensure that England's soils will be protected and managed to optimize the varied functions that soils perform for society (e.g. supporting agriculture and forestry, protecting cultural heritage, supporting biodiversity, as a platform for construction), in keeping with the</p>

principles of sustainable development and on the basis of sound evidence.

In order to achieve this vision, the aims are to ensure:

- Soil managers will look after their soils with a view both to their own and society's short-term needs and to the interests of future generations;
- The regulatory, legislative and political framework will provide appropriate protection of soil as an irreplaceable natural resource and empower and encourage people with soil to manage it properly; and

A better understanding of, and access to, information on the state of our soils and the physical, chemical and biological processes which operate on and within them.

9 Water

The Floods Directive 2007 (2007/60/EU)
Legislation on the assessment and management of flood risks.
Objectives, Targets, Indicators
Establishes a framework for the assessment and management of flood risks, aiming at the reduction of the adverse consequences for human health, the environment, cultural heritage and economic activity associated with floods. The Directive requires Member States to assess if all water courses and coast lines are at risk from flooding, to map the flood extent and assets and humans at risk in these areas and to take adequate and coordinated measures to reduce this flood risk. The Directive also reinforces the rights of the public to access this information and to have a say in the planning process. Preliminary Flood Risk Assessments were to be completed by December 2011. Flood Hazard Maps and Flood Risk Maps were to be completed by December 2013. Flood Risk Management Plans are to be completed by December 2015.
EU Directive Establishing a Framework for the Community Action in the Field of Water Policy (2000/60/EC) – The Water Framework Directive
Requires all Member States to achieve 'good ecological status' of inland water bodies by 2015, and limits the quantity of groundwater abstraction to that portion of overall recharge not needed by ecology.
Objectives, Targets, Indicators
To achieve 'good ecological status' of inland water bodies by 2015.
Urban Waste Water Treatment Directive (91/271/EEC)
This Directive was adopted by member states in May 1991 and transposed into legislation across the UK by the end of January 1995. Its objective is to protect the environment from the adverse effects of sewage discharges. It sets treatment levels on the basis of sizes of sewage discharges and the sensitivity of waters receiving the discharges. By the end of 1998 the UK had stopped all disposal of the sewage sludge left over from treatment processes at sea or to other surface waters in accordance with its requirements.
Objectives, Targets, Indicators
The main objective of the Urban Waste Water Treatment Directive (UWWTD) is to ensure that all significant discharges of sewage are treated,

whether the discharge is to inland surface water, groundwaters, estuaries or coastal waters. For the purposes of the Directive, significant discharges are those to fresh waters or to estuaries serving communities with a population equivalent (pe) of more than 2,000; or those to coastal waters serving communities of more than 10,000 pe.

EU Nitrates Directive (91/676/EEC)

The Directive addresses water pollution by nitrates from agriculture. It seeks to reduce or prevent the pollution of water caused by the application and storage of inorganic fertiliser and manure on farmland. It is designed both to safeguard drinking water supplies and to prevent wider ecological damage in the form of the eutrophication of freshwater and marine waters generally.

Objectives, Targets, Indicators

Every four years Member States shall report on polluted or likely to be polluted waters and designed vulnerable zones, and measures and actions taken to reduce the pollution from nitrates.

Polluted waters are:

- Surface freshwaters, in particular those used or intended for the abstraction of drinking water, that contain or could contain, than the concentration of nitrates laid down in accordance with Directive 75/440/EEC;
- Groundwaters containing or that could contain more than 50 mg/l nitrates;
- Natural freshwater lakes, other freshwater bodies, estuaries, coastal waters and marine waters found or likely to be eutrophic.

The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017

The 2017 update replaces the 2003 regulations. The update consolidates the 2003 Regulations, which have been amended a number of times, and in addition outlines the duties of regulators in relation to environmental permitting, impoundment and abstraction of water.

Objectives, Targets, Indicators

The Regulations transpose the requirements of the EU Water Framework Directive.

The Environment Agency's Approach to Groundwater Protection (2018)

This document updates Groundwater protection: Principles and practice (GP3). It contains position statements which provide information about the Environment Agency's approach to managing and protecting groundwater. They detail how the Environment Agency delivers government policy for groundwater and adopts a risk-based approach where legislation allows.

Objectives, Targets, Indicators

The primary aim of the position statement is the prevention of pollution of groundwater and protection of it as a resource. Groundwater protection is long term, so these principles and position statements aim to protect and enhance this valuable resource for future generations.

It covers the topics of: General approach to groundwater protection; Protection of water intended for human consumption; Infrastructure; Pollutant storage and transmission; Landfill; Non-landfill waste activities; Discharge of liquid effluents into the ground; Diffuse (rural) sources of pollution; Land contamination; Mining induced pollution; Cemetery developments ; Burial of animal carcasses; Groundwater resources; River augmentation; Managed aquifer recharge and recovery schemes ;Ground source heating and cooling; Flooding from groundwater; and Legal framework.

Flood and Water Management Act (2010)
An Act to make provision about water, including provision about the management of risks in connection with flooding and coastal erosion.
Objectives, Targets and Indicators
To improve the management of flood risk for people, homes and businesses. To protect water supplies. Local Authorities are required to prepare flood risk assessments, flood maps and plans and lead local flood authorities to prepare local flood risk management strategies.

Affinity Water- Water Resources Management Plan (2014)
Objectives, Targets, Indicators
<p>The Plan objectives are:</p> <ul style="list-style-type: none"> • To meet the water supply needs of our customers over the next 25 years; • To work closely with other water companies in our region to share water resources; • To ensure that our water abstractions are sustainable and do not damage the environment; • To reduce leakage from underground water pipes where the savings justify the expenditure and to meet customer expectations; • To promote water efficiency to support customers and as an aid to reducing demand; • To extend customer water metering, where cost beneficial, in the interests of fair charging and reducing demand; • To take account of potential future uncertainties including climate change and higher environmental standards; • To make best use of existing resources whilst maintaining water quality at all times. <p>In the immediate five years, from 2015 to 2020, Affinity Water's Preferred Plan derives:</p> <ul style="list-style-type: none"> • A saving of 20MI/d in distribution network leakage through a number of methods; • Over 29MI/d from universal metering by AMR in four of their six water resource zones in the Central region (with the remaining two WRZ delivered in the following five-year period). This includes 7MI/d from the repair of leaking customer supply pipes, and around 4MI/d from the distribution of water efficient devices and in-home water efficiency audits; • Approximately 2MI/d from water efficiency, targeted at their non-domestic customers to help them identify ways to use less water in the operation of their businesses; • An extra 2MI/d from our existing licences, by increasing the amount they abstract without causing damage to the environment. These options also give them an extra 11MI/d during peak conditions; • That they buy 17MI/d of water from our neighbouring water companies as a bulk transfer of water to make sure we have enough capacity to meet the needs of our customers.

A Green Future: Our 25 Year Plan to Improve the Environment (2018)

The plan sets out policies to achieve the Government's 25-year goals relating to: 1. Clean air; 2. Clean and plentiful water; 3. Thriving plants and wildlife; 4. A reduced risk of harm from environmental hazards such as flooding and drought; 5. Using resources from nature more sustainably and efficiently; 6. Enhanced beauty, heritage and engagement with the natural environment; 7. Mitigating and adapting to climate change; 8. Minimising waste; 9. Managing exposure to chemicals; 10. Enhancing biosecurity.

Objectives, Targets, Indicators

Clean and Plentiful Water:

Improving at least three quarters of our waters to be close to their natural state as soon as is practicable by:

Reducing the damaging abstraction of water from rivers and groundwater, ensuring that by 2021 the proportion of water bodies with enough water to support environmental standards increases from 82% to 90% for surface water bodies and from 72% to 77% for groundwater bodies;

Reaching or exceeding objectives for rivers, lakes, coastal and ground waters that are specially protected, whether for biodiversity or drinking water as per our River Basin Management Plans;

Supporting OFWAT's ambitions on leakage, minimising the amount of water lost through leakage year on year, with water companies expected to reduce leakage by at least an average of 15% by 2025; and

Minimising by 2030 the harmful bacteria in our designated bathing waters and continuing to improve the cleanliness of our waters. We will make sure that potential bathers are warned of any short-term pollution risks.

Reducing the risks of harm from environmental hazards

Making sure everyone is able to access the information they need to assess any risks to their lives and livelihoods, health and prosperity posed by flooding and coastal erosion.

Bringing the public, private and third sectors together to work with communities and individuals to reduce the risk of harm.

Making sure that decisions on land use, including development, reflect the level of current and future flood risk.

Ensuring interruptions to water supplies are minimised during prolonged dry weather and drought.

Boosting the long-term resilience of our homes, businesses and infrastructure.

Implementing a sustainable and effective second National Adaptation Programme.

Local Flood Risk Management Strategy for Hertfordshire 2013-2016

The Local Flood Risk Management Strategy for Hertfordshire sets out measures to manage local flood risk in Hertfordshire. It focuses on local sources of flooding from surface runoff, groundwater and ordinary watercourses

Objectives, Targets, Indicators

High level objectives proposed in the Strategy include: - To reduce the potential impact and costs of flooding in the county; To better understand local flood risk and make best use of available information; To develop greater personal involvement in flood risk management amongst residents of Hertfordshire; and To secure improvements to the water environment of Hertfordshire through the undertaking of actions associated with flood risk management.

Hertfordshire Water Study (2017) Stage 1
The Hertfordshire Water Study is not available (August 2018) to inform the SA/SEA. However when published it will need to be taken into account in the Local Plan and future SAs.
Objectives, Targets, Indicators
N/A at this stage

Level 1 Strategic Flood Risk Assessment: Dacorum, St Albans, Three Rivers and Watford (2007)
The purpose of this study is to assess and map all forms of flood risk from groundwater, surface water, sewer and river sources, taking into account the future climate change predictions, and use this as an evidence base to locate future development primarily in low flood risk areas.
Objectives, Targets, Indicators
<ul style="list-style-type: none"> • Protect the functional floodplain from development; • Direct vulnerable development away from flood affected areas; • Ensure all new development is 'Safe', meaning that dry pedestrian access to and from development is possible without passing through the 2 in 100 year plus climate change floodplain, and emergency vehicular access is possible; • Promote the use of sustainable urban drainage systems in all flood zones to achieve Greenfield discharge rates on both Greenfield and Brownfield sites; • Support flood alleviation measures under consideration by the Environment Agency by safeguarding possible sites for flood storage and other channel works; • Seek developer contributions via s106 planning obligations (in consultation with the Environment Agency) to fund strategic flood risk management facilities and bring benefit to the wider community.

River Basin Management Plan: Thames River Basin District (2015)
This plan considers the pressures facing the water environment in the Thames Basin district and actions that will address them. It has been prepared under the Water Framework Directive and is the first of a series of six year planning cycles.
The update (October 2015) to the Thames River Basin District River Basin Management Plan (RBMP) provides a programme of measures related to a range of Significant Water Management Issues (SWMIs) that need to be addressed to meet Water Framework Directives. The measures are presented under the following headings: measures to prevent deterioration; measures to achieve 2021 outcomes; measures to achieve outcomes for 2027 or beyond; and additional measures for protected areas.
Objectives, Targets, Indicators
By 2015, 22% of surface waters (i.e. 123 water bodies) will show an improvement for one or more of the elements measured. This translates to 1,737 kilometres of river or canal improved.
The Significant Water Management Issues identified in the proposed update to the Thames RBMP are as follows: <ul style="list-style-type: none"> • Pollution from waste water

- Physical modifications
- Pollution from rural areas
- Pollution from towns, cities and transport
- Changes to the natural flow and level of water
- Negative effects of non-native species
- Pollution from abandoned mines

Each SWMI is supported by objectives.

Thames Region Catchment Flood Management Plan (CFMP) (2009)

The Catchment Flood Management Plan sets out a sustainable direction for managing fluvial flood risk within the Thames region for the next 50 to 100 years. It provides details on the physical characteristics of the region; details on the hydrology of the region and flooding history; an assessment of flood risk across the region; and an assessment of how this flood risk could change in the future.

Objectives, Targets, Indicators

The CFMP involves new approaches to flood risk management and will be used to guide future investment, policies and flood risk management.

The CFMP's action plan highlights work necessary to manage flood risk in the Thames Region and is based on the different types of catchments present in the region.

The Colne Abstraction Licensing Strategy (2013)

This Licensing Strategy sets out how water resources are managed in the Colne catchment.

Objectives, Targets, Indicators

It provides information about where water is available for further abstraction and an indication of how reliable a new abstraction licence may be.

The strategy also outlines where it may be necessary to reduce current rates of abstraction and the approach to time limited licences.

Water Cycle Study: Scoping Study (Dacorum Borough Council, St Albans City and District Council, Three Rivers District Council, Watford Borough Council, Welwyn Hatfield Borough Council 2010)

This WCS Scoping report has been conducted for the Local Planning Authority areas (LPA) of Dacorum Borough Council (DBC), St Albans City and District Council (SADC), Three Rivers District Council (TRDC), Watford Borough Council (WBC) and Welwyn Hatfield Borough Council (WHBC), located in the southwest of Hertfordshire in the East of England. A Water Cycle Study (WCS) is required to inform the preparation of Core Strategy and Site Allocation Documents, and ideally provide evidence to support any policies included in the Local Development Framework (Local Plan) that relate to water resources, supply and sewerage, wastewater treatment, flood risk, water quality and the wider water environment.

Objectives, Targets, Indicators
<p>Key objectives of the WCS Scoping phase are to:</p> <p>Define the study area and steering group;</p> <p>Identify existing and planned levels of water supply, taking account of available resources and consumption targets, to accommodate the planned levels of growth;</p> <p>Identify the capacity of existing trunk sewers and wastewater treatment works to handle wastewater over the period to 2031 whilst highlighting pinch points and other critical issues associated with wastewater treatment;</p> <p>Identify the likely ecological and water quality impacts of planned growth on receiving watercourses at the wastewater treatment works, against existing discharge consents, whilst taking account of the Water Framework Directive;</p> <p>Identify any significant impacts on river flows, hydrology and the quality of watercourses and aquifers in the strategy area whilst considering the potential impacts of climate change;</p> <p>Consider existing and potential flood risk, by linking into Strategic Flood Risk Assessment work already undertaken, whilst considering future work that needs to be undertaken by SADC and WBC regarding a Surface Water Management Plan;</p> <p>Identify any gaps in evidence in relation to proposed development, water drainage, water infrastructure, flood risk, water quality, water resource and ecological issues; and</p> <p>Recommend any further WCS work required, and provide the scope for such work.</p>

10 Population, Health and Wellbeing

Directive 2002/49/EC relating to the assessment and management of environmental noise (The Environmental Noise Directive)
<p>The aim of the Environmental Noise Directive (END) is to define a common approach across the European Union with the intention of avoiding, preventing or reducing on a prioritised basis the harmful effects, including annoyance, due to exposure to environmental noise. Until May 2005 DEFRA consulted on the implementation of the Directive into UK law.</p>
Objectives, Targets, Indicators
<p>This will involve:</p> <ul style="list-style-type: none"> • Informing the public about environmental noise and its effects; • Preparing of strategic noise maps for: large urban areas (referred to as 'agglomerations' in the END and in this document), major roads, major railways and major airports as defined in the END; and • Preparing action plans based on the results of the noise mapping exercise. Such plans will aim to manage and reduce environmental noise where necessary, and preserve environmental noise quality where it is good.

Noise Policy Statement for England 2010
The Noise Policy Statement for England sets out the long term vision of government noise policy, to promote good health and a good quality of life through the management of noise.
Objectives, Targets, Indicators
Noise Policy Aims Through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development: <ul style="list-style-type: none"> • avoid significant adverse impacts on health and quality of life; • mitigate and minimise adverse impacts on health and quality of life; and • where possible, contribute to the improvement of health and quality of life.
Fuel Poverty Strategy for England (2015)
This new fuel poverty strategy is the first for 13 years. It brings together the successful work done in recent years with a new partnership approach and a new set of policies to build on that programme, in the light of recent evidence and learning.
Objectives, Targets, Indicators
The strategy explains who are the target groups of the strategy and the factors that lead to fuel poverty. It presents the new legal framework now in place in England for tackling fuel poverty laid out in primary legislation through the Warm Homes and Energy Conservation Act 2000 and in secondary legislation, by the Fuel Poverty (England) Regulations 2014. It highlights the new fuel poverty target: <p>to ensure that as many fuel poor homes as is reasonably practicable achieve a minimum energy efficiency rating of Band C, by 2030.</p> <p>The strategy shows what improving the energy efficiency of some illustrative fuel poor homes could mean in practice, including the effect this could have on required energy bills. It also sets out the range of indicators that will be used to monitor progress, including energy efficiency and renewables deployment in fuel poor homes, the situation of non-gas homes and the number of children living in fuel poverty.</p> <p>Also included in the strategy is the government’s strategic approach to fuel poverty both in the short term and long term, with the vision ‘to cut bills and increase comfort and well-being in the coldest low income homes’.</p>
Global Health Strategy 2014 to 2019 (Public Health England, 2014)
The strategy sets out PHE’s approach to global health for the next five years, and provides a framework for international engagement.
Objectives, Targets and Indicators
The approach outlined affects everyone who works in public health, at home and abroad. <p>The strategy identifies five strategic priorities and five ways to achieve them over the next five years, considering both UK based and internationally based activity; the aim of reducing global health inequities is threaded through the strategy. The strategy will be supported by development of annual delivery plans.</p> <p>The five strategic priorities are:</p> <ol style="list-style-type: none"> 1. Improving global health security; 2. Responding to outbreaks and incidents of international concern, and supporting the public health response to humanitarian disasters;

3. Public health capacity building;
4. Strengthening the approach to international aspects of health and wellbeing, and non-communicable diseases; and
5. Strengthening UK partnerships for global health activity.

Healthy Lives, Healthy People: Our Strategy for Public Health in England (2010)

Details the government's new approach to deal with health in England.

Objectives, Targets and Indicators

Outlines the government's commitment to protecting the population from serious health threats; helping people live longer, healthier and more fulfilling lives; and improving the health of the poorest, fastest.

NHS mandate 2018 to 2019

The mandate to NHS England sets out the government's objectives for NHS England, as well as its budget.

Objectives, Targets, Indicators

This mandate is based on the shared priorities of Government and its partner organisations for health and care. It sets objectives for NHS England that reflect its contribution to these ambitions to 2020:

- 1) Through better commissioning, improve local and national health outcomes, and reduce health inequalities.
- 2) To help create the safest, highest quality health and care service.
- 3) To balance the NHS budget and improve efficiency and productivity.
- 4) To lead a step change in the NHS in preventing ill health and supporting people to live healthier lives.
- 5) To maintain and improve performance against core standards.
- 6) To improve out-of-hospital care.
- 7) To support research, innovation and growth and to support the Government's implementation of EU Exit in regards to health and care.

Ageing Well in Hertfordshire 2014-2019

Sets out commitment to working with older people, carers and families and a wide range of stakeholders to ensure older people are supported well in their communities to lead their lives fully, and when they do need help and support it is joined up and at the right time.

Objectives, Targets, Indicators

The strategy covers social care, health and public health services support for older people in Hertfordshire and includes specialist and universal health services and preventative services provided by a wide range of partners including the voluntary sector and district councils.

Hertfordshire Physical Activity and Sport Framework (2015)

The Framework provides a coordinated and effective response to the issue of inactivity in Hertfordshire.

Objectives, Targets, Indicators

The document is aimed at county, district and borough, town and parish councils, public health leads, local strategic partnerships, health &

<p>wellbeing groups, NHS clinical commissioning groups, third sector agencies, Healthwatch and community agencies. It has been designed to help organisations in Hertfordshire to work together and provide them with a strong, evidence-based Framework for action. This Framework identifies why physical activity investment should be made and helps to make the case for increasing physical activity through reducing costs in the long term. It should be read in conjunction with the national framework for action from Public Health England 'Everybody active, every day' and the supporting resources including the physical activity promising practice collation and the overview of the evidence base.</p> <p>Specific targets for Hertfordshire as a whole are not set within this Framework.</p>
<p>Hertfordshire County Council Health and Wellbeing Strategy 2016-2020</p>
<p>This strategy sets high level priorities, based on the four life stages of Starting Well, Developing Well, Living and Working Well and Ageing Well.</p>
<p>Objectives, Targets, Indicators</p>
<p>The goal of the strategy is to optimise the health and wellbeing of people in Hertfordshire throughout the course of their lives.</p>
<p>Hertfordshire's Health and Wellbeing Planning Guidance May 2017</p>
<p>The purpose of this document is to aid planning professionals, both local authorities and developers in the delivery of healthy developments and communities by increasing local capacity, knowledge of health and wellbeing and the relationship to spatial planning issues, setting out the key principles and aspirations of the Hertfordshire County Council's (HCC) Public Health department.</p>
<p>Objectives, Targets, Indicators</p>
<p>The document provides guidance on the requirements for delivering 'healthy developments', covering seven key areas: Air Quality; Food and healthy Choices; Movement and Access; Neighbourhood Spaces; Housing and Development Design; Local Economy and Employment; and Quality Open Space, Play and Recreation</p>
<p>Hertfordshire County Council Active Travel Strategy (2013)</p>
<p>Hertfordshire's Active Travel Strategy sets out how the County Council and its partners will identify, deliver and promote interventions to increase the numbers of people walking and cycling in Hertfordshire.</p>
<p>Objectives, Targets, Indicators</p>
<p>The Active Travel Strategy therefore sets out the following over-arching aim for Hertfordshire: <i>To increase the proportion of journeys made by walking or cycling to improve individual health, quality of life, the environment and the economy</i></p> <p>The Active Travel Strategy is a daughter document to the Hertfordshire LTP, and will directly address the following LTP goals:</p> <ul style="list-style-type: none"> • Support economic development and planned dwelling growth; • Improve transport opportunities for all and achieve behavioural change in mode choice; • Enhance the quality of life, health and the natural, built and historic environment of all Hertfordshire residents; • Improve the safety and security of residents; • Reduce transport's contribution to greenhouse gas emissions and improve its resilience. <p>In addition the strategy will address the following County Council goal:</p> <ul style="list-style-type: none"> • Promote access to education, learning and training

Luton Airport Noise Action Plan (2014)
This Noise Action Plan has been prepared in response to the Environmental Noise Directive (2002/49/EC) which requires all Member States within the European Union to produce Noise Maps and Action Plans for the main sources of environmental noise, including airports.
Objectives, Targets, Indicators
The London Luton Airport Noise Action Plan includes 55 measures aimed at managing or mitigating the effects of aircraft noise, ensuring noise is effectively monitored and that the results of this monitoring are communicated.

St Albans District Draft Community Safety Partnership Strategy (2012/13)
This strategy outlines the St Albans Community Safety Partnership's priorities for 2012/13. It is based on a Strategic Assessment of crime, disorder, anti-social behaviour, drug and alcohol misuse and other data.
Objectives, Targets, Indicators
<ul style="list-style-type: none"> • To reduce, prevent and detect crimes including dwelling burglary, theft from motor vehicle and theft from person offences. • To protect vulnerable victims especially children, vulnerable adults and witnesses. • To prevent and reduce anti-social behaviour incidents; prioritising issues of high community impact. • To reduce, prevent and detect drug and alcohol related offences including raising awareness of the penalties for drugs possession and increasing the education around safer drinking. • To manage offenders effectively by co-ordinating support and rehabilitation services. • To provide reassurance and engagement around the work of the Partnership and to actively engage with local communities.
St Albans City and District Playing Pitch Strategy (2005)
This report contains a review of the current picture, participation trends, an explanation of our methodology, an examination of the supply of and the demand for all playing pitches in the district using the nationally recognised Playing Pitch Methodology (PPM), recommendations and priorities for the future, and an action plan for St Albans City and District Council. It was recognised that there is a need to protect and enhance existing provision, overcome identified deficiencies, ensure quality management and apply local standards.
Objectives, Targets, Indicators
n/a
St Albans City and District Sport and Recreation Facilities Strategy (2005)
This report analyses the current level of public, private, dual and voluntary sport and recreational provision (quality and quantity) within the City and District, identifies and evaluates strategic options for enhancing provision, provides information to inform decisions and help determine future development proposals in the area and feed into the Development Plan Documents (which are currently being prepared), makes clear recommendations used to inform the Council's five year action plan. Overall the strategy finds that the five main public facilities are becoming dated and unattractive to a largely affluent and active population.
Objectives, Targets, Indicators
n/a

11 Housing

Housing Act 2004
An Act to make provision about housing conditions; to regulate houses in multiple occupation and certain other residential accommodation; to make provision licensing and control provision in relation to residential properties; to make provision about secure tenants and the right to buy; to make provision about mobile homes and the accommodation needs of gypsies and travellers; to make other provision about housing; and for connected purposes.
Objectives, Targets and Indicators
Protect the most vulnerable in society and help create a fairer and better housing market. Strengthen the Government's drive to meet its 2010 decent homes target.
Planning Policy for Traveller Sites (2015)
Sets out the Government's planning policy for traveller sites.
Objectives, Targets, Indicators
The policy details how local authorities should deal with planning for traveller sites. It includes policies on the following subjects: <ul style="list-style-type: none"> • Using evidence to plan positively and manage development; • Planning for traveller sites; • Sites in rural areas and the countryside; • Rural exception sites; • Traveller sites in Green Belt; • Mixed planning use traveller sites; • Major development projects; • Determining planning applications for traveller sites; and • Implementation.
'Fixing our Broken Housing Market', Housing White Paper 2017
A housing white paper setting out the government's plans to reform the housing market and boost the supply of new homes in England.
Objectives, Targets, Indicators
The White Paper includes measures to: plan for the right homes in the right places; build homes faster; diversify the housing market; and help people now. The White Paper proposed new formula for assessing housing need at a local authority level. In September 2017 the Government provided the housing needs for each authority based on that formula. For the SW Hertfordshire authorities the housing need figures were as follows: Dacorum 602 dwellings per annum (dpa); Hertsmere 372 dpa; St Albans 913 dpa; Three Rivers 610 dpa; and Watford 364 dpa.

South West Hertfordshire Strategic Housing Market Assessment (2016)
<p>This Strategic Housing Market Assessment (SHMA) considers housing need in the South West Hertfordshire Housing Market Area, which is shown in the plan below. The SHMA was commissioned by Dacorum Borough Council, Hertsmere Borough Council, Three Rivers District Council and Watford Borough Council. The Housing Market Area (HMA) includes these local authority areas, together with St Albans City and District.</p> <p>The Strategic Housing Market Assessment considers: Overall housing need; Need for different sizes of homes; and Housing needs of different groups within the community, including older persons.</p>
Objectives, Targets, Indicators
<p>The report identifies an Objectively-Assessed Need for housing over the 2013-36 period as follows. Dacorum 756 houses per annum; Hertsmere 599; St Albans 705; Three Rivers 514; and Watford 577.</p>
St Albans City and District Housing Strategy 2014-2017
<p>Details how the council intend to deal with the current and future housing situation in the District.</p>
Objectives, Targets, Indicators
<p>The purpose of this strategy is to influence the future supply of housing and associated services in the district by making best use of the available resources to meet housing need. The strategy outlines the priorities for the Housing department over this period:</p> <ul style="list-style-type: none"> • Making best use of existing stock in all tenures, • Increasing the supply of affordable homes, • Meeting the needs of older people and other vulnerable groups, and how we intend to meet the challenges that lay ahead.
Supplementary Planning Guidance on Affordable Housing (2004)
<p>This guidance provides additional information to assist with the implementation of affordable housing policy.</p>
Objectives, Targets, Indicators
<p>To help meet housing needs in the district and create mixed communities by maximising opportunities to provide affordable housing.</p>
Supplementary Planning Guidance on Residential Extensions and Replacement Dwellings in the Green Belt (2004)
<p>This guidance provides additional information to assist with the determination of applications for residential extensions and replacement dwellings in the green belt.</p>
Objectives, Targets, Indicators
<p>To ensure that extensions and replacement dwellings in the Green Belt do not have a detrimental effect on the openness of the green belt and are consistent with local plan policy and government guidance</p>
St Albans Gypsy, Traveller and Travelling Show People Accommodation Needs Assessment (2015)
<p>Provides a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in St Albans City and District</p>

Objectives, Targets, Indicators
The GTANA provides a robust and credible evidence base which can be used to aid the formulation and implementation of Development Plan policies and the provision of new Gypsy and Traveller pitches and Travelling Showpeople plots for the period to 2031.
St Albans Strategic Housing Market Assessment Update (2013)
Provides an independent and objective assessment of the need for housing in the St Albans City and District Council area.
Objectives, Targets, Indicators
<p>The St Albans City and District Assessment of Housing Need and Strategic Housing Market Assessment (SHMA) conforms with Government planning policy and guidance (NPPF/G) and forms a key piece of evidence to facilitate the preparation of the Local Plan.</p> <p>Projections:</p> <p>Household projections for the recommended Migration-led (5 years) scenario for St Albans City and District between 2011 and 2031 identify a large growth in single and couple with no children households and a dramatic growth (41%) of couple/lone parent with 1 child households followed by couple/lone parent with 2 children households (27%). The most significant increases in these two household types are in the 85+ year old age group with an increase of 392%, followed by 75-84 year olds at 283%, 65-74 at 260% and 55-59 at 190%. The combined total of these 4 age groups in the two household categories is 2,302 households from an overall total of 5,400 for all age groups. Other households are also growing with the exception of a group of families/lone parents with 1 child plus extra adult.</p> <p>Applying the recommended scenario (Migration-led 5 years), there is a net need for 11,724 additional homes in the St Albans and District area between 2011 and 2031, an annual average of 586 home per annum.</p> <p>There is a projected large growth (51%) in the need for 3 bed housing; 21% growth in the need for 1 bed; 20% growth in the need for 2 bed housing and a 7% increase in the need for 4 bed housing.</p> <p>Based on an estimated current need for 2,160 specialised units of accommodation in the St Albans and District, there is a projected need - as a sub-set of the overall requirement - for 1,080 additional units to be provided between 2011 and 2031, including 402 Extra Care housing places from an estimated current need for 803 places.</p>
Strategic Housing Land Availability Assessment (SHLAA) (2018)
<p>SADC is required to carry out a Strategic Housing Land Availability Assessment (SHLAA) as a key part of the evidence base for its Local Plan. This assessment provides a comprehensive review of potential housing sites across the District and will help the Council to make important decisions over the delivery of sufficient land for housing to meet the District's future needs. The primary role of the SHLAA is to:</p> <ul style="list-style-type: none"> • Identify sites with potential for housing development; • Assess the deliverability and developability of each identified site (i.e. in terms of its suitability, availability and achievability) to determine when an identified site is realistically expected to be developed for housing. Sites should be placed into phasing periods (i.e. 5, 10 or 15 year housing supply); and • Assess the housing potential (i.e. housing capacity) on each identified site.
Objectives, Targets, Indicators
The study has no objectives that are relevant for the SA.

Local Planning Status and potential future development in neighbouring authorities
Central Bedfordshire Local Planning Process
Adopted Core Strategy for former local Government areas (2009): 17,950 dwellings (2001 – 2026) (718 dpa). Submission Local Plan proposed target of 39,350 over 2015-2035 which includes Luton’s unmet housing need of 7,350 homes (1,968 dpa)
Dacorum Local Planning Process
Core Strategy Adopted September 2013 - 430 dpa 2006 to 2031 New Local Plan Issues and Options consultation (November 2017) considered options for 602 dpa, 756 dpa; and 1,000 dpa. It included 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.
Hertsmere Local Planning Process
Adopted Core Strategy 2013 - 3,990 homes over 15 year plan period (266 dpa) New Local Plan Issues and Options consultation (September 2017) suggests 9,000 homes over 15 years – 600 dpa. It 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.
Three Rivers Local Planning Process
Core Strategy 2011 - 4,500 from 2001-2026 (180 dpa) New Local Plan Issues and Options consultation (July 2017) proposing three options for the period 2017- 2032; 411 dpa (20% below OAN), 514 (OAN), 617 dpa (20% above OAN)
Watford Local Planning Process
Local Plan Part 1 Core Strategy adopted 2013 6,500 homes from 2006 to 2031 (260 dpa) New single Local Plan Issues and Options consultation – not yet undertaken (as at August 2018)
Welwyn & Hatfield Local Planning Process
District Plan (2005) 280 dpa 1991 to 2011 Submitted new Local Plan with housing target of 12,000 over a 19 year period (632 dpa)
Neighbourhood Plans in St Albans District
Within St Albans District the Council has designated the following Neighbourhood Plan Areas: Colney Heath; Harpenden Town and Harpenden Rural Parish; Redbourn; Sandridge; St Stephen; and Wheathampstead. As of August 2018 the Harpenden Town and Harpenden Rural Parish Neighbourhood Plan had reached the Regulation 16 stage ‘Publicising a Plan Proposal’ and the Harpenden Town and Harpenden Rural Parish Neighbourhood Plan had reached the Regulation 17 stage ‘Submission of a Plan Proposal to Examination’.
Objectives, Targets, Indicators
N/A

12 Transport and Accessibility

Door to Door: A strategy for improving sustainable transport integration (DfT, 2013)
The strategy sets out the vision of the Department of Transport for an inclusive, integrated and innovate transport system that works for everyone.
Objectives, Targets, Indicators
The strategy vision focuses on four core areas that need to be addressed in order for people to be confident in choosing sustainable transport: <ul style="list-style-type: none">• accurate, accessible and reliable information about the different transport options for their journeys;• convenient and affordable tickets, for an entire journey;• regular and straightforward connections at all stages of the journey and between different modes of transport; and• safe, comfortable transport facilities.
Hertfordshire Local Transport Plan (LTP4) (2018-2031)
The fourth Hertfordshire Local Transport Plan (LTP4) sets out a vision and strategy for developing transport in the county and provides the framework for transport's economic and social development.
Objectives, Targets, Indicators
The LTP aims to deliver nine transport objectives which contribute strongly to the Prosperity, People and Place elements of the LTP's vision. These are: Prosperity <ul style="list-style-type: none">• Improve access to international gateways and regional centres outside Hertfordshire• Enhance connectivity between urban centres in Hertfordshire• Improve accessibility between employers and their labour markets• Enhance journey reliability and network resilience across Hertfordshire People <ul style="list-style-type: none">• Enhance the quality and vitality of town centres• Preserve the character and quality of the Hertfordshire environment• Reduce carbon emissions Place <ul style="list-style-type: none">• Make journeys and their impact safer and healthier• Improve access and enable participation in everyday life through transport Transport improvements included in the LTP Transport Proposals Map of direct relevance to St Albans are: <ul style="list-style-type: none">• Transport Improvements to support new development<ul style="list-style-type: none">○ Radlett Aerodrome Site○ 6) East Hemel Hempstead

- Junction Improvement
 - A414/A1081
- Cycle Infrastructure Improvement Towns
 - Harpenden
 - St Albans
- Sustainable Travel Towns
 - St Albans
- Passenger Transport Hub/Coachway to Investigate: M1 J8 and A1(M) J8
- A414 Bus Rapid Transit
- New M1 Junction 8a (additional junction)

Hertfordshire County Council Rail Strategy (2016)

The Rail Strategy is required to ensure that the railway in Hertfordshire can support economic growth and development by agreeing investment priorities for the next fifteen years and beyond. It sets the strategic framework against which decisions regarding future franchises and investment in key elements of infrastructure can be identified and prioritised.

Objectives, Targets, Indicators

A high-level strategic approach has been used, identifying conditional outputs and potential interventions that can either be developed directly or can support third parties to develop. These outputs and interventions were considered against the following four rail development objectives which have been identified for Hertfordshire:

- To support competitiveness, the Strategy includes improvements in links to the rest of the country to maximise benefits from the agglomeration effect that better transport connections between centres can bring;
- To support economic growth, the Strategy comprises a number of interventions that improve the rail service for commuting trips from/into Hertfordshire;
- To address sustainability, the Strategy proposes improvements to encourage modal shift, including for east-west orbital and long distance movements as more sustainable alternatives to travel by private car and air respectively; and
- To support population growth, the Strategy includes recommendations for the development of strategic transport hubs around key stations.

Hertfordshire County Council Growth and Transport Plan – South West Hertfordshire (Draft 2018)

The South West Herts Growth and Transport Plan is a strategic transport plan which translates and applies Local Transport Plan objectives to the south west of Hertfordshire – an area which includes the towns of Hemel Hempstead and Watford as well as their interactions with St Albans, Luton and the London fringe. The plan area reflects the strong travel and movement patterns and flows within and between these places. The plan includes 9 packages of schemes, as follows: Package 1 – Hemel Hempstead East-West Corridor; Package 2 – Maylands (Hemel Hempstead); Package 3 – Hemel Hempstead-Luton Corridor; Package 4 – St Albans-Watford Corridor; Package 5 – Watford Western Gateway; Package 6 – Watford-Hemel Hempstead Corridor; Package 7 – Watford Central; Package 8 – Watford South; and Rickmansworth.

Objectives, Targets, Indicators

A set of seven objectives are defined in the South West Herts GTP. Each objective has a spatial focus, indicating areas where it is considered

that addressing the transport challenges through suitable packages of interventions would bring about the most benefit.

- A. Support sustainable economic growth and regeneration within South West Hertfordshire by improving connectivity, primarily for walking, cycling and public transport
- B. Ensure new infrastructure and streets are resilient to changing environmental conditions
- C. Improve accessibility and network resilience, and achieve a shift to more efficient modes of travel by providing a greater choice of attractive alternatives to the private car transport
- D. Improve public health and quality of life, through encouraging and enabling active travel and reducing transport-generated air and noise pollution
- E. Encourage vibrant communities by integrating streets, enhancing walking and cycling networks, and improving the natural and built environment
- F. Improve safety and perception of safety and security risks by providing high quality and safe facilities for walking, cycling and public transport users
- G. Seek to reduce transport related emissions by embracing new technologies and encouraging sustainable travel modes

St Albans Revised Parking Policies and Standards (2002)

The Council reviewed its parking policies and standards as set out in its district local plan to take account of new guidance, such as PPG13 and Hertfordshire County Council's SPG 'Parking provision at new development'.

Objectives, Targets, Indicators

- Parking standards for non-residential development will be regarded as maximum standards that should not be exceeded, rather than minimum standards which should be met.
- Green Travel Plans (GTPs) should be submitted alongside planning applications which are likely to have significant transport implications.
- The District Council wishes to encourage an increase in cycling and is, therefore, introducing cycle parking standards.

St Albans Urban Transport Plan (2009)

Following the development of the Hertfordshire Local Transport Plan 2006/7 – 2010/11 and the Mid Hertfordshire Area Transport Plan, which set out the strategic context for transport, Hertfordshire County Council developed this Urban Transport Plan for the City of St Albans to identify local problems and propose solutions supporting the aspirations outlined in the LTP.

Objectives, Targets, Indicators

- Reduce impacts of through traffic including diversions from the strategic road network and use of unsuitable roads
- Manage and make best use of existing infrastructure and services
- Reduce demand for car travel, particularly journeys to work and school
- Minimise the negative impacts of new developments on congestion
- Reduce negative impacts of on-street parking and traffic in the city centre searching for suitable parking
- Encourage the use of sustainable modes as alternatives to the car

- Improve access to local hospitals by sustainable transport modes
- Improve access to employment by sustainable transport modes
- Improve access to schools by sustainable transport modes
- Improve physical access to the transport network and city centre
- Improved integration of land-use and transport planning
- Improve east-west access by public transport
- Improve safety for walkers and cyclists
- Improve safety for children
- Reduce road traffic collision levels
- Reduce the adverse impacts of transport on health and the environment
- Minimise visual intrusion and community severance arising from transport infrastructure
- Continue to protect and maintain the Green Belt
- Promote personal health through increased levels of walking and cycling
- Minimise negative impacts of freight accessing the city centre through improved management

Southern St Albans Urban Transport Plan (2009)

Following the development of the Hertfordshire Local Transport Plan 2006/7 – 2010/11 and the Mid Hertfordshire Area Transport Plan, which set out the strategic context for transport, Hertfordshire County Council developed this Urban Transport Plan for the area south of St Albans City Centre (encompassing the urban areas of London Colney, Park Street, Bricket Wood, and Chiswell Green) to identify local problems and propose solutions supporting the aspirations outlined in the LTP.

Objectives, Targets, Indicators

- Improve safety at road junctions and crossings - for pedestrians and cyclists.
- Improve security at public transport interchanges (stations and stops).
- Reduce road traffic accident levels.
- Reduce the impacts of congestion at key junctions and problem areas.
- Lower the demand for car travel to school and employment.
- Minimise the impacts of the new developments on congestion.
- Encourage the use of sustainable transport modes as alternatives to the car.
- Improve access to local hospitals by public transport.
- Improve passenger transport connections - particularly eastwest links.
- Improve access to employment by public transport.
- Improve quality of walking and cycling routes to access key locations.
- Minimise the impact of freight distribution on the local environment.
- Reduce the adverse impacts of transport on health and the environment.
- Minimise visual intrusion and community severance arising from transport infrastructure
- Manage and make best use of existing infrastructure and services.

13 Economy, Employment and Education

Industrial Strategy. Building a Britain fit for the future (2017)
This white paper sets out a long-term plan to boost the productivity and earning power of people throughout the UK
Objectives, Targets, Indicators
The Strategy aims to boost productivity and earning power across the country by focusing on the following five foundations Ideas; People; Infrastructure; Business environment; and Places
The Clean Growth Strategy. Leading the way to a low carbon future (2017)
The Clean Growth Strategy sets out the Governments proposals for decarbonising all sectors of the UK economy through the 2020s. It explains how the whole country can benefit from low carbon opportunities, while meeting national and international commitments to tackle climate change.
Objectives, Targets, Indicators
This Strategy sets out a comprehensive set of policies and proposals that aim to accelerate the pace of “clean growth”, i.e. deliver increased economic growth and decreased emissions. Key Policies and Proposals in the Strategy include the following: Develop world leading Green Finance capabilities; Develop a package of measures to support businesses to improve their energy productivity, by at least 20 per cent by 2030; Improving the energy efficiency of our homes; Rolling out low carbon heating; Accelerating the shift to low carbon transport; Delivering clean, smart, flexible power emissions; and Enhancing the benefits and value of our natural resources

Hertfordshire's Refreshed Strategic Economic Plan 'Perfectly Paced for Business' (2017)

This Strategic Economic Plan 2017 replaces the 2014 SEP to reflect the change in context and the progress made against the 2014 SEP aims.

Objectives, Targets, Indicators

Has the vision: by 2030, Hertfordshire will be recognised as the functional core of the Golden Triangle, the single most concentrated area in Europe for scientific research and development, benefiting the UK economy as a whole..

Four priorities, with key areas for action:

- Maintaining global excellence in science and technology
 - Encourage research and development for commercial success to ensure future job creation and enable our innovative start-ups and small businesses to scale up and grow. Hertfordshire has long been recognised as economy with substantial numbers of very small businesses, but relatively few that grow to medium size (and beyond), yet these are likely to be the principal wealth generators;
 - Invest in workforce skills, especially STEM-related, and business support systems that these fast-changing sectors need to thrive;
 - Collaborate more widely with neighbouring LEP areas to maximise opportunities within key sectors;
 - Work with Government and national bodies to ensure that appropriate levels of investment are secured and work with local authorities to avoid loss of employment land in locations that are critical to these sectors;
 - Help unlock future development at key sites particularly in relation to Hertfordshire's new Enterprise Zone;
 - Ensure that Hertfordshire's leading businesses and research institutions are engaged in international trade.
- Harnessing relationships with London and elsewhere
 - Build on the momentum gained across all three growth corridors where there are substantial agendas to pursue;
 - Develop our thinking in respect of cross-cutting east-west "corridors", particularly linked to the A120, A602, A505 and A414 where Hertfordshire County Council – as the Strategic Transport Authority – is expected to play a particularly important role;
 - Encourage smarter forms of connectivity to reduce congestion in line with our overall growth ambitions. This includes recognising and investing in the growing significance of rail, bus travel and other forms of sustainable transport and ensuring we pursue a joined-up approach to different forms of transport connectivity.;
 - Ensure that major developments on the edge of the county, such as the growth at Stansted and Luton, are factored into skills and employment priorities. Engage actively in advancing key national infrastructure proposals that have the potential to have a real economic impact on Hertfordshire, such as Crossrail 2.
- Re-invigorating places for the 21st Century
 - Appropriate provision must be made both in relation to where people live and where/how they work. This means that more housing must be delivered but also that a good supply of employment land must be secured. This relates both to the New Towns and other urban areas such as the larger towns of Watford and St Albans and the smaller towns of Bishop's Stortford and Hertford;
 - Define a clear economic strategy for other garden communities coming forward and ensure that good progress is made in relation to the new Garden Town at Harlow & Gilston;
 - Work with partners, particularly Hertfordshire County Council, to develop a long term spatial blueprint for the county;
 - Ensure that development takes into account the wider opportunities linked to key sectors, that appropriate accommodation is planned for new and small businesses to grow and that skills provision is aligned to local employment growth;
 - Work closely with partners to accelerate the pace of housing delivery whilst ensuring there is an adequate and effective supply of

employment land provision.

- Foundations for Growth
 - Work with employers to ensure a good response to the Apprenticeship Levy to encourage greater take-up;
 - Ensure that our strategic priorities in relation to meeting local employers' needs are reflected in the local Area Review of post-16 training and education institutions;
 - Ensure that skills provision is linked to key sector opportunities and that the business support needs of our SMEs continue to be met.

Hertfordshire's Strategy for School Improvement 2014-2017

The Hertfordshire school improvement strategy 2014-17 sets out the vision, aims and priorities to ensure a step change in improved performance for Hertfordshire schools, children and young people for the future.

Objectives, Targets, Indicators

The strategy also aims to clarify the:

- role and responsibility of the local authority in relation to Hertfordshire schools;
- the centrality of good and outstanding schools and system led leadership in school improvement;
- relationship between Hertfordshire local authority and Herts for Learning;
- the protocols and procedures in relation to Schools Causing Concern.

Southwest Hertfordshire Economy Study (2016)

The study provides an assessment of the economic situation in Hertfordshire and potential for growth

Objectives, Targets, Indicators

The study identified three main growth scenarios for the sub-region:

- Employment-led Scenario
- Labour Supply Scenario
- Higher Growth Scenario

The study did not identify any objectives, targets or indicators

Hertfordshire County Council Schools Planning

The County Council use a computer programme to produce a forecast every summer term to assess the demand for school places in local areas. This is updated in the autumn term. The forecast is based on: how many primary school pupils are moving on to secondary schools; any trends which have formed over the past few years; and any known housing developments.

Objectives, Targets, Indicators

The latest forecasts are provided in Excel and map format at the weblink:

<https://www.hertfordshire.gov.uk/services/schools-and-education/at-school/school-planning/school-planning.aspx>

St Albans Retail Study Update (2010)

This is an update to the strategic District-wide retail study undertaken in 2009 which specifically assessed the role, attraction and performance of St Albans City Centre and Harpenden Town Centre. It also examined the relative importance and role of the smaller Neighbourhood Centres in the District's retail hierarchy, as well as out-of centre shopping facilities.

The assessment shows that without new investment and development in St Albans City Centre's retail offer it will continue to lose market share to out-of-centre locations within and outside the District area, as well as to new retail investment and development in other competing centres outside the District. This, in turn, will have a harmful impact on the City Centre's overall vitality and viability and its role in the sub-region's shopping hierarchy, contrary to national, regional and local planning policy guidance.

Objectives, Targets, Indicators

n/a

St Albans Visitor Economy Strategy 2013-2018

This strategy outlines how the District Council intends to deliver an increased contribution by visitors to the local economy.

Objectives, Targets, Indicators

The overarching strategic aim is "To deliver significant growth in the St Albans visitor economy by 2018".

The strategy will be implemented through 4 linked objectives:

1. Raise the profile of St Albans as a quality visitor destination
2. Deliver an exceptional visitor experience
3. Continual improvement of the visitor product
4. Develop and maintain improved planning and communication

Targets:

- Number of visitors increased by approx. 40% (1.6 million visitors in 2010 to increase to 2.2 million visitors by 2018);
- Total visitor value increased by 55% (£160 million in 2010 to increase to £250 million by 2018); and
- Actual full time equivalent hobs increased by 52% (2580 jobs in 2010 to increase to 3930 jobs by 2018).



St Albans Local Plan

Sustainability Appraisal Report

Appendix B: Baseline Review

September 2018

1	Introduction	1
2	Environmental Factors	2
2.1	Biodiversity, including flora and fauna, and Geodiversity	2
2.2	Climatic factors	8
2.3	Air Quality	12
2.4	Landscape and Townscape	15
2.5	Historic Environment	20
2.6	Material Assets	23
2.7	Soil	30
2.8	Water	32
3	Social and Economic Factors	37
3.1	Population	37
3.2	Health and Wellbeing	40
3.3	Housing	47
3.4	Transport and Accessibility	53
3.5	Economy, employment and education	59

List of Figures:

Figure 2-1: Sectoral split of CO ₂ emissions 2011-2015 for St Albans District	10
Figure 2-2: Landscape Character Areas in South West Hertfordshire (Source: MAGIC)	16
Figure 2-3: Residential Development on Previously Developed Land in St Albans	27
Figure 2-4: Geological map of the main mineral resources for Hertfordshire	28
Figure 3-1: 2016-based Subnational Population Projections, mid-2016 to mid-2041	38
Figure 3-2: St Albans Population Estimates – June 2016	38
Figure 3-3: Crime Rate in St Albans and Hertfordshire Local Authority Areas 2017	45
Figure 3-4: Notifiable offences recorded by the Police in St Albans 2015-2017	46
Figure 3-5: St Albans District Scenario Forecasts 2011-2031	50
Figure 3-6: Peak Hour Congestion in Hertfordshire.....	56
Figure 3-7: Employee Jobs 2015	62
Figure 3-8: Meeting the Demand for Primary and Secondary School Places Summer 2016/17	64

List of Tables:

Table 2-1: SSSI within or partially within St Albans District.....	3
Table 2-2: Per capita Local CO ₂ emission estimates 2005-2014 (t CO ₂ per person).....	10
Table 2-3: Levels of light pollution and dark skies split for St Albans, Hertfordshire and East of England.....	18
Table 3-1: Population breakdown by health group	42
Table 3-2: Hertfordshire Dwelling Stock 2017	49
Table 3-3: Overall average house price July 2017 ⁷²	49
Table 3-4: Population and Households Change ⁷³	50
Table 3-5: Recommended Housing Mix for south-west Hertfordshire	51
Table 3-6: Traffic Forecasts by District ⁷⁸	55
Table 3-7: Vehicle Kilometres in St Albans (based on 2014 and 2015 data) ⁷⁸	56
Table 3-8: Car or van availability in households in St Albans District at 2011 (%).....	58
Table 3-9: Average earnings by residence and workplace (AMS, 2017).....	61
Table 3-10: Employment by occupation	61
Table 3-11: Claimant Count (unemployment %)	62
Table 3-12: Annual Population Survey: unemployment (%).....	63
Table 3-13: Percentage of people aged 16-74 that have no qualifications (2011 Census)	63

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1 Introduction

This Appendix provides baseline information for the sustainability topics that are being considered in the Sustainability Appraisal. In preparing the appendix the following task have been undertaken:

- Examining the relationship of the Local Plan with other policies, plans and programmes (PPPs), to identify relevant environmental protection and sustainability objectives and to identify potential conflicts to be addressed within the plan-making process – this links to the PPP review provided in Appendix A; and
- Assembling baseline data on the current and future state of the District across a range of environmental, social and economic topics which may be affected by the Local Plan.

This Appendix also outlines the key issues arising from the policy context review and baseline analysis and is set out under the following broad topics:

- Environmental Factors
 - Biodiversity, including flora and fauna, and geodiversity;
 - Climatic Factors;
 - Air Quality;
 - Landscape and Townscape;
 - Cultural Heritage;
 - Material Assets;
 - Soil; and
 - Water.
- Social and Economic Factors
 - Population;
 - Health and Wellbeing;
 - Housing; and
 - Transport and accessibility.
 - Economy, employment and education

Each SEA/SA topic is structured under the following headings:

- **Policy Context** - a summary of the relevant policies, plans and programmes (PPPs) which are applicable to that topic. This includes the relevant core principle(s) from the National Planning Policy Framework (NPPF)¹.
- **The Current Situation** - the characteristics of St Albans District and the surrounding area with respect to that particular topic, this is the baseline. It also draws on trends observed since the baseline prepared in 2015 for the SA/SEA of the St Albans Strategic Local Plan. Where there any sources of information missing which the appraisal could benefit from, these are identified.
- **The Likely Situation without the Plan** – this describes how the environmental, social and economic characteristics would change if no Local Plan were to be produced.
- **Issues and Opportunities** - a list of the various issues and opportunities facing St Albans District and the surrounding area in relation to each SA/SEA topic.

¹ National Planning Policy Framework, DCLG, 2012.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

2 Environmental Factors

2.1 Biodiversity, including flora and fauna, and Geodiversity

2.1.1 Key policy context

The NPPF requires that the planning system should seek to minimise the impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

It goes on to say:

“To protect and enhance biodiversity and geodiversity, plans should:

a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and

b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”

‘A Green Future: Our 25 Year Plan to Improve the Environment’ (2018) includes the following objectives under the theme of ‘Thriving plants and wildlife’:

- Restoring 75% of our one million hectares of terrestrial and freshwater protected sites to favourable condition, securing their wildlife value for the long term;
- Creating or restoring 500,000 hectares of wildlife-rich habitat outside the protected site network, focusing on priority habitats as part of a wider set of land management changes providing extensive benefits;
- Taking action to recover threatened, iconic or economically important species of animals, plants and fungi and where possible to prevent human-induced extinction or loss of known threatened species in England and the Overseas Territories; and
- Increasing woodland in England in line with our aspiration of 12% cover by 2060: this would involve planting 180,000 hectares by end of 2042.

On a local scale, the Hertfordshire Local Nature Partnership (LNP) Strategic Plan sets out six high level principles that are expected to be reflected when considering biodiversity and the natural environment:

1. Recognise the value of the natural environment and the range of benefits and services it provides;
2. Protect and enhance existing biodiversity assets;
3. Seek opportunities to improve habitat connectivity;
4. Integrate biodiversity opportunities within new development;
5. Make decisions informed by the best available ecological information and data; and
6. Secure the long term management of existing and new habitats/sites.

2.1.1.1 Relevant plans, policies and programmes

- (Wild) Birds Directive 2009/147/EC
- Habitats and Species Directive 92/43/EEC 1992

- Natural Environment and Rural Communities Act 2006
- The Wildlife and Countryside Act 1981 (as amended)
- Biodiversity 2020: A Strategy for England’s Wildlife and Ecosystem Services
- National Planning Policy Framework 2018
- ‘A Green Future: Our 25 Year Plan to Improve the Environment’ (2018)
- The UK Post-2010 Biodiversity Framework
- Hertfordshire Local Nature Partnership (LNP) Strategic Plan
- Hertfordshire Biodiversity Action Plan 2006
- Hertfordshire & Middlesex Wildlife Trust Strategic Plan 2011-2016
- Hertfordshire & Middlesex Wildlife Trust How to build a Living Landscape
- Hertfordshire Green Infrastructure Plan (March 2011)
- St Albans City and District Urban Wildlife Survey (2001)
- St Albans Tree Strategy Review (2010)

2.1.2 The current situation

2.1.2.1 Designated sites

St Albans contains no international or European designations (Ramsar sites, SPAs, SACs), the closest being Chilterns Beechwoods SAC, which is 7km to the north-west of the District. There are, however, two Sites of Scientific Interest (SSSIs) covering 73 hectares within St Albans. These are Bricket Wood Common (which is designated for its ‘Broadleaved, mixed and yew woodland – lowland’ and ‘Dwarf shrub heath – lowland’ habitats) and Moor Mill Quarry West (designated as an ‘Earth heritage’ site).

Generally, the natural environment is of good quality and includes some very attractive countryside, though habitats are generally fragmented and some areas within Watling Chase Community Forest in the south of the District have been affected by poor restoration following mineral extraction .

Natural England maintains statistics on the condition of all SSSIs in England, and they have a Public Service Agreement target to have 95% of the SSSI area in “favourable” or “unfavourable recovering” condition by 2010. In August 2018, 97.42% of the area of SSSIs in Hertfordshire met the conditions². This is a considerable increase from a level of 66% in 2004³ and an improvement from 96.87% in 2012. In St Albans as of 2018, 63.7% of the area of SSSI meets the PSA target⁴, again a considerable increase from a level of 10.8% in 2004.

Sites of Special Scientific Interest (SSSIs), as designated by Natural England (under the Wildlife and Countryside Act 1981), comprise land which is nationally important in terms of flora, fauna and geology. Table 2-1 shows the sites within St Albans which have been designated as SSSIs.

Table 2-1: SSSI within or partially within St Albans District

Site name	Interest	Area	Condition ⁵
Bricket Wood Common	Biological	72.48 ha	63.7% Unfavourable- Recovering 36.3% Unfavourable – No change
Moor Mill Quarry West	Geological	0.17 ha	100% Unfavourable- No change

² <https://designatedsites.naturalengland.org.uk/ReportConditionSummary.aspx?countyCode=21&ReportTitle=HERTFORDSHIRE>

³ Hertfordshire Environmental Forum (2010) "Quality of Life Report 2010", available at <http://enquire.hertsc.gov.uk/qol/>

⁴

<https://designatedsites.naturalengland.org.uk/ReportConditionSummary.aspx?SiteCode=S1000694&ReportTitle=Bricket%20Wood%20Common%20SSSI>

⁵ <https://designatedsites.naturalengland.org.uk/ReportSiteExport.aspx?countyCode=21&ReportTitle=HERTFORDSHIRE>. Accessed 11 March 2017.

Wildlife Sites are the most important places for wildlife outside legally protected land such as Nature Reserves or Sites of Special Scientific Interest. In 2010 there were almost 2,000 Wildlife Sites in Hertfordshire, totalling 17,215ha, and covering over 10% of the county. They include meadows, ponds, woodland, urban green space and geological sites. As of April 2015 (at the last review) there were 233 Wildlife Sites within the District, totalling over 2,027 hectares of land.

There are also a number of Key Biodiversity Areas (KBAs) in Hertfordshire, these are nationally identified sites of global significance and represent an important approach to addressing biodiversity conservation at the site scale.

There are no National Nature Reserves (NNR) in St Albans; however NNR Ruislip Woods is situated just outside Hertfordshire. It is designated for its woodland, open water, lowland grassland habitats.

There are six Local Nature Reserves in St Albans and the locations of these sites have been taken into account, in the assessment of the Local Plan:

- Batford Springs (3.51 ha);
- Colney Heath (21.46 ha);
- Marshalls Heath (3.99 ha);
- The Wick Wood (3.39 ha);
- Watercress Wildlife Site (1.2 ha) and;
- Wheathampstead (7.01 ha).

St Albans District contains 197 County Wildlife Sites with over 40 areas of Ancient Woodland.

Indicator WH3A of the Hertfordshire Quality of Life Report (2014) identifies that only 23.5% of local sites in the County were known to be in Positive Conservation Management. This is a deterioration from the figure of 25.14% published in the 2010 report.

St Albans has four Key Biodiversity Areas (KBAs), identified by the Hertfordshire Biodiversity Action Plan. These are as follows:

- Upper Colne Valley (wetlands and heath) – most of this area is within Hertsmeire DC;
- Bricket Wood/Moor Mill (wetlands, woodlands and heath);
- River Ver/Gorehambury (wetlands and woodlands); and
- Upper Lea Valley (wetlands, woodlands and heath).

2.1.2.2 *Area-wide Biodiversity*

The Natural Environment White Paper (2011, with updates to 2014) recognises that nature conservation cannot be purely focussed on protecting designated sites. Such sites are too small and fragmented to safeguard the full range of habitats and species on their own. The White Paper therefore called for a much wider approach to reversing the long term decline in biodiversity by expanding and linking habitats to restore ecosystem funding.

Within Hertfordshire this has resulted in an ‘Ecological Networks’ project. The results of this work concluded that overall habitat network connectivity is currently very poor in Hertfordshire and as a result so is the ecosystem integrity and resilience.

“Hertfordshire has very little semi-natural habitat remaining and that existing habitat networks are highly fragmented and failing. Woodland makes up about 10% of the county area, which is over half the total remaining area of all habitats. However, even woodland networks are highly fragmented and only a small proportion of those sites are classed as ancient – those of the highest value. Heathland is our most threatened habitat, with only 13 ha remaining from roughly 5,000 ha in existence as recently as 175 years ago. Remaining fragments are now so

*small and fragmented that this unique habitat is in danger of being lost from Hertfordshire entirely.*⁶

The project did identify four strategic core areas that should be prioritised for habitat restoration and creation projects. These were: the chalk to the north of the County; the acid soils to the South; and the two main river catchments of the Lea and the Colne.

In St Albans, priority habitats for which action plans have been prepared include, amongst others ancient and/or species-rich hedgerows, chalk rivers, fens, reed beds and a variety of lowland habitats.

The river catchment areas of the Lea and Colne cover the north and south of the District respectively and both are chalk streams, which are a globally rare habitat.

2.1.2.3 Species

A number of national species of conservation concern are found in Hertfordshire. These include the following UK priority species (short and middle list⁷) where Hertfordshire can contribute to the achieving national target because these species are characteristic of the area:

Brown Hare	Turtle Dove	Stone Curlew*
Otter*	Stag Beetle*	Corn Bunting
Water Vole*	Thatch Moss	Reed Bunting
Grey Partridge	Cornflower*	Tree Sparrow*
Song Thrush*	Dormouse*	Great Crested Newt*
Bullfinch	Pipistrelle	White-clawed Crayfish*
Linnet	Bittern*	Shepherd's Needle
Spotted Flycatcher	Skylark	Corn Cleavers

Species which are locally rare, declining, threatened and are either high profile and/or locally distinctive are as follows:

Natterer's Bat*	River Water-dropwort*	Duke of Burgundy
Nightingale	Narrow-fruited Corn Salad	Silver-washed Fritillary
Water Rail	Great Pignut*	Corn Buttercup
Kingfisher	Green-winged Orchid	Corn Gromwell
Palmate Newt	Long-eared Owl	Ivy-leaved Water Crowfoot
Brown Hairstreak	Pochard	Pasqueflower*
Chalkhill Blue*	Hawfinch	Petty Whin
Grizzled Skipper*	Snipe	Snakes-head Fritillary
Corn Parsley	Small Blue	

Species marked with asterisks have Species Action Plans within Hertfordshire⁸.

2.1.2.4 Woodland cover

Hertfordshire has a total area of woodland of 15,503 ha covering 9.5% of the county. This is slightly above the UK average of 7.7% but well below the overall woodland coverage in continental Europe

⁶ Herts & Middlesex Wildlife Trust (2014) Hertfordshire's Ecological Networks
<http://www.hertswildlifetrust.org.uk/sites/default/files/files/Mapping%20project%20report%20-%20Final.pdf>

⁷ Short list species are the top priority species for conservation in the UK as identified in the UK Steering Group Report. Middle list species are of lesser, but still national conservation priority.

⁸ http://www.hef.org.uk/nature/biodiversity_vision/chapter_03_habitat.pdf Accessed 20/06/16

of 30%⁹. Quantified figures for woodland cover were not available for St Albans. However, parts of the authority are covered by Watling Chase Community Forest which aims to combine the sustainable production of timber with wildlife conservation and environmental enhancements.

There are 3,280 hectares of ancient semi natural woodland over 0.25 hectares in size in Hertfordshire (Hertfordshire Biodiversity Action Plan (BAP))¹⁰. In St Albans District, the Woodland Trust has been running the 'Heartwood Forest' project, the largest planting of the largest new native forest in England since 2009. The intention is to plant 600,000 native broadleaf trees over 12 years. It will buffer and enhance four small remnants of existing ancient semi-natural woodland and provide 858 acres of free public access. Since 2009, more than 300,000 native trees have been planted and according to monitoring by the Woodland Trust, numbers of species of butterflies and birds are increasing¹¹

2.1.2.5 Green Infrastructure

'Green Infrastructure' is a network of protected sites, nature reserves, habitats, green spaces, waterways and green linkages that is integral to the health and quality of life of sustainable communities.

It brings a range of benefits, assisting with pollution control and flood management, improving the health and well-being of residents by providing space for leisure activities, reinforcing the character and identity of places, helping support renewable energy production, as well as having a positive impact upon social interaction.

Green infrastructure provides a setting for the District's towns and villages, threading through and connecting them to the wider countryside. It contributes to the character of the area and is particularly important on the urban fringe, where it helps to soften the transition between urban and rural landscapes.

St Albans has a rich green infrastructure resource and an array of existing green infrastructure assets and initiatives. These include promoted greenway routes on disused railway lines, the Butterfly World site at Chiswell Green, the implementation of a new country park at Ellenbrook Fields, the community forestry aspirations of the Watling Chase Community Forest and the ongoing implementation of forestry works at Heartwood Forest (by the Woodland Trust).¹²

2.1.2.6 Geodiversity

Geodiversity is the variety of rocks, fossils, minerals, natural processes, landforms and soils that underlie and determine the character of our landscape and environment¹³.

Within Hertfordshire there are 19 sites designated as Regionally Important Geological and Geomorphological Sites (RIGs), which are the most important places for geology and geomorphology outside statutorily protected land such as SSSIs. They are equivalent to local Wildlife Sites.

There are two Regionally Important Geological and Geomorphological Sites in St Albans, both of which are former chalk pits:

- Potterscrouch Section (0.18ha);
- Redbournbury Chalk Pit (0.78ha).

⁹ Forestry Commission (2002) "National Inventory of Woodland and Trees - County Report Hertfordshire", available at [http://www.forestry.gov.uk/pdf/hertfordshire.pdf/\\$FILE/hertfordshire.pdf](http://www.forestry.gov.uk/pdf/hertfordshire.pdf/$FILE/hertfordshire.pdf)

¹⁰ http://www.hef.org.uk/nature/biodiversity_vision/chapter_04_woodland.pdf Accessed 20/06/16

¹¹ <http://www.woodlandtrust.org.uk/visiting-woods/wood-information/heartwood-forest/>

¹² https://www.stalbans.gov.uk/Images/SP_GreenInfrastructurePlan_March2011_tcm15-46531.pdf

¹³ <http://www.ukgap.org.uk/geodiversity.aspx>

2.1.3 *The likely situation without the plan*

Together with the NPPF and its supporting NPPG, the existing District Local Plan Review 1994 provides the strategic framework and development management policy for the protection and enhancement of biodiversity in the District, in particular through 'Policy 106 Nature Conservation'. Without a new Local Plan the District Local Plan Review policies and NPPF/NPPG would still remain and therefore there would not be a policy vacuum in this area, meaning that biodiversity would remain protected. However, as the District Local Plan Review gets progressively older, there is a risk that the weight that can be accorded to its policies will diminish. In addition, the new Local Plan will be able to ensure that development is located having taken into account the biodiversity and geodiversity sensitivity of an area. Without the Local Plan any new development that results through planning applications on unallocated sites, rather than sites allocated in the Local Plan, could occur in areas which might not be the most appropriate in terms of their biodiversity sensitivity or their role in enhancing wider Green Infrastructure. Without a new Local Plan opportunities may be lost to plan at the strategic level for Green Infrastructure provision which could provide biodiversity enhancements. The 'development management type' policies in the new Local Plan will also update the current saved District Local Plan Review policies to bring them up to date. Without this happening there might be gaps in the policy framework which could result in inappropriate development from a biodiversity / geodiversity stand-point.

2.1.4 *Issues and opportunities*

Issues

- The two SSSIs in the District both remain in an unfavourable condition.
- As at 2014 only 23.5% of local sites in the County were known to be in Positive Conservation Management.
- 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.

Opportunities

- Maintaining, restoring and expanding BAP habitats
- Enhancing Green Infrastructure at a local level and a strategic level with neighbouring authorities.
- Compensation for features lost to development where loss is completely unavoidable.
- Protection of existing networks of natural habitats including buffer areas, migration routes, stepping stones and landscape features of major importance for wildlife.
- Linking and connecting isolated and fragmented habitats, important species populations and landscape features through creation of wildlife corridor (greenway) networks.
- Promote the use of management agreements for designated sites, where this can be linked to development.
- The planting of new trees at Heartwood Forest should help increase biodiversity. Numbers of many species of butterflies and birds have already increased.

2.2 Climatic factors

2.2.1 Key policy context

Within the EU, the 2030 Climate and Energy Framework sets out three targets to be achieved by the year 2030:

- To cut greenhouse gas emissions by at least 40% from 1990 levels¹⁴;
- To have a renewable energy share of at least 27%¹⁴; and
- To improve energy efficiency by at least 27%¹⁵.

These targets will enable the EU to take steps towards its long term objective to reducing emissions by 80-95% by 2050 and make a fair and ambitious contribution to the new international climate agreement that will take effect from 2020¹⁶.

On a national level in the UK, the Climate Change Act (2008) sets a legally binding target of reducing greenhouse gas emissions by at least 34% by 2020 and by at least 80% by 2050 against a 1990 baseline. The UK Low Carbon Transition Plan 2009 sets out the intention to produce 30% of the UK's electricity by renewable means by 2020.

The National Planning Policy Framework has a specific core planning principle relating to climate change: to *“support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”*

The NPPF requires that: *“New development should be planned for in ways that:*

a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and

b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards.”

The NPPF points to the key role of planning in reducing greenhouse gas emissions and adapting to climate change¹⁷ as well as supporting the delivery of renewable and low carbon energy and infrastructure. In particular, it states that local planning authorities should *“support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.”*

To help increase the use and supply of renewable and low carbon energy and heat, plans should:

“a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);

¹⁴ Binding target

¹⁵ On the basis of the Energy Efficiency Directive, the European Council has endorsed an indicative energy savings target of 27% by 2030. This target will be reviewed in 2020 having in mind a 30% target.

¹⁶ http://ec.europa.eu/clima/policies/strategies/2030/index_en.htm

¹⁷ In line with the objectives and provisions of the Climate Change Act 2008.

b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and

- *c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.”.*

The NPPF requires that *“plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures⁴⁸. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.”*and that *“New development should be planned for in ways that:*

a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and

b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards.”.

‘A Green Future: Our 25 Year Plan to Improve the Environment’ (2018) includes the following objectives under the theme of ‘Mitigating and adapting to climate change’:

- Continuing to cut greenhouse gas emissions including from land use, land use change, the agriculture and waste sectors and the use of fluorinated gases. The UK Climate Change Act 2008 commits us to reducing total greenhouse gas emissions by at least 80 per cent by 2050 when compared to 1990 levels;
- Making sure that all policies, programmes and investment decisions take into account the possible extent of climate change this century; and
- Implementing a sustainable and effective second National Adaptation Programme.

At a local level the Climate Change Strategic Framework for Hertfordshire identifies opportunities for addressing climate change in the county.

2.2.1.1 Relevant plans, policies and programmes

- European Commission 2030 Climate and Energy Framework
- Roadmap for moving to a competitive low carbon economy in 2050
- Energy Roadmap 2050
- Renewed EU Sustainable Development Strategy 2006
- Directive to Promote Electricity from Renewable Energy (2001/77/EC)
- Climate Change Act 2008
- UK Climate Change Risk Assessment
- The National Adaptation Programme 2013
- Climate Resilient Infrastructure: Preparing for a Changing Climate 2011
- Overarching National Policy Statement for Energy (EN-1) (Jul 2011)
- National Policy Statement for Renewable Energy Infrastructure (EN-3) (Jul 2011)
- National Planning Policy Framework 2018
- ‘A Green Future: Our 25 Year Plan to Improve the Environment’ (2018)

- Climate Change Strategic Framework for Hertfordshire (2010)
- The Building Regulations (2010)

2.2.2 The current situation

St Albans has the fourth highest carbon dioxide (CO₂) emissions per capita in Hertfordshire (out of the 10 local authority areas). The CO₂ per capita emissions for St Albans are higher than the average figures for Hertfordshire and the East of England. St Alban’s figures are somewhat aligned with the average for England and the UK, though do not show decline in recent years that is apparent in the national (UK) average figures (see Table 2-2).

Per capita emissions in the District have shown an overall decline since 2005 (from 8.6 CO₂ per person to 7.1 CO₂ in 2014); however this includes a slight increase in 2012. This follows the regional and national trends.

Table 2-2: Per capita Local CO₂ emission estimates 2005-2014 (t CO₂ per person)¹⁸

	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
St Albans	8.6	8.4	8.2	7.8	7.4	7.4	6.9	7.2	7.2	7.1
Hertfordshire	7.8	7.7	7.5	7.2	6.7	6.8	6.2	6.5	6.3	5.7
East of England	8.2	8.1	7.9	7.7	7.0	7.3	6.6	6.8	6.6	6.0
England	8.5	8.4	8.2	7.9	7.1	7.3	6.6	6.9	6.7	6.0
UK	8.8	8.7	8.4	8.2	7.3	7.5	6.8	7.1	6.9	6.3

In 2014, about 27% of emissions were produced from energy use (mainly electricity and gas) in St Albans homes (compared to 31% in 2005 and 33% in 2010) (see Figure 2-1). The industry and commercial sector contributed about 15% of emissions (compared to 21% in 2005 and 21% in 2010). Transport contributed around 56% of emissions within the District (an increase from 47% in 2005 and 46% in 2010). These were almost entirely attributed to road transport (99%)¹⁹.

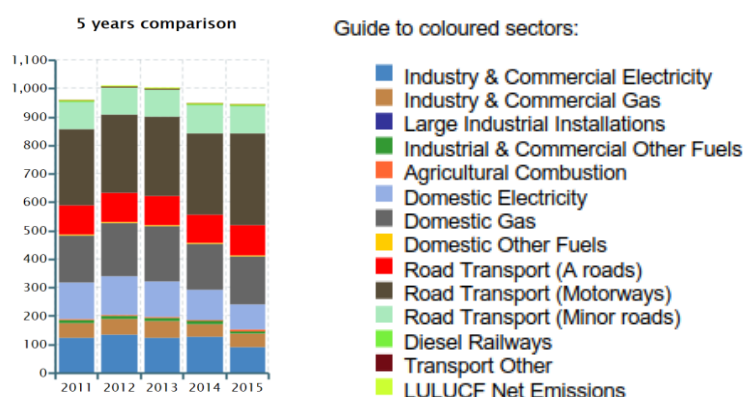


Figure 2-1: Sectoral split of CO₂ emissions 2011-2015 for St Albans District²⁰

¹⁸ DECC National Statistics (2016) UK local authority and regional carbon dioxide emissions national statistics: 2005-2014 <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-2013>

¹⁹ Figures calculated based on DECC National Statistics (2016) UK local authority and regional carbon dioxide emissions national statistics: 2005-2014 <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-2013>

²⁰ <http://naei.defra.gov.uk/data/local-authority-co2-map>

Domestic gas and electricity use decreased slightly in St Albans between 2011 and 2015. Gas consumption fell from 919 GWh (gigawatt hour) in 2011 to 905 in 2015 while electricity consumption fell from 261 GWh in 2011 to 257 GWh in 2015.

In the commercial sector, gas consumption decreased from 277 GWh in 2011 to 255 GWh in 2015. However, electricity consumption has shown an increase year on year from 252 GWh in 2011 to 315 GWh in 2013, but has dropped to 262 GWh in 2015²¹. In Hertfordshire, consumption of both electricity and gas by the commercial sector increased.

2.2.2.1 *Renewable energy*

There are no major renewable energy installations in the District. However, domestic installations of renewable energy schemes do not require planning consent so may exist without the council's knowledge. In St Albans, the council have received 9 planning applications for the installation of solar panels, though it is not known how many, if any, of these were implemented. If all were implemented, they could generate up to 112.5 megawatts per year.²²

2.2.2.2 *Effects of climate change*

Besides reducing greenhouse gas emissions to mitigate climate change, it is also important that local authorities adapt to the likely impacts. This is necessary since the climate is already changing and is likely to continue to do so for at least the next few decades.

The future climate in Hertfordshire is predicted to become warmer, with drier summers and wetter winters²³. By 2050, Hertfordshire could see a 17% increase in rainfall or snow in winter, with a 19% decrease in rainfall during the summer²⁴.

Future climate change is likely to have the following effects:

- Implications for agricultural practices, such as change in crops grown and season of activity;
- Threats to the natural environment and native biodiversity;
- Implications for human health;
- Risks and opportunities for local businesses;
- Opportunities for leisure and tourism sector;
- Weather-related disruption of transport system;
- New types of building design and existing buildings no longer being fit for purpose;
- Drought conditions and associated restrictions following prolonged dry periods; and
- Increased river and surface water flood risk²⁵ (this issue is of particular importance and is dealt with in the water section (Section 2.8.2.3).

2.2.3 *The likely situation without the plan*

As the District Local Plan Review 1994 does not include any policies specifically relating to climate change the NPPF and its supporting NPPG provide the policy framework for this topic. Whilst climate change will continue to occur, the new Local Plan needs to help to reduce St Albans' contribution to

²¹ <http://atlas.herts.gov.uk/IAS/profiles/profile?profileId=976&geoTypeId=16&geoids=26>

²² https://www.stalbans.gov.uk/Images/SP_EB_AuthoritysMonitoring%20Report2016_2017.pdf

²³ <http://www.hertsdirect.org/docs/pdf/h/ccclimateriskassessment.pdf>

²⁴ Hertfordshire Building Futures toolkit, Climate Adaptation

²⁵ <http://atlas.herts.gov.uk/IAS/profiles/profile?profileId=973&geoTypeId=16&geoids=26>

this global issue as well as helping the District to adapt to climate change. Without a new Local Plan the NPPF/NPPG would remain and therefore there would not be a policy vacuum in this area, meaning that reductions in carbon emissions and adaptation measures would still be sought in new developments and in relation to transport. However, the new Local Plan provides the opportunity to strengthen the policy framework in relation to emissions reduction and also for adaptation to the effects of climate change, through updated strategic and development management policies that could take into account new technological opportunities. Without the Local Plan in place this would not be possible.

2.2.4 Issues and opportunities

Issues

- The CO₂ 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 CO₂ emissions within the District.
- The future climate in Hertfordshire is predicted to become warmer, with drier summers and wetter winters.
- The combined effects of climate change, population growth and development needs will increase pressures on the natural environment. These impacts must be reduced through the prudent use of natural resources, encouraging renewable energy production, the effective disposal of waste, the sustainable design of new development and careful land management.
- Climate change is likely to affect water resources (supply and demand), alter habitats, affect air quality and public health and increase flood risk and likelihood of drought conditions. These could all adversely impact upon the District's economy.
- Greenhouse gas emissions are likely to lead to significant climate changes which could have significant implications for other aspects of quality of life.
- Development proposals could exacerbate flooding elsewhere in catchment and this needs to be avoided by adopting the sequential approach to site selection advocated in the NPPF.

Opportunities

- Development can help to mitigate and adapt to the impacts of climate change, through sustainable design and construction and reducing the need to travel, particularly by car.
- Implement Sustainable Drainage Systems – porous surfaces, greenspace, wetlands, flood storage areas, urban forestry to help manage some of the effects from climate change.
- Opportunity to decrease greenhouse gas emissions through reduced reliance on the private car.

2.3 Air Quality

2.3.1 Key policy context

The Environment Act 1995 requires Local Authorities to carry out annual reviews of air quality in their area. Air Quality is required to be assessed against objectives set out in the Air Quality (England) (Amendment) Regulations 2002. The National Air Quality Strategy (2007) provides a framework for air quality control through air quality management and air quality objectives that should be met at designated receptors.

The NPPF states that: *“Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.”*

‘A Green Future: Our 25 Year Plan to Improve the Environment’ (2018) includes the following objectives under the theme of ‘Clean air’:

- Meeting legally binding targets to reduce emissions of five damaging air pollutants. This should halve the effects of air pollution on health by 2030;
- Ending the sale of new conventional petrol and diesel cars and vans by 2040;and
- Maintaining the continuous improvement in industrial emissions by building on existing good practice and the successful regulatory framework.

An Air Quality Action Plan was published in 2003 and was subsequently updated in 2010. The AQAP measures are outlined to be completed in order to pursue of the annual mean objective for NO₂ thus improving air quality within the AQMAs and therefore the District as a whole. The AQAP is currently in the process of being updated.

2.3.1.1 Relevant plans, policies and programmes

- Directive 2008/50/EC and Directive 96/62/EC the 'Air Quality Framework Directive'
- The Environment Act 1995
- Air Quality (England) (Amendment) Regulations 2002
- National Planning Policy Framework 2018
- National Air Quality Strategy (2007)
- The Air Quality Standards Regulations 2010
- ‘A Green Future: Our 25 Year Plan to Improve the Environment’ (2018)
- St Albans Air Quality Action Plan 2003 (Updated 2010)

2.3.2 The current situation

Monitoring of air quality helps to ensure that levels of identified pollutants remain below national standards and targets so that human health and eco systems are protected. Identified pollutants include: Nitrogen oxides (NO_x); Nitrogen dioxide (NO₂); Particulate matter (PM₁₀); Sulphur dioxide (SO₂); Benzene; Carbon monoxide (CO); and 1, 3-butadiene.

The main source of air pollution within St Albans District is generated from vehicle emissions²⁶. Monitoring of NO₂ throughout the district is done by means of diffusion tubes at 39 sites, throughout St Albans. 26 are kerbsides, 2 are roadsides, 7 are urban backgrounds and 4 are rural sites. In 2008, 11 sites recorded NO₂ concentrations above the annual mean objective limit for NO₂, In 2016, no sites indicated concentrations above the annual mean limit for NO₂ following bias adjustment and distance correction.

²⁶ https://www.stalbans.gov.uk/Images/2017%20ASR%20St%20Albans%20Final_tcm15-63128.pdf

Three AQMAs have formally been declared within the District in relation to the annual mean air quality objective (annual mean standard of $40 \mu\text{g}/\text{m}^3$) for nitrogen dioxide:

- AQMA No 1: The area comprising of odd numbers 1-7 London Road and even numbers 2-38 London Road, St Albans
- AQMA No 2: The area comprising of Beechtree Cottages, Hemel Hempstead Road, St Albans (adjacent to junction of M1 (J7) and M10) and;
- AQMA No 3: An area encompassing a number of domestic properties in Frogmore and Colney Street in the vicinity of the M25.

In 2016, mean concentrations of NO_2 were below $60 \mu\text{g}/\text{m}^3$ at all of the monitoring sites in St Albans. The majority of monitoring sites show an overall downward trend of annual mean NO_2 concentrations from 2012-2016.

2.3.3 *The likely situation without the plan*

As the District Local Plan Review 1994 does not include any policies specifically relating to air quality the NPPF and its supporting NPPG provide the policy framework for this topic. Without a new Local Plan the NPPF/NPPG would still remain and therefore there would not be a policy vacuum in this area, meaning that effects on air quality would still be considered when planning new developments. However, the new Local Plan will have the opportunity to strengthen the policy framework in relation to air quality through updated strategic and development management policies. The new Local Plan will be able to ensure that development is located having taken into account the air quality related implications, not only in terms of ensuring that new development does not exacerbate air quality in those areas currently suffering from poor air quality, but also in terms of ensuring that sensitive developments (e.g. schools and residential homes) avoid been located in areas with poor air quality. Without the Local Plan any new development that results through planning applications on unallocated sites, rather than sites allocated in the Local Plan, could occur in areas which might not comply with these factors.

2.3.4 *Issues and opportunities*

Issues

- The main source of air pollution within St Albans District is generated from vehicle emissions.
- Whilst levels of nitrogen oxides (NO_x), nitrogen dioxide (NO_2) and particulates (PM_{10}) 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.

Opportunities

- Ensuring that potentially polluting processes incorporate pollution minimisation measures.
- Ensuring that potentially polluting developments are not located close to sensitive developments (e.g. care homes, schools etc.) or in areas of existing poor air quality.
- Ensuring that developments sensitive to air quality issues are not located in areas of poor air quality.
- Promoting the development of Green Travel Plans.
- Improving cycle and pedestrian routes and links and cycle parking facilities to encourage the use of non-motorised transport.

- Promoting low emission vehicles, such as through the provision of electric vehicle charging infrastructure.
- Reducing the need to travel through developing in sustainable locations

2.4 Landscape and Townscape

2.4.1 Key policy context

The European Landscape Convention (2000) aims to promote European landscape protection, management and planning and to organise European co-operation on landscape issues. The protection and enhancement of the countryside is often dealt with in conjunction with biodiversity issues, such as in the biodiversity strategy for England ‘Biodiversity 2020: A Strategy for England’s wildlife and ecosystem services’, or agricultural issues, such as farming schemes and subsidies. In addition, the Countryside and Rights of Way Act 2000 (CROW) created a statutory right of access to open country and registered common land and provides the context for many accessibility issues in Britain.

The NPPF requires that local planning authorities should protect and enhance valued landscapes, in particular by:

- “a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;”*

The NPPF also sets out policy for protecting the Green Belt, including *“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.”*

National Planning Policy Guidance has also been published on how local authorities should address light pollution. This Guidance sets out how the Government defines the link between lighting and planning and goes on to cover the factors that should be considered when assessing whether a development proposal might have implications for light pollution and its effects.

‘A Green Future: Our 25 Year Plan to Improve the Environment’ (2018) includes the following objectives under the theme of ‘Enhancing beauty, heritage and engagement with the natural environment’:

- Safeguarding and enhancing the beauty of our natural scenery and improving its environmental value while being sensitive to considerations of its heritage.
- Making sure that there are high quality, accessible, natural spaces close to where people live and work, particularly in urban areas, and encouraging more people to spend time in them to benefit their health and wellbeing.
- Focusing on increasing action to improve the environment from all sectors of society.

More locally, the Chilterns AONB Management Plan sets the framework for protecting and enhancing the Chilterns – an area of outstanding natural beauty lying partly in South West Hertfordshire.

2.4.1.1 Relevant plans, policies and programmes

- European Landscape Convention 2000
- National Parks and Access to the Countryside Act (1949)
- Countryside and Rights of Way Act (2000)
- Noise Policy Statement for England 2010
- National Planning Policy Framework 2018
- ‘A Green Future: Our 25 Year Plan to Improve the Environment’ (2018)
- Chilterns AONB Management Plan 2014-2019
- Hertfordshire Green Infrastructure Plan (March 2011)
- Hertfordshire Rights of Way Improvement Plan (2017)
- Green Belt Review Stage 1 (2013) (Dacorum, St Albans and Welwyn Hatfield)
- Green Belt Review Stage 2 and Landscape Appraisal (2014)
- Landscape Character Assessment
- St Albans District Green Infrastructure Plan (2011)

2.4.2 The current situation

2.4.2.1 Landscape character

England is sub-divided into 159 distinct natural areas, each with a unique combination of landscape, biodiversity, geodiversity, history and cultural and economic activity. These areas are referred to as ‘National Character Areas’ or ‘Landscape Character Areas’. St Albans falls into two Landscape Character Areas (now known as National Character Areas), “Northern Thames Basin” and “Chilterns” (see Figure 2-2).

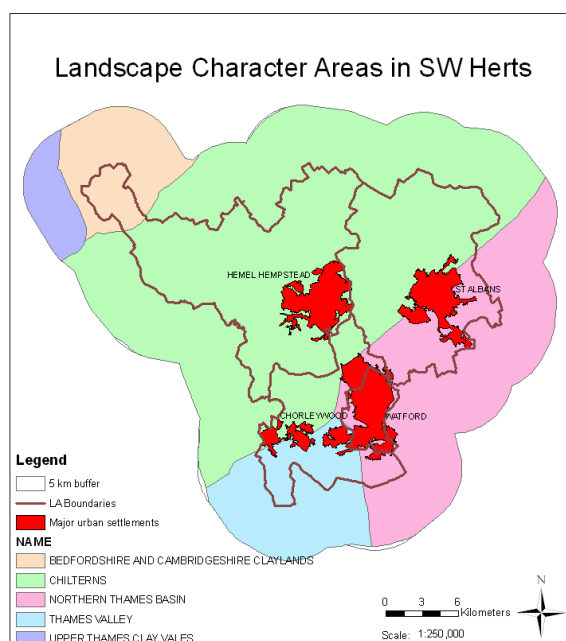


Figure 2-2: Landscape Character Areas in South West Hertfordshire (Source: MAGIC)

According to Natural England they are characterised as follows :

Chilterns (110):

“The extensively wooded and farmed Chilterns landscape is underlain by chalk bedrock that rises up from the London Basin to form a north-west facing escarpment offering long views

over the adjacent vales. From the vales, the River Thames breaches the escarpment in the south at the Goring Gap and flows on past riverside towns such as Henley. Small streams flow on chalk down some of the dip slope valleys or from the scarp foot, passing through numerous settlements. The major sources of public water supply for the Chilterns and the London area are the chalk aquifer and the Thames. The countryside is a patchwork of mixed agriculture with woodland, set within hedged boundaries. Furthest from London, the natural and built features of the countryside are recognised as special and attractive in approximately half the National Character Area (NCA) by the designation of the Chilterns Area of Outstanding Natural Beauty (AONB) and, in a small area south of the River Thames, by the North Wessex Downs AONB. Outside the AONBs there are major settlements that incorporate extensive urban fringe and growth areas, including Luton, Hemel Hempstead and High Wycombe”.

Northern Thames Basin (111):

“The Northern Thames Basin is a diverse area which extends from Hertfordshire in the west to the Essex coast in the east. It is separated from the North Sea and Thames Estuary by a narrow band of land that makes up the Greater Thames Estuary National Character Area (NCA). Included within this NCA are the suburbs of North London and also historic towns and cities including St. Albans and Colchester, as well as new and planned towns such as Welwyn Garden City, Hatfield and Basildon. Although arable agriculture is a large industry in the area the soil quality ranges from good to poor quality. The London Clay provides a poor quality soil that becomes waterlogged in winter and cracks and shrinks in summer. Better quality soil is found in areas that contain alluvial deposits from the Thames and other rivers in the area as they formed and changed position over time. The Northern Thames Basin is an area rich in geodiversity, archaeology and history and diverse landscapes ranging from the wooded Hertfordshire plateaux and river valleys, to the open landscape and predominantly arable area of the Essex heathlands, with areas of urbanisation mixed in throughout. Urban expansion has been a feature of this area since the 16th century when wealthy merchants who were conducting business in London built homes on its outskirts, mainly in the Hertfordshire area. This trend increased dramatically from the mid-19th century as infrastructure improved and people could travel to work in London from the surrounding areas in an hour or less. This has put increased pressure on the area in terms of extra housing developments, schools and other necessities for expanding populations, with a consequential reduction in tranquility.”

In addition, the Area of Outstanding Natural Beauty (AONB) “Chilterns”, which consists of gently rolling hills covered with beech woodland and chalk downland providing habitat to wild flowers and red kites, can be found in close proximity to the authority.

St Albans, being in close proximity to London, experienced as most areas in the London Arc some changes inconsistent to landscape character .

Hertfordshire County Council has conducted in depth work regarding local landscape character assessments . It defined Hertfordshire Landscape Regions which are based on Countryside Agency/ English Nature (now Natural England) Countryside Joint Character Areas (now National Character Areas) and supplemented with some local refinements).

Landscapes to the north of the District are generally of a better condition and strength of character than those to the south, some of which have been harmed by minerals extraction and disrupted by major transport corridors.

Areas of landscape importance within the District are defined as ‘Landscape Conservation Areas’. Much of the Upper Lea Valley, north east of Harpenden together with land around Wheathampstead and a tract between St Albans and Harpenden, is currently defined as a Landscape Conservation Area.

It is anticipated that this information will be used to assess in more detail how local landscape character could be affected by the proposed planning policies.

2.4.2.2 Green Belt

The Green Belt plays an important role in safeguarding the countryside from encroachment, preserving the setting and special character of the District’s historic settlements and assisting in urban regeneration.

In Hertfordshire, an area of 84,640 hectares of land was designated as Green Belt, making up 51.5% of Hertfordshire²⁷. Of this, 13,140 hectares are within St Albans District (in 2017)²⁸. There was no change in the District between 2016 and 2017. In 2015, England saw the largest annual change in its area of Green Belt reported since 2010²⁹.

2.4.2.3 Tranquillity/light pollution

The East of England has been ranked as the second darkest region in England (after the South West) in the latest CPRE ‘Night Blight’ Report 2016³⁰. However, at the county level, only five counties in England have a lower percentage of dark skies than Hertfordshire, meaning that the county has relatively high levels of light pollution. Table 2-3 shows that Hertfordshire has very little of the lowest light levels present (0.5% compared to 11% in the East of England), however it also has relatively low levels of the brightest light levels (1.2% compared to 0.6% in the East of England). The majority of light pollution within Hertfordshire is within the mid to low levels (colour bands 1-5).

Table 2-3: Levels of light pollution and dark skies split for St Albans, Hertfordshire and East of England³¹

Brightness values (NanoWatts)	East of England	Hertfordshire	St Albans
Colour band 9 (> 32 (brightest))	0.6%	1.2%	1.3%
Colour band 8 (16 – 32)	1.8%	3.7%	6.5%
Colour band 7 (8 – 16)	3.3%	8.7%	15.9%
Colour band 6 (4 – 8)	4.6%	11.7%	21.2%
Colour band 5 (2 – 4)	7%	14.2%	20.5%
Colour band 4 (1 – 2)	12.3%	21.2%	26.4%
Colour band 3 (0.5 – 1)	24.4%	25.5%	8.2%
Colour band 2 (0.25 – 0.5)	35.3%	13.2%	0%
Colour band 1 (< 0.25 (darkest))	10.8%	0.5%	0.0%
Average Rank (where a rank of 1 has the darkest skies)	2/9 regions	36/41 counties	183/326 local authority areas

Since the 1960s ‘tranquil areas³²’ and ‘tranquil areas with some intrusion’, have been decreasing substantially in England, mainly due to new housing and infrastructure developments. These areas

²⁷ Hertfordshire Quality of Life Report (2014)

²⁸ The Dacorum Core Strategy allocated six sites in the Green Belt (Local Allocations LA1-LA6) for a total of 1,630 new dwellings in the period 2006-2013.

²⁹

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/464776/Green_Belt_Statistics_England_2014-15.pdf

³⁰ http://nightblight.cpre.org.uk/images/resources/Night_Blight_cpre.pdf

³¹ Source: <http://nightblight.cpre.org.uk/maps/>

³² Tranquil areas can be defined as: Places which are sufficiently far away from the visual or noise intrusion of development or traffic to be considered unspoilt by urban influences.

are identified in relation to their distances away roads, towns, airports and power stations. In 1960, about 54% of Hertfordshire was considered to be disturbed by noise and visual intrusion. This had increased to 69% in the early 1990s and by 2007 was estimated to be just under 76%³³. The least tranquil areas are around main urban areas, and particularly concentrated within the southwest of the County.

From 2011, Hertfordshire County Council has run a night-time ‘street light switch-off’ scheme between midnight and 6am in all residential areas including towns and villages. Approximately 70% of the County’s street lights have been converted to operate for part of the night only with the remaining 30% kept on along A-roads, pavements and in known crime spots. This policy has saved approximately £1.4 million a year and contributes to substantial reductions in carbon output and upward light pollution³⁴.

2.4.2.4 *Noise pollution*

Information relating to noise is reported under the ‘Health and Wellbeing topic. See Section 3.2.2.4.

2.4.3 *The likely situation without the plan*

Together with the NPPF and its supporting NPPG, the existing District Local Plan Review 1994 provides the strategic framework and development management policy for the protection and enhancement of landscape and townscape in the District, in particular through ‘Policy 104 Landscape Conservation’ and the policies which cover design and layout. Without a new Local Plan the District Local Plan Review 1994 policies and NPPF/NPPG would still remain and therefore there would not be a policy vacuum in this area, meaning that landscape and townscape would remain protected. However, as the District Local Plan Review gets progressively older, there is a risk that the weight that can be accorded to its policies will diminish. In addition, the new Local Plan will be able to ensure that development is located having taken into account the sensitivity of an area in terms of landscape and townscape. Without the Local Plan any new development that results through planning applications on unallocated sites, rather than sites allocated in the Local Plan, could occur in areas which might not be the most appropriate. Also, without a new Local Plan, opportunities may be lost to plan at the strategic level for Green Infrastructure provision which could provide landscape enhancements. The ‘development management type’ policies in the new Local Plan will also update the current saved District Local Plan Review policies to bring them up to date. Without this happening there might be gaps in the policy framework which could result in inappropriate development from a landscape/townscape stand-point.

2.4.4 *Issues and opportunities*

Issues

- There is increasing pressure on the landscape due to increased visitor numbers and increased access routes, pressure from development, increased water extraction due to population increases, loss of traditional farming practices such as grazing and the livestock sector, and influence of climate change.
- Light pollution is increasingly an issue, as is the decreasing amount of tranquillity.

³³ Campaign to Protect Rural England (2007). England’s Fragmented Countryside: East of England- intrusion statistics. <http://www.cpre.org.uk/resources/countryside/tranquil-places/item/1761-englands-fragmented-countryside-east-of-england-intrusion-statistics>

³⁴ Campaign to Protect Rural England (2014). ‘Shedding Light: a survey of local authority approaches to lighting in England’ <http://www.cpreherts.org.uk/campaigns/countryside/dark-skies/item/2298-shedding-light-and-seeing-stars>

- 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 expansion of Luton Airport could lead to more noise related issues and complaints

Opportunities

- Ensuring that landscape proposals for development schemes reflect local landscape character.
- Ensuring that the character, diversity and local distinctiveness of all the landscapes of the District are maintained, enhanced or restored.
- New lighting should be designed and selected that minimises light pollution.
- Preserve, and appropriately manage development within, the Green Belt
- Ensuring that access to landscape character areas is socially inclusive.

2.5 Historic Environment

2.5.1 Key policy context

The European Spatial Development Perspective (1999) aims for balanced and sustainable development in the European Union. As part of that the conservation and management of natural resources and the cultural heritage is set out as one of three fundamental goals.

In the UK, the NPPF requires that local planning authorities should set out a positive strategy within their Local Plan, in relation to the conservation and enhancement of the historic environment and the opportunity for people to access and enjoy it. The NPPF states:

“Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;

b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;

c) the desirability of new development making a positive contribution to local character and distinctiveness; and

d) opportunities to draw on the contribution made by the historic environment to the character of a place..”

2.5.1.1 Relevant plans, policies and programmes

- European Spatial Development Perspective (1999)
- UNESCO World Heritage Convention (1972)
- European Landscape Convention (2000)
- The Convention for the Protection of the Architectural Heritage of Europe (1985)
- The European Convention on the Protection of Archaeological Heritage (1992)
- Ancient Monuments and Archaeological Areas Act (1990)
- Planning (Listed Buildings and Conservation Areas) Act (1990)
- The Enterprise and Regulatory Reform Act 2013

- National Planning Policy Framework 2018
- The Government's Statement on the Historic Environment for England (2010)
- Heritage 2020: Strategic Priorities for England's Historic Environment 2015-2020
- Strategy for the Historic Environment: Heritage Counts (2014)
- Historic England Good Practice Advice in Planning Notes 1-3
- Historic England Advice Notes 1,2,3,4,7,8
- An Archaeological Strategy for the Historic Centre of St Albans (2005)
- Conservation Area Character Statements

2.5.2 *The current situation*

Historic features add tradition, continuity and character to a place, as well as being an asset for the economy, the environment and the wider community. Access to heritage assets, including building, monuments and historic parks and gardens is also linked to improved health and wellbeing. It is important that the setting of these heritage assets is preserved as much as possible as well as the assets themselves.

St Albans' cultural heritage is a key feature of the District.

Many of the important heritage features and areas within St Albans are recognised through historic environment designations. The National Heritage List for England³⁵ lists a total of:

- 833 listed buildings in the District (consisting of 10 Grade I buildings, 38 Grade II* buildings and 785 Grade II buildings);
- 18 scheduled monuments;
- 2 registered parks and gardens (both Grade II); and
- 19 conservation areas.

Although none of England's historic battlefields or World Heritage Sites are located in Hertfordshire, two National Trust Properties can be found in the County: Ashridge Estate (in Dacorum) and Shaw's Corner (near Wheathampstead). The popularity of these places is in part due to their historic designed landscapes.

There are three scheduled monuments within St Albans that are on the 2017 Heritage at Risk Register: Wheathampstead earthwork incorporating Devils Dyke and the Slad; The Aubreys camp, Redbourn; and The Benedictine Priory of St Mary (Sopwell Priory) and the post-medieval mansions known as Sopwell House or Lee Hall.

In addition, the Archaeological Strategy for the Historic Centre of St Albans (2005) identified 33 key sites as being of particular significance. It should be noted that Hertfordshire County Council have undertaken extensive work with regards to local archaeological assets. Its Hertfordshire Historic Environment Record brings together (HER) information regarding Hertfordshire's historic environment in a computerised form. It contains information on historic buildings, archaeological remains, historic sites and military remains. In addition the outputs of the County Council's Extensive Urban Survey project contain information on the County's historic towns. It is anticipated that this information will be used to assess in more detail how archaeological assets could be affected by the proposed planning policies.

³⁵ Historic England (2016) Local Authority Profiles 2016. <https://historicengland.org.uk/research/heritage-counts/indicator-data/local-authority-profiles/> Accessed 22/08/17

2.5.3 *The likely situation without the plan*

Together with the NPPF and its supporting NPPG, the existing District Local Plan Review 1994 provides the strategic framework and development management policy for the protection and enhancement of the District's historic environment, in particular through the range of policies under the 'Conservation and Historic Buildings' and 'Archaeology' policy topic areas. Without a new Local Plan the District Local Plan Review 1994 policies and NPPF/NPPG would still remain and therefore there would not be a policy vacuum in this area, meaning that the historic environment would remain protected. However, as the District Local Plan Review gets progressively older, there is a risk that the weight that can be accorded to its policies will diminish. In addition, the new Local Plan will be able to ensure that development is located having taken into account the sensitivity of an area in terms of heritage assets and their settings. Without the Local Plan any new development that results through planning applications on unallocated sites, rather than sites allocated in the Local Plan, could occur in areas which might not be the most appropriate. Also, without a new Local Plan, opportunities may be lost to plan at the strategic level for Green Infrastructure provision which could provide landscape enhancements. The 'development management type' policies in the new Local Plan will also update the current saved District Local Plan Review policies to bring them up to date. Without this happening there might be gaps in the policy framework which could result in inappropriate development from a historic environment stand-point.

2.5.4 *Issues and opportunities*

Issues

- The District contains many heritage assets, and there are three scheduled monuments within St Albans that are on the 2017 Heritage at Risk Register: Wheathampstead earthwork incorporating Devils Dyke and the Slad; The Aubreys camp, Redbourn; and The Benedictine Priory of St Mary (Sopwell Priory) and the post-medieval mansions known as Sopwell House or Lee Hall.
- The historic built environment, including heritage assets, is under pressure from development and regeneration and associated traffic congestion, air quality and noise pollution. This puts heritage assets at risk of neglect or decay. The threat of infilling and replacement with new buildings and the erosion of historic features in the public realm need to be carefully mitigated and managed.
- Traffic congestion, air quality, noise pollution and other problems affecting the historic environment.
- Archaeological remains, both known and unknown have the potential to be affected by new development.

Opportunities

- Recognise the importance of the historic environment, cultural heritage and archaeological features and the importance of regenerating and re-using important buildings, particularly those listed as 'buildings at risk'.
- Be proactive in preparing development briefs to renew, restore and redevelop neglected and deteriorating sites of historic character.
- Ensure there are strong and robust design standards for new development.
- Ensure that new and existing developments have regard to settlement patterns, the local vernacular style and incorporate local materials.
- Ensure that the public realm is effectively designed using quality materials that maintain or add to the character/distinctiveness of an area.

- Recognise the importance of archaeological features and advocate a programme of archaeological investigation prior to initial earthworks.
- Retain features of historic landscape significance, where possible.
- The historic environment can make a significant contribution to the success of development. Opportunities to conserve and enhance the historic environment including designated and non-designated heritage assets and their settings should be sought where possible through sustainable development proposals.
- Development may result in significant loss or erosion of the landscape or townscape character or quality, which is likely to also have significant impact (direct and or indirect) upon the historic environment and people's enjoyment of it.

2.6 Material Assets

Material assets include resources such as land, building materials and other resources which are non-renewable. The topic is concerned with the efficient use of resources, including re-use of brownfield sites and sustainable waste management.

2.6.1 Key policy context

Legislation to reduce waste production, and to increase re-use, and recycling has been introduced with stringent targets, particularly for biodegradable waste, having been set by the European Union.

The UK National Planning Policy for Waste sets out detailed policies that should be taken into account when producing Local Plans. The Waste Management Plan for England (2013) sets out measures to make waste management in the UK more sustainable, such as decoupling waste from economic growth and promoting the composting of organic waste. Similarly, the Waste Prevention Programme for England (2013) sets out how the Government plans to reduce the amount of waste produced in the country and the process of transitioning towards a more resource efficient economy.

In terms of resource efficiency, renewable energy use and efficient use of land, the NPPF requires that local planning authorities should support the move to a low carbon future and that *“To help increase the use and supply of renewable and low carbon energy and heat, plans should:*

- a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);*
- b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and*
- c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers”.*

The NPPF also emphasises the need to encourage the effective use of land by re-using previously developed land, whilst recognising that recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production.

‘A Green Future: Our 25 Year Plan to Improve the Environment’ (2018) includes the following objectives under the theme of ‘Using resources from nature more sustainably and efficiently’:

- Maximising the value and benefits we get from our resources, doubling resource productivity⁷ by 2050.

- Improving our approach to soil management: by 2030 we want all of England’s soils to be managed sustainably, and we will use natural capital thinking to develop appropriate soil metrics and management approaches.
- Increasing timber supplies.
- Ensuring that all fish stocks are recovered to and maintained at levels that can produce their maximum sustainable yield.
- Ensuring that food is produced sustainably and profitably.

and the theme of ‘Minimising Waste’:

- Working towards our ambition of zero avoidable waste by 2050;
- Working to a target of eliminating avoidable plastic waste by end of 2042;
- Meeting all existing waste targets – including those on landfill, reuse and recycling – and developing ambitious new future targets and milestones;
- Seeking to eliminate waste crime and illegal waste sites over the lifetime of this Plan, prioritising those of highest risk. Delivering a substantial reduction in litter and littering behaviour; and
- Significantly reducing and where possible preventing all kinds of marine plastic pollution – in particular material that came originally from land.

On a regional level, the Hertfordshire Waste Local Plan 2011-2026 and the Hertfordshire Minerals Local Plan Review 2015 set out issues how to address waste issues locally.

2.6.1.1 Relevant plans, policies and programmes

- Landfill Directive 1999/31/EC
- Waste Framework Directive 2008/98/EC
- Waste Management Plan for England (2013)
- Waste Prevention Programme for England (2013)
- Urban Waste Water Treatment Directive 1991
- The Waste Strategy (2007)
- National Planning Policy Framework 2018
- ‘A Green Future: Our 25 Year Plan to Improve the Environment’ (2018)
- Hertfordshire Minerals Local Plan Consultation Draft (2017)
- Hertfordshire Waste Local Plan
- St Albans Energy Policy
- St Albans Energy Opportunities Plan (2010)
- St Albans Infrastructure Delivery Plan (2016)

2.6.2 The current situation

2.6.2.1 Waste

Hertfordshire County Council is the waste disposal authority and the minerals and waste planning authority for the County. Locally St Albans District Council runs the household refuse and recycling collection service for all residents in the District. A current priority for the Council is providing a high standard waste and recycling service for the benefit of all households as set out in the 2016 Corporate Plan.

In Hertfordshire, overall waste produced increased between 2012/13 and 2013/14 with 502,307 tonnes of household waste being produced. This was despite a reduction in residual waste³⁶ (by 7,800 tonnes) and an increase in recycling and composting (by about 25,000 tonnes). Residents within the County were recycling almost 50% of their waste in 2013/14, an increase from about 46% in 2012/13³⁷. The increase in reuse and recycling has been attributed to the majority of Hertfordshire's districts and boroughs diverting cardboard from their organic (composting) collection service to their dry recycling collection service, combined with a number of authority's moving to co-mingled recycling collections. However, the cardboard coming out of the organic collection service has been backfilled by additional green waste resulting in a 9,400 tonne increase in material composted.

In 2013/14 about 83,378 tonnes of waste were sent to energy recovery facilities (ERFs), where waste is burnt to produce electricity and heat whilst waste sent to landfill increased from 2012/13 by 6,339 tonnes. However, this will significantly reduce in future years as disposal arrangements move more towards energy from waste.

The amount of total household waste produced per person (including waste, recycling and composting) fell between 2013 and 2014 to 439kg despite overall waste going up (attributed to an increase in population).

In Hertfordshire as a whole, increases in both dry recycling and organic waste resulted in an overall increase in waste of 43kg per property in 2013/14 when compared to 2012/13. This is comparable to the amount of waste collected per household in 2011/12 and 2010/11 possibly reflecting an upturn in the economy.

In St Albans, waste produced per capita has reduced from 433kg in 2014 to 422kg for 2015/16. The level of household waste that is recycled in St Albans has increased to 50.4% in contrast to the national trend which has seen an overall decrease in levels of recycling. The Hertfordshire Waste Partnership has met its goal to bring recycling levels up to 50%.³⁸

Whilst a long term solution to Hertfordshire's growing residual waste disposal need is developed, in the short term, Hertfordshire's residual waste will be disposed of at five Landfill or Energy Recovery Facilities (ERF):

- Westmill Landfill, just north of Ware (the only disposal location within Hertfordshire), which accepts residual waste from East Hertfordshire and waste from five of Hertfordshire's 17 household waste recycling centres;
- The Ardley ERF in Oxfordshire, which has been accepting waste from the Waterdale Transfer Station since mid-2014;
- Milton Landfill, located in Cambridgeshire, which accepts a portion of North Hertfordshire's residual waste;
- Bletchley Landfill, located in Buckinghamshire, which takes residual waste from both the privately operated Hitchin Transfer Station and the Waterdale Transfer Station; and
- Greatmoor ERF, near Calvert in Buckinghamshire opened in June 2016, and is due to take residual waste from Hertfordshire, that would have previously gone to Bletchley Landfill³⁹.

³⁶ Waste not reused, recycled or composted

³⁷ Hertfordshire Quality of Life Report (2014)
<http://atlas.hertslis.org/IAS/profiles/profile?profileId=961&geoTypeld=16&geolds=26>

³⁸ Hertfordshire Quality of Life Report
<http://atlas.hertslis.org/profiles/profile?profileId=961&geoTypeld=16&geolds=26#iasProfileSection2>

³⁹ Hertfordshire Quality of Life Report (2014)
<http://atlas.hertslis.org/IAS/profiles/profile?profileId=961&geoTypeld=16&geolds=26>

These arrangements, whilst indicating a move from the use of landfill sites to ERF, demonstrate that Hertfordshire has a lack of in-county disposal options and a need for increased waste transfer by road to access regional facilities.

2.6.2.2 *Waste water and sewage*

Thames Water covers most of Hertfordshire's drainage catchment split into two main catchments, each with a sewage treatment works (STW). In the east is Rye Meads STW (near Ware) and to the west is Maple Lodge STW located in Rickmansworth. The Maple Lodge site serves Hemel Hempstead along with St Albans and Watford and given the future growth planned for this area will need to have upgrades in order to provide sufficient treatment capacity⁴⁰.

2.6.2.3 *Land use*

In Hertfordshire, there are conflicting pressures on land use. This is particularly true for housing and associated infrastructure which has to be balanced with the protection of the natural environment⁴¹, as well as the preservation of the Green Belt.

Approximately 13% of Hertfordshire is considered urban. There has been a loss of approximately 8.8 hectares of rural land on the urban fringe this year, which is almost double from last year. A large proportion of this can be attributed to the development of the Leavesden Aerodrome site. Since 1995, 427 hectares have been lost.

To achieve both the more efficient use of previously developed land (PDL) and the reduction of development pressures on undeveloped (greenfield sites and Metropolitan Green Belt land), in 1998 the government set a target that 60% of all new developments should be built on brownfield sites., which was exceeded in 2008 when an estimated 79% of new housing was built of previously developed land (PDL). In 2015, the government has set an objective that by 2020, local development orders should be in place on over 90% of brownfield land suitable for housing, and which does not already benefit from planning permission.

In 2014/2015, there were high levels of new build completions and finally completed schemes with densities over 30 dwellings per hectare and above - relating to the tendency to build high density flatted developments on brownfield, urban sites. This is a modest increase in both cases on the position during 2013/14.

The percentage of new homes constructed on previously developed land within the area covered by St Albans City and District Council is shown in Figure 2-3.

⁴⁰ Water Cycle Scoping Study. Hyder 2010.

⁴¹ HEF (2004) "Quality of Life Report 2004", available at <http://www.hertsdirect.org/infobase/docs/pdfstore/qol4.pdf>

Dwelling increase (gross)

Year	Previously Developed Land	Greenfield	Total	% Previously Developed
01-02	371	21	392	95
02-03	295	54	349	85
03-04	267	25	292	91
04-05	612	34	646	95
05-06	368	11	379	97
06-07	437	3	440	99
07-08	317	22	339	94
08-09	457	9	466	98
09-10	327	3	330	99
10-11	433	61	494	88
11-12	413	55	468	88
12-13	217	183	400	54
13-14	342	162	504	68
14-15	321	77	398	81
15-16	408	49	457	89
16-17	358	46	404	89
01-17	5,585	769	6,354	88

Figure 2-3: Residential Development on Previously Developed Land in St Albans⁴²

The figure illustrate that there has been a decrease in the proportion of new developments being built on previously developed land in St Albans District between 2009 and 2014 . The main issue is that previously developed land is a finite resource and might not be as readily available in the future, thus leading to greater pressure to build on greenfield sites.

A measure of achieving higher land efficiency is increasing housing density. However, to sustain quality of life this has to be combined with good design. St Albans’ Housing Monitoring Report (2010) states housing densities in 2009/10 averaged 18 dwellings per hectare for developments on green belt sites and 37 dwellings per hectare for developments on urban sites .

2.6.2.4 *Aggregates and minerals*

Hertfordshire’s geology is primarily chalk bedrock from the Cretaceous period, with a covering of London Clay in the south and the east of the County. In the very north and northwest of the County there are some small areas of Gault Clay. Lying on top of the bedrock, there are superficial deposits of Clay-with-flints covering a large proportion of west Hertfordshire, including the Chilterns dip slope. Boulder clay can be found in central and east Hertfordshire, while there are gravel deposits in the Vale of St Albans and the river valleys⁴³ .

Sand and gravel is the most commonly worked mineral in Hertfordshire, with land-won sand and gravel providing the only source of soft sand and sharp sand. The sand and gravel resources are found in most parts of the County, although they are particularly concentrated in a belt sitting across the southern half of the County (south of a line between Bishop Stortford in the east and Hemel Hempstead in the west) (see Figure 2-4). This area entirely covers the local authority areas of Watford, Three Rivers, Hertsmere, Welwyn Hatfield and Broxbourne. Large parts of St Albans and East Hertfordshire are also covered along with a small part of Dacorum⁴⁴ .

⁴² St Albans Authority’s Monitoring Report, Deember 2017

⁴³ Biodiversity Action Plan for Hertfordshire 2006, www.hef.org.uk

⁴⁴ Hertfordshire Minerals Planning (2015) ‘Local Aggregate Assessment’ <http://www.hertfordshire.gov.uk/docs/pdf/l/locaggass2015.pdf>

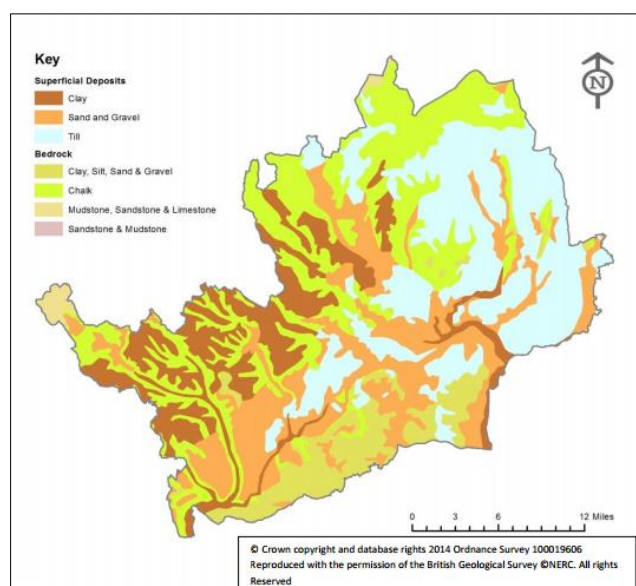


Figure 2-4: Geological map of the main mineral resources for Hertfordshire⁴⁵

Soft sand is relatively scarce within Hertfordshire and is concentrated within a small number of areas, meaning that the County in general has to import this resource from elsewhere; however sharp sand and gravel are more widely distributed across Hertfordshire⁴⁶. Gravel deposits are found within the river valleys of the Mimram, Ver and Colne around St Albans and Hemel Hempstead, although resources at the Ver and Colne have mostly been exhausted⁴⁷.

Currently there are four quarries extracting sand and gravel in Hertfordshire:

- Panshanger Quarry, Hertford
- Tyttenhanger Quarry, Colney Heath;
- Westmill Quarry, Ware;
- Hatfield Quarry with the linked Symondshyde extraction site.

The Local Aggregates Assessment (2015) reported that extraction is steadily continuing at active sand and gravel sites in Hertfordshire; however the County's reserves are showing a steady decline. There are currently two other inactive sites within the County. Permitted reserves in Hertfordshire are estimated to be able to supply aggregate for a period of 11.3 years based on the County's current apportionment of 1.39 million tonnes⁴⁷.

There are three chalk quarries located within Hertfordshire (Codicote Quarry, Bedwell Park just outside Hertford, and Anstey Chalk Pit). In the past, there were many chalk extraction sites, primarily for local use, however the scale of extraction has significantly decreased to just these sites. The chalk is now extracted for use in agriculture within and outside the County⁴⁷.

Information regarding land contamination, mineral and aggregate use/reserves specific to the St Albans area was not available for this study.

⁴⁵ Source: BGS & ODPM, 2003, Technical report CR/03/075/N Mineral Resource Information in support of National, Regional and Local Planning: Hertfordshire and Northwest London Boroughs

⁴⁶ Hertfordshire County Council (2014) 'Sand and Gravel in Hertfordshire Frequently Asked Questions' <http://www.hertfordshire.gov.uk/docs/pdf/h/18857322/Sndandgrvlinhertsfaqs.pdf>

⁴⁷ Hertfordshire Minerals Planning (2015) 'Local Aggregate Assessment' <http://www.hertfordshire.gov.uk/docs/pdf/l/locaggass2015.pdf>

There is no hard rock found within Hertfordshire and as a result the County imports crushed rock via the rail aggregate depots located at:

- Langley Sidings, Stevenage;
- Rye House, Hoddesdon;
- Harper Lane, Radlett;
- Orphanage Road, Watford; and
- Hitchin⁴⁷.

Extracting primary resources can cause a variety of impacts which could potentially be avoided by using secondary or recycled materials.

In Hertfordshire recycled and secondary aggregate processing increased from 78,390 tonnes in 2004 (this being 7% of total aggregate production) to 329,457 tonnes in 2013 (22.5%)⁴⁸.

2.6.3 *The likely situation without the plan*

Together with the NPPF and its supporting NPPG, the existing District Local Plan Review 1994 provides the strategic framework and development management policy for the sustainable use of land and resources. Without a new Local Plan, the District Local Plan Review 1994 policies and NPPF/NPPG would still remain and therefore there would not be a policy vacuum in this area, meaning that land use and resource efficiency would still be considered when planning new developments. However, as the District Local Plan Review gets progressively older, there is a risk that the weight that can be accorded to its policies will diminish. In addition, the new Local Plan will have the opportunity to strengthen the policy framework in relation to resource use through updated strategic and development management policies. It should be noted that planning for minerals and waste is undertaken at a county level and therefore the Local Plan has limited influence at the strategic level for these two topics.

2.6.4 *Issues and opportunities*

Issues

- 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. Hertfordshire as a county is having to use sites in Buckinghamshire and Oxfordshire in order to meet its needs. 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.

Opportunities

- There is the opportunity to promote the use of renewable resources, protect natural resources and reduce waste.
- Supporting a reduction in the amount of waste deposited in landfill.
- Supporting alternative methods of waste management, e.g. minimisation and recycling by incorporating facilities within development schemes.

⁴⁸ Hertfordshire County Council Secondary and Recycled Aggregates Topic Paper (March 2015)

<http://www.hertfordshire.gov.uk/docs/pdf/h/18857322/topicpapsecandrecyaggreg.pdf>

- Encouraging re-use and recycling of construction waste in development schemes through the use of planning conditions.
- Promoting development on previously developed land and maximise the efficient use of land.
- Avoiding the sterilisation of mineral resources.

2.7 Soil

2.7.1 Key policy context

When compared to the higher profile environmental issues, such as climate change and loss of biodiversity, impacts on soil are less well reported. This is despite the fact that soil is the foundation of the environment, landscape, wildlife and food production. Nevertheless, at the European level the EU 7th Environment Action Programme highlights soil degradation as a serious challenge with the requirement to increase efforts to reduce soil erosion and increase soil organic matter, and to remediate contaminated sites.

The National Planning Policy Framework requires *“Planning policies and decisions should contribute to and enhance the natural and local environment by:*

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

...”

and “Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.”

The NPPF also emphasises the role of the planning system in contributing to and enhancing the natural and local environment by *“preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.”*

The Planning Practice Guidance on Minerals advises mineral planning authorities how to balance best social, economic and environmental issues related to mineral and aggregates extraction which can impact on soil. The Soil Strategy for England has a vision to ensure that England’s soils will be protected and managed to optimise the varied functions that soils perform for society.

2.7.1.1 Relevant plans, policies and programmes

- The European Soil Thematic Strategy (2006)
- Safeguarding our Soils: A Strategy for England (2009)
- Rural Strategy (2004), Defra
- National Planning Policy Framework 2018

2.7.2 The current situation

The geology of the County is the major factor determining its topography (the hills and valleys) and its soils. These, together with the climate, determine the natural vegetation and habitats which support the range of species and influence farming practices. The combination of all these factors results in the distinctive landscape of each part of the County.

The solid geology of Hertfordshire is relatively simple, being largely chalk of the Cretaceous period, overlain in the south and east by London Clay. In the far north and north-west of the County are small areas of Gault Clay. Throughout much of the County, the superficial deposits which overlay the solid geology complicate the picture. These include the Clay-with-flints of much of west Hertfordshire, including the Chilterns dip slope; the boulder clay of central and east Hertfordshire; and the gravels of the Vale of St Albans and the river valleys⁴⁹.

South-west Hertfordshire's soils are mainly classified as grade 3 agricultural land, with some grade 2 soils⁵⁰.

St Albans District covers a number of different soils. The predominant soilscape is 'Slightly acid loamy and clayey soils with impeded drainage', which has moderate to high fertility. There are also areas of 'Freely draining slightly acid loamy soils' (with low fertility); 'Slowly permeable seasonally wet acid loamy and clayey soils (with low fertility); 'Loamy and clayey floodplain soils with naturally high groundwater' (with moderate fertility); and 'Freely draining slightly acid but base-rich soils' (with high fertility)⁵¹. The covers a relatively narrow area stretching from Chisell Green to the north west of Redbourn, with one 'finger' off to north Hemel Hempstead and a second off to Sandridge/Marshalswick south of Wheathamstead/south-west Harpenden.

Major impacts on soil are soil loss, contamination or compaction which can stem from a variety of sources, such as⁵¹:

- Erosion;
- New developments (e.g. housing and accompanying infrastructure);
- Nutrient loss and diffuse pollution from agriculture;
- Climate change;
- Air pollution and run-off from roads; and,
- Quarrying.

In recent years, Hertfordshire has seen a number of sinkholes appearing; a result of the predominantly chalk geology.

2.7.3 *The likely situation without the plan*

Together with the NPPF and its supporting NPPG, the existing District Local Plan Review 1994 provides the strategic framework and development management policy for the maintaining soil quality and remediating contaminated land, in particular through 'Policy 102 Loss of Agricultural Land'. Without a new Local Plan the District Local Plan Review 1994 policies and NPPF/NPPG would still remain and therefore there would not be a policy vacuum in this area, meaning that effects on soils would still be considered when planning new developments. However, as the District Local Plan Review gets progressively older, there is a risk that the weight that can be accorded to its policies will diminish. In addition, the new Local Plan will have the opportunity to strengthen the policy framework in relation to safeguarding soils and remediating contaminated land through updated strategic and development management policies. The new Local Plan will be able to ensure that development is located having taken into account the soil quality related implications (e.g. whether best and most versatile agricultural land could be affected and whether opportunities are taken to remediate contaminated sites). Without the new Local Plan, any new development that results through planning applications on unallocated sites, rather than sites allocated in the Local Plan, could occur in areas which might not result in the best outcomes in relation to these factors.

⁴⁹ http://www.hef.org.uk/nature/biodiversity_vision/chapter_02_geology.pdf

⁵⁰ Natural England (2010) Agricultural Land Classification map Eastern Region(ALC008) <http://publications.naturalengland.org.uk/publication/127056?category=5954148537204736>

⁵¹ <http://www.landis.org.uk/soilscales/index.cfm#>

2.7.4 *Issues and opportunities*

Issues

- The District includes areas classified as the Best and Most Versatile Agricultural Land.

Opportunities

- Protecting the best and most versatile agricultural land.
- Promoting good soil handling practices.
- Encouraging development on previously developed land.

2.8 Water

2.8.1 *Key policy context*

The EU Water Framework Directive 2000/60/EC is the key regulation that governs all UK water policies via the Water Framework Regulations 2003. The main aim of the directive is to prevent deterioration and where possible improve the quality of rivers and other water bodies to 'good ecological status' and 'good chemical status' by 2015 or at the latest, by 2027. There is also the requirement for groundwater to have reached 'good status' in terms of quality and quantity by 2015 or at the latest, by 2027.

'A Green Future: Our 25 Year Plan to Improve the Environment' (2018) includes the following objectives under the theme of 'Clean and Plentiful Water':

Improving at least three quarters of our waters to be close to their natural state as soon as is practicable by:

- Reducing the damaging abstraction of water from rivers and groundwater, ensuring that by 2021 the proportion of water bodies with enough water to support environmental standards increases from 82% to 90% for surface water bodies and from 72% to 77% for groundwater bodies;
- Reaching or exceeding objectives for rivers, lakes, coastal and ground waters that are specially protected, whether for biodiversity or drinking water as per our River Basin Management Plans;
- Supporting OFWAT's ambitions on leakage, minimising the amount of water lost through leakage year on year, with water companies expected to reduce leakage by at least an average of 15% by 2025; and
- Minimising by 2030 the harmful bacteria in our designated bathing waters and continuing to improve the cleanliness of our waters. We will make sure that potential bathers are warned of any short-term pollution risks.

In the UK, there are national and regional strategies which focus on maintaining and protecting water resources. St Albans District is covered within the following plans:

- Thames Water 'Water Resource Management Plan 2015-2040',
- Thames River Basin Management Plan (2015-2021),
- Thames Catchment Flood Management Plan (2009)
- The Colne Catchment Abstraction Licensing Strategy (2013)

The NPPF requires that policies should make sufficient provision for "*...infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat) ...*", and that

“Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.”

The NPPF also emphasises the role of the planning system in contributing to and enhancing the natural and local environment by *“preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.”*

Flood risk should be considered at all stages of planning and development in order to reduce risk to properties and people. The NPPF requires that local authorities take account of flood risk throughout the planning process to avoid inappropriate development in areas at risk of flooding. This involves carrying out a Strategic Flood Risk Assessment to inform planning policies.

A Strategic Flood Risk Assessment covering Dacorum BC, St Albans City & District Council, Three Rivers DC and Watford BC (2007) identifies areas that are at risk from flooding, whilst a Water Cycle Scoping Study was undertaken in 2010 (covering the same four local authorities, but in addition Welwyn and Hatfield BC) to inform the preparation of Local Plans and provide evidence to support any policies that relate to water resources, supply and sewerage, wastewater treatment, flood risk, water quality and the wider water environment. The ‘Water Project for Hertfordshire’ is providing the evidence to support the update the Water Cycle Scoping Study that is due to be published in 2017.

2.8.1.1 *Relevant plans, policies and programmes*

- Water Framework Directive 2000/60/EC
- The EU Floods Directive 2007/60/EC
- Nitrates Directive 91/676/EC (and Protection of Water against Agricultural Nitrate Pollution (England and Wales) Regulations 1996, SI 888)
- Water Framework Regulations 2003
- The Water Act 2014
- The Flood and Water Management Act 2010
- Water Industry Act 1991 (as amended)
- Groundwater Protection: Policy and Practice (Environment Agency, 2012)
- The Environmental Permitting (England and Wales) Regulations 2010
- National Planning Policy Framework 2018
- ‘A Green Future: Our 25 Year Plan to Improve the Environment’ (2018)
- Thames Water Authority Land Drainage Byelaws 1981
- River Basin Management Plan: Thames River Basin District (2015)
- Thames Region Catchment Flood Management Plan (CFMP) (2009)
- The Colne Abstraction Licensing Strategy (2013)
- Local Flood Risk Management Strategy for Hertfordshire 2013-2016
- Water Cycle Scoping Study 2010
- Hertfordshire Water Study (2017) Stage 1
- Hertfordshire County Council, Infrastructure & Resources, Sub-catchment Solutions (2017)
- Level 1 Strategic Flood Risk Assessment: Dacorum, St Albans, Three Rivers and Watford (2007)

2.8.2 *The current situation*

2.8.2.1 *Water quality*

Water is an essential natural resource. It is important that water resources are protected so that the risk of harm to the environment and to human health can be reduced as far as possible. Nitrate and phosphate levels, in particular, need to be monitored closely due to the risk of eutrophication and loss of biodiversity.

The main sources of water quality information are now the River Basin Management Plans which provide information on the ecological and chemical status of water bodies. This information was first published in 2009, with a proposed update being published in October 2015. Priority issues for the Colne catchment identified in the 2015 document include changes to natural level and flow of water, pollution from wastewater, transport infrastructure, and rural areas.

Some areas of Hertfordshire suffer from over abstraction of water resources which has adverse impacts on flora and fauna. The proposed new developments in South West Hertfordshire are likely to lead to an increase in demand for water.

After 2006 the monitoring of water quality changed to conform with the requirements of the Water Framework Directive. Under this new classification the status of the main rivers in St Albans is as follows:

- River Ver: overall status was moderate in 2014, compared with bad in 2011 (ecological status is bad, chemical status is not given);
- River Colne (upper stretch, Hatfield to confluence with Ver): overall status was moderate in 2011 (ecological status is moderate, chemical status is good);
- River Colne (from Confluence with Ver to Gade): overall status was poor in 2011 (ecological status is poor, chemical status is good); and
- River Lee (from Luton Hoo Lakes to Hertford): overall status was moderate in 2014, compared to bad in 2011 (ecological status is poor, chemical status is fail).

It should be noted that a Bromate plume is present in the area. Although the source (a former chemical works at Sandbridge) has been built upon, consideration needs to be given to contaminated land, water quality and further developments in the area.

Between 2013 and 2014, in the County as a whole there was no change to the number of water bodies at good status and an increase in the number of water bodies at moderate status.

2.8.2.2 *Water quantity*

The Environment Agency has produced figures on water use per person across local authorities in Hertfordshire. In 2014/15 the household water use in Hertfordshire was approximately 148.28 l/h/d (litres per head per day or 'per capita consumption (PCC)'). People in Hertfordshire use more water than any other county in the UK (8% above the national average).

The overall water consumption for Hertfordshire has remained fairly consistent over recent years (the revised estimate for 2012/13 was also 148 l/h/d). Water consumption rates in Hertfordshire have overall reduced from 163 l/h/p in 2009/10. This follows a similar trend to national water consumption which has fallen from 150 l/h/d in 1999 to 139 l/h/d in 2014/15.

The impact of these high water consumption levels is exacerbated by the fact that St Albans is located in the driest region in the country. The East of England receives only two thirds of the average UK annual rainfall. Many of the region's surface and ground waters are under severe pressure.

Water resources are over abstracted in the region. Hertfordshire's natural water environment is constantly at risk from periods of drought and floods. Groundwater resources are now at or approaching full utilisation, and many rivers and streams including the River Ver and River Colne⁵² suffer from low flows which detrimentally impacts upon water quality. Climate change could also contribute to a 5% loss of available water resource by 2035⁵³.

The Chilterns Chalk Streams are particularly susceptible to over abstraction. The Catchment Abstraction Management Strategy (CAMS) for the Colne catchment identified that the underlying chalk aquifer is assessed as being 'over-abstracted'.

The Water Cycle Scoping Study (April 2010) indicates that in relation to a housing growth level of 9,000 homes (2010 – 2031), for potable water supply; waste water and sewerage network capacity; flood risk; and the water environment, the only major constraints are those related to the Maple Lodge waste water treatment works which serve Hemel Hempstead and Kings Langley. However for a higher growth scenario of 17,000 homes in the same period there would be wider issues including the supply of potable water.

2.8.2.3 Flood risk

The landscape of south-west Hertfordshire, including St Albans, is such that the level of flood risk is relatively low, in particular along the chalk tributaries such as the Gade and the Bulbourne where the catchment topography is such that river flooding will only affect a relatively narrow and well-defined corridor as opposed to an expansive floodplain.

The River Gade flows from north to south through Hemel Hempstead town centre, while Berkhamsted is situated along the River Bulbourne and the Grand Union Canal.

A Strategic Flood Risk Assessment (SFRA) covering St Albans and three neighbouring districts was undertaken in 2007⁵⁴. Large scale flood risk is not a significant constraint (when considered at a national scale); however, some parts of the district are susceptible to small scale flooding from various sources. For example in the upper Colne catchment London Colney was affected by flooding in September 1992 and Winter 2000/01; and Colney Heath in 1947, 1979, 1992, 1993 and 2000. The risk of flooding is also expected to increase with climate change. Therefore, it is important that appropriate planning control and management is achieved in the wider river basins in order to help reduce this risk.

In addition groundwater flooding has been experienced in the urban are of St Albans – for example Fishpool Street in December 2000; Beverly Gardens in April 2001; and Harper Lane in February 2006.

2.8.3 The likely situation without the plan

As the District Local Plan Review 1994 does not include any policies specifically relating to climate change the NPPF and its supporting NPPG provide the policy framework for this topic. Without a new Local Plan the NPPF/NPPG would still remain and therefore there would not be a policy vacuum in this area, meaning that effects on water would still be considered when planning new developments. However, the new Local Plan will have the opportunity to strengthen the policy framework in relation to flood risk, water quality and water resources through updated strategic and development management policies. The new Local Plan will be able to ensure that development is located having taken into account the issues relating to flood risk, water quality and water resources. Without the new Local Plan any new development that results through planning applications on

⁵² <http://www.colnecan.org.uk/>

⁵³ <http://www.hertslink.org/buildingfutures/content/migrated/obdocs/pdfs/waterian11.pdf>

⁵⁴ Dacorum Borough Council, St Albans City & District Council, Three Rivers District Council, Watford Borough Council, Strategic Flood Risk Assessment Volume I, August 2007

unallocated sites, rather than sites allocated in the Local Plan, could occur in areas which might not result in the best outcomes in relation to these factors.

2.8.4 *Issues and opportunities*

Issues

- 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.
- Climate change impacts indicate a 5% loss of available water resource by 2035.

Opportunities

- Considering overall siting of development schemes in order to minimise potential effects on water quality.
- Taking account of groundwater resources and sensitivities (e.g. source protection zones) when allocating sites for development
- Encouraging the use of Sustainable Drainage Systems in new developments.
- Ensuring that efficient use of water resources in development schemes, this includes the use of recycled water and incorporating rainwater re-use.
- Ensuring that new potentially polluting processes are located in areas where groundwater is not vulnerable.

3 Social and Economic Factors

3.1 Population

3.1.1 Key policy context

The 'Population' topic in this SA/SEA primarily relates to demographics, about which there are very few specific plans, policies or strategies. However, many other types of plans and policies will have secondary impacts on the population, e.g. housing strategy policies on accommodation for the elderly. Therefore, when taking into account effects on the SA/SEA topic of 'population', cross reference should be made to issues covered within plans and policies relating to housing, education, social deprivation, crime (safety), recreation, leisure and sports.

Objectives relating specifically to demographics (not attempting to alter them, but rather to adapt to changes in future demographics), may be found in documents focusing on sustainable development. Examples can be seen in the EU Sustainable Development Strategy (updated in 2006), which includes an objective specifically on 'dealing with the economic and social implications of an ageing society' and the Europe 2020 Strategy which prioritises inclusive growth, 'fostering a high-employment economy delivering social and territorial cohesion'. The UK government has produced a set of sustainable development indicators to provide an overview of progress towards a sustainable economy, society and environment in the UK⁵⁵.

The NPPF identifies that the planning system has an overarching social objective "*to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being;*".

3.1.1.1 Relevant plans, policies and programmes

- EU Sustainable Development Strategy (updated 2006)
- Europe 2020 Strategy
- National Planning Policy Framework 2018
- St Albans Corporate Plan (2018-2023)

3.1.2 The current situation

3.1.2.1 Population

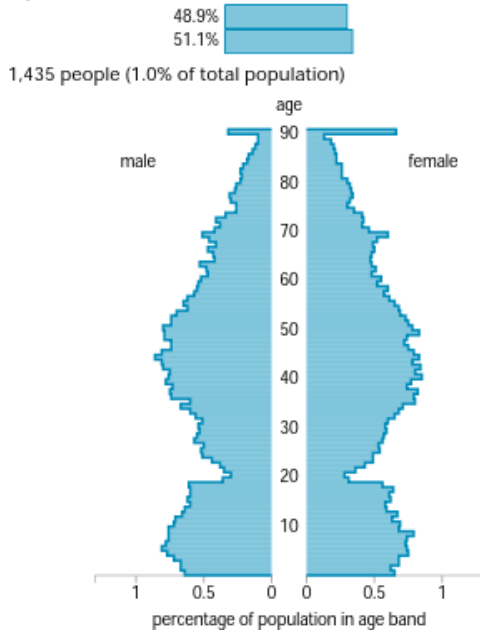
The 2011 Census data established the population of St Albans as 140,600, and by 2026 the population of St Albans is expected to reach 156,200. Between the Census in 2001 and 2011, there was an increase in population of 8%.

Figure 3-1 shows the 2016-based population projections by age and gender for the years 2016 and 2041.

⁵⁵ <http://www.ons.gov.uk/peoplepopulationandcommunity/wellbeing/articles/sustainabledevelopmentindicators/2015-07-13>

147,025 people in 2016

All ages
71,925 males
75,100 females



164,899 people in 2041

All ages
80,622 males
84,277 females

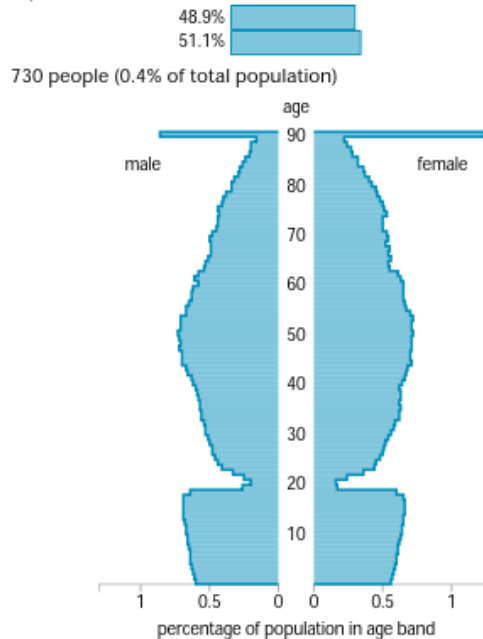


Figure 3-1: 2016-based Subnational Population Projections, mid-2016 to mid-2041⁵⁶

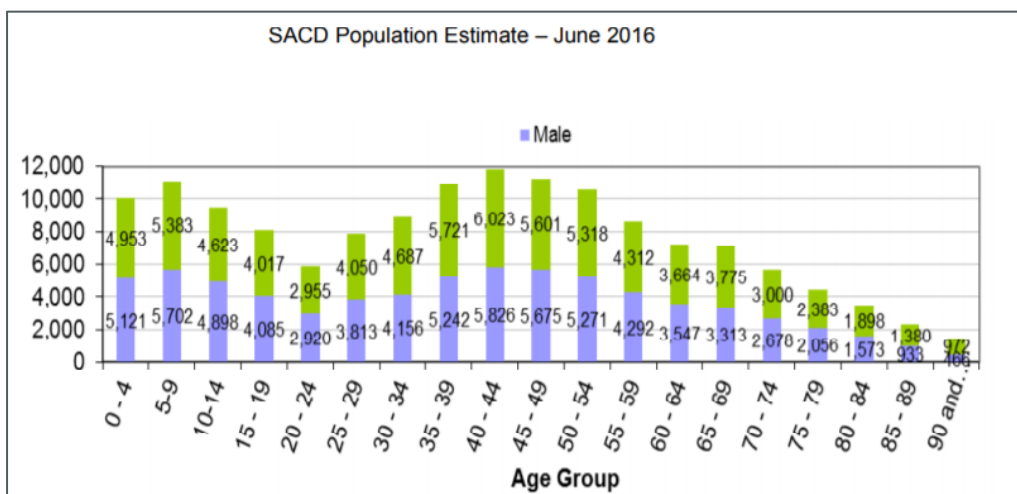


Figure 3-2: St Albans Population Estimates – June 2016⁵⁷

The Office for National Statistics (ONS) published the 2016 based sub-national population projections for England covering the period from 2016-2026. They project population in districts using recent trends in birth and death rates and migration. The projections do not take account of

⁵⁶

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/subnationalpopulationprojectionsforengland/2016based>

⁵⁷ St Albans City and District Monitoring Report 2017

the future implications of local, regional or national policy. The population in St Albans during the period 2016-2026 is forecast to grow from 140,600 to 149,766⁵⁸.

3.1.2.2 Deprivation

The geographical spread of deprivation across Hertfordshire can be gauged by using the Government's Indices of Deprivation (ID2015). These rely on Census and administrative data from 2011 for the Census's lower-layer Super Output Areas (SOAs). There are 32,844 of these in England in 2015, as opposed to the 32,482 SOAs used for the Indices of Deprivation 2010. Hertfordshire contains 690 LSOAs of which two are in the 10% most deprived areas in England (compared with zero in 2010) and 187 are in the 10% least deprived (compared to 194 in 2010).

In 2004, in Hertfordshire there were estimated to be 82,559 people in the income deprived category. This represents around 8% of residents. For employment deprivation the number is 31,841. Hertfordshire has over 15% of the total numbers of income deprived in the region and over 14% of the employment deprived. As Hertfordshire has around 19% of the region's residents, it can be concluded that these forms of deprivation are somewhat less prevalent in Hertfordshire than in the region as a whole.

St Albans ranked 319th out of 326 local authority areas in England in the 2015 Index of Multiple Deprivation rankings (a rank of 1 being the most deprived). This compares to a ranking of 286/354 in 2010, 317/354 in 2007 and 333/354 in 2004. The neighbouring authorities in southwest Hertfordshire had the following ranks: Three Rivers 300/326 (250/354 in 2010), Dacorum 260/326 (286/354 in 2010) and Watford 194/326 (221/354 in 2010).

Despite the relatively low levels of deprivation in the District as a whole, there are however small pockets of more deprived areas within St Albans. The Index of Multiple Deprivation divides the District into 87 smaller areas called lower super output areas (LSOAs). Three LSOAs in the District rank within the 40% most deprived in England.

St Albans 009A LSOA, within the Batchwood ward, was ranked the most deprived in the District (11,737th out of 32,844 LSOAs); St Albans 017B LSOA within the Sopwell ward ranked 11,852nd and St Albans 016A LSOA, within the Cunningham ward was ranked 13,022nd. Forty-two out of the 87 LSOAs in the District are within the 10% least deprived in the country, with another 13 included in the 20% least deprived.

The main issue from the Multiple Indices of Deprivation (2015) for St Albans District is that of 'Barriers to Housing and Services Domain' where two LSOAs in the District are within the 10% most deprived in England. These are St Albans 004C within the Wheathampstead ward (ranked 2,767th) and St Albans 006A within the Redbourn ward (ranked 2,969th). In total, 21 LSOAs in the District are within the 30% most deprived in terms of barriers to housing and services. This domain is made up of the following indicators:

- Household overcrowding: The proportion of all households in an LSOA which are judged to have insufficient space to meet the household's needs.
- Homelessness: The rate of acceptances for housing assistance under the homelessness provisions of housing legislation.
- Housing affordability: The difficulty of access to owner-occupation, expressed as a proportion of households aged under 35 whose income means that they are unable to afford to enter owner occupation.

58

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/subnationalpopulationprojectionsforengland/2016based>

3.1.3 *The likely situation without the plan*

Together with the NPPF and its supporting NPPG, the existing District Local Plan Review 1994 provides the strategic framework and development management policy for the provision of homes, jobs, services and facilities to help meet the needs of the District's existing and future population. Without a new Local Plan the District Local Plan Review policies and NPPF/NPPG would still remain and therefore there would not be a policy vacuum in this area. However, as the District Local Plan Review gets progressively older, there is a risk that the weight that can be accorded to its policies will diminish. The new Local Plan will be able to ensure that development is planned to meet the updated needs of the area. Without the new Local Plan, any new development that results through planning applications on unallocated sites, rather than sites allocated in the Local Plan, is likely to result in uncoordinated development that fails to meet all needs and does not link new development with appropriate new supporting infrastructure.

3.1.4 *Issues and opportunities*

Issues

- 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.

Opportunities

- Ensuring adequate housing, facilities and infrastructure whilst protecting and enhancing the local environment.
- Use planning obligations to help secure an appropriate range of facilities.
- The requirements of an ageing population need to be taken into account.

3.2 Health and Wellbeing

3.2.1 *Key policy context*

The UK's Sustainable Development Strategy (2011) sets out five guiding principles of sustainable development, one of which is "*ensuring a strong, healthy and just society*". The NPPF seeks to support this strategy and incorporates this into its own core planning principle, that planning should: "*take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs*".

In order to promote healthy communities, the NPPF states the importance of social interaction and inclusive communities which should be facilitated through the planning system. The planning process should involve all sections of the community and should facilitate neighbourhood plans. In relation to health, this will concern the delivery of social, recreational, sport and cultural facilities and services. The NPPF requires that planning policies and decisions take a positive approach to planning for use of shared space and community facilities and protect against the loss of such facilities.

The NPPF also highlights the importance of access to high quality open spaces and sport and recreation facilities to community health and wellbeing. The NPPF recommends having up to date needs assessments for open space, recreation and sport facilities to indicate demand and highlight opportunities for new provision. It also states that "*Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:*

a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or

b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or

c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.”

With respect to rights of way, the NPPF provides the following guidance: *“Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.”*

In 2012, the Health and Social Care Act gave an increasing responsibility to local authorities in achieving health targets provided by the Government. Following the Act, local government now has responsibility for public health and improving the health of local communities. In Hertfordshire and the surrounding counties, there are a number of trusts who manage healthcare services within the area. Within southwest Hertfordshire, this is the West Hertfordshire Hospitals (WHH) NHS Trust who manage the Watford, Hemel Hempstead and St Albans Hospitals. The WHH NHS Trust has a strategy and annual plan outlining its plan for future services including those which affect St Albans District.

The NPPF requires that *“Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:*

a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;

b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; and

c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.”

Objectives and aims relating more directly to crime and safety are included within the St Albans Community Safety Partnership Strategy.

3.2.1.1 Relevant plans, policies and programmes

- 2012 Health and Social Care Act
- Crime and Disorder Act 1998
- National Planning Policy Framework 2018
- Hertfordshire County Council Health and Wellbeing Strategy 2016-2020
- Hertfordshire’s Health and Wellbeing Planning Guidance (2017)
- Hertfordshire County Council Active Travel Strategy (2013)
- Hertfordshire County Council Road Safety Strategy (2011)
- Hertfordshire Physical Activity And Sport Framework (2015)
- Ageing Well in Hertfordshire 2014-2019
- Luton Airport Noise Action Plan (2014)
- St Albans District Draft Community Safety Partnership Strategy (2012/13)

- St Albans City and District Playing Pitch Strategy (2005)
- St Albans City and District Sport and Recreation Facilities Strategy (2005)

3.2.2 The current situation

3.2.2.1 Life expectancy

Hertfordshire is in general a very healthy county and St Albans is generally a healthy district. Life expectancy for both men and women is higher than the England average.

Health priorities in Hertfordshire (and St Albans District) are to reduce levels of excess weight and obesity and increase levels of physical activity, reduce the prevalence of smoking, and to help the growing older population maintain their health.

Life expectancy in Hertfordshire is improving and is higher than the England average, but varies between men and women and between smaller areas according to levels of multiple deprivation. The principal causes of death in Hertfordshire are: heart disease and stroke, dementia and Alzheimer's disease, cancers, and respiratory diseases. These conditions are also principal causes of disability and ill health .

The life expectancy at birth for a resident in the Hertfordshire between 2011-2013 was 80.6 years for men and 84.0 years for women. Between 2000-2002 and 2011-2013 life expectancy in Hertfordshire increased by 3.2 years for men and 2.6 years for women.

3.2.2.2 General health

In the 2011 Census, people were asked about their general state of health. Of Hertfordshire's population 3.1% have health reported as bad and 0.9% reported very bad health, compared to 3.6% and 1.0% respectively in the Eastern Region and 4.3% and 1.3% respectively in England. Table 3-1 shows the percentage of resident population in each group that classify themselves as being in either very good, good, fair, bad or very bad health and also provides the percentages of people that have limiting long term illnesses, are of working age and have a limiting long term illness and finally the percentage of households with one or more person with a limiting long term illness. This data is recorded for England and Wales, East of England, Hertfordshire and St Albans.

Table 3-1: Population breakdown by health group⁵⁹

	England	East of England	Hertfordshire	St Albans
General health: Very Good	47.17%	47.23%	50.90%	55.12%
General health: Good	34.22%	35.23%	33.93%	31.86%
General health: Fair	13.12%	12.87%	11.25%	9.81%
General health: Bad	4.25%	3.64%	3.07%	2.50%
General health: Very bad	1.25%	1.03%	0.85%	0.71%
People with a limiting long term illness	17.60%	16.70%	14.30%	12.90%
People of working age with a limiting long term illness	12.75%	11.40%	9.58%	8.28%
Households with one or more person with a limiting long term illness	40.94%	24.57%	22.27%	20.36%

In the matter of unpaid care, approximately 9.7% of people in Hertfordshire and 9.5% of people in St Albans District provided some level of unpaid care⁶⁰.

⁵⁹ <http://atlas.hertsliis.org/IAS/dataviews/tabular?viewId=1144&geoid=16&subsetId=>

Overall the health of people in the District is better than the England average. The 2015 Health Profile for St Albans⁶¹ provides the following summary in relation to the health of the District's population:

- The health of people in St Albans is generally better than the England average. Deprivation is lower than average, however about 8.2% (2,400) of children live in poverty.
- Life expectancy for both men and women is higher than the England average.
- Life expectancy is 6.9 years lower for men and 5.8 years lower for women in the most deprived areas of St Albans than in the least deprived areas.
- About 9.4% of Year 6 children are classified as obese, lower than the average for England. Levels of alcohol-specific hospital stays among those under 18, teenage pregnancy, GCSE attainment, and breastfeeding and smoking at time of delivery are better than the England average.
- Estimated levels of physical activity and adult obesity (15.5% in the district) are better than the England average. Rates of sexually transmitted infections, smoking and smoking-related deaths and hospital stays for alcohol related harm and self harm are better than the England average. The rate of TB is better than average. Rates of violent crime, long term unemployment, drug misuse, early deaths from cardiovascular diseases and early deaths from cancer are better than average.
- Priorities in St Albans include reducing levels of excess weight in adults, helping the expanding older population maintain their health and reducing the prevalence of smoking.

3.2.2.3 Healthcare

In Hertfordshire, there are four major acute hospitals, the nearest one for St Albans residents is the St Albans City Hospital. These hospitals provide over 60% of acute care for Hertfordshire residents, with hospitals outside Hertfordshire also being accessible to residents. Close to 98% of Hertfordshire's population live within 30 minutes of an acute hospital (travelling by car). Watford Hospital is the closest hospital with specialist emergency facilities (e.g. intensive care).

St Albans City & District perform better than average on the majority of healthcare indicators. Healthcare in the region is set to come under pressure with the ageing population- the 90+ age group is projected to increase by over 200% (2700 people) from 2014-2039. As a means to reduce pressure, the Hertfordshire County Council's Public Health Strategy 2017-2021 supports a focus on the prevention of ill health, including building mental resilience and promoting healthy weight amongst all age groups. There is also a call for the NHS to work with external bodies responsible for wider determinants of health, such as housing and accessibility to green space. St Albans City & District Council has received funding since 2014 from Hertfordshire County Council (HCC) to commission local projects aimed at improving health and wellbeing.⁶²

3.2.2.4 Noise

Complaints about noise in Hertfordshire decreased slightly between 2009/10 and 2013/14, with 5.7 complaints received per 1,000 population (in total, 6,513 complaints in 2013/14 compared to 6,678 complaints in 2009/10). Of the complaints received in 2013/14, 69% related to domestic noise; 14%

⁶⁰ UK Government Census 2011

⁶¹ St Albans Health Profile (2015), available at: http://www.apho.org.uk/default.aspx?QN=HP_METADATA&ArealID=50477

⁶² St Albans District Health and Wellbeing Strategy https://www.stalbans.gov.uk/Images/St%20Albans%20City%20and%20District%20Health%20and%20Wellbeing%20Strategy%202018-2021_tcm15-63388.pdf Accessed: 08/08/2018

to commercial noise; 7% to construction noise; 3% to both vehicle/machinery noise and industrial noise; and 2% were classed as miscellaneous noise complaints⁶³.

Hertfordshire is susceptible to noise from aircraft, due to its close proximity to the major airports of Stansted and Luton. In 2015, the total number of complaints received in Hertfordshire for Stansted was 244; this was an increase of 66 since 2014. In 2014, the number of complaints for Luton was 997, 86% of the total. Changes in Luton airport flightpaths in 2015 involves communities surrounding Redbourn, Hemel Hempstead, St Albans and Harpenden. The corridor is a westerly departure corridor known as 26 Match/Detling⁶⁴.

In St Albans District, noise complaints showed a general decline, from 665 complaints in 2010/11 to 650 in 2013/14. However, this was a slight increase from the previous year, when there were 558 noise complaints^{65 66}.

3.2.2.5 *Recreation, sport and leisure space and facilities*

The number of visits to or usage of museums per 1,000 population in St Albans is recorded at 1,078. This is above the regional average of 707.7 and the English average of 976.9 . St Albans has five main sports and recreation facilities .

As part of Green Infrastructure Plan process, consultants were engaged to undertake an assessment of Hertfordshire's districts in relation to Accessible Natural Greenspace Standards (ANGSt). The results for St Albans District were that:

- 52.1% of households lie within 300 m of an accessible natural greenspace of at least 2 ha;
- 80.5% lie within 2 km of a site of at least 20 ha;
- 97.8 lie within 5 km of a site of at least 100 ha; and
- 4% lie within 10 km of a site of at least 500 ha.

The 2012 St Albans Infrastructure Delivery Plan states that the District Council operates 11 allotments sites, while Harpenden Town Council and Parish Councils in the District together operate 30 allotments sites. The total area of these is some 41.5 hectares. In 2015, there are 756 allotment plots in total (up from 697 in 2012); however there is a waiting list of around 180 people for the Council operated sites .

There are 17 parks and public gardens across the District, ranging from the 54 hectare Verulamium Park to the tiny 227 sq m Glossop Memorial Garden. They contain a range of disparate facilities which make them attractive to potential visitors, some from a wide area and others primarily local to a particular park or garden. Parks total 1,501,172 sqm and gardens total 9,033 sqm. (NB This does not include Historic Parks and Gardens.) 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 (St Albans Infrastructure Delivery Plan, 2012).

In Hertfordshire, about three-fifths (58.8%) of the adult population are getting the recommended levels of physical activity (150 minutes per week of moderate physical exercise in sessions of 10 minutes or more). A quarter of the population in Hertfordshire are considered to be inactive . In terms of sport, there has been an increase in adult participation in sport from 37.6% in 2005/6 to 39.8% in 2012/13. Fewer women than men are physically active, physical activity decreases with age,

⁶³ Hertfordshire Quality of Life Report (2014)

<http://atlas.hertslis.org/IAS/profiles/profile?profileId=920&geoTypeId=16&geoids=26>

⁶⁴ <https://www.london-luton.co.uk/corporate/community/noise/frequently-asked-questions>

⁶⁵ Hertfordshire Quality of Life Report (2014)

<http://atlas.hertslis.org/IAS/profiles/profile?profileId=920&geoTypeId=16&geoids=26>

⁶⁶ NB: The Hertfordshire Quality of Life Report has not been produced post-2014.

and those who have a limiting illness/disability are less active than those who do not. Socio-economic classification also plays a part with the more deprived being less active on average.

According to the Active People Survey (2015), 44% of people in St Albans play sport once a week and 22% play sport three times a week or more. This is an increase from 43% and 16% respectively in 2010. This is above average compared with Hertfordshire as a whole.

There are 50 outdoor children’s play areas across the District, ranging from small local play parks with one or two pieces of equipment to much larger facilities with wide catchments areas such as those at Rothamsted, Verulamium and Clarence Parks. Many of these parks are in need of refurbishment, with much of the equipment being old and in need of replacement (St Albans Infrastructure Delivery Plan, 2012).

Teenage facilities are defined as aerial runways, ball courts, BMX tracks, shelters, skateboard areas, and similar open access facilities. In the District teenage facilities are fairly few and far between and generally of poor quality (St Albans Infrastructure Delivery Plan, 2012).

Verulamium Park also has the ‘adiZone’, an outdoor gym built as part of the London 2012 legacy campaign, which is available to members of the public. There are 2026 hectares of publicly accessible open space in St Albans. Within the District, there are six Green Flag parks, awarded in 2017, recognised as some of the best green spaces in the country with excellent park management standards. The total amount of Green Flag awarded land is 134.18ha. These are:

- Bricket Wood Common (78.48ha)
- Clarence Park (10.10 ha)
- Hatfield Road Cemetery (7.1 ha)
- Sopwell Nunnery (5.5 ha)
- Rothamsted Park (23 ha)
- Verulamium Park (10 ha)

3.2.2.6 Crime and Safety

In the year ending December 2017, the crime rate in St Albans was about the same as the average crime rate across similar areas (see Figure 3-3).

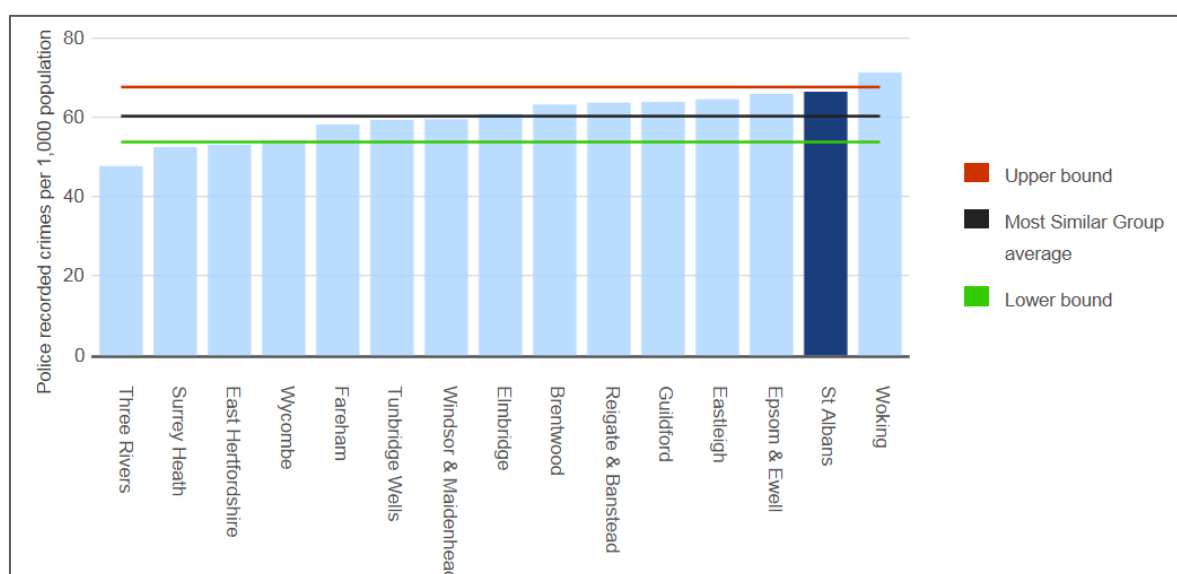


Figure 3-3: Crime Rate in St Albans and Hertfordshire Local Authority Areas 2017⁶⁷

⁶⁷ <https://www.police.uk/hertfordshire/F02/performance/compare-your-area/>

Offence	2015		2016		2017		% Change 2016 to 2017
	Count	Rate per 1,000 population	Count	Rate per 1,000 population	Count	Rate per 1,000 population	
Violence Against the person	1,145	8	1,602	11	2,138	15	33
Homicide	1	0	1	0	0	0	0
Violence with injury	573	4	681	5	764	5	12
Violence without injury	571	4	920	6	1,374	9	49
Sexual offences	126	1	160	1	191	1	19
Robbery	52	0	36	0	49	0	-
Theft Offences	3,085	22	3,236	22	3,802	26	17
Domestic burglary	355	2	393	3	344	2	-12
Non-domestic burglary	386	3	299	2	375	3	25
Vehicle offences	547	4	739	5	953	7	29
Theft from the person	121	1	144	1	131	1	-9
Bicycle theft	132	1	112	1	171	1	53
Shoplifting	451	3	504	3	817	6	62
All other theft offences	1,093	8	1,045	7	1,011	7	-3
Criminal damage and arson	798	6	839	6	1,038	7	24
Drug offences	303	2	314	2	249	2	-21
Possession of weapons offences	15	0	30	0	37	0	-
Public order offences	210	1	335	2	625	4	87
Miscellaneous crimes against society	234	2	160	1	207	1	29
Total	5,968	42	6,712	46	8,336	57	24

Figure 3-4: Notifiable offences recorded by the Police in St Albans 2015-2017⁶⁸

Figure 3-4 shows the split of different crimes within the District from 2015 to 2017. The most reported crimes are ‘theft offences’ and ‘violence against the person’. Public order offences have shown the greatest percentage increase from 2016-2017 (87% increase). Across all categories (excluding ‘domestic burglary’, ‘theft from the person’, and ‘all other theft offences’), the number of reported crimes have increased in St Albans from 2016-2017).

3.2.3 The likely situation without the plan

Together with the NPPF and its supporting NPPG, the existing District Local Plan Review 1994 provides the strategic framework and development management policy for the provision of services, facilities and social infrastructure to help meet the needs of the District’s existing and future population. Without a new Local Plan, the District Local Plan Review policies and NPPF/NPPG would still remain and therefore there would not be a policy vacuum in this area. However, as the District Local Plan Review gets progressively older, there is a risk that the weight that can be accorded to its policies will diminish. The new Local Plan will be able to ensure that development is planned to address any new issues in relation to health and wellbeing, recreation & leisure, and crime & safety that are identified during the preparation of the plan.

3.2.4 Issues and opportunities

Issues

- 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. Many of these parks

⁶⁸ <http://www.ons.gov.uk/ons/taxonomy/index.html?nscl=Crime+in+England+and+Wales#tab-data-tables>

are in need of refurbishment, with much of the equipment being old and in need of replacement. In the District teenage facilities are fairly few and far between and generally of poor quality.

Opportunities

- Encourage healthy forms of travel and exercise, e.g. walking/cycling and access to leisure and recreational facilities.
- St Albans green infrastructure provides an opportunity to encourage greater numbers of the population to undertake regular physical activity. Accessible facilities and activities need to be provided for young people.
- Encourage the provision of convenience stores that provide fresh produce in accessible locations.
- Designing out crime by improving the urban environment. This may be through redevelopment or adding additional security features such as CCTV and improved lighting.
- Developing community activities and facilities that can divert people away from crime, improve tolerance and prevent anti-social behaviour.

3.3 Housing

3.3.1 Key policy context

The NPPF highlights the need to deliver a wide choice of high quality homes and sets out how local authorities should plan for “*significantly boosting the supply of housing*”.

It requires local authorities to; determine the minimum number of houses needed; assess the the size, type and tenure of housing needed for different groups in the community; specify the type of affordable housing required; establish a requirement figure for their whole area; identify land for homes; and maintain supply and delivery. Detailed policy is provided for each of these requirements.

The Strategic Housing Market Assessment (SHMA) addresses the requirements of the NPPF and considers the housing need in the District. The SHMA looks at the overall housing need, the need for different sizes of homes and the needs of different groups within the community. The Council use this as part of the process of determining housing requirements within the District.

National policy for Gypsies and Travellers is set out in the Planning Policy for Traveller Sites (August 2015), which accompanies the NPPF. This guidance encourages fair and equal treatment for travellers, and urges local planning authorities to identify need and plan for future provision in appropriate locations. It recognises the sensitivity of new sites in rural areas, particularly the Green Belt, and seeks to limit the number and scale of new traveller site development in open countryside.

In practice the document states that (Planning for Traveller Sites Page 3):

“Local planning authorities should set pitch targets for Gypsies and Travellers and plot targets for travelling Showmen which address the likely permanent and transit site accommodation needs of Travellers in their area, working collaboratively with neighbouring local planning authorities”.

“Criteria should be set to guide land supply allocations where there is identified need”.

The Housing White Paper (2017) sets out measures for boosting housing supply, through: ‘Planning the right homes in the right places’; ‘Building homes faster’; ‘Diversifying the market’; and ‘Helping people now’. Alongside the White Paper the Government also introduced a new methodology for assessing housing need in each local authority in England which needs to be taken into account in the Local Plan.

3.3.1.1 *Relevant plans, policies and programmes*

- Housing Act 2004
- Planning for Traveller Sites 2015
- 'Fixing our Broken Housing Market', Housing White Paper 2017
- National Planning Policy Framework 2018
- South West Hertfordshire Strategic Housing Market Assessment (2016)
- Central Bedfordshire LDF and Local Plan
- Dacorum LDF and Local Plan
- Hertsmere LDF and Local Plan
- Three Rivers LDF and Local Plan
- Watford LDF and Local Plan
- Welwyn & Hatfield LDF and Local Plan
- St Albans Strategic Housing Market Assessment (SHMA) 2013
- St Albans Strategic Housing Land Availability Assessment (SHLAA) Update (2018)
- St Albans Gypsy, Traveller and Travelling Show People Accommodation Needs Assessment (2015)
- Neighbourhood Plans

3.3.2 *The current situation*

3.3.2.1 *Households*

Additional housing is needed in the region. Access to housing is an acute problem in parts the area and many council homes are in need of significant repair. Government household projections (based on the 2012-based sub-national population projections, published by the Office for National Statistics in 2014) suggest that the number of households in England is likely to grow to 27.5 million from 22.3 million by 2037, an increase of 5.2 million from 2012 (24%)⁶⁹. This is equal to an average of 210,000 additional households per year.

In Hertfordshire, the household projection is a growth from 460,000 in 2012 to 603,000 households in 2037, whilst in St Albans District, the forecast growth is from 57,000 households in 2012 to 73,000 households in 2037⁷⁰.

The dwelling stock for all the Hertfordshire local authorities is shown in Table 3-2.

⁶⁹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/407556/Household_Projections_-_2012-2037.pdf (accessed 04/10/15)

⁷⁰ <https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections> (accessed 04/10/15)

Table 3-2: Hertfordshire Dwelling Stock 2017⁷¹

	Local Authority	Private Registered Provider	Other public sector	Private sector (P) ¹	Total (P) ¹
Hertfordshire	33,220	52,670	240	390,610	476,730
Broxbourne	350	5,160	10	34,120	39,650
Dacorum	10,360	2,810	0	49,670	62,850
East Hertfordshire	20	7,750	50	51,980	59,790
Hertsmere	180	7,210	0	34,540	41,920
North Hertfordshire	0	10,480	40	45,390	55,910
St Albans	5,020	2,240	0	51,720	58,990
Stevenage	8,130	2,020	50	25,820	36,020
Three Rivers	0	5,310	0	31,350	36,660
Watford	30	6,490	50	32,190	38,760
Welwyn Hatfield	9,130	3,190	40	33,820	46,180

During 2016/17, 404 net additional dwellings were completed and 89% were built on previously developed land. 46 (11%) were on greenfield land.⁷²

Within St Albans, the number of owner occupied houses at the 2011 Census was 40,831 (73%), with about a quarter of households being in rented accommodation.

The Council's 2016 Housing Needs Survey Update showed an overall annual shortage of affordable housing units. Total annual need was recorded at 1,109 units. With a relets supply of 287 units, this leaves a shortfall of 822. The survey identified a range of housing needs which will arise, including a significant need for affordable housing for first time buyers, single people, and other low income households.

3.3.2.2 House prices

House prices in St Albans have risen steadily since 2008 and the overall average price of a dwelling is now £593, 770. The overall average house price for St Albans and the main towns in Hertfordshire is shown in Table 3-3.

Table 3-3: Overall average house price July 2017⁷²

Overall Average Price 2009-2017

Year	St Albans	Dacorum	Hertsmere	Welwyn Hatfield	North Hertfordshire	Three Rivers	Watford	Central Bedfordshire
Overall Average House Price (July) 2017								
2009	£362,250	£293,363	£344,036	£288,644	£227,772	£334,100	£235,506	£204,619
2010	£396,235	£322,529	£376,890	£309,706	£261,740	£386,974	£249,405	£222,489
2011	£426,476	£301,564	£371,703	£320,595	£256,348	£380,416	£241,135	£213,764
2012	£444,165	£306,085	£384,834	£295,913	£268,824	£395,245	£266,585	£220,596
2013	£435,037	£303,194	£403,659	£316,118	£265,795	£417,108	£273,527	£220,663
2014	£476,580	£349,487	£436,062	£332,148	£307,491	£435,505	£286,369	£245,440
2015	£509,738	£401,740	£448,802	£376,660	£313,844	£498,924	£323,219	£267,525
2016	£533,979	£421,066	£536,518	£438,702	£361,683	£522,704	£372,760	£290,464
2017	£593,770	£455,832	£530,907	£431,167	£379,984	£566,657	£405,725	£314,774

Source: Hometrack; © Hometrack 2017

⁷¹ <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>

⁷² St Albans City and District Authority Monitoring Report (2017)

3.3.2.3 Housing needs

The St Albans Housing Growth Forecast projects the following housing trajectory from 2011-2031 (see Figure 3-5).

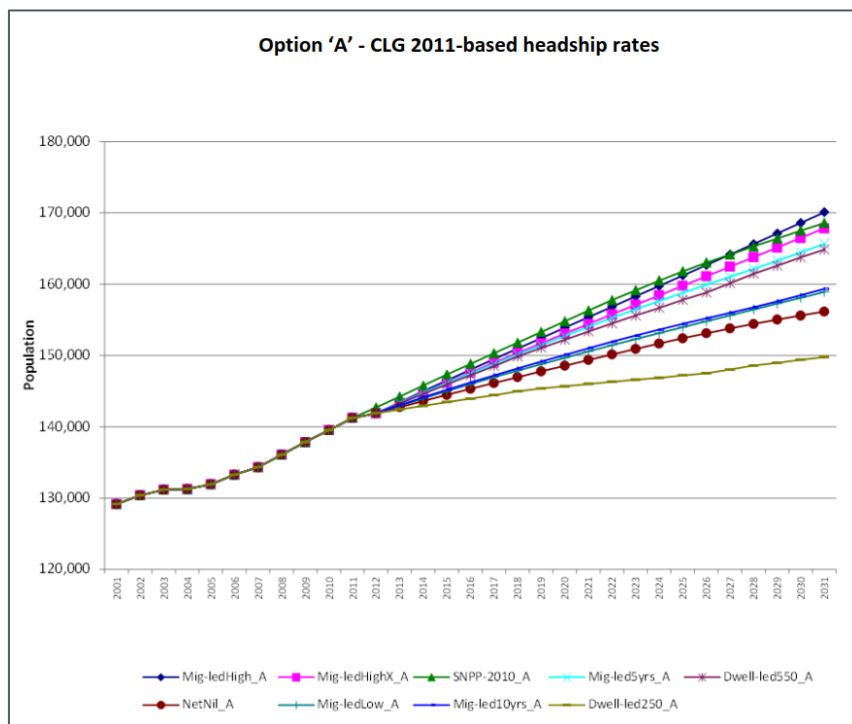


Figure 3-5: St Albans District Scenario Forecasts 2011-2031 ⁷³

Table 3-4: Population and Households Change ⁷³

Scenario	Change 2011 - 2031				Average per year		
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings	Jobs
Mig-ledHigh_A	28,838	20.4%	12,821	22.8%	625	661	426
Mig-ledHighX_A	26,602	18.8%	12,099	21.5%	533	624	378
SNPP-2010_A	27,329	19.3%	12,005	21.3%	397	619	412
Mig-led5yrs_A	24,398	17.3%	11,329	20.1%	437	584	325
Dwell-led550_A	23,614	16.7%	10,550	18.7%	375	550	320
NetNil_A	14,911	10.6%	9,098	16.1%	0	469	216
Mig-ledLow_A	17,680	12.5%	9,068	16.1%	165	468	179
Mig-led10yrs_A	18,093	12.8%	8,452	15.0%	142	436	200
Dwell-led250_A	8,531	6.0%	5,023	8.9%	-238	250	-28

The 'SNPP-2010' scenario suggests a +19.3% increase in population between 2011-31, which is higher than all but one of the alternative scenarios ('Mig-ledHigh'). The different age profile of the population for the 'SNPP-2010' scenario also results in a relatively high household growth figure (+21.3%) and annual dwelling requirement (+619 per year). Of the six trend scenarios tested, the

⁷³ St Albans District Council https://www.stalbans.gov.uk/Images/SP_Housing_HousingGrowthForecasts_Oct2013_tcm15-38412.pdf

highest growth trajectory is suggested by the ‘Mig-ledHigh’ scenario, which results in a +20.4% increase in population between 2011-31, a 22.8% increase in households, an average annual dwelling growth expectation of +661 units and an estimated job requirement of +426 (see Table 3-4).

The St Albans Strategic Housing Market Assessment Update (2015) updated the 2013 Housing Needs Assessment providing revised migration and affordability data and modelling of the implications for housing need of a 10 year migration-led demographic scenario and of the implications for population and household growth of constraining housing development to only 250 homes per year. The 10 year migration-led demographic scenario identified a housing need of 450 dpa, compared to 550 dpa from the 5 year forecast base.

A separate ‘South West Hertfordshire Strategic Housing Market Assessment’ (2016) (SHMA), found that the St Albans District has an Objectively Assessed Need (OAN) for 705 dwellings to be built per annum between 2013 and 2036. This was the second highest in the south-west Hertfordshire region, comparing to 756 OAN for Dacorum, 599 for Hertsmere, 514 for Three Rivers and 577 for Watford. Together for the region of South West Hertfordshire this is an OAN of 3,151 per annum⁷⁴.

The SHMA recommends the following housing mix for the South West Hertfordshire Market Area (see Table 3-5). This mix takes account of changes in the population structure, including potential for some older households to downsize to take account of their changing needs.

Table 3-5: Recommended Housing Mix for south-west Hertfordshire

	1-bed	2-bed	3-bed	4+ bed
Market	5-10%	25-30%	40-45%	20-25%
Affordable	30-35%	30-35%	25-30%	5-10%
All dwellings	15%	30%	40%	15%

Evidence from the SHMA suggests that the required mix of affordable housing in St Albans might be up to 17% intermediate housing and 83% social or affordable rented homes. This compares to a SW Herts average of 19% intermediate and 81% social or affordable rented homes.

The need for specialist housing for older people is expected to increase along with an ageing population. In St Albans, the need over the period 2013-2036 is predicted to be 1,352 dwellings, with an annual need of 59 dwellings. The total for the south-west Hertfordshire housing market area is 6,281 with an annual need of 273 dwellings.

For people requiring registered care, the SHMA provides an indicative assessment of need for 3,067 C2⁷⁵ bedspaces for older persons over the 2013-36 period, equivalent to 133 per year across the Housing Market Area (HMA). For St Albans, this equates to 640 C2 bedspaces, or 28 bedspaces per year⁷⁶.

The SHMA considers the needs of a number of other vulnerable groups in south-west Hertfordshire. Across the HMA, 22% of households contain someone with some form of disability. It is estimated that the number of people with a disability will increase by 33,900 – an increase of 48% – between 2013 and 2036. The evidence from the SHMA indicates a need to provide additional homes which are wheelchair-accessible and homes which can be adapted to meet households changing needs.

⁷⁴ ‘South West Hertfordshire Strategic Housing Market Assessment’ (2016)
<http://www.dacorum.gov.uk/docs/default-source/strategic-planning/shma-jan-2016-exec-summary.pdf?sfvrsn=4>

⁷⁵ Registered care provision falls within a C2 use class

⁷⁶ The SHMA models the need for residential and nursing care bedspaces on the basis that the proportion of people aged 75 and over living in such accommodation remains constant.

The SHMA evidence also indicates that the Black and Minority Ethnic (BME) population in the HMA is growing, and is typically younger and more likely to live in Private Rented accommodation and be overcrowded.

After the St Albans SHMA and the SW Herts SHMA were undertaken the Government introduced a new standard methodology for assessing housing need. The figures for each English local authority were published in September 2017. For St Albans the objectively assessed need is 913 dpa and therefore the Publication Local Plan uses that figure as the overall average over the 16 year period 2020-2036.

3.3.2.4 *Gypsy and travelling communities*

At present there are three public authorised gypsy and travellers sites in St Albans. The site at Barley Mow in Tyttenanger has 15 permanent pitches with a capacity for up to 30 caravans. The site at Ver Meadows in Redbourn also has 15 permanent pitches with a capacity for 30 caravans. The site at Watling Street, Park Street is smaller with 10 pitches and a capacity for 20 caravans. There are a further 7 private authorised sites with permanent planning permission (as of April 2017): Ardens Rise, House Lane, St Albans; The Paddocks, Colney Heath; Chiswell Green Lane, Chiswell Green; Woodview Lodge, Lye Lane, Bricket Wood; Tullochside, Redbourn; Little Orchard, Barley Mow Lane, Colney Heath and; the Meadows, Hemel Hempstead Road, Redbourn. These sites have a combined total of 35 pitches.

During a caravan count in January 2017 there were 81 caravans on public sites in St Albans and 65 on private sites⁷⁷. This compares with 2007 figures of 57 on public sites and 30 on private sites. The St Albans City and District Council Gypsy and Traveller Accommodation Needs Assessment of 2015 concluded that with anticipated growth, 79 additional pitches will be necessary before 2031.

Currently there is only one transit site (for travelling show people) located within Hertfordshire which is located in Hertsmere at South Mimms. This site has 15 pitches and capacity for 30 caravans. There is no provision within St Albans. The TNA concluded that given the low number of historic unauthorised encampments in the authority, there is currently little demand for such a site in St Albans.

Although the study identified an existing small travelling show person yard in St Albans, it is not suggested there is any need for additional pitches.

Providing a more settled base for Gypsies and Travellers, enables these communities to have better access to key services (health, education and employment).

3.3.2.5 *Neighbourhood Plans*

Within St Albans District the Council has designated the following Neighbourhood Plan Areas: Colney Heath; Harpenden Town and Harpenden Rural Parish; Redbourn; Sandridge; St Stephen; and Wheathampstead.

As of August 2018 the Harpenden Town and Harpenden Rural Parish Neighbourhood Plan had reached the Regulation 16 stage 'Publicising a Plan Proposal' and the Harpenden Town and Harpenden Rural Parish Neighbourhood Plan had reached the Regulation 17 stage 'Submission of a Plan Proposal to Examination'.

3.3.3 *The likely situation without the plan*

Together with the NPPF and its supporting NPPG, the existing District Local Plan Review 1994 provides the strategic framework and development management policy for the provision of homes to help meet the needs of the District's existing and future population. Without a new Local Plan, the

⁷⁷ St Albans Authority Monitoring Report 2017

District Local Plan Review policies and NPPF/NPPG would still remain and therefore there would not be a policy vacuum in this area. However, as the District Local Plan Review gets progressively older, there is a risk that the weight that can be accorded to its policies will diminish. The new Local Plan will be able to ensure that amount and type of housing development and accommodation is planned to meet the updated needs of the area. Without the new Local Plan these needs may not be met, and any new development that results through planning applications on unallocated sites, rather than sites allocated in the Local Plan, is likely to result in uncoordinated development that fails to link new housing development with appropriate new supporting infrastructure.

3.3.4 *Issues and opportunities*

Issues

- 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 growth.
- The need for specialist housing for older people is expected to increase along with an ageing population.
- The price of housing compared to earnings is an issue.
- The St Albans City and District Council Gypsy and Traveller Accommodation Needs Assessment of 2015 concluded that with anticipated growth additional pitches will be necessary before 2031.

Opportunities

- Ensuring the provision of a range of housing types to satisfy demand including affordable housing and mixed use developments and a range of housing types of varying sizes.
- Provision of affordable housing in accessible locations.
- Ensuring appropriate housing provision for the elderly and disabled population, e.g. through independent living housing, Life-long homes and appropriate forms of affordable housing.
- Ensuring that such housing is located near to the necessary services and facilities and public transport.

3.4 **Transport and Accessibility**

3.4.1 *Key policy context*

Basic services and facilities are an important part of our communities. They provide essential services such as food and medical provisions. They also contribute to the sense of place in communities and provide a focal point for community interactions. They also provide employment, often for locally based people. Limiting access and availability to these services can make people feel socially excluded and reduce interactions in the community.

Transport planning falls into one of the core principles within the NPPF. It states, *“The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”*

Effective transport planning can help reduce greenhouse gas emissions and air quality, lower levels of congestion, reduce the need for major transport infrastructure, promote more sustainable forms of transport and overall a healthier lifestyle amongst the population. Smarter use of technologies can also reduce the need to travel.

There are a number of local level plans and strategies for the transport network, identifying schemes required to improve the transport network so that it can meet the demand of a growing population. The Hertfordshire Local Transport Plan 2018-2031 (LTP4) sets out a vision and strategy for developing transport in the county and provides the framework for transport's economic and social development..

The LTP aims to deliver nine transport objectives which contribute strongly to the Prosperity, People and Place elements of the LTP's vision. These are:

- Prosperity: Improve access to international gateways and regional centres outside Hertfordshire; Enhance connectivity between urban centres in Hertfordshire; Improve accessibility between employers and their labour markets; and Enhance journey reliability and network resilience across Hertfordshire.
- People: Enhance the quality and vitality of town centres; and Preserve the character and quality of the Hertfordshire environment; Reduce carbon emissions.
- Place: Make journeys and their impact safer and healthier; and Improve access and enable participation in everyday life through transport.

Transport improvements included in the LTP Transport Proposals Map of direct relevance to St Albans are:

- Transport Improvements to support new development
 - 1) Radlett Aerodrome Site
 - 6) East Hemel Hempstead
- Junction Improvement
 - A414/A1081
- Cycle Infrastructure Improvement Towns
 - Harpenden
 - St Albans
- Sustainable Travel Towns
 - St Albans
- Passenger Transport Hub/Coachway to Investigate: M1 J8 and A1(M) J8
- A414 Bus Rapid Transit

3.4.1.1 *Relevant plans, policies and programmes*

- National Planning Policy Framework 2018
- Hertfordshire Local Transport Plan (LTP4) 2018-2031
- Herts Transport Vision 2050
- Hertfordshire County Council Active Travel Strategy (2013)
- Hertfordshire County Council Rail Strategy (2016)
- Hertfordshire County Council Rights of Way Improvement Plan 2017/18–2027/28 (2017)
- Hertfordshire County Council Road Safety Strategy (2011)
- Hertfordshire County Council Bus Strategy (2011)
- Hertfordshire County Council Intalink Strategy (2011)
- Hertfordshire County Council Intelligent Transport Systems Strategy (2011)

- Hertfordshire County Council Growth and Transport Plan – South West Hertfordshire (Draft) (2018)
- South West Herts Cycling Strategy (2013)
- St Albans Revised Parking Policies and Standards (2002)
- St Albans Urban Transport Plan (2009)
- Southern St Albans Urban Transport Plan (2009)

3.4.2 The current situation

3.4.2.1 Access to key services

In 2011, 13.26% of residents of St. Albans District aged 16 to 74 in employment worked mainly at or from home. 51.96% drove to work by car (2.95 as a passenger in a car), 21.69% travelled by public transport (underground, metro, light rail, tram, train, bus, coach or taxi) and 9.20% cycled or walked to work. It should be noted that the 2011 Census asked that people choose the method of travel relating to the longest part by distance of their usual journey to work

BPVI indicators provide the following information on a regional level:

- The percentage of principle roads in the region, in need of repair stood at 8.7% in 2003/4, slightly lower than the English average of 9.8%;
- The percentage length of footpaths and other rights of way which are easy to use in the region stood at 79.3%, significantly higher than the England average of 68.9%; and,
- The proportion of pedestrian crossings with disabled facilities within the region is similar to the English average, at 84.9% and 82.4% respectively.

In St Albans, 82% of all local authority buildings were classified as being suitable for and accessible by disabled people in 2004/05, compared with an average of 47.1% in the region and 43.8% in England.

3.4.2.2 Roads

Road use across Hertfordshire is expected to increase in line with national expected growth rates. Within the county, growth in St Albans is predicted to be the smallest, with just a 2.8% traffic increase anticipated by 2021 in comparison to 2015 traffic levels, and a 8.2% increase by 2031 (Table 3-6)

Table 3-6: Traffic Forecasts by District⁷⁸

Town	2021 (% increase from 2015)	2031 (% increase from 2015)
Great Britain	4.0%	11.9%
Eastern Region	5.1%	14.3%
Hertfordshire	4.1%	12.4%
Broxbourne	4.0%	12.3%
Dacorum	3.5%	11.2%
East Hertfordshire	3.7%	13.7%
Hertsmere	2.9%	10.2%
North Hertfordshire	6.7%	17.0%
St Albans	2.8%	8.2%
Stevenage	6.1%	15.4%
Three Rivers	2.7%	9.3%
Watford	4.5%	12.9%
Welwyn Hatfield	4.8%	13.4%

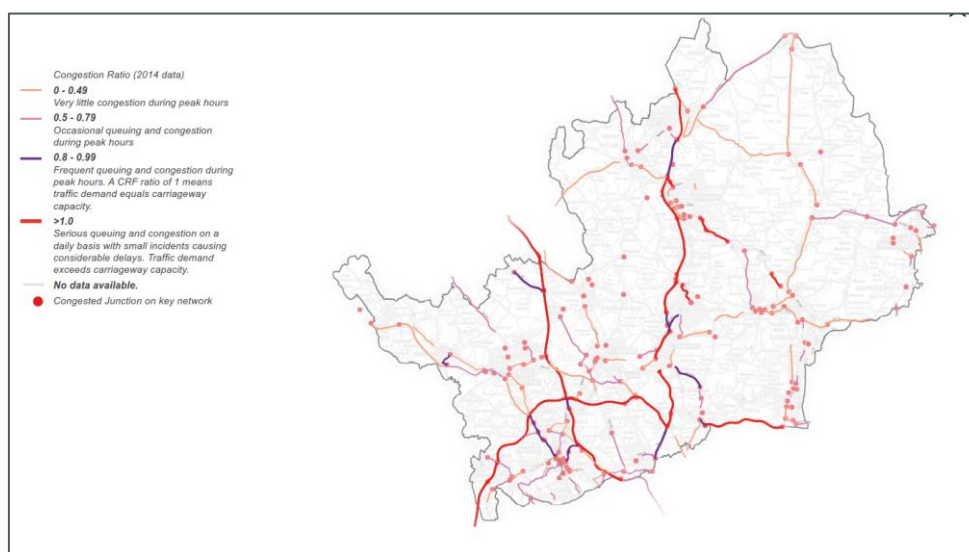


Figure 3-6: Peak Hour Congestion in Hertfordshire⁷⁸

Table 3-7 shows the traffic flows in the District. There was a small increase of 1.2% between 2014 and 2015. This was the smallest increase across the Hertfordshire local authority areas. Of the 5.23 million VKm/Day in 2015, 1.26 million were on Principal A roads, 2.7 million on motorways and trunk roads, 0.45 million on B roads and 1 million on C roads.

Table 3-7: Vehicle Kilometres in St Albans (based on 2014 and 2015 data)⁷⁸

District	VKm/Day All Roads (millions)	VKm/Day HCC Roads ⁷⁹ (millions)	% Change All Roads 2014-2015	% Change HCC Roads 2014-2015	Highest Recorded Flow (AAWD)	Road
St Albans	5.23	2.54	1.2%	0.7%	161,665	M1

3.4.2.3 Public transport

Mainline rail is a good travel option for St Albans District, with easy access to stations in St Albans, Harpenden and Watford. The Midland Main Line links London, Luton, Bedford and the East Midlands, via Harpenden, St Albans and Radlett. The Abbey Line runs between Watford Junction and St Albans Abbey stations via Garston, Bricket Wood and Park Street. Watford Junction is the busiest railway station in Hertfordshire. To the west of the District the main rail line is the West Coast Main Line connecting London, Milton Keynes, Birmingham and the West Midlands, North West England and Scotland. High speed services call at Watford Junction, and local services at stations including Hemel Hempstead, Apsley, Kings Langley and Bushey as well as Watford Junction. In addition the London Underground Metropolitan Line runs from Watford Met station, via Croxley and Moor Park and London Overground serves Watford Junction, Watford High Street, Bushey and Carpenders Park.

St Albans City Centre is well connected on the local bus network with services from North London, Welwyn Garden City, Hatfield, Luton and Watford, as well as routes to the city's suburbs and outlying shopping areas⁸⁰. St Albans lies on the Thameslink train line, connecting the district to London St Pancras in 20 minutes.

⁷⁸ <https://www.hertfordshire.gov.uk/media-library/documents/highways/transport-planning/transport-and-accident-data/ttdr/traffic-and-transport-data-report-2016.pdf>

⁷⁹ HCC roads = Hertfordshire County Council controlled roads, which excludes motorway and trunk roads

⁸⁰ <https://www.stalbans.gov.uk/transport-and-streets/public-transport/>

Across Hertfordshire, car ownership has increased. Bus journeys in to city centres in the county have declined, but the use of bus travel as the mode of transport to get to work has increased. However, at a national level 8% of journeys to work are made by bus, coach or minibus, and the figure for Hertfordshire is just 3.5%⁸¹.

St Albans District Council is taking action to encourage cycling and walking as the preferred mode of transport. Current barriers include narrow roads, poorly designed streets, poor quality of road surfaces, heavy traffic, lack of cycle infrastructure and a hilly topography. To support this, investment is being made in facilities to improve security, safety, encourage a cycle friendly culture and integrate cycling in to policy initiatives and programme.⁸²

3.4.2.4 Air transport

St Albans is located under a busy section of London airspace with routes from 5 airports routing over the District. In particular, St Albans lies close to, and is affected by the flight path of London Luton Airport, the UK's 5th largest airport. The airport carried 15.8 million passengers in 2017. The Airport directly and indirectly employs over 600 and 8,000 staff respectively and is a key economic driver locally and for the eastern region, including St Albans. In June 2014, Luton Borough Council granted planning permission for a £100m development of London Luton Airport by the airport operator. The work will increase annual passenger capacity from 12 million to 18 million by 2031. Work began in early 2015 and is scheduled to be completed by 2026. This expansion could have impacts on St Albans, relating to increased noise from a higher number of aircraft movements; increased traffic in the District and the secondary effects of this (such as pollution and congestion). There may however be some benefits to the local economy.

Many St Albans residents have reported noise complaints from London Luton airport. Complaints have increased since the introduction of a new navigation system known as RAVI. A review of the software system is being undertaken.

The airport of Stansted is located to the east of Hertfordshire and although the majority of the impacts from this are felt to the east of the county, residents in St Albans may also experience impacts associated with flight paths. With the proposed expansion of Heathrow there may be increased air movements and additional noise pollution over the area affecting residents in the future.

3.4.2.5 Community transport

Within Hertfordshire there is a Dial a Ride scheme which offers door to door transport for the elderly and people of all ages who have difficulty travelling due to permanent disability or illness. There is also WRVS Good Neighbour Scheme which allows volunteers to driver older passengers to appointments. A number of schemes exist in St Albans for wheelchair accessible transport.⁸³

3.4.2.6 Travel behaviour

In 2013 in Hertfordshire, there was a rise in traffic levels, a reversal in the trend from previous years, with an increase of 1.6% for vehicle kilometres travelled. This increase was recorded across all road classifications with the exception of Principal A Roads, where there was a slight decrease.

Compared to the average for England, motorways in Hertfordshire take twice the level of traffic and A roads take 70% more. HGV activity has increased with trucks and lorries now travelling three times the national average of kilometres on Hertfordshire's roads.

⁸¹ <https://www.hertfordshire.gov.uk/media-library/documents/highways/transport-planning/transport-and-accident-data/ttdr/traffic-and-transport-data-report-2016.pdf>

⁸² https://www.stalbans.gov.uk/Images/St%20Albans%20Cycling%20Strategy_tcm15-41962.pdf

⁸³ <https://www.stalbans.gov.uk/transport-and-streets/communitytransport/>

According to the 2011 Census, 13.55% of households in St. Albans District had no car or van available for their use. However an average of 1.44 car or vans were available per household. This is better than 16.93% of households in Hertfordshire not having a car or van available and an average of 1.38 car or vans being available per household (see Table 3-8).

Table 3-8: Car or van availability in households in St Albans District at 2011 (%)

	St. Albans District	Hertfordshire	East of England	England
% No cars or vans in household (2011)	13.55	16.93	18.55	25.80
% One car or van in household (2011)	42.94	42.16	42.91	42.16
% Two cars or vans in household (2011)	33.78	30.89	29.05	24.66
% Three cars or vans in household (2011)	7.08	7.23	6.87	5.46
% Four or more cars or vans in household (2011)	2.65	2.79	2.63	1.93
Cars or vans per household (2011)	1.44	1.38	1.33	1.16

(Source: Office for National Statistics, 2011 Census, Table KS404EW).

In 2011, 13.26% of residents of St. Albans District aged 16 to 74 in employment worked mainly at or from home. 51.96% drove to work by car (2.95 as a passenger in a car), 21.69% travelled by public transport (underground, metro, light rail, tram, train, bus, coach or taxi) and 9.20% cycled or walked to work. It should be noted that the 2011 Census asked that people choose the method of travel relating to the longest part by distance of their usual journey to work⁸⁴.

The District's close proximity to London and good transport links allow a high proportion of residents to commute out of the District to work. Over 21% commute into London. 43% of residents work within the District, and 22% commute to work in the rest of the County.⁸⁵

SACD attracts workers from its neighbours, with over 27% of inflow coming from other Hertfordshire Authorities and 12% from Luton and Central Bedfordshire. A small percentage also commute in from London, (just over 2%). Overall, the District is a net exporter of labour, and the numbers out-commuting and in-commuting have increased since 1991⁸⁵.

3.4.3 *The likely situation without the plan*

Together with the NPPF and its supporting NPPG, the existing District Local Plan Review 1994 provides the strategic framework and development management policy for development to reduce the need to travel and to encourage sustainable transport. Without a new Local Plan, the the District Local Plan Review policies and NPPF/NPPG would still remain and therefore there would not be a policy vacuum in this area. However, as the District Local Plan Review gets progressively older, there is a risk that the weight that can be accorded to its policies will diminish. The new Local Plan will be able to ensure that additional new development occurs in the most sustainable locations in order to reduce the need to travel and is designed to enable and encourage sustainable travel modes such as walking, cycling and use of public transport. In the absence of the new Local Plan these issues may not be given the same level of consideration.

⁸⁴ <http://atlas.hertslis.org/IAS/profiles/profile?profileId=179&geoTypeId=16&geoids=26>

⁸⁵ St Albans Authority's Monitoring Report, December 2017

3.4.4 Issues and opportunities

Issues

- 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.

Opportunities

- Use planning obligations to secure improvements to public transport.
- Providing and maintaining safe and available infrastructure for healthy pursuits – cycleways, dedicated walkways.
- Requiring green travel plans in large new developments.
- Provision of infrastructure to enable the increased use of sustainable modes of transport (e.g. cycle parking facilities, electric vehicle charging points)
- Make developments permeable to provide improved opportunities for walking and cycling
- The district has high levels of rail users and opportunities to increase lines and services should be taken forward

3.5 Economy, employment and education

3.5.1 Key policy context

The NPPF identifies that, as part of achieving sustainable development, planning has an economic role, to build a *“to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure”*. One key aspect of this is making it easier for jobs to be created in cities, towns and villages.

In order to support the objective of building a strong, competitive economy, the NPPF recommends that local planning authorities should set out an economic strategy that promotes sustainable economic growth; facilitate local and inward investment to match the strategy and anticipated development needs; support existing business sectors and identify priority areas for economic regeneration.

The NPPF highlights the importance of supporting a ‘prosperous rural economy’ with planning policies being required to: *“support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development”*. It requires that *“Planning policies should:*

a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;

b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;

c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and

d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.”

Local authorities should also seek to ensure the vitality of town centres as recommended in the NPPF. It should be recognised that as the heart of our communities, it is important to support the viability and vitality of local town centres.

Accompanying the NPPF is the Planning Practice Guidance, which specifically covers housing and economic development needs assessments and housing and economic land availability assessments.

At a county level Hertfordshire’s Refreshed Strategic Economic Plan ‘Perfectly Paced for Business’ (2017) has the vision that: by 2030, Hertfordshire will be recognised as the functional core of the Golden Triangle, the single most concentrated area in Europe for scientific research and development, benefiting the UK economy as a whole. The SEP includes four priorities, with key areas for action under each: Maintaining global excellence in science and technology; Harnessing relationships with London and elsewhere; Re-invigorating places for the 21st Century; and Foundations for Growth.

Within Hertfordshire, the southwest Hertfordshire Economy Study (2016) forecasts what the future economy in the region may look like; highlighting areas (sectors and locations) of growth.

In terms of education, the NPPF emphasises the importance that the Government places on education and ensuring that there are sufficient school places available to meet existing and future demand. The NPPF states that: *“local authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:*

- *Give great weight to the need to create, expand or alter schools; and*
- *Work with schools promoters to identify and resolve key planning issues before applications are submitted”.*

3.5.1.1 Relevant plans, policies and programmes

- Industrial Strategy. Building a Britain fit for the future (2017)
- The Clean Growth Strategy. Leading the way to a low carbon future (2017)
- National Planning Policy Framework 2018
- Hertfordshire’s Refreshed Strategic Economic Plan ‘Perfectly Paced for Business’ (2017)
- East of England Forecasting Model (2013)
- Southwest Hertfordshire Economy Study (2016)
- Hertfordshire Schools Expansion Programme
- St Albans Visitor Economy Strategy 2013-2018
- St Albans Retail Study Update (2010)

3.5.2 The current situation

3.5.2.1 Economy

There were a total of 74,553 economically active people within St Albans at the time of the 2011 census. At this point, 69,041 were in employment which equates to 92.6% of the working population

being in employment. This is a higher proportion when compared to regional and national averages (80.1% and 77.5% respectively). The number of self-employed was 12,566 with the remaining 56,475 comprising of employees. In total 2,715 people were unemployed across the District⁸⁶.

Average earnings in St Albans are significantly higher than the average for Great Britain as a whole and the average for the East of England. Whilst female full time workers' pay is above average, there is a greater disparity in gender pay (40%) in St Albans (where females account for 40% of total full-time earnings) in comparison with the East of England and Great Britain (where females account for 45% of full-time earnings) , see Table 3-9⁸⁷

Table 3-9: Average earnings by residence and workplace (AMS, 2017)

Average Earnings by Residence and Workplace

Earnings by Residence 2016			
Gross weekly pay	St Albans	East	Great Britain
Full-time workers	£785.00	£569.40	£541.00
Male full-time workers	£937.30	£613.30	£581.20
Female full-time workers	£642.70	£496.90	£481.10
Earnings by Workplace 2016			
Gross weekly pay	SACD	East	Great Britain
Full-time workers	£527.00	£528.80	£540.20
Male full-time workers	£570.00	£574.90	£580.60
Female full-time workers	£486.40	£466.60	£480.80

Source: ONS Annual Survey Hours & Earnings

3.5.2.2 Employment

St Albans falls above the national average for employment in Major Group 1-3 (managers, directors, senior officials; professional occupations; associate professional and technical) and below the national average for employment in Major Groups 4-5, 6-7 and 8-9, see Table 3-10.

Table 3-10: Employment by occupation⁸⁸

Employment by occupation (Apr 2017-Mar 2018)				
	St Albans (Numbers)	St Albans (%)	East (%)	Great Britain (%)
Soc 2010 Major Group 1-3	48,600	68.7	46.1	45.8
1 Managers, Directors And Senior Officials	15,700	22.0	12.2	10.8
2 Professional Occupations	17,600	24.7	19.0	20.3
3 Associate Professional & Technical	15,300	21.5	14.8	14.5
Soc 2010 Major Group 4-5	9,000	12.8	21.5	20.6
4 Administrative & Secretarial	5,000	7.1	10.7	10.3
5 Skilled Trades Occupations	#	#	10.7	10.2
Soc 2010 Major Group 6-7	6,000	8.5	16.2	16.7
6 Caring, Leisure And Other Service Occupations	#	#	8.8	9.0
7 Sales And Customer Service Occs	#	#	7.4	7.6
Soc 2010 Major Group 8-9	7,100	10.0	16.3	16.9
8 Process Plant & Machine Operatives	#	#	6.3	6.3
9 Elementary Occupations	#	#	9.9	10.5

⁸⁶ <https://www.nomisweb.co.uk/reports/localarea?compare=1946157227>

⁸⁷ https://www.stalbans.gov.uk/Images/SP_EB_AuthoritysMonitoring%20Report2016_2017.pdf

⁸⁸ <https://www.nomisweb.co.uk/reports/lmp/la/1946157227/report.aspx#tabeinact>

The Hertfordshire County Travel Survey 2015 reported that 32% of St Albans residents work within the District, with 18% working in other districts within Hertfordshire, 36% working in London and 8% working in an adjacent county (6% unknown)⁸⁹.

The largest industry jobs in the District are business administration and support, professional, scientific and technical; and health. The employee jobs breakdown in St Albans is shown in Figure 3-7.

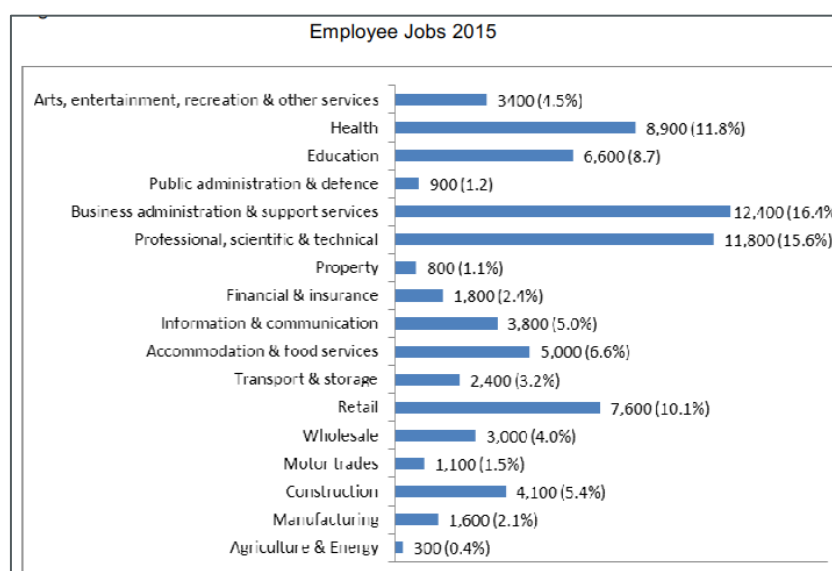


Figure 3-7: Employee Jobs 2015⁹⁰

Based on the Claimant Count⁹¹, St Albans unemployment rate in June 2018 was low (1.3%). This rate is lower than that in the East of England (1.5%) and in Great Britain as a whole (2.2%)⁹². St Albans has generally the lowest unemployment rate across 2006-2016 compared with neighbouring districts and boroughs (Table 3-11). St Alban's unemployment rate almost halved between 2006 and 2018.

Table 3-11: Claimant Count (unemployment %)⁹³

	March 2006	March 2011	March 2013	March 2014	March 2015	March 2016
St Albans	1.1	1.7	1.7	1.2	0.8	0.6
Dacorum	2.0	2.7	2.4	1.8	1.3	0.9
Hertsmere	1.8	2.6	2.5	1.8	1.3	1.0
Three Rivers	1.3	2.0	2.1	1.5	0.9	0.8
Watford	2.2	3.1	3.0	2.3	1.5	1.3
Hertfordshire	1.6	2.5	2.5	1.8	1.2	0.9
Aylesbury Vale	-	1.9	1.8	0.8	0.8	0.6
Chiltern	-	1.7	1.7	0.8	0.7	0.5
Central Bedfordshire	No info	No info	2.5	1.0	0.9	0.8
East of England	2.1	3.0	3.1	2.2	1.4	1.1

⁸⁹ Hertfordshire County Travel Survey 2015- St Albans District Profile <https://www.hertfordshire.gov.uk/media-library/documents/highways/transport-planning/st-albans-2015-profile-finished.pdf>

⁹⁰ St Albans Authority's Monitoring Report, December 2017

⁹¹ The Government's preferred measure of unemployment is the Labour Force Survey, however statistics are not published at district council level.

⁹² <https://www.nomisweb.co.uk/reports/lmp/la/1946157227/printable.aspx>

⁹³ Office for National Statistics

The number of unemployed people in the UK is much higher than stated in the Claimant Count. Not everyone who is unemployed is eligible for, or claims, JSA. Many unemployed people (especially women) are not eligible for JSA, because they have a partner who works and/or because of their financial position. While most recipients of JSA are classified as unemployed, some fall into the 'employed' or 'economically inactive' categories.

A fuller and more accurate measure of unemployment at district council level can be gained from the Annual Population Survey (Table 3-12). According to this measure, unemployment in St Albans is well below the regional average, lower than the Hertfordshire figure and in the lowest amongst surrounding and nearby local authorities. Unemployment in St Albans is now back to its pre-recession level.

Table 3-12: Annual Population Survey: unemployment (%)

	July 2007- June 2008	July 2010- June 2011	July 2012- June 2013	April 2013- March 2014	April 2014- March 2015	April 2015- March 2016
St Albans	2.9	4.6	5.0	3.7	2.8	2.8
Dacorum	3.5	5.4	5.2	4.4	3.9	3.4
Hertsmere	4.0	5.8	5.5	4.9	6.3	4.1
Three Rivers	3.3	6.6	6.0	4.9	N/A	2.9
Watford	4.4	7.7	4.9	5.3	3.4	4.2
Aylesbury Vale	3.4	5.2	5.9	4.4	3.7	3.3
Chiltern	3.3	4.1	4.9	4.1	3.6	2.7
Central Bedfordshire	3.2	5.8	5.8	4.9	3.7	3.2
Hertfordshire	3.7	6.4	5.4	4.6	4.3	3.2
East of England	4.2	5.2	6.5	5.8	4.9	3.8

3.5.2.3 Education

In Hertfordshire the proportion of pupils achieving Level 2 at Key Stage 4 (five or more GCSEs at grade A*-C or equivalent accredited qualifications), including English and Mathematics increased from 53.7% in 2005/06 to 66.4% in 2013/14. This is better than the regional and national figures for 2013/14 (57.2% for the East of England and 53.4% for England). In St. Albans District, the figure was 73.0%.

Table 3-13 shows the percentage of people aged 16-74 that have no qualifications in St Albans and Hertfordshire and also highlights the figure for the East of England for comparison.

Table 3-13: Percentage of people aged 16-74 that have no qualifications (2011 Census)

	East of England	Hertfordshire	St Albans
People aged 16-74 with no qualifications	22.5%	18.2%	12.9%

(Source: Office for National Statistics, 2011 Census, Table KS501EW.)

Nearly half of adults (46.3%) living in the District are educated to degree level or above, higher than both the county and national levels of 32.1% and 27.4% respectively⁹⁴.

At the end of the academic year 2013/14, a higher percentage of Hertfordshire schools were judged good or outstanding in their Ofsted inspections than nationally. The percentage of Hertfordshire schools in an Ofsted inadequate category was much lower than the national figure.

⁹⁴ Office for National Statistics, 2011 Census

3.5.2.4 School provision

Hertfordshire County Council is responsible for ensuring there are sufficient school places for residents within St Albans. HCC commission the places from existing schools. All new schools now need to be academies or free schools, approved by the Secretary of State. In line with national trends, Hertfordshire experienced a period of falling demand for primary school places between 2000 and 2007. The national and local situation has now changed: demand for places has increased and will increase further.

In the 2017/2018 Summer interim forecast, a 31.3% surplus of primary school places is predicted, increasing to 35.3% surplus in 2018/2019 and declining somewhat to 32% in 2020/2021, in line with national trends⁹⁵.

In terms of secondary schools, a smaller surplus of 5.4% is predicted for 2017/18, changing to a predicted shortfall of 3.4% in 2019/2020 and 3.9% shortfall in 2020/2021.

To meet increasing levels of demand, a new school was built in Chorleywood in September 2017, a new school is scheduled to open in Harpenden in September 2018 and plans are being considered for a new school to meet demand from a new housing estate in Bishop's Stortford North.

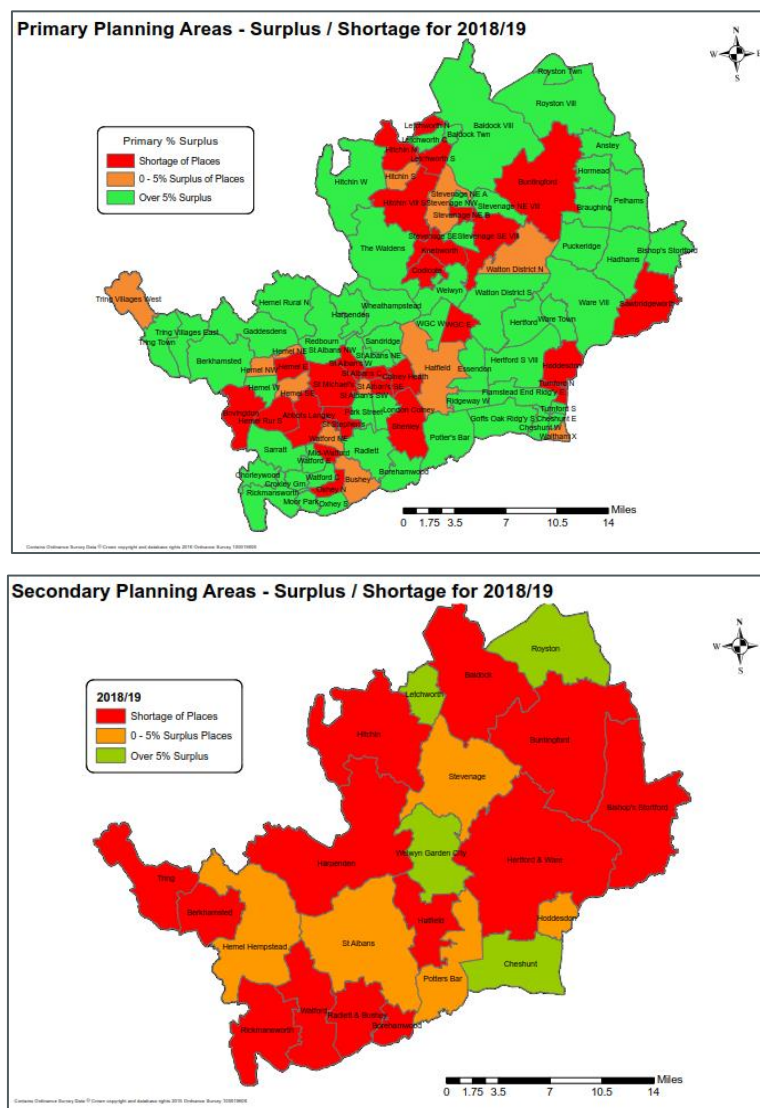


Figure 3-8: Meeting the Demand for Primary and Secondary School Places Summer 2016/17⁹⁶

⁹⁵ <https://www.hertfordshire.gov.uk/services/schools-and-education/at-school/school-planning/school-planning.aspx>

3.5.2.5 *Tertiary education*

Oaklands College in St Albans offers a range of full-time, part-time, apprenticeship and degree level courses and has over 5,000 learners and apprentices.

Improvement plans are in place to refurbish or rebuild the teaching and associated accommodation at the Smallford Campus. This will be delivered alongside the delivery of the East St Albans Broad Location. The college has also received funding from the Hertfordshire Local Enterprise Partnership for new specialist facilities.

3.5.3 *The likely situation without the plan*

Together with the NPPF and its supporting NPPG, the existing District Local Plan Review 1994 provides the strategic framework and development management policy for economic development in the District, in particular through 'Policy 19 Overall Employment Strategy', 'Policy 51 Shopping and Services Uses, Overall Strategy' and 'Policy 65 Education Facilities'. Without a new Local Plan, the the District Local Plan Review policies and NPPF/NPPG would still remain and therefore there would not be a policy vacuum in this area. However, as the District Local Plan gets progressively older, there is a risk that the weight that can be accorded to its policies will diminish. The new Local Plan will be able to ensure that economic development is planned to meet the updated needs of the area. Without the new Local Plan, any new development that results through planning applications on unallocated sites, rather than sites allocated in the Local Plan is likely to result in uncoordinated development that fails to meet all needs and does not link new development with appropriate new supporting infrastructure.

3.5.4 *Issues and opportunities*

Issues

- 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

Opportunities

- Maintaining a strong employment base is essential for the future prosperity of the area.
- Maintaing and providing employment sites, including ones that will be attractive to inward investment.
- Providing incubator units and units with shared facilities, e.g. reception and meeting facilities etc. Local Plan to identify suitable locations.
- Using planning obligations to enhance existing educational facilities – including allocating land for new schools where required.
- Providing facilities and services to support the improvement of GCSE attainment in schools.
- Ensuring that educational opportunities are available to provide the training and skills necessary to support the District's local economy.
- Aiming to maintain levels of out-commuting at existing levels.

⁹⁶ <https://www.hertfordshire.gov.uk/services/schools-and-education/at-school/school-planning/school-planning.aspx>

- Strengthening the retail offering of the District.
- Encouraging a diverse and sustainable economy and increasing participation in education and skills development at all ages.



St Albans Local Plan

Publication

Sustainability Appraisal Report

Appendix C: Sustainability Framework

September 2018

Appendix C – The Sustainability Appraisal Framework

This Appendix provides the framework of SA objectives which have been used to assess the Local Plan strategies, policies and broad locations.

The framework that was originally developed in 2006 and subsequently used for the assessments that were undertaken on the Strategic Local Plan and Detailed Local Plan has been updated for the assessment of the new Local Plan. The changes largely reflect comments and recommendations provided by the three statutory consultees.

The updates to the SA objectives and sub-objectives are shown in the framework below, using underlined text (additions) and strikethrough text (deletions).

SA Objective	Criteria
Biodiversity	
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	To protect, maintain and enhance designated wildlife and geological sites (international, national and local) and protected species to achieve favourable condition
	To restore characteristic habitats and species, to achieve BAP targets
	To support farming and countryside practices that enhance wider biodiversity and landscape quality by economically and socially valuable activities (e.g. grazing, coppicing, nature reserves)
	To manage woodlands and other habitats of value for biodiversity in a sustainable manner and protect them against conversion to other uses
	To recognise the social/environmental value and increase access to woodlands, wildlife & geological sites and green spaces particularly near/in urban areas
	To encourage people to come into contact with, understand, and enjoy nature
	<u>To conserve and enhance the green infrastructure and blue infrastructure within the District.</u>
	<u>To consider the effects of light pollution on night flying fauna</u>
	<u>To recognise the potential biodiversity value of brownfield land and identify appropriate mitigation measures</u>
	<u>To actively seek to promote ecological connectivity between existing greenspaces</u>
<u>Ensure mitigation is provided to counteract any adverse effects of increased access and recreational disturbance to designated sites and for any other identified impacts</u>	
Water	
2. To protect, maintain and enhance water resources (including water quality and quantity) while taking into account the impacts of climate change	To raise awareness and encourage higher water efficiency and conservation by for instance promoting water reuse in new and existing developments
	To ensure water consumption does not exceed levels which can be supported by natural processes and storage systems
	To improve chemical and biological quality and flow of rivers and encourage practices which reduce nitrate levels in groundwater
	To improve flow of rivers
	<u>To reduce the number and severity of pollution incidents and reduce the risks to groundwater resource from contamination</u>
	To maintain or restore the integrity of water dependent wildlife sites in the area
	<u>To take account of the existing and future capacity of sewerage network</u>
3. Ensure that new developments avoid areas which are at risk from flooding and natural flood storage areas	To avoid developments in areas being at risk from fluvial, sewer or groundwater flooding (for instance natural flood plains) while taking into account the impacts of climate change
	To ensure that developments, which are at risk from flooding or are likely to be at risk in future due to climate change, are sufficiently adapted
	<u>To promote properly designed and maintained sustainable urban drainage systems to reduce flood risk and run off and contribute to improved water quality, green and blue infrastructure and function, in areas outside Source Protection Zones 1 (SPZ)</u>

	<u>To take account of additional surface water generated by new development</u>
	<u>To seek opportunities for Natural Flood Management where appropriate</u>
Soil	
4. Minimise development of land with high quality soils and minimise the degradation/loss of soils due to new developments	To safeguard high quality soils, such as agricultural land grades 1, 2 and 3a) from development
	To limit contamination/degradation/loss of soils due to development
	<u>To encourage the remediation of contaminated and derelict land and buildings</u>
Climatic Factors	
5. Reduce the impacts of climate change, with a particular focus on reducing the consumption of fossil fuels and levels of CO ₂	To minimise greenhouse gas emissions (particularly CO ₂) for instance through more energy efficient design and reducing the need to travel
	To promote increased carbon sequestration e.g. through increases in woodland cover
	To adopt lifestyle changes which help to mitigate and adapt to climate change, such as promoting water and energy efficiency (through for instance higher levels of home insulation)
6. Ensure that developments are capable of withstanding the effects of climate change (adaptation to climate change)	To promote design measures which enable developments to withstand and accommodate the likely impacts and results of climate change (for instance through robust and weather resistant building structures)
Air Quality	
7. Achieve good air quality, especially in urban areas	To reduce the need to travel by car through planning settlement patterns and economic activity in a way that reduces dependence on the car and maintains access to work and essential services for non-car-owners
	To integrate land use and transport planning by for instance: <ul style="list-style-type: none"> • Promoting Green Transport Plans, including car pools, car sharing as part of new developments • Ensuring services and facilities are accessible by sustainable modes of transport
	To ensure that development proposals do not make existing air quality problems worse
	To address existing or potential air quality problems
	<u>To avoid siting developments that would be sensitive to air quality issues in areas with poor air quality</u>
Material Assets	
8. Maximise the use of previously developed land and buildings, and the efficient use of land	To concentrate new developments on previously developed land (PDL)
	To avoid use of greenfield sites for development
	To maximise the efficient use of land and existing buildings by measures such as higher densities and mixed use developments
	To encourage the remediation of contaminated and derelict land and buildings

9. To use natural resources, both finite and renewable, as efficiently as possible, and re-use finite resources or recycled alternatives wherever possible	To encourage maximum efficiency and appropriate use of materials, particularly from local and regional sources
	To require new developments to incorporate renewable, secondary, or sustainably sourced local materials in buildings and infrastructure
	To safeguard reserves of exploitable minerals from sterilisation by other developments
	To promote renewable energy sources as part of new or refurbished developments
	To increase recycling and composting rates and encourage easily accessible recycling systems as part of new developments
	To promote awareness regarding waste/recycling and renewable energy issues through education programmes in schools and the community
Cultural Heritage Historic Environment	
10. To identify, maintain and enhance the historic environment, and cultural assets <u>heritage assets and their settings and cultural assets</u>	To safeguard <u>conserve</u> and enhance the historic environment, including designated and non-designated assets , heritage assets most at risk through neglect, decay or other threats, and to restore historic character where appropriate, based on sound historical evidence
	To promote local distinctiveness by maintaining and restoring historic buildings and areas, encouraging the re-use of valued buildings and thoughtful high quality design in housing and mixed use developments – to a density which respects the local context and townscape character, and includes enhancement of the public realm
	To promote public education, enjoyment and access of the built heritage and archaeology
Landscape & Townscape	
11. To conserve and enhance landscape and townscape character and encourage local distinctiveness	To protect and enhance landscape and townscape character, <u>including historic landscape character</u>
	To evaluate the sensitivity of the landscape to new/inappropriate developments and avoid inappropriate developments in these areas
	To protect ‘dark skies’ from light pollution, and promote low energy and less invasive lighting sources while considering the balance between safety and environmental impacts
	To minimise the visual impact of new developments
Population & Human Health	
12. To encourage healthier lifestyles and reduce adverse health impacts of new developments	To promote the health advantages of walking and cycling and community based activities
	To identify, protect and enhance open spaces, such as rivers and canals, parks and gardens, allotments and playing fields, and the links between them, for the benefit of people and wildlife
	To include specific design and amenity policies to minimise noise and odour pollution, particularly in residential areas
	To narrow the income gap between the poorest and wealthiest parts of the area and to reduce health differential
	<u>To take health, and access to health, issues into account in new developments</u>
13. To deliver more sustainable patterns of location of development	To reduce the need to travel through closer integration of housing, jobs and services
	To promote better and more sustainable access to health facilities

Social Factors	
14. Promote equity & address social exclusion by closing the gap between the poorest communities and the rest	To include measures which will improve everyone's access to high quality health, education, recreation, community facilities and public transport
	To ensure facilities and services are accessible by people with disabilities and minority groups
	To encourage people to access the learning and skills they need for high quality of life
	To ensure that the Local Plan does not discriminate on the basis of disability, ethnic minority, or gender
15. Ensure that everyone has access to good quality housing that meets their needs	Promote a range housing types and tenure, including high quality affordable and key worker housing
16. Enhance community identity and participation	To recognise the value of the multi-cultural/faith diversity of the peoples in the region
	To improve the quality of life in urban areas by making them more attractive places in which to live and work, and to visit
	To encourage high quality design in new developments, including mixed uses, to create local identity and encourage a sense of community pride
17. Reduce both crime and fear of crime	To reduce all levels of crime with particular focus on violent, drug related, environmental and racially motivated crime
	To plan new developments to help reduce crime and fear of crime through thoughtful design of the physical environment, and by promoting well-used streets and public spaces
	To support government-sponsored crime/safety initiatives and maximising the use of all tools available to police, local authorities and other agencies to tackle anti-social behaviour
Economic Factors	
18. Achieve sustainable levels of prosperity and economic growth	To support an economy in the District which draws on the knowledge base, creativity and enterprise of its people
	To promote and support economic diversity, small and medium sized enterprises and community-based enterprises
	To support the economy with high quality infrastructure and a high quality environment
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	To encourage local provision of and access to jobs and services
	To improve the competitiveness of the rural economy
	<u>To enable the provision of new and enhanced education and training facilities</u>
	<u>To provide training that will help people acquire the skills needed to find and remain in employment</u>
20. Revitalise town centres to promote a return to sustainable urban living	To promote the role of local centres as centres for sustainable development providing services, housing and employment, drawing on the principles of urban renaissance
	To encourage well-designed mixed-use developments in the heart of urban areas, create viable and attractive town centres that have vitality and life, and discourage out-of-town developments



St Albans Local Plan

Publication

Sustainability Appraisal Report

Appendix D: Consultation Comments

September 2018

Appendix D – Consultation Comments

As required by the SEA Directive, consultation has been undertaken at several stages of the process. The reports to date which have been consulted upon during the development of the Local Plan and previously the Strategic Local Plan and Detailed Local Plan include:

- The SA/SEA Scoping Report (February 2006)
- Issues and Options SA Working Note (July 2007)
- The Emerging Core Strategy SA Working Note (June 2009)
- The Core Strategy: Consultation on the Strategy for Locating Future Development in the District SA Working Note (December 2010)
- Draft Strategic Local Plan: Strategic Local Plan Options SA Working Note (June 2014)
- Publication Strategic Local Plan SA Report (December 2015)
- Detailed Local Plan SA Working Note (November 2016)
- Local Plan Regulation 18 SA Working Note (January 2018)
- Local Plan SA Scoping Letter (April 2018)

A summary of the consultation responses received and the actions taken in response are provided in the following tables.

1 Comments on SA/SEA Scoping Report (February 2006)

Summary of Comments	Reply to comments / how the comments have been taken on board
Countryside Agency/Landscape, Access and Recreation Division	
<p>We have read the draft Scoping Report with interest and in general, we are satisfied that the Sustainability Appraisal of the LDF is proceeding in a proper, logical and comprehensive manner.</p>	No action required.
<p>Baseline section on landscape Could be improved by reference to information from Countryside Quality Counts (CQC) on landscape change. Information regarding the presence of, and access to, open space and on the length and condition of Public Rights of Way is missing – the current and future green spaces strategies should provide a suitable up to date database. The Countryside Agency has published maps of Open Access Land under the CroW Act – a map for Hertfordshire can be accessed at: www.countrysideaccess.gov.uk/where_you_can_go.php; information on the Rights of Way network should also be available from the County Council’s work on the Rights of Way Improvement Plan. The Countryside Agency welcomes the recognition of issues and options around landscape character, pedestrian and cycle facilities and open space provision. No evidence is presented to justify the statement that there are some deficits in the availability of and access to sport and recreation facilities in St Albans – this evidence may be found in the Green Spaces Strategy and should be presented if available; if not the statement should be revised.</p>	<p>Information on landscape change has been incorporated into the baseline section on landscape. Information on public rights of way and access to green infrastructure is provided in the baseline sections on accessibility and recreation, sport and leisure.</p>
<p>SA/SEA Objectives The Countryside Agency would like to see the first criterion for Objective 11: Landscape improved - It should be changed to “To conserve and enhance the landscape character”. The Countryside Agency welcomes the criteria under Objective 12: To encourage healthy lifestyles.</p>	The framework has been amended to incorporate this change.
<p>Assessment and monitoring indicators The indicator of changes in landscape features will need to be related to the descriptions of the various local landscape character areas. The Countryside Agency is aware of the difficulty of setting targets and indicators of landscape change and is working to develop practice in this area through our Countryside Quality Counts initiative – the CA hopes to be in a position to issue guidance later this year. Under Objective 12: To encourage healthy lifestyles it would be helpful to monitor “Length and condition of cycle ways and footpaths”.</p>	Changes have been incorporated in the revised appraisal framework.
<p>Consultation As one of the statutory consultation bodies the Countryside Agency is happy to respond to all future consultations and assist in the appraisal process in anyway it can.</p>	Noted.
<p>Methodology You might like to consider the use of Quality of Life Assessment as a tool to assist in the identification of impacts for the appraisal.</p>	Noted.

English Nature	
<p>Natura 2000 sites</p> <p>There are no Natura 2000 sites within or close to St Albans District; therefore it is unlikely that the LDF might impact upon such sites.</p> <p>The only realistically viable mechanism for impact would to be in terms of increased demand for water associated with large scale new development, which could potentially affect the Lee Valley SPA and Ramsar site, although even this is unlikely.</p>	No action required.
<p>Main issues and opportunities</p> <p>These are likely to include: fragmentation of habitats, loss of infrastructure to support agriculture and the rural economy (e.g. closure of livestock markets and abattoirs), low flows in rivers during summer months, invasive non-native species, air and water pollution (surface and ground water), effects of climate change.</p>	Taken into account during the assessment.
<p>Assessment framework</p> <p>English Nature is of the opinion that the objectives do form a reasonable framework for the assessment of the likely significant effects of the DPDs.</p>	No action required.
<p>Indicators</p> <p>English Nature would like to draw the attention to the Hertfordshire Biological Records Centre which has drawn up a list of potential indicators for which data exists (contact person Martin Hicks).</p>	Indicators from the Hertfordshire Quality of Life Report 2004 have been incorporated in the revised assessment framework; these are partly based on HBRC data.
Environment Agency	
<p>Natura 2000 sites</p> <p>The Environment Agency confirms that St Albans does not contain any Natura 2000 sites.</p>	No action required.
<p>PPP review</p> <p>The following should be included:</p> <ul style="list-style-type: none"> • Draft PPS 3 Housing • Draft PPS 25 Development and Flood Risk • Draft Catchment Flood Management Plan (CFMP) for the Colne Catchment due to the implications for flood risk in the St Albans area 	The PPP review has been updated to include the National Planning Policy Framework (NPPF) (which replaces PPS3 and PPS25) and the Thames Region CFMP.
<p>The summary of PPS 1 Sustainable Development should be amended to reflect the need to promote all three aspects of sustainable development with a strong focus on environmental enhancements and promoting a greener more environmentally focussed community.</p>	Not applicable. The PPP review now refers to the NPPF which replaced PPPS1.
<p>Baseline section on biodiversity</p> <p>The overall tone of the section does not support biodiversity in a more general manner and needs to look more broadly at the biodiversity of St Albans and encourage enhancements throughout - This is particularly significant along river corridors such as the Rivers Colne, Ver and Lee.</p>	Baseline section on biodiversity amended.
<p>Baseline section on climatic factors</p> <p>This section needs to be cross referenced with the sections on water resources (including flood risk) in the relation to adaptation to</p>	Baseline section on climatic factors amended to refer to section 1.8.

climate change.	
<p>Baseline section on material assets</p> <p>Inclusion of indicators BV 216a and BV 216b is welcomed.</p>	No action required.
<p>Baseline section on water resources</p> <p>Draft PPS 25 also requires the achievement of ‘good ecological status of inland waters and should be noted in this section.</p> <p>‘The Environment Agency questions the statement that some areas of Hertfordshire suffer from over abstraction of water resources.</p> <p>A map regarding chemical and biological river quality has been provided which should be included in the Environmental Report.</p> <p>It is suggested to include a map illustrating the flood risk in the area; however a map was not provided.</p> <p>The Environment Agency recommends conducting a Strategic Flood Risk Assessment (SFRA) as required by PPG 25 (‘sequential test’) and draft PPS 25.</p> <p>The Environment Agency suggests including trend data for flood risk and water resources. More attention should be paid to the links between the provision of housing and water resources and flood risk issues.</p> <p>The Environment Agency recommends paying more attention to the interrelationship between Contaminated Land in St Albans and the issue of water quality.</p>	<p>PPS 25 is no longer applicable as it has been replaced by the NPPF.</p> <p>Baseline section amended. Maps of areas at risk from flooding have not however been provided.</p> <p>A Strategic Flood Risk Assessment has been undertaken to identify area that are at risk from flooding.</p>
<p>Environmental and sustainability issues, opportunities and priorities</p> <p>Opportunities for the enhancement of biodiversity in general should be encouraged.</p> <p>This section should also outline how the LDF could prevent the pollution of water courses.</p>	The SLP includes policy relating to protection of watercourses.
<p>Main issues in St Albans</p> <p>Water resources</p> <ul style="list-style-type: none"> • The river Ver suffers from low flow and is a designated BAP priority and chalk stream, as such the river must be treated sensitively. • The whole area is over abstracted, as it has been identified in the opportunities section, this ultimately has a knock-on effects on the ecology of rivers in the area. <p>Flood risk</p> <ul style="list-style-type: none"> • Draft Catchment Flood Management Plans have been produced for the rivers Lee and Ver – these should be used as baseline information. • There are opportunities to reduce flood risk along the river Colne at London Colney. <p>Source Protection Zones (SPZ)</p> <ul style="list-style-type: none"> • No high risk developments should be built in SPZ 1, therefore the use of SUDS should not be encouraged in these areas. • A Bromate plume is present in the area; however the source has been built upon, but you should be aware of its presence with regards to contaminated land, water quality and further developments in the area. 	Baseline amended.
<p>SA/SEA Objectives</p> <p>The Environment Agency recommends re-assessing the proposed assessment framework.</p>	The SA/SEA framework was revised as part of the SA/SEA scoping workshop, where the EA

<p>The Environment Agency recommends rewording the criteria regarding flood risk to reflect that developments should not take place in high risk areas.</p> <p>The Environment Agency recommends making reference to climate change adaptation in the water resources & flood objectives and criteria.</p>	<p>was present.</p> <p>Criteria for flood risk have been amended.</p> <p>Objectives/criteria for water resources/flood risk have been amended to highlight the need for climate change adaptation.</p>
<p>Consultation and next steps</p> <p>Stage B: Assessment of the effects of the LDF alternatives.</p> <p>With regards to point 8 'no net loss', it should be highlighted that the LDF should seek to enhance and improve biodiversity as stated in PPS 1 and PPS 9.</p>	<p>Noted.</p>
<p>Hertfordshire Gardens Trust</p>	
<p>The Trust is concerned by the absence of specific protection for historic designated landscapes in the St Albans District Local Plan and does not wish this omission to be replicated in the forthcoming development Plan Documents.</p> <p>The Trust would like to see the listing and protection of both registered and unregistered historic designed landscapes.</p>	<p>The SLP now includes policy text relating to the Historic Landscape Characterisation and Heritage Partnership Agreements.</p>
<p>Baseline</p> <p>The Trust is pleased to see that the historic environment is valued as an asset, but finds that the distinct contribution of historic designated landscapes appears not to be recognised and the Trust hopes that the report will demonstrate a clearer understanding.</p> <p>In particular the wording of the text concerning Cultural Heritage and Landscape is insufficient and requires further development.</p>	<p>The SA baseline includes information on the historic environment. Policy SLP26 in the SLP seeks to protect, manage and where appropriate enhance the district's landscapes.</p>
<p>Compatibility of objectives</p> <p>The Trust sees a potential conflict of interest between the desire to maximise the use of previously developed land and the protection and enhancement of historic heritage.</p> <p>Already much housing, leisure and infrastructural development is taking place within or very close to historic designed landscapes and as the pressure for development land grows, the historical integrity of individual sites could be lost forever.</p>	<p>This potential conflict has been taken into account during the assessment of SLP.</p>

2 Comments on Issues and Options SA Working Note (July 2007)

Summary of Comments	Reply to comments / how the comments have been taken on board
<p>Hertfordshire Constabulary (Letter dated 15th November 2007 following meeting with SADC on 13th November)</p>	
<p>Concerned that issues of crime and disorder, and community safety appeared not to have been robustly dealt with nor seen as integral to the sustainable communities' agenda. By way of example I referred to the Sustainability Appraisal and its approach to town centre issues, and the fact that when considering options for growth and their spatial distribution, the impact on policing appeared not to have been considered unlike education and health.</p> <p>There is a lot of information available on the spatial distribution of crime and anti-social behaviour in the District, including the draft Strategic Appraisal which is being carried out in relation to the new Community Safety Strategy which the Council's Community Safety</p>	<p>The issues raised in relation to crime have been considered as part of the assessment.</p>

<p>Officer is organising.</p> <p>The town centre is the crime hotspot for the District. It is important to note that through a number of measures, the number of incidents of violence in the town centre has dramatically reduced. However nevertheless town centre policies and the management of the town centre are vital to the target of reducing crime and disorder. This while supportive of proposals to regenerate and rejuvenate the town centre, consideration of policy options should take into account impacts they may have on crime and disorder.</p> <p>The distribution of housing growth could impact upon on the police as a key public service however the consultation paper appeared not to include this as a consideration. Response times are important. The Council's likely preferred option of concentrating development in and around St Albans, Harpenden and London Colney would not materially impact on policing. They would be well related to our existing facilities and would not require a redistribution of resources. The exception of this was the Smallford option which would require resources to be redistributed and would impact on response times. It is also considered that the option to spread housing around villages rather than towns would also impact on our distribution of resources and on our ability to meet responses time targets.</p>	
<p>The Community Safety Strategy has not been listed as a plan/strategy considered by the Sustainability Appraisal.</p>	<p>The most recent St Albans District Community Safety Partnership Strategy has been reviewed as part of the PPP.</p>

3 Comments on Emerging Core Strategy SA Working Note (June 2009)

Summary of Comments	Reply to comments / how the comments have been taken on board
Hertfordshire County Council Environment Department	
<p>It would be helpful if the technical appraisal of all areas of search considered and a clear picture of how decisions have been arrived to could be brought together as a single appraisal – perhaps formally within the sustainability appraisal/strategic environmental assessment process.</p>	<p>The SA Report provides details on the process of selecting preferred locations for development.</p>
Abbots Langley Parish Council	
<p>Concerned about the Building Research Establishment site being identified for 150 dwellings plus strategic employment site in the Green Belt. Consider such intensified use in the isolated location of the BRE site will be detrimental to the residential surroundings. Concerned about the impact of additional traffic that the proposal would generate in the parish, particularly along residential road of Bucknalls Lane. The accessibility/key services distance figures given in the Sustainability Appraisal for BRE are totally unrealistic in practice and do not contribute to fair evaluation of the sustainability of the site.</p>	<p>The approach was consistent with the evidence base provided in the Emerging Core Strategy Appendices.</p>
Welwyn Hatfield Borough Council	
<p>As St Albans City is identified as a Major Town Centre in the East of England Plan, the level of development proposed for the city is in line with the regional hierarchy and therefore acceptable. However, the Council is concerned about the out-of-town retail development at London Colney. Depending on scale, additional development at London Colney could have an impact on the vitality and viability of Welwyn Hatfield's town centres and could impact on proposals to regenerate Hatfield Town Centre. Locating retail development within St Albans District centres would be a far more sustainable approach. It is suggested that St Albans District Council strengthen the</p>	<p>This factor is reflected in the latest assessment.</p>

sustainability appraisal analysis as it does not even consider the impact of the development on the vitality of St Albans city centre.	
The Council has the same concerns with regard to access issues and the loss of green belt land as outlined in the response to Chapter 11. In addition, it is not clear why this option has not been assessed in the sustainability appraisal.	The sustainability appraisal provided an assessment of the proposed Employment Policies. This is documented in Appendix B of the SA Working Note.
Go East	
Assessment of options needs to be fully informed by the Sustainability Appraisal. The Sustainability Appraisal needs to assess all options, proposed and discounted.	Through the ongoing SA process all reasonable options have been assessed. The findings of these assessments are reported in the SA Report.
The Harpenden Green Belt Association and The Harpenden Society	
<p>Strong opposition of the identification of Area of Search No. 8 as a possible site for release from the Green Belt. Strongly disagree that the site is a sustainable location for housing and consider the initial SA of the site to be flawed in relation to its assessment of accessibility to key services.</p> <p>High out commuting will lead to traffic congestion. Almost all residents of north-west Harpenden drive into the town centre for shopping and leisure purposes. Walking 1km from the town centre would be strenuous due to the topography of the land.</p> <p>Development would lead to traffic, road congestion and parking issues. Should not be making decisions on sites without traffic modelling study.</p> <p>Schools including Roundwood Primary and Secondary Schools are over-subscribed.</p> <p>Development including possible growth to the south of Luton would also have an adverse effect on the open character of the countryside and would pose a threat to the important strategic gap which currently separates Harpenden and Luton.</p> <p>Impact on landscape, biodiversity and heritage noted.</p> <p>A flaw in the evidence base analysis is that the SA omits reference to the Chilterns Way running alongside Cooters End Lane in its discussion of adjacent rights of way.</p> <p>The council has provided no information to demonstrate that existing utilities (such as water and sewage) would have the capacity to cope with a further 300+ homes to the north of Harpenden. Drains from the Victorian era run beneath Luton Road.</p> <p>Deficiencies in local infrastructure – no real planning benefits to be gained from development.</p> <p>The Council has not sufficiently assessed the reasonable alternatives.</p>	Given that the area of search is located within walking distance of Harpenden town centre the SA found that this are of search was in a <u>relatively</u> sustainable location with good access to services and facilities.

4 Comments on Core Strategy: Consultation on the Strategy for Locating Future Development in the District SA Working Note (December 2010)

Summary of Comments	Reply to comments / how the comments have been taken on board
Tony Waite	
<p>Object to the sustainability appraisal of the Core Strategy. The strategy can only worsen the air quality in the Air Quality Management Area, as it exacerbates the need for cars as opposed to the other means of transport, and will not reduce, but rather increase greenhouse gas emissions.</p>	<p>The lower level of growth now being proposed in the SLP will result in fewer emissions than if the higher growth level options were taken forward.</p>
Entec on behalf of Crown Estates	
<p>Document states that the housing target has been reviewed and based on affordable housing delivery. There is no reference to any evidence to suggest how the housing target has been arrived at or what the review has involved.</p> <p>No explanation of how the target relates to population or household projections.</p> <p>Guidance PPS3 para 33 is applicable, it identifies evidence that LPAs should take into account when determining local housing provision, including:</p> <ul style="list-style-type: none"> • Evidence of the levels of demand for housing and affordability • Evidence of the availability of suitable land for housing using SHLAAs, National Land Use Database and the Register of Surplus Public Sector land • The Governments ambitions for affordability across the housing market; and • A sustainability appraisal of the environmental, social and economic implications of development including the most sustainable patter of housing. <p>Planning Officers' reports to PPAP in 2010 indicated that 500 units would be required per annum to meet the Governments population and household targets. New projections were published in November 2010 which indicates the number of households in St Albans will increase from 59,000 to 72,000, an increase of 22% or 650 households per annum for the next 20 years.</p> <p>St Albans housing target would be meeting less than half of this projected need for new households. This could lead to a reduction in the local employment workforce and an increase in the price of market housing, making housing less affordable for those on lower incomes. This will potentially increase pressure on affordable housing.</p> <p>Not meeting overall housing needs will have implications for surrounding authorities, putting additional pressure on their housing needs and on their services and infrastructure.</p> <p>Section 5 of the document sets out a range of factors which need to be considered in deciding the right amount of growth. It is not clear what the link is between these factors and the 250 housing target proposed.</p> <p>The Sustainability Appraisal Working Note considers and appraises three options (between 360 and 500), but not the 250. The consultation document does not consult on any other options therefore if the Inspector decides that this is not an appropriate level of growth, there will be no flexibility in the strategy and it will be found unsound. The SA gives more weight to environmental factors over</p>	<p>The Sustainability Appraisal produced to accompany the December 2010 consultation included an assessment of the 250 dpa – see Appendix A of the December 2010 SA Working Note.</p> <p>The SA provides an assessment against the 20 SA objectives that were developed at the Scoping Stage following wide consultation. The framework includes objectives that cover environmental, social and economic objectives. The same weight is provided to each objective.</p>

<p>social and economic factors. It makes assumptions that urban brownfield sites are always preferable for the environment rather than considering the most sustainable patterns of development.</p> <p>Consultation does not make reference to New Homes Bonus and the financial implications of different levels of housing growth including the potential financial benefits to the communities where development takes place.</p>	
<p>County Council Forward Planning Unit</p>	
<p>Housing growth levels – evidence base</p> <p>The proposed approach is not in conformity with the East of England Plan; however SADC quite rightly recognises Governments intention to abolish regional strategies and has taken a fresh approach within the spirit of Government’s localism agenda.</p> <p>PPS3 requires Local Development Documents to be informed by a robust, shared evidence base in particular of housing need and demand. The ongoing preparation of the core strategy process will therefore need to present as clear a view as possible about what can be considered to be reasonable assumptions about the likely level of future housing need and demand.</p> <p>One indication of potential future need is household projections, but the document does not present consultees with any intelligence about what there sources of readily available intelligence tell us. Though some information is contained in the SA it is lacking evidence relating to the latest set of national 2008 based household projections which were published after the SA working note was produced. A further existing source of evidence comes in the form of East of England Forecasting Model which generates an alternative view of potential future housing need however this is not referred to and does not appear in the evidence base.</p>	<p>The options assessments undertaken in September 2010 considered a high level of growth based on the 2008 housing projections. The assessment is presented in the September 2010 SA Working Note.</p>
<p>Housing growth levels – alternatives</p> <p>PPS12 is clear on the need for LPAs to demonstrate that the plan is the most appropriate when considered against reasonable alternatives and that the community is involved in considering the options for the strategy before the final document is produced.</p> <p>The SA considers three different growth levels. It is questionable whether the appraisal of options in the SA can genuinely be considered as satisfying the PPS12 requirements to consult on reasonable alternatives.</p> <p>The SA does not appear to assess the 250 dwellings per annum included in the consultation document. It also does not appear to assess an adequate range of reasonable alternatives, for example the growth matching the latest housing projections.</p>	
<p>Vincent Gorbing on behalf of Hertfordshire County Council: Hertfordshire Property</p>	
<p>The Consultation document does not set out the spatial strategy scenarios considered at a small limited number of community workshops in July 2010; and it fails to set out housing growth options which were considered by members of the PPAG Panel (September and October 2010).</p> <p>The views of the wider local community on the spatial strategy scenarios and the housing growth options are not being taken into account in the evidence base. The Core Strategy will not be justified on this account.</p> <p>The proposed new housing target of 250 dwellings per annum of which 100 dwellings will be affordable does not demonstrate effective links back to the evidence base in respect of demographic information (population growth and household formation) or affordable housing need (St Albans housing needs survey update 2006) and it does not demonstrate the extent to which the Council’s land supply will meet any shortfall on privately owned sites. The Plan fails to show how the choices reached are backed up by these facts and therefore it is not justified.</p> <p>The Consultation Document fails to identify sufficient land supply to meet the 250 dwellings per annum; fails to identify a clear strategy in the Consultation Document as to how the shortfall will be met; fails to indicate the extent of greenfield Green Belt sites; proposes</p>	<p>The SA Working Note was produced to report the assessment of the specific level of growth that had been included in the Consultation Document.</p> <p>Earlier sustainability appraisal in September 2010 had assessed other options for growth and the findings of these assessments were published on the SADC website.</p> <p>All the assessments have been incorporated into the SA Report to accompany the Pre-Submission Strategic Local Plan.</p>

<p>strategic housing sites (of which two may be undeliverable); fails to include sites that have been identified as suitable, available and deliverable (land to the north and south of Napsbury); and does not have a housing land trajectory to prove the deliverability of the housing target over the plan period. As such the plan is not deliverable, flexible and able to be monitored. It is therefore not effective.</p> <p>The Consultation Document has not presented all the alternatives and explained how the competing interests have been weighed; has not provided a robust audit trail of decision-making that explains the justification for the choice against the evidence base of the Core Strategy; and has not presented a direct comparative analysis of the options through Sustainability Appraisal.</p>	
<p>Countryside Properties</p>	
<p>No reasons have been given as to why these sites have been chosen ahead of others not identified in the document.</p> <p>There appears to be little transparency in the Council's decision making process. Sites have been chosen through Council meetings and committed to without properly engaging with the local community and consulting upon alternatives.</p> <p>There is a lack of sustainability appraisal of the alternative sites which is a key test of soundness. The SA does not compare sites chosen with alternative ones. The SA describes two sites chosen for the strategy as isolated and not in sustainable locations. All sites are remote with the exception of London Road/Alma Road. No reference linking growth to settlement hierarchy e.g. most development local within or on edge of main urban settlements in sequential manner. Therefore the SA is inadequate.</p>	<p>The SA Report produced to accompany the Pre-Submission SLP includes details on the assessment of options and the reasons for choosing broad locations ahead of others.</p>
<p>Hunston Properties Ltd</p>	
<p>Why, after the full extent of Area Search 7 was removed from the Emerging Core Strategy by the Cabinet in January 2010, does the Working Note include analysis of and comment upon the full extent of Area of Search 7? We believe that the negative comments relating to the larger Area of Search may, to the detriment of our proposal, be wrongly attributed to Sewell Park.</p>	<p>The SA Working Note provided assessments for three different levels of housing growth. In order to meet the highest level of growth there was an assumption that either 300 or 1,000 dwellings would need to be developed in Area of Search 7 whilst to meet the lower levels either 125 or 300 dwellings would be needed in this area.</p> <p>The assessment for the lower levels of growth was not based on a specific site within AoS7 (e.g. Sewell Park) but was based on a broad location.</p>
<p>The Sustainability Appraisal Working Note does not include a proper Landscape Assessment of the potential strategic housing locations. Has one been carried out on behalf of planning policy of the four sites currently before the PPAP? And if not, when will one be done? We enclose a draft copy of our Landscape Assessment for your files and would be interested to see how this compares with the other three potential strategic housing locations.</p>	<p>The sustainability appraisal uses the local authority's evidence base to inform the assessments. It is not the role of the sustainability appraisal itself to undertake detailed landscape assessments.</p>
<p>Sustainability</p> <p>Please explain the following conclusions relating to the four potential strategic housing locations:</p> <p>Nicholas Breakspear (distance from city centre = 3.5 km): "This is a relatively accessible and sustainable location for housing".</p> <p>Baumont (distance from city centre = 2.7 km): "This is an accessible, sustainable location for housing".</p>	<p>The three sites to the east of St Albans City centre are relatively close to a range of local services, such as the supermarket on Hatfield Road. Area of Search 7 does not have the same range of services close by.</p>

<p>Oaklands (distance from city centre = 2.6 km): “This is a relatively accessible, sustainable location for housing”.</p> <p>Sewell Park (distance from city centre = 2.2 km): “The area is not in a very sustainable location, being some distance from the city centre”.</p>	
<p>Minerals</p> <p>Please explain why the Working Note does not mention that Beaumont and Nicholas Breakspear, like Oaklands, are on the Sand and Gravel Belt.</p>	<p>Approximately half of the District is in the minerals belt, but mineral sterilization is only likely to be a significant issue if about 1 million tonnes or more of mineral reserves are likely to be sterilized. At the time when the assessments in question were undertaken, this was only likely to be the case for potential development at Oaklands (900 homes scale) to meet the option for the highest level of housing growth.</p>
<p>Watling Chase Community Forest</p> <p>Please explain why the Working Note does not mention that Beaumont, Nicholas Breakspear and Oaklands are with the Watling Chase Community Forest. (The Working Note does refer to the Community Forest in relation to the Harperbury Hospital site.)</p>	<p>The assessment for Oaklands identified opportunities for green infrastructure improvements but did not make specific reference to the area’s location in the Watling Chase Community Forest. The updated assessment for this site now reflects this.</p>
<p>Green Infrastructure</p> <p>Please explain how it is that Oaklands “has been identified as having a high potential for delivering significant green infrastructure improvements”. Which methodology was used to assess green infrastructure and when? Who carried it out? Were similar assessments made of the three other potential strategic housing sites? If so, what were the results? If not, why not?</p>	<p>When the assessment was undertaken there was specific detail relating to green infrastructure available for this site.</p>
<p>Hertfordshire County Council</p>	
<p>The Council’s Sustainability Appraisal consultant produced a Sustainability Working Note on the three housing growth options. This is considered in the PPAG Panel (16 September). The note concludes that:</p> <p><i>“All three options provide a balanced distribution of housing growth across the District appropriate to deliver the planned levels of growth associated with each option. As a result most of the effects identified across the options are similar in type, but differ in scale.</i></p> <p><i>Option 1 (9,720 dwellings 2001-2028): would require 2,800-3,000 new homes to be developed on Greenfield sites in the Greenbelt which could have adverse effects on local landscapes and could erode gaps between settlements in some locations; would provide 144 affordable dwellings per annum but this option falls short of meeting the overall housing needs of the District which could result in insufficient provision of certain types of homes and lead to some people moving to other areas to access appropriate housing which would not support the Core Strategy for promoting mixed and balanced communities.</i></p> <p><i>Option 2 (8,950 dwellings 2001-2028): would require 2,030-2,230 new homes to be developed on Greenbelt land, the lower levels of growth under this option will minimise adverse effects compared to the other options; smaller developments are unlikely to be able to deliver the same levels of Green Infrastructure gain as the larger developments which are included in options 1 and 3; would provide 144 affordable dwellings per annum from 2011-2021 and 100 per annum from 2021-2028, however it is uncertain as to whether this level is achievable for this option, given that some developments may not deliver the full 40%, if they are delivering other infrastructure or are</i></p>	<p>The assessment of the 250 dpa housing growth is detailed in Appendix A of the December 2010 SA Working Note.</p> <p>This does identify that there are effects associated with the lower level of housing growth being proposed. These are against the SA objectives for:</p> <ul style="list-style-type: none"> • ‘equality and social exclusion’ – relating to fewer opportunities for new community facilities; • ‘good quality housing’ – relating to the proposed housing level not meeting the housing need; and • ‘fairer access to services’ – relating to the

located on small sites.

Option 3 (12,100 dwellings 2001-2028): would require 5,180 to 5,380 new homes on Greenbelt land with associated adverse effects on landscapes and increased potential for eroding the gaps between settlements; would result in unsustainable pressure being placed on District infrastructure, but would deliver in excess of the 100 affordable dwellings per annum helping to promote balanced and mixed communities across the district.

Option three which would provide the highest levels of growth has been forecast to have significant adverse effects in relation to the landscape SA objective ... The high levels of growth would also result in unsustainable pressure being placed on the District's already stretched infrastructure".

A further Sustainability Appraisal Working Note was prepared in December 2010 and issued alongside the Consultation Document. Section 3.3 of the Working Note does identify

"that lower levels of growth will mean that there will be a larger shortfall in terms of meeting the identified overall housing needs of the district which will have societal implications and potential associated well being issues. There could be an out migration of local people from the district to any neighbouring areas which do have available housing".

Even the proposed level of housing (4,250 dwellings) is practically significantly lower than that previously discussed, the Sustainability Working Note (December 2010) does not explicitly say that the proposed level of affordable housing at 100 units per annum would fall short of meeting the needs of the district with option one (providing 8270 dwellings) or option two (providing 8950 dwellings), as was stated in the earlier Sustainability Appraisal Working Note. Neither does it recognise that some developments may not deliver the full 40% affordable housing quota if there are other infrastructure pressures or that the reduced affordable housing quota could result in outward migration that would not meet the Core Strategy objective of balanced and mixed communities.

The Sustainability Appraisal Working Note (December 2010) falls short by not providing a comparative evaluation of the proposed approach in the Consultation Document with the conclusions reached above on all three of the above housing growth options. It does not reiterate concerns in the earlier Sustainability Appraisal Working Note (September 2010) in respect of affordable housing delivery and the maintenance of balanced and mixed communities. It does not indicate that these adverse impacts would be exacerbated by the current approach.

It is considered that there should be a comparative evaluation of the proposed approach alongside all three housing growth options. Currently the Sustainability Working Note does not provide sufficient comparative analysis of the alternative options.

lower number of new dwellings limiting the opportunities for people to stay living in the area.

5 Comments from the Consultation on the Draft Strategic Local Plan (October 2014)

Summary of Comments	Reply to comments / how the comments have been taken on board
Environment Agency	
No comments received relating to the Sustainability Appraisal	N/A
English Heritage (now Historic England)	
No comments received relating to the Sustainability Appraisal	N/A
Natural England	
No comments received relating to the Sustainability Appraisal	N/A
Environment Department – Hertfordshire County Council	
No comments received relating to the Sustainability Appraisal	N/A
Hertfordshire Ecology	
No comments received relating to the Sustainability Appraisal	N/A
Legal and General Property	
<p>Whilst the broad conclusions of the Sustainability Appraisal are supported, i.e. that Green Belt release is required and the North West of Harpenden Broad Location should be allocated for predominately residential development, we object to the analysis and scoring of the North West of Harpenden site, and contend that the site should have scored even more highly in sustainability terms than is set out in the SA.</p> <p>Please refer to more detailed representations submitted pursuant to the Sustainability Appraisal at the end of this document and those submitted pursuant to policy SLP 13c (para 6.75 objection) and the submitted LGP North West Harpenden Vision Document, LGP Initial Sustainability Appraisal and LGP Preliminary Landscape and Visual appraisal which forms part of these representations.</p>	<p>The assessment for the North West of Harpenden Broad Location is largely consistent with previous assessments for this area and for other similar sized areas.</p>
<p>There are some elements of the scores set out in the relevant document Sustainability Appraisal (incorporating Strategic Environmental Assessment) Working Note Appendix B: Strategic Sub-Areas that we would object to. These are set out below and are supported by the Interim Sustainability Appraisal which forms part of these representations.</p> <p>For both greenhouse gas emission and air quality an amber score is provided for North West Harpenden site S5 -with the following explanation:</p> <p>‘The site is located approximately 1km from the town centre, which while being walkable is also likely to generate additional car trips, with associated greenhouse gas emissions. However the potential for public transport service improvement would help to mitigate.’</p> <p>Given that the site is the closest to the town centre from all the candidate sites and is on an existing main bus route we believe the site should have scored higher in respect of this criterion. More detail is provided in the Interim Sustainability Appraisal and Preliminary Landscape and Visual Appraisal submitted as part of these representations.</p>	<p>The Sustainability Appraisal provides a split-assessment for the ‘greenhouse gas emissions’ and ‘air quality’ objectives and in addition to the amber score provides a minor positive assessment to reflect the fact that the site is in a relatively sustainable location.</p>

<p>For resource efficiency for North West Harpenden an amber score is provided for site S5 with the following explanation: ‘The site is not located in a District Heating Opportunity Area and its scale would not be sufficient to support district heating.’ Figure 15. of the Draft SLP (September 2014 Consultation Draft) confirms a St Albans Energy Opportunities Plan and identifies a ‘heat demand for district heating potential’ within the existing built area of Harpenden a short distance to the south and east of the site. In addition the wider North West Harpenden broad location is proposed to accommodate 500 houses plus potentially a primary school and community facility. Given these facts we do not agree that the site is too small to support district heating or that the opportunity for district heating combined with the wider area does not exist. In addition the Interim Sustainability Appraisal submitted as part of these representations which includes the following statements:</p> <ul style="list-style-type: none"> • The site has potential for other sustainable energy production opportunities – it benefits from a south-westerly orientation, with the topography providing a good opportunity for energy efficient design using both passive solar and - potentially - building integrated solar PV and solar thermal systems. <p>We therefore believe the site should have scored more highly in relation to this criterion.</p>	<p>The assessment remains unchanged in relation to this objective. The neutral score against this objective is consistent with previous assessments and the assessments for other similar sites.</p>
<p>For landscape and townscape an amber score is provided for North West Harpenden site S5 with the following explanation: The site is in an area designated as a Landscape Conservation Area within the SADC Local Plan Review 1994. Development may have some impact on the setting of Harpenden when approached from the north. Development of the part of the site to the north of Cooters End Lane would be more intrusive into countryside than that to the south. Development would have local visual impacts. Notable effects would be in relation to residents within the sub-area (e.g. Cooters End Farm, residents of properties on the opposite side of the valley and people travelling along the local road network) (SKM, 2014). Development would impact on views from rights of way, including the long-distance Chiltern Way which runs along the Luton Road to the south-west of the site and Cooters Lane to the north-west of the site. We strongly disagree with these statements. The draft SLP states at paragraph 10.5 that SADC intends to review the boundaries of the Landscape Conservation Area and the previous policy from 1994 is now significantly out of date. The above statements in the SA regarding land north of Cooters End Lane are simply incorrect. These representations include a Preliminary Landscape and Visual Appraisal which includes the following conclusions:</p> <ul style="list-style-type: none"> • Existing mature vegetation along the northern edge of the site and along and to the north of Ambrose Lane, together create a robust visual screen which prevents views of both the L&G site and the CEG land parcel (the two sub-components of the North West Harpenden Broad Location), from the plateau and wider landscapes located to the north While the site is currently partially open at its western side allowing views into it from Thrales End Lane, it otherwise has very little physical or visual connection to the wider area of land falling within the Central Bedfordshire Area of Great Landscape Value designation. • There are partial views into the LGP site and CEG land parcel from the A1081 Luton Road, through occasional gaps in the trees and shrubs alongside the road. However, land north/west of the lane benefits from a more robust belt of trees and shrubs along the south-western boundary on the approach to the Thrales End Road junction. • The dwelling at Cooters End Farm is generally well screened from the L&G site by vegetation surrounding the property. The principle elevation faces the CEG land. • The Chiltern Way National Trail follows Cooters End Lane into the countryside north of the site. While narrow in width, it is open on both sides at the southern end near the junction with Luton Road, allowing views across land to both sides. The lane is likely to require some modification at this southern end to enable access into the site. However, the overall integrity of the lane, and route of the public footpath could be maintained. 	<p>The assessment is consistent with the approach taken in all previous stages of the sustainability appraisal, where any new development on a greenfield site is scored with an adverse effect, as is the case for the biodiversity and soils objectives.</p> <p>To recognise that there are potential positive effects against this objective from the delivery of recreation space and public open space and the retention of existing landscape features a split assessment is now provided for this broad location, to now include positive effects alongside the adverse effect.</p>

<p>The Independent SKM Green Belt Sites and Boundaries Study Report, instructed by St Albans City and District Council and published in February 2014 also considers such matters. Para 7.6.5 confirms:</p> <ul style="list-style-type: none"> The location of the site avoids identified constraints and is well integrated with the urban area which adjoins the site on two edges. It is located within the area of lower landscape sensitivity within the sub-area however the potential visual connection with the wider landscape especially from elevated sections of the site is noted and is considered by the indicative layout. The site is therefore recommended suitable for residential-led development. <p>We therefore believe the site should have scored more highly in relation to this criterion.</p>	
<p>For sustainable locations a single tick is provided for North West Harpenden site S5 with the following explanation:</p> <p>The site is in a relatively sustainable location with good access to services and facilities and close to bus routes.</p> <p>Other sites have received two ticks, indicating a more sustainable location on the basis that they are close to employment and areas that are a focus for future growth and regeneration and could deliver community facilities. We consider that a fundamental criteria for a sustainable location is proximity to a town centre with a wide range of services and employment opportunities. As demonstrated by the Initial Sustainability Appraisal submitted with these representations the site is in a highly sustainable location with excellent access to services and facilities and adjacent to an existing bus route.</p> <p>We therefore believe the site should have scored more highly in relation to this criterion.</p>	<p>The assessment provided for this broad location is consistent with previous assessments for this area and with other similar areas. It remains unchanged.</p>
<p>For revitalising town centres a single tick is provided for North West Harpenden site S5 with the following explanation:</p> <p>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.</p> <p>As the only site within 1.5 km of a town centre we believe the site should have scored more highly in relation to this criterion.</p>	<p>The assessment provided for this broad location is consistent with previous assessments for this area and with other similar areas. It remains unchanged.</p>
<p>Overall, when the representations are taken into account, we believe that both table 4: Results of Sub Area Assessment using the SADC Evaluation Framework and table 7: Summary of assessments of sub-area options as set out in the St Albans Strategic Local Plan: Strategic Local Plan Options Sustainability Appraisal (incorporating Strategic Environmental Assessment) Working Note June 2014 would conclude that the North West Harpenden Site S5 would score and rank much more highly.</p>	<p>See comments above</p>
<p>Harpenden Green Belt Association and private individuals' responses relating to SA5 NW Harpenden</p>	
<p>New Sustainability Appraisal Working Note: The new Sustainability Appraisal Working Note Appendix B is inaccurate in several respects.</p> <p>-In assessing against the SA objectives "greenhouse gas emissions", "air quality", it uses the erroneous "as the crow flies" measurements of distance given by officers to justify its conclusions about NW Harpenden and NE Harpenden: the true walking distances are significantly longer.</p> <p>- In addition, in relation to NW Harpenden the Working Note is inconsistent with the 2012 statutory Sustainability Appraisal for Area of Search 8 as regards the SA objectives "historic and cultural assets", "health" and "equality and social exclusion", without good reason.</p> <p>The 2012 statutory Sustainability Appraisal for Area of Search 8 (SE part) – i.e. the southern part of the NW Harpenden site – graded the site as "unsustainable" for "historic and cultural assets" given the proximity of Cooters End Farm, a listed building. The NW Harpenden site now is not merely next to, but includes the site of, the listed building: the impact on this heritage asset is worse, not better. Despite that, the scoring in the Working Note against this SA objective is merely "uncertain".</p> <p>The 2012 Sustainability Appraisal graded Area of Search 8 (SE part) as "unsustainable" on health grounds because the topography could discourage walking and cycling. The topography of the land has not changed. Despite that, the Working Note grades NW Harpenden as</p>	<p>With regard to the distances that have been queried these have now been updated to the distances in the SLP Technical Report (October 2014)</p> <p>The differences between the 2012 and 2014 assessments are for the following reasons:</p> <ul style="list-style-type: none"> "historic and cultural assets": the change from a minor negative to an uncertain assessment reflected the fact that the incorporation of mitigation was considered in the 2014 version of the SLP and the assessment was updated accordingly.

<p>“sustainable” on health grounds.</p> <p>The 2012 Sustainability Appraisal graded Area of Search 8 (SE part) as “unsustainable” against “equality and social exclusion” because of the lack of places in local schools. The position has got worse since 2012, not better. Despite that, the Working Note grades the NW Harpenden site as “sustainable” against this objective on the grounds that “there may be some potential to create new small scale local community facilities and improved open space”. This is inconsistent with the scoring of 0 for strategic infrastructure in the evaluation.</p>	<ul style="list-style-type: none"> • “health”: the change from a minor negative to a positive assessment resulted from an approach that sought consistency of assessment between the eight sub-areas by considering the topography between the site and the town/local centre and not so much the ‘within-site’ gradients – which had been the cause of the adverse score for AoS8. • “equality and social exclusion”: the change from a negative to a positive assessment resulted from a change in context between 2012 and 2014 in terms of future school place provision, along with recognition in the SA of the potential benefits of new development – to be consistent with the assessments of the other sub-areas.
<p>The Sustainability Report 2014 says development in North Harpenden would ‘revitalise the town centre’, and in the Sustainability Report on sub areas it says ‘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’. This section of the sustainability report seems to be only ever taken as a positive or a ‘need’, but there is no need to ‘revitalise’ Harpenden, which is already a vibrant, busy, prosperous town. To have potentially 1000+ more homes would significantly worsen the quality of life and the character of Harpenden. Additional housing would lead to even more traffic in and out of the town centre, in which there is already inadequate parking, and would put even more pressure on the schools. School capacity is already a big issue in the area.</p>	<p>The assessment does not infer that Harpenden needs to be revitalised, but, as for the other sub-areas, provides the view that new development will help to support local businesses and services.</p>
<p>In the Sustainability Report – sub areas – in relation to the ‘sustainable locations’ objective, it says that the development site in North Harpenden ‘is in a sustainable location with good access to services and facilities and close to bus routes’. This is not true – if more housing was built in North Harpenden existing services, facilities and overall infrastructure would be overloaded and totally inadequate (it is already straining at rush hour and school drop off/pick up times).</p>	<p>Under this objective the assessment chiefly considers how close, and/or accessible by public transport, the sub-area is to services and facilities.</p> <p>The SLP Infrastructure Delivery Schedule considers the infrastructure required to support new development.</p>
<p>The Sustainability Appraisal Working Note Appendix B is inaccurate in several respects:</p> <p>In assessing against the SA objectives “greenhouse gas emissions”, “air quality”, it uses erroneous “as the crow flies” measurements of distance to justify its conclusions about NW Harpenden and NE Harpenden: the true walking distances are significantly longer.</p>	<p>The assessment has been updated to reflect the revised distances in the Strategic Local Plan Technical Report (October 2014). The updates do not however alter the findings of the 2014 SA working note.</p>
<p>The Council has not considered all reasonable alternatives</p>	<p>In developing the SLP the Council has considered a wide range of alternatives and</p>

	<p>these have been subject to Sustainability Appraisal. Details of the previous appraisals are provided in Section 4 of the SA Report and also in Appendix E of this report.</p> <p>Reasonable alternatives evaluated in further detail are those that can meet the objectives of the Plan, which in the case of the strategic locations for development that are to be included in the SLP are the broad areas that are related to the main settlements (as identified in Policy SLP1).</p> <p>Smaller scale greenfield Green Belt sites that are supported by communities will be considered through DLP or neighbourhood plan process. These are not reasonable alternatives in terms of the identification of strategic locations in the context of the SLP.</p>
<p>Oaklands College (VRG Planning Ltd)</p>	
<p>... we note that the 'Sustainability Appraisal' for the SLP refers to the benefits of allocating Site S3 under criteria 'Equality & social exclusion', 'Community identity & participation', 'Sustainable prosperity and growth' and 'Fairer access to services'. In each case, it awards a 'sustainable' rating, but not the superior 'very sustainable' rating. Given the substantial education / community benefits of the S3 allocation, a very sustainable rating would be more appropriate.</p> <p>... considers that the infrastructure implications for further and vocational education should be more explicitly taken into consideration in assessing the alternative site options.</p>	<p>The assessment of the broad location in June 2014 identified that new development at Site S3 – Sandpit Lane, St Albans [Broad Location East St Albans (Oaklands)] would enable significant improvements to Oaklands Further Education college. The assessment has been updated to reflect this and now identifies a significant positive effect for the 'equality & social exclusion objective'. The value of a better educated population towards supporting the local economy has also been recognised in the assessment against the 'sustainable prosperity and growth' objective.</p>
<p>Private individual's response relating to East St Albans (Oaklands) Broad Location</p>	
<p>I disagree with some C4S sustainability findings which show a lack of understanding of the local area as it operates now. For example, it indicates that supermarkets are within walking distance. Virtually no one in this area walks anywhere – everyone uses their cars because of lamentable public transport and time constraints. Residents from any new development in East St Albans would undoubtedly use their cars to get to a supermarket as they are not nearby – the 1 kilometre cited, if correct, is from the nearest possible corner of a very large site. C4S, whilst acknowledging the increase in traffic there could be, grossly underestimate the current detrimental effects of the weight of traffic flowing east/west on local people's social wellbeing, health and quality of life</p>	<p>The assessments for the 'greenhouse gas emissions' and 'air quality' recognise that there are potential issues relating to increased levels of traffic from a new development. There is however a requirement for the development to deliver transport network and public</p>

	transport services upgrades/improvements which will help to mitigate these issues.
Hunston Properties Limited	
We note the very many complaints that have been levelled against the inaccuracy, inconsistency and incompleteness of the evidence within the Sustainability Appraisal (“SA”). However, for the purpose of this consultation, we address the key issues that undermine the credibility of the Council’s SA exercise, and trust the factual evidence can be corrected when the SA is redone properly.	See responses to the specific SA comments below. Other points (Issues One, Four, Six and Seven) are made in the response, but they relate to the detailed site evaluations in the Plan rather than the SA.
<p>Issue Two – failure to assess “reasonable alternatives”: Contrary to the claims in section 1.6 of the Technical Report, the Council has not assessed all the “reasonable alternatives”, far from it. Paragraph 1.6. states:</p> <p>“The reasonable alternative sites are generated using the Green Belt Review.”</p> <p>However the Green Belt Review generated 16 sites that contributed least to the Green Belt, and the Council has chosen to consider only 8 of them. Furthermore, the Council failed to consider distinct “parts” of 7 of the 8 larger areas. To carry out an SA on just eight sites as the basis for a 20-year Local Plan appears insufficient. We submit that a further Sustainability Appraisal exercise is required to consider, as a minimum, the 8 Small Scale Sub Areas and “parts” of ALL of the larger sites.</p>	<p>During the development of the SLP a wide range of alternative locations for new development have been considered and subject to Sustainability Appraisal. Details of the previous appraisals are provided in Section 4 of the SA Report and also in Appendix E of this report.</p> <p>The eight sites taken forward from the Green Belt Review are the strategic locations that were considered as reasonable alternatives to deliver the objectives of the SLP.</p> <p>Smaller scale greenfield Green Belt sites that are supported by communities will be considered through DLP or neighbourhood plan process. These are not reasonable alternatives in terms of the identification of strategic locations in the context of the SLP.</p>
<p>Issue Three – the treatment of S5: Strategic Sub Area “S5 North West Harpenden” appears to have been treated entirely differently to other sites. Concerns include:</p> <p>Consideration of “part” of the site. Whilst the Council should have been prepared to consider “parts” of all 8 Strategic Sites, it did so in respect of S5 alone.</p> <p>Non-Strategic. The reduction of S5 to just c.12 hectares made it smaller than two of the 8 Small Scale Sub Areas that the Council simply refused to consider for the SLP because of size.</p> <p>Density. The draft SLP assumes a net density of 40 dwellings per hectare. At the reduced scale of c.12 hectares that equates to just 288 new homes. However, the Council continues to expect S5 to deliver 500 homes, equivalent to 70 dwellings per hectare: 40% higher density than any other site.</p> <p>Vehicular access and traffic impact. The Council awarded 9 out of 10 to S5 for access and traffic, the highest score for all 8 sites it looked at. In doing so, the Council omitted vital evidence including the fact that Herts County Council has identified this stretch of the A1081 as a “congestion hotspot”. In addition, there is no evidence to suggest that Herts Highways will conclude that “special circumstances” apply to</p>	<p>The assessment of S5 North West Harpenden that was included in the 2014 SA Working Note was based on the whole area shown in yellow in the Green Belt Review Stage 2. It was not based on a ‘part’ of that area.</p> <p>In relation to the relationship of the broad locations to the “M1/M25 Growth Area” of Hertfordshire LEP’s Strategic Economic Plan, the SA considered the economic implications of new housing development on the local area. This has no relationship to whether or not a broad location lies within the “M1/M25 Growth Area”.</p>

<p>exempt S5 from its normal policy of prohibiting new accesses onto main roads.</p> <p>Outside SEP 'Growth Area'. Whilst the sites at Hemel, St Albans, Chiswell Green and London Colney are all within the "M1/M25 Growth Area" of Hertfordshire LEP's Strategic Economic Plan, S5 (and S6, NE of Harpenden), sit outside of it. There is no recognition of this in the SA.</p>	
<p>Issue Five – lack of expert consultation. The scores awarded to sites for various issues have been arrived at without sufficient consultation with independent experts. For instance, we are unaware of any input from Herts Highways on the "vehicular access and traffic impact" element of the 2014 SA. As a result, we believe it is likely that un-trained Officers scoring this issue have missed potential opportunities and problems at each of the sites. We look forward to the Council engaging fully with Herts Highways, and others, when the SLP is revised.</p>	<p>This comment relates to the Strategic Local Plan Technical Report (October 2014) and not to the Sustainability Appraisal.</p> <p>The "vehicular access and traffic impact" criterion is part of the SLP Technical Report and is not a sustainability appraisal criterion.</p>
<p>Mr Brian Parker</p>	
<p>The Council only reviewed the sustainability credentials of 8 Strategic Sub Areas identified by SKM in the Green Belt Review. Despite being required by law to consider all reasonable alternatives, the Council failed to look at either the 8 Small Scale Sub Areas or distinct "parts" of the 8 larger areas. [In July 2014, Officers did consider the development of "part" of North West of Harpenden, limited to Cooters End Lane, but have subsequently denied doing this and have refused to consider "parts" of other sites.]</p> <p>A further Sustainability Appraisal exercise to consider the 8 Small Scale Sub Areas and "part" sites of the larger sites, is required to better inform a revised SLP.</p>	<p>See response above for the equivalent comment in Issue Two raised by Hunston Properties Limited.</p>
<p>St Albans and District Friends of the Earth</p>	
<p>Whilst the Sustainability Appraisal mentions the desirability of saving the best agricultural land, we do not feel that enough weight was given to this factor. Transport links can be created, local services can be provided and workspaces can be built, but new land for growing the food we depend on cannot be created once it has been destroyed.</p>	<p>The Sustainability Appraisal has identified significant adverse effects where development at broad locations would result in the loss of best and most versatile agricultural land.</p>

6 Comments from the Consultation on the Publication Strategic Local Plan SA Report (November 2015)

The table below provides details of the representations received during the Regulation 19 consultation on the Publication Strategic Local Plan, along with replies to the representations and details of how they were taken into account in the SA/SEA process. This repeats the information provided in Appendix A of the SA Report Addendum (July 2016) which was prepared to report on the sustainability appraisal activities that had been undertaken from the representation on the Publication Strategic Local Plan (SLP) in January 2016, up to the Submission of the SLP and associated documents to the Secretary of State.

Summary of Comments	Reply to comments / how the comments have been taken on board
<p>Historic England</p>	
<p>Historic England notes the point made at page 16, paragraph 6 (b) of the Sustainability Appraisal Report non-technical summary (identification of other effects), that 'For the 'development controlling' policies (such as SLP3-Historic Environment and Townscape</p>	<p>This representation is related more to the</p>

<p>Character, SLP4-Urban Design, and SLP26-Natural Environment etc.) the assessments are generally positive against the SA objectives related to that policy, with there being no predicted effects against the non-related objectives'. The sustainability appraisal (SA) continues that, where there is uncertainty as to how some SA objectives would be influenced by the SLP policies, there is some difficulty in identifying effects. This is because the individual characteristics of the area remain uncertain at this stage in the plan-making process, as exact site locations remain to be determined. When considering the Sustainability Appraisal Report's assessment of individual policies, Policy SL3 is assessed as very sustainable in the delivery of historic and cultural asset objectives. This level of assurance cannot be guaranteed for SLP 13 (a) (b) (c) and (d) and an uncertain outcome for SEA/SA purposes is recorded (at the SA assessment at its paragraph 5.2.3 and page 62). Historic England would recommend that such uncertainty points towards the need for necessary policy assurances in SLP (a) (b) (c) and (d), in addition to SLP 3, as we have identified in our submissions. In conclusion, this means that SEA/SA criterion requires additional policy text to support the inclusion of 'historic environment', as advocated against SLP (a) and (b) in particular. The sustainability appraisal report concludes (at its paragraph 5.3.7 on page 62, when assessing SA objectives 10 and 11) that: 'There is uncertainty over the effects of the development at the Broad Locations on the 'historic & cultural assets' objective. 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 master-planning process.' Again Historic England would conclude that additional policy wording is required to avoid uncertainty and to reinforce the assessment of impacts upon the historic environment when producing effective master-planning and area action plans.</p>	<p>content of the Local Plan than the SA. The strategic approach to heritage assets is set out at policy SLP3.</p>
<p>Natural England</p>	
<p>Natural England does not wish to make any specific comments in relation to the Sustainability Appraisal.</p>	<p>Noted</p>
<p>Savills on behalf of Legal and General Property</p>	
<p>Savills provided a representation to Section 4 of the SA Report which reiterated their concerns provided in their consultation response to the Draft SLP (November 2014). It has therefore not been repeated here.</p>	<p>Section 5 of Appendix D to the SA Report (December 2015) provides a response to the 2014 representation.</p>
<p><u>Savills Response to Section 5 of the SA Report (December 2015)</u></p> <p>Given that there is an increasingly serious housing shortfall and housing accessibility problem emerging across the district and the wider south east, it is critical for future generations that the Council takes a proactive, enabling approach to delivering sufficient land for housing to meet local community and economic needs. Overall, we support SACDC's Strategic Local Plan and associated Sustainability Appraisal Report, particularly the identification of Broad Locations for growth for residential development, which will help address those challenges. Section 4: Development of the Strategic Local Plan provides a summary of the assessment of options undertaken during the various stages of the development of the SLP and where appropriate provides the reasons for selecting the options taken forward to the next stage of the planning process. In this regard the objections we previously submitted on behalf of LGP at the previous stages of the SLP remain valid as follows.</p> <p>Assessment of Strategic Local Plan Options- June 2014 We previously made representations in November 2014 to the Sustainability Appraisal published at the Regulation 18 consultation stage of the SLP. Those objections focussed on the housing requirement/target; the strategic sub-areas and the development strategy options undertaken in June 2014 and reported in the Sustainability Appraisal published for consultation in November 2014. Those stages are now reported in pages 46-55 of the latest SA Report. Our historic position was that the broad conclusions of the Sustainability Appraisal and SACDC officer assessments, i.e. that Green Belt release is required and the North West of Harpenden Broad Location should be allocated for predominately residential development is supported. However, we did have the following concerns on some of the detailed matters set out in these documents: - Housing requirement/target - there was a risk that</p>	<p>Broadly, the representation relates to what is considered by the respondent to be 'overly negative' assessments for some of the environmental objectives and 'not positive enough' assessments for some of the social and economic objectives.</p> <p>The respondent has challenged the assessments for SLP13c against several SA objectives. Reasons behind the assessment 'scores' attributed are provided below:</p> <ul style="list-style-type: none"> • Resource efficiency (SA9): the reasons for the finding of 'no predicted effects' were provided in Appendix F of the SA Report (page F50). The site was considered to not be of a size that could support district heating. The orientation of the site was

the housing requirement target had been set too low - Development strategy options – as a demonstrably highly sustainable site, the LGP site within the full extent of the North West Harpenden Broad Location should have been considered as an essential component to each of the development strategy options under consideration. - Strategic sub-areas - whilst the conclusions of the SACDC officer assessment (SLP Technical Report – Development Sites and Strategy Options Evaluation October 2014) of Site SA-S5 were supported, i.e. that the site is highly sustainable and should be allocated, there were some elements of the scores set out in the relevant document Sustainability Appraisal (incorporating Strategic Environmental Assessment) Working Note Appendix B: Strategic Sub-Areas that we objected to, with those objections supported by the submitted Savills/LGP Interim Sustainability Appraisal (which also forms part of these representations). Overall, once the revised scoring set out in our previous representations are taken into account, we contended that both table 4: Results of Sub Area Assessment using the SADC Evaluation Framework and table 7: Summary of assessments of sub-area options as set out in the St Albans Strategic Local Plan: Strategic Local Plan Options Sustainability Appraisal (incorporating Strategic Environmental Assessment) Working Note June 2014 and other related reports and assessments would conclude that the North West Harpenden Site S5 would score and rank much more highly. The detailed representations made in November 2014 to the SA appraisal matrix objective scoring are not repeated again here as the comments now made above in response to Section 5 of the SA (which provides an appraisal of the most recent publication draft SLP (December 2015)) represent the most recent position. Please refer to these. Nevertheless, our historic position on this early stage of the development SLP should be noted.

Whilst the broad and detailed conclusions of the sustainability appraisal and officer assessment are supported, we have some minor concerns regarding the application of the sustainability appraisal scoring matrices. We contend that the NW Harpenden site should have scored even more highly in sustainability terms than is set out in the SA. However we agree with the overall conclusions reached in the SA.

Given that there is an increasingly serious housing shortfall and housing accessibility problem emerging across the district and the wider south east, it is critical for future generations that the Council takes a proactive, enabling approach to delivering sufficient land for housing to meet local community and economic needs. Overall, we support SACDC's Strategic Local Plan and Sustainability Assessment, particularly the identification of Broad Locations for growth for residential development, which will help address those challenges. Whilst the broad conclusions of the Sustainability Appraisal are supported, i.e. that Green Belt release is required and the North West of Harpenden Broad Location should be allocated for predominately residential development we do object to some elements of the analysis and scoring of the North West of Harpenden site, and contend that the site should have scored even more highly in sustainability terms than is set out in the SA. We support the conclusion that no significant adverse effects arise in connection with policy SLP13c North West Harpenden, and that no further mitigation is required. Our concerns relate to the detailed matters set out in the sustainability appraisal scoring matrices for NW Harpenden (Policy SLP 13c) both in terms of page F49-F50 of appendix F: Policy Assessment and the related summary which appears at page 69 (para 5.2.3.11) of the SA. These objections are as follows:

1. No score for resource efficiency (objective 9) We object to the absence of a score for this criterion. The site has potential for sustainable energy production opportunities – it benefits from a south-westerly orientation, with the topography providing a good opportunity for energy efficient design using both passive solar and - potentially - building integrated solar PV and solar thermal systems.
2. Uncertainty for impact on historic and cultural assets (objective 10) and Negative score for landscape and townscape (objective 11) We object to the scoring against these criteria. The SLP states at paragraph 10.5 that SACDC intends to review the boundaries of the Landscape Conservation Area and the previous policy from 1994 is now significantly out of date. The statements in the SA regarding land north of Cooters End Lane being more intrusive into countryside than that to the south are simply incorrect. These representations include a previously submitted Preliminary Landscape and Visual Appraisal which includes the following conclusions: Existing mature vegetation along the northern edge of the site and along and to the north of Ambrose Lane, together create a robust visual screen which

not one of the criteria considered when undertaking the assessment.

- Historic and cultural assets (SA10): an uncertain score was provided due to the listed buildings within/adjacent to the Broad Location. It is uncertain as to whether these would be affected by any new development – this being dependent on mitigation.
- Landscape and townscape (SA11): the solely negative assessment that was provided in the September 2014 SA Working Note was updated in the 2015 assessment to also include a positive element to reflect the delivery of recreation space and public open space that would be required. Nevertheless the negative element of the assessment remained. This reflects the fact that development of approximately 500 houses within a high quality landscape will have inevitable adverse effects.
- Community identity and participation (SA16): this Broad Location has consistently been assessed as having 'no predicted effects' against this SA objective. Compared to larger Broad locations it is not of a scale that would provide new facilities that would serve the needs of the wider population.
- Sustainable location (SA13): this Broad Location has consistently been assessed as having 'minor positive' effects against this SA objective to reflect the location of the site.
- Equity and social exclusion (SA14): the 'minor positive' score reflects the relatively limited potential for the development to provide new facilities and open space.

<p>prevents views of both the L&G site and the CEG land parcel (the two sub-components of the North West Harpenden Broad Location), from the plateau and wider landscapes located to the north. While the site is currently partially open at its western side allowing views into it from Thrales End Lane, it otherwise has very little physical or visual connection to the wider area of land falling within the Central Bedfordshire Area of Great Landscape Value designation. There are partial views into the L&G site and CEG land parcel from the A1081 Luton Road, through occasional gaps in the trees and shrubs alongside the road. However, land north/west of the lane benefits from a more robust belt of trees and shrubs along the southwestern boundary on the approach to the Thrales End Road junction. The dwelling and listed building at Cooters End Farm is generally well screened from the L&G site by vegetation surrounding the property. The principle elevation faces Cooters End Lane. The Chiltern Way National Trail follows Cooters End Lane into the countryside north of the site. While narrow in width, it is open on both sides at the southern end near the junction with Luton Road, allowing views across land to both sides. The lane is likely to require some modification at this southern end to enable access into the site. However, the overall integrity of the lane, and route of the public footpath could be maintained. The Independent SKM Green Belt Sites and Boundaries Study Report, instructed by St Albans City and District Council and published in February 2014 also considers such matters. Para 7.6.5 confirms: The location of the site avoids identified constraints and is well integrated with the urban area which adjoins the site on two edges. It is located within the area of lower landscape sensitivity within the sub-area however the potential visual connection with the wider landscape especially from elevated sections of the site is noted and is considered by the indicative layout. The site is therefore recommended suitable for residential-led development. We therefore believe the site should have achieved a higher positive score in respect of these criteria.</p> <p>3. No score against the Community identity and participation (objective 16) There is no score entered for NW Harpenden in the 'community identity and participation objective', yet other broad locations have received positive scores on the basis of the 'potential to develop new facilities (education, health, community etc) that would be accessible to the new and nearby existing population'. It is considered that the NW Harpenden site should have a positive score against this criterion particularly as the SA matrix already identifies 'some potential to create new small scale local community facilities and improved open space' and the policy now also includes a requirement for primary school provision.</p> <p>4. Low positive scores against a number of objectives: It is noted that whilst some of the other broad locations have received 'double ticks' against certain criteria, NW Harpenden only receives a 'single tick', notably for the criteria of: sustainable location (objective 13); equity and social exclusion (objective 14); good quality housing (objective 15); sustainable prosperity and growth (objective 18); and, fairer access to jobs and services (objective 19). Given that the site is one of the closest broad locations to the town centre of one of the largest settlements in the District, and is on an existing main bus route, we believe the site should have scored higher in respect of the sustainable location criterion. In terms of the other criterion, the site seems to have been penalised for being of a smaller scale than the other broad locations. Whilst this can be a relevant factor, the site can still make a significant contribution and therefore potentially score more highly.</p> <p>Whilst the broad and detailed conclusions of the sustainability appraisal are supported, we have some minor concerns regarding the application of the sustainability appraisal scoring matrices. We contend that the North West Harpenden site should have scored even more highly in sustainability terms than is set out in the SA. However we agree with the overall conclusions reached in the SA.</p>	<ul style="list-style-type: none"> • Good quality housing (SA15): this Broad Location has consistently been assessed as having 'minor positive' effects against this SA objective. This 'score' reflects the level of housing that the site could deliver, when considered at the strategic level of the SLP. • Sustainable prosperity and growth (SA18): the findings of 'no predicted effects' against this objective in the 2014 assessment was amended to a minor positive score in 2015. This reflected the fact that the development could help the local economy and support local services. • Fairer access to jobs and services (SA19): the assessment of 'no predicted effects' against this objective is based on the development not providing new employment opportunities – beyond the construction phase. <p>Based on the explanations provided above the findings of the SA Report (December 2015) remain unchanged.</p>
Strutt & Parker LLP on behalf of Taylor Wimpey Strategic Land South East	
<p>Consideration of alternatives</p> <p>4.1. We have reviewed the St Albans Strategic Local Plan: Strategic Local Plan Options Sustainability Appraisal (incorporating Strategic Environmental Assessment) Working Note Appendix A: Housing Requirement / Target (June 2014). This and other working notes are cited</p>	<p>It is acknowledged that new development can bring with it some environmental benefits, such as biodiversity enhancements, and this has been</p>

<p>within the SEA/SA published alongside the Strategic Local Plan 2016, including in relation to the consideration of alternative housing figures and how the housing figure proposed in the Strategic Local Plan has been derived at.</p> <p>4.2. In respect of the SA Objective in relation to Biodiversity, the Working Note Appendix A assessment states that the larger the housing requirement the greater the need will be to develop on greenfield sites, which have an inherent value for biodiversity and will inevitably lead to some adverse effects on habitats and species. We question the validity of this assertion. It is not the case that greenfield sites are intrinsically biodiverse. Agricultural land, particularly that in use for monoculture, is often of limited ecological value, and its development can often afford opportunities for ecological enhancement. There is no evidence that the development of additional housing to that proposed will have an adverse impact on biodiversity that cannot be mitigated. Further, it should be noted that Land at Hill Dyke Road, Wheathampstead represents an example of a site whose development is not supported by the SLP, but which is of low ecological value and can be delivered for housing without undue ecological impact.</p> <p>4.3. The Working Note Appendix A assessment draws similar conclusions in respect of three other SA Objectives (Water quality / quantity; Flood risk; and Landscape & townscape). In relation to each of these three SA Objectives, the validity of stating that additional housing growth will intrinsically result in greater negative impacts is questioned.</p> <p>4.4. In the case of water quality / quantity the Council's Water Cycle Study (2010) does not support the conclusion that a higher level of growth will inevitably lead to harm. Rather, it identifies various levels of constraint to development in various different locations, and the extent to which infrastructure improvements and / or other mitigation will be required to enable development. It is also notable that this study identifies greater constraints to growth respect of wastewater treatment works, sewerage network capacity, flood risk and water environment in areas such as Hemel Hempstead (an area to which the Strategic Local Plan seeks to direct growth) than in Wheathampstead (a settlement that is not identified for any growth).</p> <p>4.5. Against the SA Objective on Flood Risk, the Working Note Appendix A states it should be possible to deliver all the levels of growth without having to build in Flood Risk Zones. It further states however that increased levels of development, and associated impermeable surfaces, would however increase the risk from pluvial flooding. Again, we question whether such an assertion can be substantiated. The relevant Lead Local Flood Authority – Hertfordshire County Council – has published a Sustainable Drainage System (SuDS) Policy Statement as an addendum to the Local Flood Risk Management Strategy. This requires proposals for SuDS to demonstrate how the frequency, rate and volume of runoff from development will be managed to achieve a greenfield rate. There is no evidence that there is a particular level of growth at which meeting this requirement will no longer be feasible. Again, Land at Hill Dyke Road, Wheathampstead represents an example of a site where there are no constraints to its development vis-à-vis flood risk or water, yet its development is not supported through the SLP.</p> <p>4.6. The Working Note Appendix A also suggests that greater levels of development will inevitably result in a greater negative impact on the SA Objective Landscape & townscape. It states that the larger the housing requirement the greater the need for developing on greenfield sites in the Green Belt, therefore requiring Green Belt release with associated adverse effects on local landscapes and the potential for eroding gaps between settlements. However, there is no evidence to suggest that there is a particular level of growth at which it will no longer be possible to accommodate development without undermining the strategic purposes of the Green Belt, including preventing neighbouring towns from merging into one another.</p> <p>4.7. Further, there is no evidence that there is a particular level of growth above which there will inevitably be undue harm to the District's landscape or townscape. In the case of Land at Hill Dyke Road, Wheathampstead, by way of example, whose development for housing is not supported by the SLP, development can be achieved without undermining the strategic purposes of including land within the Green Belt. As set out in our submissions on the 2014 draft SLP, a Landscape Visual Assessment and Green Belt Review carried out by CSa on behalf of Taylor Wimpey confirms the site could be released for development with minimal impact</p>	<p>recognised in the assessments for some of the broad locations, as well as in the assessments of those Spatial Strategy options (Options 1a and 3) that included the larger broad locations.</p> <p>Nevertheless the methodology used in the SA since the first assessment in 2006 has been to identify negative effects where greenfield land is to be lost to new development, in particular against SA Objectives 1 (Biodiversity), 4 (Soils), 8 (Use of brownfield sites) and 11 (Landscape).</p> <p>Similarly increased activity and housing numbers associated with new developments will inevitably lead to increased traffic, with associated increases in greenhouse gas emissions and potential reductions in air quality, as well as increased water consumption. With regard to the latter, St Albans is in an area classified as suffering from serious water stress, with the vast majority of the rivers and groundwater being over-abstracted. Any new housing development will exacerbate this situation, hence the identification of adverse effects against the water objective (SA2).</p> <p>The sustainability appraisal has only assessed the site and policy options that have been seen by the Council as being 'reasonable alternatives' at each particular stage of plan preparation. At each such stage all alternatives have been assessed at the same level of detail.</p> <p>Policy SLP 1 identifies four broad locations where development needs that cannot be accommodated within existing areas and other previously developed land will be met. The 'reasonable alternatives' considered for these broad locations constituted the eight strategic sub-areas identified in the SKM Green Belt Study. Four of these eight sub-areas were selected for inclusion in the SLP.</p> <p>The SKM Study also identified some small-scale</p>
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<p>4.8. Further, the Council’s own Green Belt Review Purposes Assessment (November 2013) confirms the lack of harm to the Green Belt that development of the site would entail. It considers land south of Wheathampstead (GB43A - land to south of Hill Dyke Road and enclosed by Dyke Lane to the east and settlement edge to the west) and conclude the following at paragraph 8.3.10: “Assessed in isolation this very small subarea makes a limited or no contribution towards checking sprawl, preventing merging, preserving setting or maintaining local gaps.”</p> <p>4.9. Considerable supporting information has been previously submitted to the Council to demonstrate development of the site can be suitably and sustainably accommodated. However, the reasons for its rejection remain unclear.</p> <p>4.10. We have been able to identify one document in which the Council purports to justify the rejection of potential alternatives for development, including Land at Hill Dyke Road, Wheathampstead. In June 2015 the Council published St Albans City and District Council Draft Strategic Local Plan Consultation Report of 2014. At page 169, our client’s site is considered and the following is stated: “This site should not be considered for inclusion in the SLP as it does not fall within the areas identified for possible Green Belt boundary change consideration in the Green Belt Review. However the site is potentially relatively small and is noted as a possible site for assessment as part of work on the DLP (small scale Green Belt boundary changes).”</p> <p>4.11. The above does not provide adequate justification for the failure of the plan to identify the site for development within the SLP , or at the very least to provide a strategic policy indicating that growth will be directed to this location.</p> <p>4.12. Having regard to the above, the process by which potential alternatives – particularly the alternative of a higher level of housing development, but also that of specific sites / locations for development – have been assessed and rejected is not considered to be robust. The decision for the Strategic Local Plan to not seek to deliver a greater number of homes is therefore not considered justified, and the plan is unsound.</p>	<p>sub-areas. These included Site SA-SS7 – Land south of Wheathampstead. However, due to their size these small-small scale sites were not considered by the Council to be ‘reasonable alternatives’ at a strategic level. They were not therefore considered for inclusion in the SLP, but will be considered, if appropriate, for inclusion in the Detailed Local Plan – as mentioned in the Council report to which the respondent makes reference, as well as being stated in Policy SLP 1.</p> <p>In relation to the respondent’s comment about the process by which potential alternatives have been assessed and rejected not being considered to be robust, at each stage of the planning process the SA has undertaken assessments to the same level of detail for each of the options that were considered as ‘reasonable alternatives’ at that particular stage. The options considered included strategic policies and strategic locations. The findings of these assessments have been provided in a series of SA Reports and SA Working Notes, with consultation having been undertaken on those documents, and have informed the plan making process.</p>
<p>London Colney Limited</p>	
<p>In response to the Sustainability Appraisal (December 2015), the 2015 Representations submitted to SADC (see Appendix A of the attached Representations Statement) are relevant and are summarised below. These Representations ultimately consider Land South of Alban Way, in the same manner that the sustainability assessment considers the Green Belt site options. In doing so it also takes into account the Planning Policy Committee (17 November 2015), and also considers the Evaluation Framework (SLP, Technical Report, October, 2014) and SLP Consultation (December 2014).</p> <p>The full assessment is set out at Appendix A (of the Representations Statement) and the updated sustainability appraisal which includes Land South of Alban Way is set out in Figure 1 – both set out in the attached Representations Statement.</p> <p>In summary, the assessment demonstrates that when assessed against the other strategic subareas (using the 20 criteria set out in the Sustainability Appraisal) the site can deliver a range of significant positive effects. These effects relate to social, economic and environmental factors and are at a level which is comparable with the four sites identified as broad locations for development / Green Belt release in the SLP. Overall the site represents a potential logical urban extension to the east of St Albans. In terms of location, the site is in close proximity to Alban Park, which represents a key employment location, so it is positive planning to locate housing nearby. In terms of the connectivity and accessibility the site is well-connected to existing routes including the Alban Way, which runs between St Albans and Hatfield, and highways access of Colney Heath Lane is possible. This means that the Site could be well-integrated into existing</p>	<p>This representation does not provide any comment on the SA Report (December 2015). Instead it provides an assessment of a site not considered for inclusion in the Strategic local Plan – and therefore not subject to sustainability appraisal.</p>

urban areas, and help deliver a range of economic and social benefits to new residents and existing communities.	
JB Planning Associates on behalf of Hilton House Properties Ltd	
<p>Sustainability Appraisal</p> <p>1.1 We consider that the sustainability appraisal is unduly negative in terms of housing provision. Examples are set out below:</p> <p>P.27 - Core Strategy Objective: "Mixed and balanced / sustainable communities"</p> <p>1.2 It is stated that this objective is potentially incompatible with a number of the SA objectives:</p> <ul style="list-style-type: none"> • <i>"The level of housing development required in the District will require development of greenfield land. Development of greenfield land is not compatible with biodiversity due to landtake, potential habitat fragmentation and urban pollution issues. Development on greenfield land would also result in soil sealing.</i> • <i>Providing new homes in the District will put direct pressure on water resources which are already identified as 'over-abstracted'.</i> • <i>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 also has uncertain compatibilities with a number of the SA objectives:</i> • <i>Parts of the District lie within areas of flood risk and there is the potential for new housing sites to lie within these zones.</i> • <i>Housing development on greenfield sites is potentially incompatible with the SA objectives on historic & cultural assets, and landscape & townscape"</i> <p>1.3 The above objective ignores the fact that housing provision that takes place is capable of adding and improving biodiversity and green links. This is particularly true in respect of much agricultural land, which is lacking in existing biodiversity value.</p> <p>1.4 In terms of the both the economy and delivering infrastructure, it is apparent that the Sustainability Appraisal fails to properly balance the economic, social and environmental considerations. Instead, it overly focuses upon just the environmental aspects of development.</p> <p>P.27 - Core Strategy Objective: "A thriving economy"</p> <p><i>"This objective is incompatible with the SA objectives on greenhouse gas emissions and air quality as activities relating to the new employment sites, such as transport and travel, will result in increases in greenhouse gas emissions and other airborne emissions.</i></p> <p><i>The objective also has uncertain compatibilities with a number of other SA objectives. For example, developing employment sites on greenfield land will have uncertain effects on biodiversity, soils, historic & cultural assets and landscape & townscape depending on the exact location and type of employment to be provided"</i>.</p> <p>P.27 - Core Strategy Objective: "Delivering Infrastructure"</p> <p><i>"Through the provision of new infrastructure to enable there are potential incompatibilities with the SA objectives for biodiversity, soils, and historic & cultural assets and landscape & townscape as providing infrastructure, e.g. roads, utilities, services and community facilities, could lead to effects such as habitat fragmentation, soil sealing and adverse effects on the historic environment and landscapes, depending on the location and design of the infrastructure"</i>.</p> <p>P.30 - 4.2.1 Theme 1: Protection of the Green Belt</p> <p>1.5 A further example of this imbalance is highlighted below:</p> <p><i>"Two of the options contributed 'very sustainably' against one or more of the SA/SEA objectives. These were "no further greenbelt releases to meet further land use requirements" (against SA Obj.8 'Use of brownfield land', 11 'landscape', & 13 'sustainable locations') and</i></p>	<p>Whilst the representation identifies sections of the SA Report where the respondents consider the sustainability appraisal to be 'unduly negative in terms of housing provision' there are many other areas of the SA Report where housing provision is shown to be positive against a range of the SA objectives.</p> <p>Table 4 of the SA Report (Compatibility between SA/SEA Objectives and SLP Objectives) identifies several SA objectives for which compatibility with the SLP Objective 'Mixed and balanced / sustainable communities' have been identified. The report does not however then provide descriptions of why these compatibilities have been identified, as it does for the incompatibilities, which is perhaps why the respondent sees the SA as being unduly negative in terms of housing provision. This has not been the intention. The positive assessments against the social and economic SA objectives that have been identified for the SLP policies on housing back this up. In meeting the requirements of the SEA Regulations the SA framework includes more environmental objectives than social and economic ones, and as it is against the environmental objectives that new development in Green Belt greenfield locations has some inevitable negative effects, this means that there could be more negative scores than positive scores when assessing the scale or location of new development.</p> <p>However, the SA does not count up the positive and negative scores to arrive at a single score for a policy or site assessment.</p> <p>The SA Framework was developed in 2006 with extensive consultation and has been used for all</p>

<p><i>“retaining certain villages within the greenbelt and continuing to apply a strong presumption against development” (SA Obj. 13)”</i>.</p> <p>P.46 & 47 and Table 6 - Housing Requirement / Target Options</p> <p>1.6 The sustainability of 7 different options have been examined. These proposed rates of housing development between 200 – 900 dpa. Again, it is noteworthy that environmental considerations were given prominence over social and economic considerations.</p> <p>P.64 - 5.2.3.4 SLP8 Local Housing Requirement/Target and Provision</p> <p>1.7 It is stated that <i>“significant positive effects have been identified for the “good quality housing’ objective as the provision of an average of 450 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”</i>. We would question where the precise evidence is to support this assertion. We consider that a far higher level of housing is required in order to increase the very poor level of affordable housing provision currently occurring in St Albans.</p> <p>1.8 We also note that the Sustainability Appraisal offers limited analysis of the relative benefits and drawbacks of the eight potential Broad Location sites.</p>	<p>the sustainability appraisal activities since that time. The make-up of the SA framework does not mean that environmental considerations are given prominence over social and economic considerations as the respondent contests.</p> <p>It is acknowledged that new development can bring with it some environmental benefits, such as biodiversity enhancements, and this has been recognised in the assessments for some of the broad locations.</p> <p>Nevertheless the methodology used in the SA since the first assessment in 2006 has been to identify negative effects where greenfield land is to be lost to new development, in particular against SA Objectives 1 (Biodiversity), 4 (Soils), 8 (Use of brownfield sites) and 11 (Landscape).</p> <p>Similarly increased activity and housing numbers associated with new developments will inevitably lead to increased traffic, with associated increases in greenhouse gas emissions and potential reductions in air quality, as well as increased water consumption.</p> <p>The representation also comments on the assessment of SLP 8 against the housing objective. The assessment undertaken against the ‘good quality housing’ objective (SA15) was based on the most up to date information available in terms of housing need. As the proposed level of housing (436 dpa) was arrived at to meet this need this was considered as contributing significantly towards meeting the SA objective a significant positive ‘score’ was attributed. Any level of housing above 436 dpa would have been given the same ‘score’ (i.e. significant positive).</p> <p>With regard to the respondent’s point that the SA offers limited analysis of the relative benefits and drawbacks of the broad locations, the SA provided the Council officers and Members with</p>
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	an assessment for each site in order to inform the decision making process. It did not seek to provide a ranking for the sites.
Clowes Developments (UK) Ltd	
<p>Sustainability Appraisal Clowes Developments (UK) Ltd object to the Sustainability Appraisal (SA) on the grounds that it has not been properly prepared, is not effective and in part does not comply with National Policy.</p> <p>The SA sets out the journey that the local plan has taken since 2006 when work commenced on the plan.</p> <p>It is clear that whilst the council acknowledged early in the process that a large proportion of the District lies in Green Belt and that the need to protect Green Belt is a very important issue with residents. Despite this acknowledgement the need to release land from the Green Belt was not really accepted by the District until 2012, when consideration was given to identifying broad locations for future development. Up until this point there was an expectation that all development could be accommodated on previously developed land outside of the Green Belt.</p> <p>At the heart of the local plan is an objective to direct future housing and mixed use development to four broad locations. Furthermore these locations need to be removed from the Green Belt.</p> <p>Clowes Developments (UK) Ltd object to the way that the Council has identified the four broad locations which essentially entailed two separate reports (one prepared by external consultants SKM who were commissioned by the Council and the second which was prepared by the local authority's officers) which arrived at almost diametrically opposed conclusions.</p> <p>Clowes Developments (UK) Ltd find it difficult to understand how the work undertaken on the second report has produced such significantly different conclusions. The absence of any tangible evidence suggests that the second report is for more subjective in its analysis than the first which appears to be more objectively assessed.</p> <p>Notwithstanding the above, Clowes Developments (UK) Ltd contend that the Council's officers and their consultants failed to give any due consideration to the company's landholding indicated on the attached plan, which is situated east of the M1 motorway, north of the M25 motorway and west of the northern orbital. This land lies near to the land referred to as "Chiswell Green".</p> <p>The council's failure to give consideration to this area which could be developed either independently or as part of a larger broad location, represents a flaw in the Council's plan preparations. As a result, the policies which have been put forward in the plan in so far as they apply to the broad locations for housing and mixed use development are considered to be unsound.</p>	The response does not raise any issues relating to the SA Report prepared by C4S.
Troy Planning & Design on behalf of Redbourn Parish Council	
<p>Sustainability Appraisal and Approach to the Strategy</p> <p>We also consider that St Albans City and District Council has failed to approach the plan-making process in a manner that has allowed all reasonable alternatives to be considered or in accordance with the latest national policy and guidance. The Sustainability Appraisal is deficient in failing to account for the possible contribution smaller sites may make to the main Development Strategy Options tested, despite relevant alternatives being identified in the Green Belt Study Phase 1.</p> <p>Equally, the Sustainability Appraisal fails to take account of the disproportionate burden of delivery placed on individual Broad Locations dependent on the housing requirement being applied; and overlooks that the proportion of development could be shared differently across larger strategic sites considered more suitable in Green Belt terms (and better-related to the main settlements of Harpenden and</p>	With regard to the consideration of smaller sites, these were not considered in the sustainability appraisal as they were not considered by the Council to be 'reasonable alternatives'. Only Strategic Sub Areas identified by SKM as least meeting the purposes of the GB were considered to be suitable for consideration in the Strategic Local Plan. Smaller sites will be considered for inclusion in the Detailed Local Plan or

<p>St Albans).</p> <p>The alternatives tested in the Sustainability Appraisal are based on the assumption that some of the land at the Broad Locations East of Hemel can be safeguarded and meet sub-regional housing needs. This is inconsistent with the proposed strategy requiring all recommended potential capacity at these locations being required to meet needs arising in St Albans, which represents a different basis for the spatial strategy and a different basis for the assessment of significant effects.</p> <p>Based on the above, it can also be stated that the test of exceptional circumstances has been misconstrued in terms of the planning judgments reached in respect of Land East of Hemel and the selection of sites is inconsistent with the overall settlement hierarchy to meet needs arising in St Albans or having full regard to the consequences for sustainable development.</p>	<p>Neighbourhood Plans, as stated in SLP1.</p> <p>In 2014 a series of Development Strategies for options for growth were considered and the findings of the sustainability appraisal were included in Appendix C of the SA Working Note (June 2014). The options considered different patterns of growth to deliver the same level of new development, ranging from concentrated development at a small number of broad locations, to reliance on smaller sized areas at all eight of the broad locations. A summary of the options considered and reasons for taking them forward, or not, are provided in Section Error! Reference source not found. of this Addendum.</p> <p>With regard to the comment relating to the basis and assumptions for assessing the alternatives at East Hemel Hempstead, the SA has assessed the type, scale and location of the proposed development in isolation of whether such development would be meeting District or sub-regional needs.</p> <p>The respondent's final comment relating to exceptional circumstances is not related to the SA Report.</p>
<p>Harpenden Green Belt Association</p>	
<p>The Sustainability Appraisal is not sound because there are inconsistencies between the treatment of the same objectives, as between different policies and over time. First, in relation to SLP2 at paragraph 5.2.2.1 of the SA, it is said " As the Green Belt is valued by the local community its protection will therefore have a positive effect on the "community identity and participation" objective. We welcome the recognition given to the value which the community places on the Green Belt, strongly and consistently expressed through consultation. The SA is right to say that the community having its voice heard in this respect is an important aspect of community identity and participation.</p> <p>However, it must follow that where there is loss of Green Belt and no countervailing benefit as regards "community identity and participation", there should be a negative assessment. In relation to NW Harpenden, the community has strongly and consistently voiced its opposition to loss of Green Belt and yet the community's views have gone unheeded and Green Belt release is being foisted on it. There are no countervailing benefits identified from development at this Broad Location in relation to "community identity and participation", in contrast to other Broad Locations.</p> <p>Yet, inconsistently with the position taken on SLP2, the assessment against this objective is shown as neutral rather than negative. This does not reflect the real anger felt by the community at their inability to effectively participate in decision-making which affects them.</p>	<p>With regard to the assessment against the SA Objective for community identity and participation (SA16), the assessment in November 2012 identified 'no predicted effects' related to Area of Search 8. That assessment remained unchanged for the assessment of the Broad Locations (SA Working Note September 2014) and for Policy SLP13c (SA Report December 2015). For the other three Broad Locations (Policies SLP13a, 13b and 13d) positive effects were identified against this objective, in relation to the provision of new community facilities, but due to the smaller scale of the NW Harpenden Broad Location such benefits were</p>

<p>Second, no adequate reason has been given from departures in the current Sustainability Appraisal from previous assessments made in the 2012 Sustainability Appraisal.</p> <p>The 2012 Sustainability Appraisal assessed an area of land referred to as “Area of Search 8 (SE part)”. This was part of the NW Harpenden Broad Location, but with the boundary at Cooters End Lane. It was therefore adjacent to two listed buildings, one at Cooters End Farm across Cooters End Lane, and the Area of Search itself was a pre-18th century enclosure. The assessment given against the “heritage and cultural assets” objective was negative.</p> <p>The 2015 Sustainability Appraisal assesses the NW Broad Location, which comprises both Area of Search 8 (SE part) and the field in which the listed building at Cooters End Farm stands. The listed building is not merely adjacent to, it is now within, the site under assessment. Clearly the risk of harm is worse, not better – yet the assessment given is merely “uncertain”.</p> <p>The response in this regard to a previous comment to the same effect by the Sustainability Appraisal consultants (at Appendix D-19) is inadequate. It is here suggested that the change from a minor negative to an uncertain assessment “reflected the fact that the incorporation of mitigation was considered in the 2014 version of the SLP and the assessment updated accordingly”.</p> <p>This makes no sense. In 2012, the listed building was to be retained and was across a road from the closest development. Now it is actually on the development site. Policy 13 SLPC does not prescribe any particular form of mitigation, it merely notes the listed building as a constraint. Furthermore, the consultants clearly do not have sufficient information available to them to suggest adequate protection of the setting of the listed building, or they would not have scored this as “uncertain”.</p> <p>The strong impression given is that the consultants perceive their role to be to support the Council as far as possible rather than to critically analyse the plans, and that “uncertain” has been substituted for “minor negative” to make the assessment more benign in relation to this objective.</p>	<p>not envisaged.</p> <p>The positive assessment provided against SA16 for Policy SLP2 – Metropolitan Green Belt in both the SA Reports from November 2012 and December 2015 provides a different approach than that considered at the site level, when this objective has been consistently used for providing an assessment based on the provision of community facilities. Previous representations on the SA have not identified any issue in respect to this approach.</p> <p>With regard to the assessment against the SA Objective for heritage and cultural assets (SA10), the indicative layout shows that the listed building at Cooters End Farm and its curtilage are excluded from the area of the Broad location (Policy SLP13c) that will be developed and is screened from the proposed area for development north of Cooters End Lane by mature hedgerow and trees. In addition there is also screening within the curtilage.</p> <p>The listed building itself is closer to the area of the Broad Location south of Cooters End Lane, against which the original finding of the SA (November 2012) had identified a minor adverse effect.</p> <p>The effect of new development on the listed building will therefore not necessarily be adverse, as had been identified in the November 2012 assessment, and therefore the ‘uncertain’ assessment provided in 2014 remains valid.</p>
<p>Mrs Joanne Whitehead</p>	
<p>I agree with and adopt the representations of the Harpenden Green Belt Association</p>	<p>See response to the Harpenden Green Belt Association representation above.</p>
<p>Mr Nigel Gale</p>	
<p>The consequences of the December 2015 St Albans full Council meeting resolution regarding Drovers Way and Aboyne Lodge School, has been overlooked by the Sustainability Appraisal Report (December 2015) section 5.2.4.5. The author of that report must reflect the</p>	<p>The assessment has been updated to reflect the changes made to Policy SLP19 Major Retail and</p>

voted decision of St Albans Council. The 4th and 7th paragraphs of 5.2.4.5 should therefore be revised.	Town Centre Development following December 2015 Full Council. The summary of the assessment provided in Section 5.2.4.5. of the SA Report has also been updated. These amendments can be found in Appendix C to this SA Report Addendum.
Gladman Developments Limited¹	
<p>Sustainability Appraisal/Strategic Environmental Assessment</p> <p>4.6 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.</p> <p>4.7 The Council should ensure that the results of the SA process clearly justify its policy choices.</p> <p>In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Council's decision making and scoring should be robust, justified and transparent.</p> <p>4.8 Gladman reminds the Council that there have now been a number of instances where the failure to undertake a satisfactory SA has resulted in Plans failing the test of legal compliance at Examination (South Somerset) or being subjected to later legal challenge (Heard vs Broadland DC).</p>	<p>Response noted.</p> <p>Section 4 and Appendix E of the SA Report (December 2015) provide information on the sustainability appraisal undertaken at eight stages prior to the final assessment as summarised in Section 5 of the SA Report.</p> <p>At each stage during the development of the SLP a range of options have been considered and assessed at the same level of detail.</p> <p>This SA Report Addendum clarifies the reasons for selecting and rejecting alternatives. It does not however provide any new assessment.</p>

7 Comments from the Regulation 18 Consultation on the Detailed Local Plan SA Working Note (November 2016)

The table below provides details of the representations received during the Regulation 18 consultation on the Detailed Local Plan, along with replies to the representations and details of how they were taken into account in the SA/SEA process.

Summary of Comments	Reply to comments / how the comments have been taken on board
Harpenden Green Belt Association	
<p>We consider that Appendix 1 of the SA Working Note significantly understates the negative impact in sustainability terms of Option B. For example:</p> <p>- Under "biodiversity" and "landscape and townscape", Option B is scored as "uncertain", it being suggested that locating the school off-site could allow for more open space on the Broad Location. A similar comment is given for "health". But there is no basis for the</p>	<p>As the Detailed Local Plan did not provide different housing numbers for the two options, the assessment was undertaken using the assumption that both options would deliver</p>

¹ This representation was included in Gladman's general response document and not in a Response Form for the SA Report (i.e. to comment on specific paragraphs / pages in the SA Report).

<p>assumption that if Option B is adopted, there will be increased open space at the Broad Location in comparison with Option A. On the contrary, the Developers' presentation presented to PPC in November 2015 made clear the Developers' intention to build more housing if the school were located off site, as it would be in their financial interests to do. There is no policy requirement in the SLP or DLP to create a greater amount of open space within the Broad Location if Option B is adopted.</p> <p>The "landscape and townscape" assessment fails to have regard to the evidence from the Green Belt Review, referred to above, about the relative landscape and visual impacts of development of land to the east of Ambrose Lane.</p> <ul style="list-style-type: none"> - Under "soil", the SA Working Note suggests that there is "no difference in effects between the two options". This position cannot be maintained. If Option B is pursued a greater total area of land will be developed, in comparison with Option A. - Under "sustainable locations", we do not agree that there is no difference in effects between the two options. The traffic consequences of building a school on Ambrose Lane make this a significantly less sustainable location than if the school were built within the Broad Location. 	<p>the level of housing as specified in Strategic Local Plan Policy SLP 13c (i.e. circa. 500 dwellings). This would have meant the same level of hard development but with the housing on the main site being built to a lower density. There would therefore be similar levels of soil sealing from both options.</p> <p>The assessment for Policy S6 viii) now reflects the different landscape/visual sensitivity of the land to the east of Ambrose Lane.</p> <p>When undertaking the assessment it was anticipated that appropriate mitigation to transport issues would be required for both Options A&B.</p>
Redbourn Parish Council	
<p>1.8. The NPPG says the following in relation to the role for Sustainability Appraisal in the preparation of Local Plans:</p> <p>"Every Local Plan must be informed and accompanied by a Sustainability Appraisal. This allows the potential environmental, economic and social impacts of the proposals to be systematically taken into account, and should play a key role throughout the plan-making process. The Sustainability Appraisal plays an important part in demonstrating that the Local Plan reflects sustainability objectives and has considered reasonable alternatives. The Sustainability Appraisal should incorporate a Strategic Environmental Assessment to meet the statutory requirement for certain plans and programmes to be subject to a process of 'environmental assessment'. (ID:121016120140306)</p> <p>1.9. Preparation of the Detailed Local Plan is not yet informed by a full Sustainability Appraisal. Ultimately this would lead to further legal failures of plan preparation for the circumstances of the Land East of Hemel Hempstead. The Regulation 18 Consultation Draft DLP is supported by a "Sustainability Appraisal Working Note" (November 2016) which contains the following statement:</p> <p>For the Broad Locations at East Hemel Hempstead and East St Albans, the diagrams do not provide any further detail to that which had been the basis of the assessments undertaken for Policies SLP3a&b and SLP13d. There are therefore no new implications for the findings of those previous assessments. For the North West Harpenden Broad Location, Policy DLP 13 provides two diagrams (Option A and Option B). The assessment undertaken for these two options (see Appendix 1) found that there is the potential for different effects against the SA objectives for 'biodiversity', 'landscape and townscape' and 'health'. However no new significant effects have been identified.</p> <p>1.10. On one level, this extract simply highlights the limited contribution that the DLP makes towards providing the necessary policy framework for the East of Hemel Hempstead location. Furthermore, however, the statement is also wholly untrue given the facts and evidence surrounding emerging proposals. Based on the current information available from the site's promoters and the details of live planning applications on the western portion of the site (land West of Cherry Tree Lane) it is self evident that numerous options exist for the site. This especially includes the location of the required secondary school.</p>	<p>The SA Working Note was prepared in order to accompany the consultation on the Detailed Local Plan at the Regulation 18 stage. There is no requirement to have a 'full Sustainability Appraisal' at his early stage in the plan-making process. It is at the Regulation 19 stage that a full SA is required. This was outlined in Section 1.2 of the SA Working Note, as follows:</p> <p><i>"The Working Note does not constitute the formal SA Report for the DLP. That report will be produced alongside the publication of the DLP (currently scheduled for 2017) and will be informed by this Working Note."</i></p> <p>As the DLP did not progress beyond the Regulation 18 stage, that formal SA Report was never prepared.</p> <p>Instead, the SA of the new Local Plan now picks up the elements of the DLP that have been carried forward into the Draft Local Plan, including updated assessments of the Broad Locations at East Hemel Hempstead.</p>

1.11. These factors will all have a material impact on the scale of development achievable, the extent and location of infrastructure provision and the amount of land which may be removed from the Green Belt. These will subsequently influence the significant effects arising from any allocation and should be assessed in detail.

8 Comments from the Consultation on the Local Plan Regulation 18 SA Working Note (January 2018)

The table below provides details of the representations received during the Regulation 18 consultation on the new Local Plan, along with replies to the representations and details of how they have been taken into account in the SA/SEA process.

Summary of Comments	Reply to comments / how the comments have been taken on board
759908 Redbourn Parish Council	
<p>Within the current context for plan-making the significant reliance placed on the evidence base and supporting assessments undertaken as part of the abortive work to prepare the Strategic Local Plan is concerning. The Sustainability Appraisal 'Working Note' (January 2018) acknowledges that relevant objectives and scoping information to inform the framework for Sustainability Appraisal are unchanged from previous assessments. Although not fatal on its own this is coupled with recognition that substantial elements of the evidence base will be superseded and replaced as part of work to inform the publication draft. In relation to the majority of objectives set out in the current consultation, it has not been possible to undertake any specific assessment. The Working Note therefore simply acknowledges that there may be potential positive effects of any policy approach seeking to achieve these aims.</p> <p>This fails to satisfy the requirement to illustrate the testing of reasonable alternatives as part of developing the local plan options for how sustainable development may be achieved. As a result, the likely effects of the Local Plan and different alternatives have not been illustrated and there is no consideration of how adverse effects might be mitigated and benefits maximised. Fundamentally this illustrates a lack of wider consideration of the strategic priorities for plan-making that affect St Albans and its relationship with surrounding authorities. The work to-date provides little indication of how strategic policies might be focused to achieve quantitative development requirements alongside the effective and co-ordinated delivery of infrastructure and protection of key assets in the built and natural environment. The approach to addressing these requirements should provide meaningful alternatives for the proposed approach to be considered at this stage.</p> <p>The 'Working Note' devotes the greatest attention to assessing the objective of 'building homes in the right places' from the current consultation draft. However, this predominantly reiterates the assessment of options for distributing housing development considered as part of preparation of the Strategic Local Plan and considers similarities with the potential sources of supply contributing to housing provision outlined by this consultation. The 'Working Note' acknowledges that no spatial options are assigned under any of the potential sources. Based on the current information available it is considered inappropriate to draw these comparisons as an indication of support for any given approach. For example, the 'Working Note' repeats that "Options 1a and 3 [from assessment of options for the approach in the Strategic Local Plan, both of which included Land East of Hemel Hempstead] 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." In considering the approach in the emerging plan, the Working Note states that "as with previous SA work it will be recognised</p>	<p>Following the Regulation 18 stage a second SA Working Note (May 2018) was prepared which updated earlier assessments to include a higher level alternative for the housing requirement that those previously considered (1,200 dwellings per annum), as well as providing assessments of the 12 Broad Locations which were considered to be reasonable alternatives following the Council's Local Plan site selection process.</p> <p>The development of the new Local Plan is a continuation of the process to replace the St Albans District Local Plan Review 1994. As highlighted in the SA Working Note (January 2018), against which this representation was made, <i>"...though this is a new Local Plan, the work undertaken in developing the SLP has already undertaken assessment on a wide range of options, including those relating to housing numbers and the distribution of development – these being two topics which are covered in the new Regulation 18 consultation"</i> (Section 4.1). The previous consideration of options, in particular those relating to housing requirements, development strategy and broad locations has informed the work on the new Local Plan and the accompanying SA/SEA.</p> <p>Section 4 and Appendix E of the SA Report (September 2018) provide details of how options have been considered during the development of the Local Plan and the preceding Strategic Local Plan.</p>

<p>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.”</p> <p>In terms of representing a guide for future plan-making or to demonstrate that reasonable alternatives to the spatial strategy have been appropriately considered these statements should be regarded as flawed. In-particular, they repeat many of the grounds on which preparation of the previous Strategic Local Plan failed. Redbourn Parish Council has previously highlighted that land East of Hemel Hempstead cannot be regarded as sustainable in terms of its access to public transport and key facilities and services, while substantial queries remain over deliverability and the infrastructure required to support development in this location. It is currently impossible to conclude that the evidence base would support a given scale of development in any location. For example, in relation to land East of Hemel Hempstead the previous Green Belt Study indicated that a specific area might be considered suitable to support the potential alteration of Green Belt boundaries. The current findings of the Sustainability Appraisal ‘Working Note’, and in-particular the reliance on conclusions for the assessment of effects in earlier rounds of plan-making, should not be relied upon and do not support any current conclusions that exceptional circumstances exist for given alterations to Green Belt boundaries.</p>	
1051022 Legal and General	
<p>Highly relevant to the question of the provision of infrastructure is the statement made by SACDC in the supporting text to questions 2 and 3 that ‘Large-scale development on Green Belt generates the money and land that provides new infrastructure like roads, schools, shops, and parks’. This is also repeated in the Regulation 18 SA Working Note (TRL, January 2018, p17 para 2). On this basis it is clear that SACDC should support the allocation of the NW Harpenden broad location for a residential-led development as it is a strategic green belt release of a sufficient size to provide for necessary related infrastructure.</p>	Noted. No change to SA needed.
1153774 Goodman Logistics Development UK Ltd	
<p>6.9 Not justified. The approach to the plan must consider the strategy against reasonable alternatives. The strategy following a unilateral pursuit of only one Growth Area corridor, the M25/M1, has evidently not been considered against reasonable alternatives in the Regulation 18 Sustainability Appraisal Working Note prepared by TRL. The more robust pursuit of promoting economic growth in two or more areas of the District, most notably the A1(M) Growth Area corridor along the eastern boundary must be considered. While the majority of this growth area is located outside the District, the cross boundary Duty to Cooperate provides a mechanism by which this strategy can be pursued. An allocation of land at Roehyde to deliver a pharmaceutical, bioscience, engineering and logistics park represents a reasonable alternative and must be assessed as such in the Sustainability Appraisal.</p>	<p>During the development of the SLP (and formerly Core Strategy) the site at Roehyde had been considered as a potential option for employment development, but was not taken forward for inclusion in the SLP.</p> <p>The SA provided an assessment of the site at Roehyde in both the Emerging Core Strategy SA Report (July 2009) and the St Albans Pre-Submission SLP SA Report (November 2012).</p> <p>The SA Report (November 2012) identified the ‘E4 Roehyde’ employment site as a rejected option, and provided the following reasons:</p> <ul style="list-style-type: none"> • Development of part greenfield Green Belt land with detrimental landscape and environmental impacts; • Access issues cannot be resolved; and • A proportion of the site is with Welwyn Hatfield Borough. They do not support the proposal, therefore it

	<p>could not be delivered.</p> <p>In addition, in rejecting the site for housing the SHLAA (SHLAA-GB-CH-451) identified that: <i>“The site makes a crucial contribution to Green Belt purposes. Development of the site would affect land that is presently rural, would result in encroachment into open countryside, would be visually intrusive from the surrounding countryside and would cause demonstrable harm to the character and amenity of surrounding areas and land uses.”</i></p> <p>In this new round of planning the site is not considered by the Council to be a reasonable alternative for either housing or employment use and has therefore not been assessed in the SA of the Local Plan.</p>
1155890 Abbey Precincts Residents' Association	
<p>We note that Local Plan 2018 is a comprehensive 16-year plan, not just a list of strategic policies as previously. The sustainability appraisal for this plan should therefore be more detailed and draw out current issues and opportunities more fully than before. The previous Sustainability Appraisal (ref CD 0079) contained little information on issues and opportunities for cultural heritage. We hope that the above issues will be incorporated so that positive policy responses are identified and taken forward.</p>	<p>The new Local Plan includes a detailed policy covering the historic environment (Policy L30) which provides the policy responses that were included in Strategic Local Plan Policy SLP3 and Detailed Local Plan (draft for consultation) Policy DLP4.</p> <p>The SA has identified significant positive effects for Policy L30 in relation to the SA objective (SA10) which covers the historic environment. In addition the baseline and review of other plans and policies have been updated for this new SA, which has resulted in the identification of some new issues and opportunities.</p>
975683 Martin Grant Homes and Kearns Land Ltd	
<p>10. The Regulation 18 document does ask respondents to consider how they feel about expanding existing villages into the Green Belt (Question 2, page 6). In relation to this option, the Regulation 18 Sustainability Appraisal Working Note (January 2016) states:</p> <p><i>“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.” (paragraph 4.3.3.4.).</i></p> <p>11. The nature of the consultation document means that the sustainability appraisal is fairly broad-brush at this stage. Going forward, SADC should take account of the need to promote sustainable patterns of development when reviewing Green Belt</p>	<p>The NE Redbourn Broad Location was assessed along with 11 other Broad Locations, these 12 being considered by the Council to be ‘reasonable alternatives’ following a three stage site assessment process. The findings of the assessment were included in a second SA Working Note (May 2018) which was prepared to inform the development of the Publication Local Plan, including the selection of Broad Locations for inclusion in that plan.</p> <p>The assessment of the NE Redbourn Broad Location covered the majority of the points identified under ‘social, economic and environmental’ in this representation.</p>

<p>boundaries (NPPF, paragraph 84), but this should be done as part of a site-specific assessment exercise.</p> <p>12. It is our position that sustainable development is achievable at land east of Redbourn and the general negative effects identified at paragraph 4.3.3.4. of the Sustainability Appraisal are not, on the whole, a fair assessment of this particular site. We have considered the proposed development of the site in relation to the three strands of sustainable development (NPPF, paragraph 7) below. At this stage it is envisaged that the proposals would:</p> <p>Social:</p> <ul style="list-style-type: none"> • Deliver new housing, including affordable housing, to help meet local need; • Enable the delivery of community benefits for local residents (for example, public open space, new recreational routes/links and a new car park); • Be located within walking/cycling distance of a wide range of local services and facilities; <p>Economic:</p> <ul style="list-style-type: none"> • Deliver positive effects to the local economy and help sustain and enhance local facilities and services; • Create construction jobs and spending related to the construction of the new homes; • Result in New Homes Bonus payments for the local area; • Potentially increase the viability of public transport provision; • Offer a potential site for a new 'hot office' facility (subject to market interest); <p>Environmental</p> <ul style="list-style-type: none"> • Deliver homes on a Green Belt site within an area which is considered to contribute the least to Green Belt purposes as it "does not restrict sprawl, prevent merging, safeguard the countryside, preserve setting or maintain local gaps"; • Deliver a valuable informal greenspace associated with the River Ver corridor, that could deliver biodiversity as well as recreational benefits; • Ensure the release of a site which is not considered suitable for commercial farming purposes; • Encourage modal shift by being located within close proximity of existing facilities and services as well as the Nickey Line; • Be designed in such a way as to have a less than substantial impact upon the Redbourn Conservation Area which lies adjacent to a small part of the site; and • Potentially provide flood alleviation measures which would provide a betterment to existing residents. 	
<p>1156886 DHSC & Bloor Homes</p>	
<p>6. EVIDENCE BASE</p> <p>6.1 The Sustainability Appraisal (SA) Working Note January 2018 states that work on both the Local Plan and the SA/SEA will be informed by the large amount of evidence and policy development previously prepared in respect of the draft Strategic Local Plan and the Detail Local Plan, which have been suspended by this new Local Plan. It is noted from the Council's response to the Secretary of State stated that "We have much of the required evidence base already prepared from our previous SLP to support the new Local Plan."</p> <p>6.2 The SA states at para 4.1, that the work undertaken in developing the Strategic Local Plan (SLP) has already undertaken an assessment of 900 dwellings per annum, this was one of the options considered against the 20 SA Objectives. It is noted in para 4.3.1 that that whilst the Council are not considering options for the level of housing growth as part of this Regulation 18 consultation, they have assumed that they will be seeking to meet the identified housing need in full. However, in the absence of a Statement of Common Ground it is not clear whether the local planning authorities within the HMA are also planning to</p>	<p>Following the Regulation 18 stage a second SA Working Note (May 2018) was prepared which updated earlier assessments to include a higher level alternative for the housing requirement that those previously considered (1,200 dwellings per annum), as well as providing assessments of the 12 Broad Locations which were considered to be reasonable alternatives following the Council's Local Plan site selection process.</p> <p>Whilst it remains the case that the "larger strategic sites provide the best opportunities for infrastructure provision and planning gain opportunities, including biodiversity</p>

<p>meet their respective housing needs in full or whether there will be a need to accommodate housing needs from elsewhere in the HMA. It is noted that in the Dacorum Issues and Options consultation in November 2017 that Dacorum Council had received a request from Welwyn Hatfield Council, which falls outside the South West Hertfordshire HMA (para 6.1.17 of the Dacorum Issues and Options consultation).</p> <p>6.3 Whereas in the SA previously the approach was to assess each Plan Option, and where appropriate combinations of options were assessed against each of the objectives in the SA framework; there now appears to be only one Option i.e. 913 dwellings per annum i.e. in order to accord with the Government’s proposed standard methodology. There is no suggestion of another Option, i.e. a “Policy On Option”, such as to reflect a higher level of growth scenario e.g. as a result of a strategic infrastructure project or through increased employment as a result of Local Economic Partnership Investment Strategy, a bespoke housing deal with the Government or through delivering the modern Industrial Strategy or through the Duty to Co-operate.</p> <p>6.4 It is considered that the SA will need to test reasonable alternatives in meeting the housing requirement of 913 dwellings per annum as a minimum.</p> <p>6.5 It is noted that the SA for the Local Plan is intended to assess reasonable alternatives for sites to deliver the development strategy, and that these sites will be identified for future Plan analysis, as well as from availability/deliverability information from the SHLAA and from a new call for sites.</p> <p>6.6 Pegasus is aware that there is a Call for Sites and a submission has been prepared to accompany these representations.</p> <p>6.7 The SA states that the Council still hold the view 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.” However, as set out in Appendix 2 larger sites are more challenging in terms of their deliverability, and in order to achieve the quantum of dwellings in the plan period, a wide range and choice of sites are required.</p>	<p>enhancements, when compared to a larger number of smaller developments”, the SA of the Publication Local Plan recognises that in addition to the larger sites, smaller sites do play an important role in delivering the housing requirement.</p>
<p>1157560 Hallam Land Management Ltd and St Albans School</p>	
<p>We note that the accompanying Sustainability Appraisal Working note indicates that the Sustainability Appraisal framework and Sustainability Appraisal approach used to appraise the previous ‘Strategic Local Plan’ are also being used to inform the preparation of this new Local Plan. Whilst noting that the justification for this is to ensure ‘consistency’, we have reservations that this approach has been adopted without at least reviewing the position on the light of the significant additional growth challenges now facing the District. As discussed above, we would suggest that more emphasis should be placed in weighing the need to meet the social and economic needs of the District.</p> <p>Notwithstanding these concerns we have prepared an updated sustainability appraisal of land north of St Albans which appraises the site against the previous Sustainability Appraisal objectives, based on the evidence and detailed plans now available for this site. This is set out in pages 42-45 of the accompanying Vision Document. This updated appraisal now demonstrates the strong and unique contribution that this site can make towards sustainable development, as measure against the previous local Plan objectives.</p>	<p>The approach taken previously, for the SA of the ‘Strategic Local Plan’, remains valid for the new Local Plan and does not need to be amended along the lines suggested in the representation.</p> <p>In meeting the requirements of the SEA Regulations the SA framework includes more environmental objectives than social and economic ones. However, the SA does not count up the positive and negative scores to arrive at a single score for a policy or site assessment and therefore additional social and economic objectives are not needed. There have been some minor changes to the SA Framework since the consultation on the SA Working note, however these are relatively minor – the number and topics covered by the 20 main SA objectives remaining the same.</p>

9 Comments from the Consultation on the Local Plan SA Scoping Letter (April 2018)

Summary of Comments	Reply to comments / how the comments have been taken on board
Environment Agency	
<p>Thank you for consulting us on the above matter. We welcome the additions to the SA Framework and are in agreement with this approach. We have the additional following comment:</p> <p>Biodiversity</p> <p>We approve of the criteria ‘To conserve and enhance the green and blue infrastructure within the District’ but would like this expanded to include an 8 meter buffer zone around Main Rivers wherever possible. The majority of watercourses in the district are chalk streams and are of international importance.</p>	<p>The inclusion of a specific reference to an 8m buffer zone around main rivers is considered to be more of a planning requirement than one for inclusion as an SA objective criterion.</p> <p>The SA Framework includes objectives to protect and enhance watercourses and therefore assessment against these objectives would identify potential issues relating to the proximity of a development to a watercourse.</p>
Historic England	
<p>The objectives and criteria set out in Appendix A of the report provide a useful starting point.</p> <p>We make the following specific comments:</p> <p>Objective 10</p> <p>We welcome reference to the historic environment in the objective. The historic environment is considered the most appropriate term to use as a topic heading as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage. To that end we would suggest that the title of this section should also be ‘Historic Environment’ rather than cultural heritage.</p> <p>We also suggest the use of the term ‘heritage assets’ rather than cultural assets.</p> <p>Reference should also be made to ‘designated and non-designated assets’.</p> <p>When referring to heritage assets, reference should also be made to their ‘settings’.</p> <p>We also suggest changing safeguard and enhance to ‘conserve and enhance’ in line with the wording in chapter 12 of the NPPF.</p> <p>Reference should also be made to ‘Heritage at Risk’.</p> <p>Objective 11 Reference should also be made to historic landscape character.</p> <p>NB: Historic England also provided some generic advice on SA Scoping for Local Plans. This has not been reproduced in this table.</p>	<p>The SA Framework has been updated to reflect the comments provided by Historic England (see Appendix C).</p>
Natural England	
<p>Natural England recommends that the biodiversity sustainability objective also includes consideration of increased recreational impacts as a result of the proposed Local Plan and Housing Allocation and suggest the inclusion of the sentence below:</p> <p>Ensure mitigation is provided to counteract any adverse effects of increased access and recreational disturbance to designated sites and for any other identified impacts.</p>	<p>The SA Framework has been amended to incorporate this change (see Appendix C).</p>



St Albans Local Plan

Publication

Sustainability Appraisal Report

September 2018

Appendices – Volume 2

Appendix E: Consideration of Options

Appendix F: Local Plan Assessment Matrices

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St Albans Local Plan

Publication

Sustainability Appraisal Report

Appendix E: Consideration of Options

September 2018

Appendix E

Consideration of Options

This Appendix pulls together text from previous SA Working Notes and SA Reports that have been produced during the development of the Local Plan in order to provide details of how the Local Plan has developed and in particular how options have been considered during Plan development. The full SA documents referred to in this appendix are available at the following web locations.

For pre-2016 documents:

<http://www.stalbans.gov.uk/planning/Planningpolicy/library/localplan.aspx>

For 2016 onwards, links to the documents are provided in the relevant section below.

The SA Working Notes and Reports included in this Appendix are as follows:

Appendix E1: Consultation on Issues & Options, SA Working Note, May 2006

Appendix E2: Consultation on Joint Issues & Options, SA Working Note, October 2006

Appendix E3: Consultation on further Issues and Options SA Working Note, July 2007

Appendix E4: Consultation on the Emerging Core Strategy, SA Working Note, July 2009

Appendix E5: Spatial Strategy Options Development, SA Working Note, September 2010

Appendix E6: Consultation on the Strategy for Locating Future Development in the District, SA Working Note, December 2010

Appendix E7: SA Report for proposed Publication Strategic Local Plan, November 2012 (not published)

Appendix E8: St Albans Strategic Local Plan: Strategic Local Plan Options, SA Working Note, June 2014

Appendix E9: St Albans Strategic Local Plan: SA Report, December 2015

Appendix E10: Detailed local Plan SA Working Note (November 2016)

Appendix E11: Local Plan SA Working Note (January 2018)

Appendix E12: Local Plan SA Working Note (May 2018)

Appendix E1 Issues and Options – May 2006

The St Albans Joint Issues and Options Consultation Document, “*Your Views on its Future*” included Issues and Options relating to three of the Development Plan Documents (DPDs) in the Local Development Framework (LDF), namely the Core Strategy, Site Allocations & Proposals DPD; and Development Control Policies DPD.

The Core Strategy Issues and Options formed the bulk of this consultation document and outlined nine main ‘Themes’ and 34 ‘Issues’ which the Core Strategy aimed to address. Whilst nine of these issues did not have any appraisable options, in most cases several options were proposed for each issue. Some of the Options proposed were not mutually exclusive, but instead provided alternative and complementary ways for addressing the Issues.

A summary of the main findings identified in the SA Working Note is presented below.

Overall, the effects of most Core Strategy options were assessed to be ‘neutral’, ‘uncertain’ or ‘sustainable’. Of the 74 sustainable options, 17 of these were considered to be ‘very sustainable’. A total of 38 options were assessed as being ‘unsustainable’, two of which were classed as ‘very unsustainable’ against the SA/SEA objective ‘Use of Brownfield Land’.

1.1.1.1 Theme 1: Protection of the Greenbelt

Two of the options contributed ‘very sustainably’ against one or more of the SA/SEA objectives. These were “*no further greenbelt releases to meet further land use requirements*” (against SA Obj. 8 ‘Use of brownfield land’, 11 ‘landscape’, & 13 ‘sustainable locations’) and “*retaining certain villages within the greenbelt and continuing to apply a strong presumption against development*” (SA Obj. 13).

1.1.1.2 Theme 2: Sustainable and Integrated Transport

Two options were assessed as having a very unsustainable effect against the ‘Use of Brownfield sites’ SA/SEA objective (SA8). These options were for the St Albans Eastern Distributor road, and “*one or more park and Ride sites in the Greenbelt*”, as both would result in development on greenfield land.

One option, “*the consideration of demand management measures (such as area-wide congestion charging or motorway tolls)*”, was assessed as having a ‘very sustainable’ effect on ‘Health’ (SA Obj. 12), as it is likely to restrict private vehicle use and encourage the uptake of more active travel modes (with secondary air quality benefits).

1.1.1.3 Theme 3: Meeting Housing Needs

Two options were found as having a ‘very sustainable’ effect, these being “*retaining/changing the 35% target for affordable housing*” (SA Obj. 15 ‘housing’), and “*giving greater priority to socially rented housing*” (also SA Obj. 15).

Options were not included for Issues 3.1 (Location of new Housing) and 3.3 (Previously Developed Land).

1.1.1.4 Theme 4: Embracing Diversity and Creating Opportunities for All

No significant effects were identified for the options under this theme.

1.1.1.5 Theme 5: Cherishing and Promoting Our Heritage, Arts and Culture

No significant effects were identified for the options under this theme.

1.1.1.6 Theme 6: Environmental Sustainability and Protection

Three options were found likely to have ‘very sustainable’ effects on at least one SA/SEA Objective. These were “*on-site renewable energy for developments over a certain size*” (SA Obj. 5 ‘CO₂ emissions’ and 13 ‘sustainable locations’), “*planning policies to insist on higher energy efficiency*” (SA Obj. 5, 9 ‘resource efficiency’ and 12 ‘health’) and “*energy conservation policies*” (SA Obj. 9 and 12).

1.1.1.7 Theme 7: Fostering Economic Growth and Prosperity

‘Very sustainable’ effects were predicted for the option to “*increase the number of local jobs to reduce out commuting*” against the SA objectives ‘sustainable prosperity and growth’ (SA Obj. 18) and ‘fairer access to services’ (SA Obj. 19).

1.1.1.8 *Theme 8: Improving the Health of the Community*

There were no appraisable options for Theme 8: *Improving the Health of the Community*.

1.1.1.9 *Theme 9: Striving for High Quality Design*

The option to “*take a design-led approach*” was found as likely to have a ‘very sustainable’ effect on SA objective 15 (good quality housing).

1.1.1.10 *Recommendations*

The SA Working Note provided a series of recommendations to help improve the sustainability of the Core Strategy. These covered issues including: development in the Green Belt and on greenfield sites; road improvement and building schemes; location of key services and amenities; and economy and employment.

The SA provided comparative assessments of all the options considered in the St Albans Joint Issues and Options Consultation Document. The SA did not however identify which option should be the preferred option to take forward to the next stage of the Core Strategy’s development.

Appendix E2 Supplemental Issues and Options - November 2006

An additional round of Issues and Options consultation 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.

The sustainability appraisal was undertaken at three levels:

- Firstly, the more general elements of the supplementary paper were appraised at a level appropriate to the level of detail contained in each section and the number of options proposed for each question.
- Secondly, the 17 areas put forward as potential urban extensions were assessed at a level, which whilst aiming to remain strategic, examined the main sustainability constraints specific to the individual locations.
- Thirdly, the appraisal looked at how the potential increased growth would impact on the existing Core Strategies and the findings of the sustainability appraisal work undertaken to date. The significant increase in potential housing numbers compared to those covered by the original Issues and Options Papers could not be appraised in isolation and it was necessary to examine the wider implications on the immediate and surrounding areas.

As it was considered that many of the issues raised and questions posed in this Issues and Options document were not easily appraised using the SA framework, a commentary was instead provided in terms of the likely sustainability implications of taking forward the different proposals relating to the issues discussed. For the 17 potential urban extensions, a Geographical Information System (GIS) was used to assess the sites in terms of potential constraints and opportunities.

The appraisal found that if the proposed extra growth was required to be delivered at Hemel Hempstead it would be likely to have widespread sustainability implications. Whilst there may be positive social and economic effects, it was also found to be likely that there would be some significant adverse environmental effects. These adverse effects are mainly linked to the intrusion into the Green Belt that would result from the growth considered. With this would arise the direct impacts of loss of greenfield sites and a range of other direct and indirect impacts such as effects on local landscapes.

No preferred options for urban extensions were recommended or selected at this stage.

The Sustainability Appraisal for this consultation is available at URL:

http://www.stalbans.gov.uk/Images/SANoteforHemelGrowthMainReport_tcm15-28800.PDF

Due to the quashing of elements of the East of England Plan relating to the expansion of Hemel Hempstead into St Albans District, it was no longer an issue to be determined in the Core Strategy. Discussions and joint working with Dacorum Borough Council are underway on this issue as part of the preparation of the East Hemel Hempstead Area Action Plan.

Appendix E3 Core Strategy Issues and Options – July 2007

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.

A new draft vision was put forward, along with a revised set of Core Strategy objectives. The July 2007 consultation also provided thoughts on policies covering the broad topics of:

- Sustainable Development;
- Meeting Housing Needs – Quantity;
- Meeting Housing Needs – Type;
- Employment Land Supply;
- Town Centres and Retail Hierarchy;
- Sustainable Transport and Other Infrastructure Requirements;
- Metropolitan Green Belt;
- Green Spaces; and
- Environmental Protection

The document sought views from the public in relation to a series of options covering:

- Settlement Hierarchy;
- Maximising development opportunities in towns and large villages;
- Release of Green Belt to meet housing needs;
- Employment Land Supply v Out-Commuting;
- Policy approaches to existing employment sites in St Albans City and District;
- Allocating additional land for employment use to meet identified needs;
- Town Centres and Retail Hierarchy – Defining the Future Role of St Albans;
- Supporting options for proposed out of centre location to accommodate a new food store;
- Options for a retail-led development scheme within St Albans City Centre;
- Developing an appropriate policy approach to sustainable transport across the District; and
- Park and Ride – Potential provision in the following broad locations.

1.1.1.11 Summary of Assessment Findings

Whilst the majority of the assessment scores fell in the ‘non-significant’ categories of ‘minor negative’, ‘neutral’, ‘uncertain’, or ‘minor positive’, the sustainability appraisal did predict that significant effects (positive and negative) could result through implementation of the following options:

- For the options that required some use of the Green Belt to accommodate housing, significant adverse effects were identified against the SA objective to use previously developed land;
- Similarly, a significant adverse effect was also identified against the SA objective to use previously developed land for the option to allocate a new employment site (or extend an existing employment site) within the Green Belt;

- A significant positive effect was identified against the SA cultural heritage objective for the option to create a dedicated arts and cultural quarter within the City Centre; and
- Significant positive effects were predicted for the SA objectives on greenhouse gas emissions, air quality and resource efficiency in relation to the option to place a strong emphasis on securing improvements to public transport, cycling and walking facilities and take a restrictive approach to use of the car, particularly within the main centres of the District.

1.1.1.12 *Possible Broad Locations to Accommodate Future Growth Needs*

In addition to the new Vision & Objectives and options for strategic policies, the Issues and Options paper also identified eight areas of search within the Green Belt which could accommodate substantial housing and/or employment growth. One urban site that could potentially accommodate future growth was also identified.

Broad locations to accommodate future growth – Constraints Assessment

- 1: South West of St Albans
- 2: South East of St Albans
- 3: West of London Colney
- 4: South of London Colney
- 5: East of St Albans
- 6: Smallford
- 7: North of St Albans
- 8: North of Harpenden
- UA1: Former Gas Works Site

The broad locations were assessed against potential environmental, social and economic constraints in order to help the Council understand the implications of taking forward one or more of the broad locations for future development. The SA provided the information to help in this decision making process.

1.1.1.13 *Recommendations*

As for the previous round of Issues and Options consultation, the SA Working Note provided a series of recommendations to help improve the sustainability of the Core Strategy. These covered issues including: health; climate change; crime and fear of crime; and sustainable transport.

The SA provided comparative assessments of all the options considered in the Issues and Options Consultation Document. The SA did not however identify which options should be the preferred options to take forward to the next stage of the Core Strategy's development.

Appendix E4 Emerging Core Strategy – July 2009

Community and stakeholder consultation on the Emerging Core Strategy took place in August and September 2009. A Sustainability Appraisal Working Note was produced to accompany this consultation.

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.

A summary of the main findings identified in the SA Working Note is presented below

1.1.1.14 Summary of Policy Assessment Findings

As with earlier rounds of assessment, the majority of the assessment scores fell in the 'non-significant' categories of 'minor negative', 'neutral', 'uncertain', or 'minor positive'. However, the sustainability appraisal predicted that significant effects (positive and negative) could result through implementation of the following options:

- Significant positive effects were forecast for the Green Belt policies against the 'landscape & townscape' SA objective as the policies restrict development within the Green Belt that would inevitably lead to adverse effects on St Albans' landscape, including the erosion of gaps between settlements;
- Negative effects were identified for the housing policies against the water resources SA objective due to the direct pressure on the region's already 'over abstracted' water resources. In the long term the effect was considered likely to be significant, with more dwellings being built and the risk of periodic water shortages increasing. The same was found to be the case for the policies relating to employment growth;
- Significant positive effects on the SA 'housing' objective were forecast as a result of the affordable housing policy which aims to provide at least 100 affordable homes per annum, and the target of 35 or 40% affordable dwellings within housing developments;
- The SA found that providing and expanding employment opportunities in the District would have significant positive effects on the economic SA objectives ('Sustainable prosperity & growth' and 'Fairer access to services') by supporting the local economy and providing local employment opportunities; and
- Significant positive effects were forecast on the SA objective for 'equality & social exclusion' in relation to the Leisure, Culture and Tourism Policies, as providing additional sport and recreation facilities should reduce the shortfall in this type of leisure facility.

1.1.1.15 Emerging Spatial Strategy

The SA found that the settlement hierarchy was likely to have largely positive effects on the SA objectives. Concentrating the majority of development within St Albans, Harpenden and London Colney should help to protect designated biodiversity sites, protect the Green Belt, reduce the need to travel (thereby reducing transport emissions and encouraging active travel), and improve access to services for those without access to a private vehicle. Encouraging higher density developments in the three main settlements where most development in the District would be concentrated could also lead to more efficient use of

land, while encouraging lower densities in the villages and other settlements should help to retain their local distinctiveness and character.

However potential adverse effects were forecast on 'equality & social exclusion' as concentrating development in the three main settlements could lead to rural communities becoming more isolated due to further centralisation and the associated potential for loss of facilities.

1.1.1.16 Strategic Sites

The Emerging Core Strategy proposed sites for housing, employment and other community facilities. Each site was assessed against a series of criteria/constraints and various sustainability issues and opportunities were identified. The sites considered in this assessment were as follows:

Housing

- H1: Oaklands City Campus, St Albans
- H2: St Albans City Station (south of Victoria Street)
- H3: King Harry Lane Playing Fields, St Albans
- H4: London Road/Alma Road (Previously FS1 in 2007 consultation)
- H5: Harperbury Hospital, Radlett
- H6: Building Research Establishment, Garston
- Area of Search 1: South West Of St Albans
- Area of Search 5: Beaumont School Element
- Area of Search 5: South of Sandpit Lane/North of Oaklands College
- Area of Search 7: North of St Albans
- Area of Search 3: West of London Colney
- Area of Search 8: (south east part) North of Harpenden
- H7: East of Redbourn
- H8: Nicholas Breakspear School Playing Fields, Colney Heath Lane

Employment Sites

- AoS 2 (north east part): London Road, St Albans
- E1: Rothamsted Research Site, West Common, Harpenden
- E2: Building Research Establishment, Garston
- E3: Roehyde (south west of A1 (M))
- Area of Search 7: Porters Wood

Shopping and Mixed use

- West of St Peter's Street (Drovers Way)
- Civic Centre, East of St Peter's Street
- Griffiths Way (gas works site), St Albans
- Colney Fields, London Colney
- FS1: London Road / Alma road
- FS2: Harpenden Road (former fire station and adjoining land)
- FS3: Harpenden Road (rear of Texaco filling station)

Schools

- Oaklands College
- Secondary school: Proposed new secondary school north of St Albans possibly in Area of Search 7.
- Primary schools: Proposed new schools west of city centre and in Area of Search 1 (south west of St Albans). Other new and extended schools also needed.

Leisure

- Proposed new indoor leisure centre: Westminster Lodge
- Proposed 4 star hotel with conference facilities: London Road, adjacent to cemetery
- Proposed new indoor leisure centre: Cotlandswick

Transport

- Proposed western orbital route consisting of:
 - A new link road from the A414 (former M10) to the A4147 Hemel Hempstead Road.
 - Junction improvements at Bluehouse Hill/King Harry Lane roundabout, Batchwood Roundabout and Ancient Briton junction.
- Junction Improvements
 - Improvements at Park Street and London Colney Roundabouts should be proposed.
- Eastern Distributor Road
- Park and Ride Sites
 - Park and Ride: North of London Colney Roundabout
 - Park and Ride: South of Park St Roundabout
 - Park and Ride: Vicinity of Noke Hotel
 - Park and Ride: Area near proposed Western Orbital Road

The strategic sites were assessed against potential environmental, social and economic constraints in order to help the Council understand the implications of taking forward one or more of the strategic sites into the next stage of the Core Strategy's development. The SA provided the information to help in this decision making process. The assessment summaries against the environmental, social and economic objectives are included in the full SA Working Note.

1.1.1.17 Recommendations

At this stage of the Core Strategy's development a series of recommendations were provided relating to how sustainability considerations could be further integrated into the Core Strategy or the lower tier development plan documents. These recommendations were provided under the themes of: Natural Environment; Resource Use; Sustainable Communities; and Achieving a Sustainable Economy.

Appendix E5 Spatial Strategy Options – 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. A further SA Working Note then produced. The options that were assessed are detailed in Table 1.

Table 1: Spatial Strategy Housing Growth Options

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

A summary of the main findings identified in the SA Working Note is presented below.

1.1.1.18 Summary of Assessment Findings

The appraisal compared the relative sustainability of the three options for growth and identified potential positive and adverse effects in relation to the SA objectives. It should be noted that for the adverse effects identified, other topic based policies included in the Strategic Local Plan and future Detailed Local Plan (DLP) will help mitigate many of these effects (e.g. policies relating to design of development, landscape enhancement, and provision of infrastructure). These other policies would also help to enhance any predicted positive effects.

The SA found that all three options provide a balanced distribution of housing growth across the District appropriate to deliver the planned levels of growth associated with each option. As a result most of the effects identified across the options are similar in type, but differ in scale.

Option 3 which would provide the highest levels of growth, with a consistently high annual delivery across the plan period, was forecast to have significant adverse effects in relation to the ‘landscape’ SA objective. This option would require release of land from the Green Belt to accommodate over 5,000 new homes on greenfield sites – with associated adverse effects on other environmental objectives. Such a scale of development would change the landscape character in these areas and erode gaps between neighbouring settlements.

The high levels of growth under Option 3 would also result in unsustainable pressure being placed on the District’s already stretched infrastructure, particularly schools and waste water treatment works.

Whilst there are these dis-benefits, the appraisal identified a range of positive effects that would result from the high levels of growth under Option 3. In particular the provision of the higher numbers of new dwellings was predicted as having significant positive effects against the ‘housing’ SA objective, as it would meet the forecast housing need over the plan period and would deliver the highest number of affordable homes to help resolve an issue for the District, particularly with respect to young people and key workers. This would help to promote balanced and mixed communities across the District. The high levels of growth would also provide the greatest support to the local economy, however there is the risk that increased growth could fuel the already high levels of out-commuting.

The larger developments that are proposed under this option also provide the greatest opportunities for realising significant gains in Green Infrastructure provision which could help to meet Biodiversity Action Plan targets and community forest objectives as well as encouraging the take up of active and healthy lifestyles. In addition larger developments would be required to provide significant new infrastructure which could have benefits for the wider community.

The lower growth options (Options 1 and 2) are similar in that levels of housing growth are the same up until 2021, and it is only after this period that growth under Option 2 lags behind that provided by Option 1.

The levels of development under Option 1 would result in the need for less development on greenfield sites in the Greenbelt compared to Option 3, with associated reduced adverse effects on some of the environmental objectives, particularly in relation to effects on landscapes. Option 1 would however need some large sites to be developed which would provide Green Infrastructure gains with the associated benefits described above. Pressures on local services and infrastructure would be less than for Option 3 but would still be an issue, particularly in relation to school provision and waste water treatment.

Under Option 1 there would be a shortfall in meeting the forecast housing demand which could have implications for maintaining balanced and mixed communities in the District.

Delivering Option 2 would further limit the impact on the local environment and the pressure on existing infrastructure compared to Option 1, although the lack of larger sites would mean that there would be limited opportunities for planning gains relating to Green Infrastructure and community facilities and infrastructure.

However conversely, the lower level of growth will limit the success of meeting a number of the social and potentially the economic objectives. The needs of the local community for new housing, particularly affordable housing, will not be met and there would be a significant shortfall in terms of meeting forecast local housing needs. This could result in certain groups of the population such as young people and key workers having to move to other areas, thereby creating unbalanced communities.

The lower levels of growth could also have implications for the viability of existing services and facilities in the District and reduce the vitality of the town and village centres.

As for previous stages the SA provided a comparative assessment of the options in order to help the Council understand the implications of taking forward any one particular option. Each option has specific pros and cons and the SA provided the information to help in the decision as to which option should be taken forward as the preferred option.

Following deliberation by Council Members a decision was made that none of the three options considered at this stage should be 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. The assessment of this strategy is discussed in Appendix E6.

Appendix E6 Core Strategy: Consultation on the Strategy for Locating Future Development in the District - December 2010

"The Core Strategy: Consultation on the Strategy for Locating Future Development in the District - December 2010" 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.

1.1.1.19 Summary of Assessment Findings

This section provides a summary of the contents of each section of the Core Strategy consultation document followed by a summary of the findings of the sustainability appraisal.

The Strategy for Locating Future Development in the District

The strategy proposed that development be concentrated in existing settlements, in the following priority:

- 1) Main urban settlements (excluded from Green Belt);
- 2) Other settlements excluded from Green Belt;
- 3) Green Belt settlements; and
- 4) Rest of Green Belt.

The SA found that this Strategy should provide a good balance between focusing development in the main settlements whilst still allowing for local needs to be met in smaller settlements and rural areas. The growth in the main settlements would help to support local services and community vitality, with associated social and economic benefits. It would also help to service the needs of surrounding areas. The strategy prevents the general dispersal of development across the District and by focusing growth in the main settlements would limit the need to travel to access goods and services, particularly by private car. Improvements in health could result, through enabling more cycling and walking and in so doing increasing access to local key services and activities for those without access to a car.

Concentrating new development in the main settlements through high density development, could lead to a danger of 'town cramming'. However the Strategy proposes a broad policy approach that new development will need to respect local character which will help to mitigate such effects.

By focusing development in the larger settlements the pressure on the Green Belt, local landscapes, and biodiversity associated with developing greenfield sites would be minimised.

Infrastructure and Non-Residential Proposals

The Spatial Strategy included a range of proposals for non-residential development in the topic areas of economic development; retail development; healthcare development; leisure, culture, arts and tourism; transport; green corridors and spaces; and education.

In some cases these proposals were put forward as specific 'Strategic Sites' whilst others were smaller scale and in some cases non-locationally specific. The 'Strategic Sites' were as follows:

- Extension at Rothamsted Research, Harpenden;
- New retail and mixed use development in St Albans city centre, east of St Peter's Street (Civic Centre) and/or west of St Peter's Street (Drovers Way);
- Retail warehousing at Griffiths Way, St Albans
- New leisure centres at Westminster Lodge, St Albans and Cotlandswick, London Colney; and
- Four star hotel with conference facilities at London Road, near the cemetery.

Details of the appraisals for the non-residential proposals are included in Appendix A of the SA Working Note (December 2010), whilst the appraisals for the individual sites are provided in Appendix B of the same document.

Significant positive effects were predicted against the health objective through a combination of improved provision of healthcare facilities across the District, the support for improvements to green spaces, the encouragement for the take-up of more active modes of travel, and the provision of new leisure facilities. The provision of improved services and facilities should also help to improve everyone's access to high quality health, education, recreation, and community facilities. In addition the promotion of walking, cycling and public transport, through improvements to infrastructure, would benefit those without access to a car.

1.1.1.20 Balancing Housing Growth, Sustainability and the Green Belt

The Council would like to see 100 new affordable homes provided each year in the District, whilst at the same time protecting the Green Belt.

Affordable homes are mostly delivered as a proportion of private housing developments and the Council considered that the 100 new affordable homes could be delivered through the development of 250 new dwellings each year providing that:

- The proportion of affordable housing sought on housing developments is increased from 35% to 40%;
- Contributions to affordable housing are required from all new housing (by reducing the site size threshold from 15 dwellings to one); and
- More affordable homes are built on Council owned land.

This figure is considerably lower than the 360 homes a year target that was planned for the District through the East of England Plan, which is planned to be revoked. This higher level of growth was previously subject to a sustainability appraisal alongside the Emerging Core Strategy consultation in July 2009. The sustainability appraisal reported in the December 2010 SA Working Note provided a comparison of the effects predicted for the lower level of growth against this earlier appraisal.

Details of the appraisal undertaken on the housing growth are provided in Appendix A of the SA Working Note (December 2010). The appraisal findings are summarised against the environmental, social, and economic Sustainability Appraisal objectives below.

Environmental: The lower levels of growth proposed would mean that there would be less pressure on greenfield sites in the Green Belt as much of the development would be provided in urban brownfield sites. This would have positive effects in terms of reducing impacts on biodiversity, protecting local landscapes, avoiding the reduction of gaps between settlements, and resulting in lower levels of soil loss. The lower growth would also mean that there will be less pressure on transport infrastructure which would help to avoid increases in greenhouse gas emissions as well as resulting in lower levels of any increase in air pollution from vehicles.

As it would be possible to deliver this lower level of growth through fewer and smaller strategic sites, so some of the opportunities that existed at the higher growth level would be lost. These could have included green infrastructure improvements and the improvement of degraded landscapes in some edge of settlement areas.

Social: The lower levels of growth would mean that there would be a larger shortfall in terms of meeting the identified overall housing needs of the District which would have societal implications and potential associated health and wellbeing issues. There could also be an out-migration of local people from the District to any neighbouring areas which do have available housing.

As with the environmental topics there would also be a reduced potential for realising any major community infrastructure planning gains now that there are fewer and smaller strategic housing sites proposed. However to counter this, the lower levels of growth would place less strain on existing community infrastructure than if the higher levels had been taken forward.

Economic: The new lower housing target would result in less additional support for shops and services in local and town centres which may already be under pressure in terms of

viability. Given the already high levels of out-commuting from the District, and the limited new Strategic Employment allocations proposed, the lower level of growth would limit any increase in out-commuting.

1.1.1.21 Distribution of Strategic Housing Locations

Whilst the majority of housing would be built on sites of less than 100 homes, the Strategy identified the following strategic housing locations which would each deliver between 100-250 homes. These sites were identified as offering infrastructure and community benefits.

Some of the sites were included as potential housing sites in the Emerging Core Strategy (July 2009) and were therefore subject to sustainability appraisal at that stage, other sites were not included or were considered for uses other than housing – details for each site are provided below.

Urban:

- London Road/Alma Road, St Albans: c.100 dwellings
 - Site included in the 2009 consultation
- Ridgeview, Barnet Road, London Colney: c.100 dwellings
 - Site included in the 2009 consultation but as part of a retail proposal for Colney Fields

Greenfield, excluded from the Green Belt:

- Spencer's Park, Hemel Hempstead: c.150 dwellings
 - Site not included in the 2009 consultation

Previously developed Green Belt:

- Building Research Establishment, Bricket Wood: c.150 dwellings
 - Site included in the 2009 consultation
- Harperbury Hospital: c.250 dwellings
 - Site included in the 2009 consultation, but for 350 dwellings.

Details of the appraisals for these individual sites are provided in Appendix B of the SA Working Note (December 2010). The appraisals provided a commentary of the potential effects against environmental, social and economic objectives.

The sustainability appraisal provided individual assessments for each of the strategic housing locations, highlighting relevant location specific sustainability issues and opportunities in order to help the Council understand the implications of taking forward one or more of the strategic locations into the next stage of the Core Strategy's development.

1.1.1.22 Summary

The sustainability appraisal provided assessments of the strategies for housing growth and infrastructure provision, as well as for a series of potential strategic sites. Recommendations for changes to the strategy were not provided at this stage of the SA process.

Appendix E7 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.

The level of housing growth proposed in the Draft Strategic Local Plan was 250 new dwellings per annum, giving a total of 4,250 over the plan period. Three broad locations were included in the Draft Plan for helping to deliver this housing requirement, these being Harperbury Hospital/Kingsley Green Mixed Use Broad Location (Policy SLP13), Oaklands Mixed Use Broad Location (Policy SLP14), and BRE, Bricket Wood Mixed Use Broad Location.

The assessment of the Draft Strategic Local Plan generally found that the policies were likely to have overall positive effects across the range of sustainability topics, with a number of **significant positive effects** having been identified, as follows:

- Policy SLP2 - Metropolitan Green Belt: in relation to the SA ‘landscape & townscape’ objective;
- Policy SLP3 - Historic Environment and Townscape Character: in relation to the SA ‘historic environment’ and ‘landscape & townscape’ objectives;
- Policy SLP4 - Urban and Architectural Design: in relation to the SA ‘landscape & townscape’ objective;
- Policy SLP5 - Mixed and Sustainable Communities: in relation to the SA ‘equity and social exclusion’ objective;
- Policy SLP7 - Community, Sport and Recreational Facilities: in relation to the SA ‘health’ objective;
- Policy SLP9 - Affordable Housing: in relation to the SA ‘good quality housing’ objective;
- Policy SLP15 - Economic Prosperity and Employment: in relation to the SA ‘sustainable prosperity’ and ‘fairer access to services’ objectives;
- Policy SLP20 - Creating Attractive and Vibrant Centres: in relation to the SA ‘revitalise town centres’ objective;
- Policy SLP26 - Natural Environment: in relation to the SA ‘biodiversity’, ‘water quality/quantity’ and ‘landscape & townscape’ objectives;
- Policy SLP27 - Green Infrastructure: in relation to the SA ‘biodiversity’ and ‘health’ objectives;
- Policy SLP28 - Renewable and Low Carbon Energy: in relation to the SA ‘greenhouse gas emissions’ and ‘resource efficiency’ objectives; and
- Policy SLP29 - Sustainable Design and Construction: in relation to the SA ‘water quality/quantity’, ‘greenhouse gas emissions’ and ‘resource efficiency’ objectives.

Whilst **no significant adverse effects** were identified in the assessment, a number of minor adverse were identified as a result of the proposed level of housing, economic growth and other planned developments. For example, there would inevitably be some land take which could have localised adverse effects on environmental factors, such as biodiversity, soils, and landscape & townscape. There are also likely to be increases in the level of water abstraction, which in an area already identified as being ‘over abstracted’ could become a more significant issue over time. Housing development will also result in an increase in greenhouse gas emissions from energy used in new housing and associated activities.

Adverse effects were also identified in relation to the level of housing proposed in the plan as it will fall short of meeting the identified housing need for the District, with associated adverse effects against the SA objective 'good quality housing'. The relatively low identified housing capacity of the District results from a large area of the District lying within the Green Belt, with the constraints to development in order to protect it.

In addition to the positive and negative effects that were identified, there were areas where there is uncertainty as to how some SA objectives would be influenced by the SLP policies. For example, there is uncertainty as to how the relatively low level of housing provision will affect some of the SA social objectives. Also, where development is proposed but without specific sites being identified, the effects will be dependent on the individual characteristics of the area affected and therefore remain uncertain at this stage of the planning process. This uncertainty will reduce when further detail is provided through the Detailed Local Plan.

Alternative locations

In addition to the Broad Locations that were included in the Draft Strategic Local Plan a number of alternative locations that had been considered during the plan making process were also assessed using the same methodology as for those Broad Locations that were included in the Draft SLP. The alternative locations that were assessed were as follows:

Housing Broad Locations

- H7: Land East of Redbourn
- H8: Nicholas Breakspear School Playing Fields
- Area of Search 1: Land South West of St Albans
- Area of Search 8: Land North of Harpenden (South-East part)
- Land West of Cherry Tree Lane, Hemel Hempstead (at Spencer's Park)
- Land North East of Hemel Hempstead, East of Cherry Tree Lane
 - NB: development out from Hemel Hempstead (Spencers Park) is a prerequisite to development of this area
- Land West of Chiswell Green
- Land at Mayne/Avenue Bedmond Lane

Employment Broad Locations

- E1 London Road (also known as Area of Search 2 North East)
- E4 Roehyde
- E5 Porter's Wood Extension (Also part of Area of Search 7)

The assessments of the Alternative Locations are detailed in Appendix F of the SA Report (November 2012).

All the documents can be found at the following weblink:

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

Appendix E8 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.

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 Co-operate (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 on these seven options are summarised in Table 2.

Table 2: Summary of Assessment of Housing Requirement / Target 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 Locational	14. Equality/ Social Inclusion	15. Good Quality Housing	16. Community Identity and	17. Crime and Fear of Crime	18. Sustainable Prosperity	19. Fairer Access to Services	20. Revitalise Town Centres
200 dpa			-							?		-	-			-	-	-	-	
250 dpa			-							?		-	-			-	-	-	-	
350 dpa			-							?		-	-			-	-	?	-	
450 dpa			-							?		✓	-			-	-	?	-	
550 dpa			-							?		✓	-			-	-	?	-	
750 dpa			-							?		✓	-			-	-	✓	-	
900 dpa			-							?		✓	-			-	-	✓	-	

The assessment of the seven options for the level of housing provision, that were put forward as illustrative approaches to setting a Plan housing requirement / target, identified that the higher levels of growth would have significant adverse effects against several of the environmental SA objectives but would 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.

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 increased water usage, resource use, greenhouse gas emissions and other vehicle pollutant emissions. In general, these effects would all be reduced with lower housing numbers.

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.

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 has used a sliding scale to illustrate how the magnitude of the effect changes as the potential housing levels increase.

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 are 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.

Officer assessments

In addition to the study undertaken by SKM, SADC officers undertook a separate assessment of the strategic sub-areas (SLP Technical Report – Development Sites and Strategy Options Evaluation (October 2014)). They also undertook a similar assessment for the development strategy options (see below).

For the evaluation of the relative merits and constraints associated with the strategic sub-areas and the development strategy options SADC developed an evaluation framework based on a range of criteria and a weighted scoring system. This framework included a wide range of economic, social and environmental factors that together were seen to effectively represent the concept of sustainable development as defined in the NPPF.

During the development of this framework consideration was given to the SA Framework objectives to ensure that they were represented within the criteria against which the sites and strategies were scored.

Through the use of this methodology SADC derived a score for each site / strategy and from these scores ranked the sites /strategies in terms of their suitability for being taken forward.

Both the SKM and the SADC studies ranked the sites. SKM in terms of the site’s suitability for Green Belt release when considered against the five Green Belt purposes; SADC in terms of the score achieved when assessed against the evaluation framework based on socio-economic criteria as well as environmental ones.

The table below summarises the findings of the two studies

<u>Strategic Sub Areas</u>	<u>SADC Assessment</u> <u>Total / Rank</u> (Maximum Potential Score 90)	<u>SKM Assessment</u>
SA-S1 – Land enclosed by east Hemel Hempstead and M1 (North)	68 (Rank 2)	Rank 7=
SA-S2 – Land enclosed by east Hemel Hempstead and M1 (South)	70 (Rank 1)	Rank 7=
SA-S3 – Area enclosed by residential development at east St Albans along Sandpit Lane	64 (Rank 3)	Rank 2
SA-S4 – Enclosed land at north St Albans along Sandridgebury Lane	47 (Rank 5)	Rank 4=
SA-S5 – Enclosed land at north Harpenden in vicinity of Luton Road, Cooters End Lane and Ambrose Lane	55 (Rank 4)	Rank 4=
SA-S6 – Enclosed land at northeast Harpenden along Lower Luton Road and extending to the vicinity of Whitings Close	45 (Rank 6)	Rank 6
SA-S7 – Land south and south west of London Colney	39 (Rank 8)	Rank 3
SA-S8 – Enclosed land at Chiswell Green Lane at Chiswell Green	44 (Rank 7)	Rank 1

The findings of the sustainability appraisal that was undertaken for these sites are summarised in Table 3.

Table 3: Summary of Assessments of Sub-Area 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 Locational	14. Equality/ Social Inclusion	15. Good Quality Housing	16. Community Identity and	17. Crime and Fear of Crime	18. Sustainable Prosperity	19. Fairer Access to Services	20. Revitalise Town Centres
Site S1 - east Hemel Hempstead (North)	*	-	-	**	✓	-	✓	*	✓	?	**	?	✓✓	✓✓	✓✓	✓	-	✓✓	✓✓	✓
Site S2 - east Hemel Hempstead (South)	*	-	-	**	✓	-	✓	*	✓	?	**	?	✓✓	✓✓	✓✓	✓	-	✓✓	✓✓	✓
Site S3 - Sandpit Lane, St Albans	*	-	-	**	✓	-	✓	*	-	?	*	✓	✓	✓	✓✓	✓	-	✓	✓	✓
Site S4 - north St Albans	*	-	-	*	✓	-	✓	*	-	-	*	✓	✓	✓	✓✓	-	-	-	-	✓
Site S5 - north Harpenden	*	-	-	*	✓	-	✓	*	-	?	*	✓	✓	✓	✓	-	-	-	-	✓
Site S6 - northeast Harpenden	*	-	-	*	✓	-	✓	*	-	-	*	✓	✓	✓	✓✓	-	-	-	-	✓
Site S7 - west of London Colney	*	-	-	*	✓	-	✓	*	-	*	*	✓	*	✓	✓	✓	-	-	-	✓
Site S8 - west of Chiswell Green	*	-	-	*	✓	-	✓	*	-	-	*	✓	*	✓	✓	-	-	-	-	✓

Significant positive social and economic effects were predicted for the two sites to the east of Hemel Hempstead (Sites S1 and S2) as they would provide the largest numbers of new homes in a sustainable location and would also deliver economic growth, particularly though the redevelopment of the area of Site S2 that is in Buncefield Oil Storage Depot HSE Consultation Zone, where housing would not be permitted. Development of these two sites also offers 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. To counter these positive effects, as these sites are both large, development would result in significant effects on the landscape. In addition, as the two sites contain best and most versatile agricultural land, significant adverse effects were also predicted for the soil objective.

A significant adverse effect on soils was also identified for Site S3 (Sandpit Lane, St Albans) as that also contains areas of best and most versatile agricultural land which it may not be possible to avoid developing over.

Significant positive effects were identified against the 'housing' SA Objective for Sites S3 (Sandpit Lane, St Albans), S4 (north St Albans) and S6 (northeast Harpenden) – in addition to those identified for Sites S1 and S2 – as these are large sites with the potential to meet a variety of accommodation needs and to deliver a large number of affordable homes.

The remainder of the effects predicted across the assessment of the eight sites were not predicted as being significant.

Uncertainties in the assessment were identified in relation to the following SA objective / site relationships:

- 'Resource efficiency' v Sites S3 (Sandpit Lane, St Albans) and S7 (west of 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;
- 'Historic environment' v Sites S1 and S2 (east of Hemel Hempstead, North and South), Site S3 (Sandpit Lane, St Albans) and Site S5 (north Harpenden) – in relation to the uncertain effects on Listed Buildings and other heritage assets;
- 'Health' v Sites S1 and S2 (east of Hemel Hempstead, North and South) – in relation to potential effects resulting from the Buncefield Oil Storage Depot HSE Consultation Zone, oil and gas pipelines and electricity transmission lines crossing the sites, and the sites being close to the M1 motorway with potential noise issues.

Mixed effects were 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).

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 is 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 are 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.

As for the Strategic Sub-Areas, the Development Strategy Options were also assessed against the SADC officer evaluation framework (SLP Technical Report – Development Sites and Strategy Options Evaluation (October 2014)). The results of this assessment are provided in Table 4.

Table 4: Results of Development Strategy Assessment

Development Strategy Options	Total / Rank (Maximum Potential Score 90)
Option 1 a) Mixed Location / Scale Development	62 (Rank 1)
Option 1 b) Mixed Location / Scale Development With Smaller, But More, Sites	49 (Rank 3)
Option 2 Dispersed Development	38 (Rank 4)
Option 3 Concentrated Development	58 (Rank 2)

The findings of the sustainability appraisal for the development strategy options are summarised in Table 5.

Table 5: 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	9. Resource Efficiency	10. Historic environment	11. Landscape/	12. Health	13. Sustainable Locational	14. Equality/ Social	15. Good Quality Housing	16. Community Identity	17. Crime and Fear of	18. Sustainable Prosperity	19. Fairer Access to	20. Revitalise Town
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	✓	✓✓	✓✓	✓	?	-	✓✓	-	✓

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 will help to support the regeneration of Hemel Hempstead that 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 would have significant 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 for 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 were also 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 are 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.

Full details can be found in the SA Working Note (September 2014) which is available at the following weblink:

<http://www.stalbans.gov.uk/planning/Planningpolicy/library/localplan.aspx>

Appendix E9 SA Report for Publication Strategic Local Plan December 2015

At the Publication stage the Strategic Local Plan was accompanied by an SA Report which provided an assessment of the SLP strategies, policies and broad locations for development. The SA Report also provided, in Section 4, a summary of how alternatives had been taken into account during the development of the SLP and the preceding Core Strategy.

At this stage in the SA there was no new consideration/comparison of options.

SA Report Addendum (July 2016)

The SA Report was later supplemented by an SA Report Addendum (July 2016) which was prepared to accompany the Submission SLP. Like the SA Report it did not include any new consideration/comparison of options.

Appendix E10 Detailed Local Plan SA Working Note (November 2017)

Selected relevant extracts from the SA Working note are provided below.

Consideration of alternatives

During the development of the Strategic Local Plan there was extensive and detailed consideration of options and alternatives, particularly in relation to the quantum and location of growth.

The SA 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 provided the decision makers with information on the likely sustainability implications of pursuing one option over another and were therefore an important part of both the evidence base and the decision making process itself, when deciding the preferred options for including in the SLP.

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.

At this stage it is therefore considered that there are no reasonable alternatives to the DLP policies as included in the Regulation 18 consultation.

There is however one policy where options are provided as part of the consultation. This relates to the North West Harpenden Broad Location where two options are provided for the main land uses and essential parameters for the developments. Appendix 1 provides the details relating to these options, along with an assessment of how they perform against the sustainability appraisal objectives. The findings are also summarised in Section 2. In relation to the site for a new secondary school in Harpenden, which has been identified by the Local Education Authority (LEA), there has been the consideration of alternative sites (see Note (1) to **Table 6**). However the assessment and selection processes that have been undertaken to arrive at a preferred location for the school have been undertaken for the LEA as part of their school planning process and do not form part of the SA/SEA for the DLP.

2 Screening of the DLP Policies

In order to determine whether the DLP will result in sustainability effects that have not already been identified and assessed during the SA/SEA of the SLP, it will be necessary to undertake an assessment of the policies and any other contents that could have effects on sustainability (e.g. allocations) prior to the publication of the DLP for the Regulation 19 consultation. That consultation process will need to include an SA Report as required by regulations.

In advance of that assessment an initial screening exercise has been undertaken on the policies in the version of the DLP that was presented to the Planning Policy Committee on 13th September 2016. The findings of that screening process are documented in **Table 6**.

Table 6: Initial screening of St Albans Detailed Local Plan policies

SLP Policy Area	DLP Policy	SA comments
SLP2	DLP 1 Green Belt Settlement Envelopes	No Likely Significant Effects (LSE) Supports SLP2 to prevent inappropriate development in the GB.
	DLP 2 Extension or Replacement of Dwellings in the Green Belt	No LSE Supports SLP2 to prevent inappropriate development in the GB.
	DLP 3 Non-Residential Development in the Green Belt	No LSE Supports SLP2 to prevent inappropriate development in the GB.
SLP3	DLP4 Heritage Assets	No LSE Provides the detail to support SLP3.
SLP4 and SLP10	DLP 5 Design and Layout of New Development	No LSE Provides the detail to support SLP4 and SLP10.
	DLP 6 Development Amenity Standards	No LSE Provides the detail to support SLP4.
	DLP 7 Primarily Residential Areas	No LSE Provides the detail to support SLP4.
	DLP 8 Location of Non-residential Uses in Serving Residential Areas	No LSE Provides the detail to support SLP4.
	DLP 9 Residential Caravans, Mobile Homes and Short Life Dwellings	No LSE Provides the detail to support SLP4.
SLP6 and SLP13	DLP 10 Education Locations in the Green Belt	No LSE ^(See Note 1) Provides the detail to support SLP6.
SLP7	DLP 11 Leisure Uses	No LSE Provides the detail to support SLP7.
SLP2 and SLP9	DLP 12 Neighbourhood Level Housing Development in the Green Belt	No LSE Supports SLP2 to prevent inappropriate development in the GB and SLP9 to enable the provision of affordable housing
SLP13	DLP 13 Broad Locations Masterplanning	See Appendix 1 for the assessment/commentary on the details provided in the diagrams included in this policy.
SLP15	DLP 14 Primarily Business Use Areas	No LSE beyond those identified in SLP.
SLP18 and SLP19	DLP 15 Major Retail Development Locations	No LSE. Provides the detail to support SLP19.
	DLP 16 Town, District and Local Centres	No LSE beyond those identified in SLP. Provides the detail to support SLP19.
SLP15	DLP 17 Strategic Office Locations	No LSE beyond those identified in SLP. Provides the detail to support SLP15.
SLP16 and SLP17	DLP 18 Special Employment Location Guidelines	No LSE. Provides the detail to support SLP16 and SLP17.
SLP25	DLP 19 Highways Considerations and Roadside Services	No LSE. Provides the detail to support SLP25.
	DLP 20 New Development Parking Guidance and Standards	No LSE. Provides the detail to support SLP25.
SLP13, SLP26 and SLP27	DLP 21 Local Green Spaces	No LSE beyond those identified in SLP.
	DLP 22 Green Space Not Designated as Local Green Space	No LSE beyond those identified in SLP.
	DLP 23 Green Space Standards and New Green Space Provision	No LSE beyond those identified in SLP.
	DLP 24 Green Infrastructure, Countryside, Landscape and Trees	No LSE beyond those identified in SLP.

(Note 1) The Draft Policies Map shows the location of the site that the Local Education Authority has identified for a new secondary school in Harpenden. This site was chosen following the detailed consideration of nine potential sites on the edge of the town by the infrastructure provider. Whilst the site is identified in the DLP, the SA/SEA of the DLP will consider the school to be part of the baseline and will not undertake a detailed assessment of the site. The SA/SEA will however take the site into account when considering cumulative effects. Details of the alternative sites considered and the assessments of those sites are provided at the following weblink (NB: Site F is the site that has been chosen by the LEA):

<http://m.hertfordshire.gov.uk/services/edlearn/aboutstatesch/newschools/harpenden/sitefeb15/>

The screening of the policies has identified no new Likely Significant Effects (LSE) beyond those identified in the SA/SEA of the SLP. This is because the DLP policies in most cases just provide more detail to the SLP policies, which have already been assessed, with these earlier assessments having identified the main effects on sustainability.

In relation to Policy DLP 13, the inclusion of diagrams to show the main land uses and essential parameters for the developments at the Broad Locations provides additional spatial detail to that included in the corresponding policies in the Strategic Local Plan (Policies SLP13a-d). The implications in relation to the Sustainability Appraisal are considered in Appendix 1 to this SA Working Note.

For the Broad Locations at East Hemel Hempstead and East St Albans, the diagrams do not provide any further detail to that which had been the basis of the assessments undertaken for Policies SLP3a&b and SLP13d. There are therefore no new implications for the findings of those previous assessments. For the North West Harpenden Broad Location, Policy DLP 13 provides two diagrams (Option A and Option B). The assessment undertaken for these two options (see Appendix 1) found that there is the potential for different effects against the SA objectives for 'biodiversity', 'landscape and townscape' and 'health'. However no new significant effects have been identified.

Based on the findings from this initial screening, and without prejudice to further consideration in the SA/SEA, it is considered that only a limited amount of new detailed assessment will be required at the Regulation 19 stage. The level of assessment will be dependent on the contents of the DLP as it is prepared for Publication following the Regulation 18 consultation. Even if individual policies do not have significant effects it will be necessary to consider how the DLP as a whole will affect sustainability. This would be established through the consideration of cumulative effects against each of the SA objectives.

Appendix 1: Policy DLP13 - Broad Location Masterplanning

For the broad locations that are included in the Strategic Local Plan (Policies SLP13a – 13d), Policy DLP 13 provides diagrams showing the main land uses and essential parameters for the developments at these broad locations.

The SA/SEA of the Strategic Local Plan provided assessments for each of the four broad locations, taking into account the proposed uses included in the policies, as follows:

- Policy SLP13a - East Hemel Hempstead (North) Broad Location - Mixed Use
- Policy SLP13b - East Hemel Hempstead (South) Broad Location - Mixed Use

- Policy SLP13c – North West Harpenden Broad Location – Principally Housing
- Policy SLP13d – East St Albans (Oaklands) Broad Location – Principally Housing

Given the additional level of spatial detail provided in Policy DLP13, this Appendix considers what implications there are for the assessments undertaken for the Strategic Local Plan.

East Hemel Hempstead (North and South) Broad location (Policies SLP13a and SLP 13b)

The diagram confirms that the employment area will be located in the part of the East Hemel Hempstead South Broad location that is in the Buncefield Oil Storage Depot HSE Consultation Zone. This was the assumption made when undertaking the assessment for Policy SLP13b and therefore that assessment remains unchanged.

The diagram does not provide any additional detail that would alter the findings of the assessments for either SLP13a or SLP13b.

North West Harpenden Broad Location (Policy SLP 13c)

Policy DLP 13 includes two diagrams for the North West Harpenden Broad Location.

Option A shows 'Residential with primary education including 4G Youth Sports Pitches' to be included in the footprint identified in Figure 6 of the Strategic Local Plan, (the school and pitches to be located at north-west of site), with Allotments located in the Green Belt beyond the north-east boundary of the Figure 6 footprint.

Option B shows 'Residential' to be included in the footprint identified in Figure 6 of the Strategic Local Plan, with allotments and 'Primary education including 4G Youth Sports Pitches' located in the Green Belt in two separate parcels of land beyond the north-east boundary of the Figure 6 footprint.

NB: both the figures are based on indications from early technical work and masterplanning.

The assessment undertaken on Policy SLP 13c took into consideration the provision of housing, a school and recreation space within the footprint identified in Figure 6 of the SLP. Therefore, in relation to Option A, the new information provided in DLP13 relates to the provision of allotments and their location in the Green Belt, and to the siting of the 'Primary education including 4G Youth Sports Pitches' at the north-west of the site.

In relation to Option B, the new information provided in DLP13 relates to the provision of allotments and their location in the Green Belt, the location of the 'Primary education including 4G Youth Sports Pitches' in the Green Belt, and the potential implications that the latter has on the layout and density of the residential development within the Figure 6 footprint.

An assessment of the two options against the SA Objectives is provided below. This does not repeat the assessment findings for SLP13c, in which the principle of development in this location is established, but instead identifies the implications against the SA objectives of one option over the other. The one exception to this approach is in the assessment that needs to be undertaken to consider the provision of allotments, this being a principle that was not included in the SLP.

SA Objective	Option A	Option B		
Biodiversity	No change to effects identified in the assessment of Policy SLP13c.	The potential for an increased area of open space under this option provides increased opportunities for biodiversity enhancement. However this may be countered by the development of the school on the area to the north of Ambrose Lane – which could have adverse effects on biodiversity due to the greenfield nature of this area.	?	
Water quality/ quantity	No difference in effects between the two options. No change to the finding of 'No predicted effects' for the assessment of Policy SLP13c.			
Flood risk	No difference in effects between the two options. No change to the finding of 'No predicted effects' for the assessment of Policy SLP13c.			
Soils	No difference in effects between the two options as the area of new built development on greenfield land will be the same for both options.			
Greenhouse gas emissions	No difference in effects between the two options. No change to effects identified in the assessment of Policy SLP13c.			
Climate change proof	No difference in effects between the two options. No change to the finding of 'No predicted effects' for the assessment of Policy SLP13c.			
Air quality	No difference in effects between the two options. No change to effects identified in the assessment of Policy SLP13c.			
Use of brownfield sites	No difference in effects between the two options. No change to effects identified in the assessment of Policy SLP13c.			
Resource efficiency	No difference in effects between the two options. No change to the finding of 'No predicted effects' for the assessment of Policy SLP13c.			
Historic & cultural assets	No difference in effects between the two options. No change to effects identified in the assessment of Policy SLP13c.			
Landscape & Townscape	No change to effects identified in the assessment of Policy SLP13c.	Locating the school and pitches in the area to the north of Ambrose Lane could allow for more greenspace and a layout that could reduce landscape impacts at the Broad Location. However it would result in new impacts north of Ambrose Lane.	?	
Health	The provision of allotments supports this objective.	✓	The provision of allotments supports this objective. This option would provide more opportunity for the creation of open space within the Broad Location, which would help to support this objective.	✓
Sustainable locations	No difference in effects between the two options. No change to effects identified in the assessment of Policy SLP13c.			

Equality & social exclusion	It is assumed that the facilities provided will be the same under both options and therefore there will be no difference in effects between the two options. Therefore there are no changes to effects identified in the assessment of Policy SLP13c.
Good quality housing	No difference in effects between the two options. No change to effects identified in the assessment of Policy SLP13c.
Community identity & participation	No difference in effects between the two options. No change to the finding of 'No predicted effects' for the assessment of Policy SLP13c.
Crime and fear of crime	No difference in effects between the two options. No change to the finding of 'No predicted effects' for the assessment of Policy SLP13c.
Sustainable prosperity & growth	No difference in effects between the two options. No change to effects identified in the assessment of Policy SLP13c.
Fairer access to jobs & services	No difference in effects between the two options. No change to effects identified in the assessment of Policy SLP13c.
Revitalise town centres	No difference in effects between the two options. No change to effects identified in the assessment of Policy SLP13c.

East St Albans (Oaklands) Broad Location (Policy SLP 13d)

The diagram for this broad location provides details of which parts are proposed for residential development and which parts are proposed for Schools/Community Facilities.

Policy SLP13 d provided information on the types of development, facilities and infrastructure that the overall development would be required to deliver and the assessment undertaken on that policy reflected these requirements. The details in the diagram in Policy DLP13 provide some spatial indication of where the different types of development will be situated but do not have any implications for the findings of the assessment undertaken for Policy SLP 13d.

Appendix E11 Local Plan Regulation 18 consultation SA Working Note (January 2018)

1 Introduction

1.1 Background

St Alban City and District Council (SADC) are currently preparing a Local Plan to replace the Local Plan 1994. The Local Plan will cover the period 2020-2036.

During its preparation this Local Plan must be subject to both Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) under the 'Planning and Compulsory Purchase Act' (2004) and 'The Environmental Assessment of Plans and Programmes Regulations' (2004) respectively. 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 Plan against key sustainability issues.

The main purpose of the Sustainability Appraisal (SA) is to improve the environmental and sustainability performance of the plan by assessing whether it is likely to result in any significant effects (positive or negative) on topics related to environmental, social and economic sustainability.

This Sustainability Appraisal Working Note has been produced to accompany the Regulation 18 consultation stage of the plan making process. Independent consultants TRL Ltd have been appointed by the Council to undertake Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) in support of the Local Plan.

The work on both the Local Plan and the SA/SEA will be 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. In order to ensure consistency with the previous SA, the SA framework and the SA approach used for this new round of SA are entirely consistent with those previously applied.

Sustainability Appraisal (incorporating Strategic Environmental Assessment) has been 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. Where relevant an appropriate this SA Working Note refers back to the assessments that were undertaken during the development of the SLP.

1.2 Local Plan 2020 – 2036

During this new round of consultation the Council are seeking views in relation to the six areas:

- 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

This SA Working Note has been produced to examine the sustainability credentials for the various approaches being considered during this new phase of work on the Local Plan. It builds on the findings of the previous SA activities which have also assessed options for scale, distribution and location of new development.

1.3 The SA Process

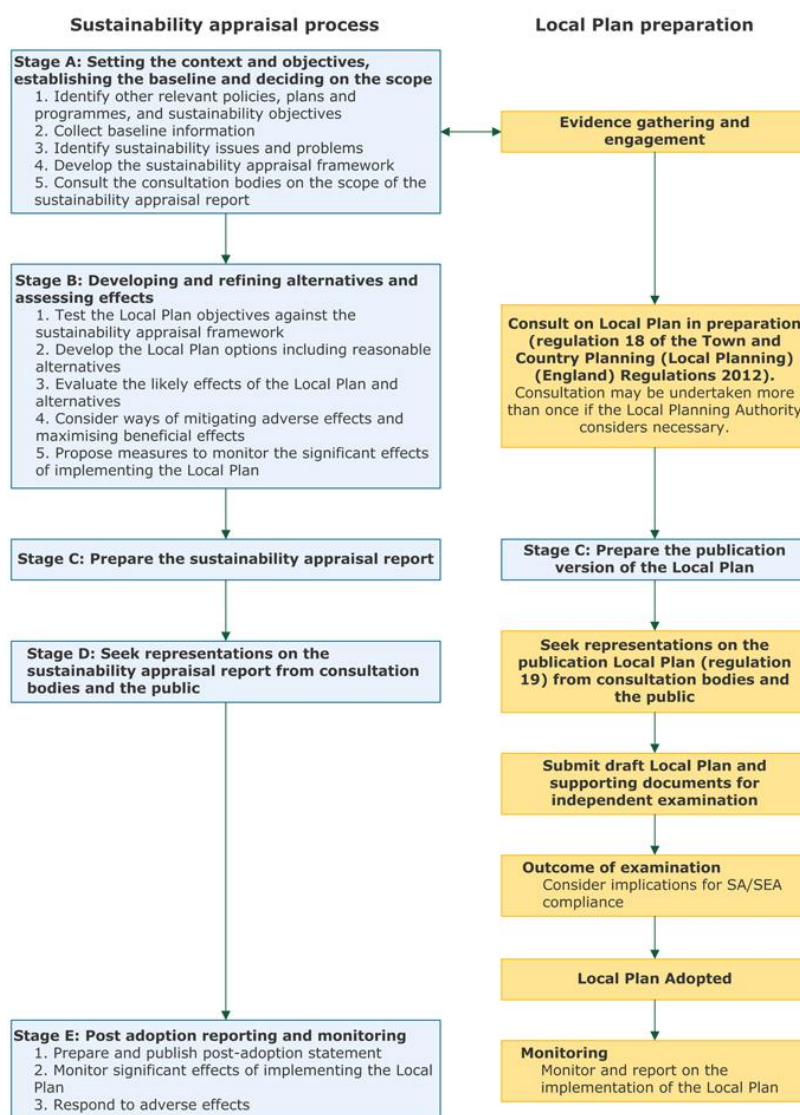
The process for undertaking SA of Local Plans is summarised in Figure 1.

During Stage A of the process a scoping exercise was undertaken in order to identify the key issues and opportunities within the District, which can then inform the development of the Local Plan, and to develop the SA methodology for undertaking the assessment of the Local Plan. The Scoping Report for this SA was prepared and published for consultation in 2006, with the information provided in that report having been updated on several subsequent occasions, most recently in 2015.

This SA Working Note forms part of Stage B of the SA process.

Figure 1: Relationships between Local Plan preparation and SA processes

(Source: Planning Practice Guidance, 2016)



A framework of SA Objectives was developed at the start of the SA process in 2005 and this framework has been used as a consistent basis for all Plan evaluation work that has been undertaken since the start of the process. This will continue to be the case.

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.

This new round of SA involves the assessment of a range of approaches that are being considered as part of the development of the Local Plan.

1.4 Habitats Regulations Assessment

The Council is required by legislation to undertake a Habitats Regulations Assessment (HRA) on the Local Plan, in order to determine whether there may be 'likely significant effects' on European Sites of importance for nature conservation from the Local Plan, either alone or in combination with other plans or projects.

Within St Albans District there are no European Sites, however the HRA needs to also consider the potential for effects on European sites in neighbouring areas, the closest such site being the Chilterns Beechwoods Special Area for Conservation (SAC), which lies within approximately 7km of the District.

Whilst the HRA for the Strategic Local Plan (and the previous draft Core Strategy) did not identify any significant issues for European sites, for this new round of Local Plan development a new HRA screening process will need to be undertaken in order to determine whether this remains the case. The new HRA will be informed by the previous HRA undertaken for the Strategic Local Plan.

The HRA will be undertaken as a separate process to the SA, and reported separately. However there are links between the two assessments and one will inform the other.

At this Issues and Options stage there is not the necessary level of Plan detail to undertake HRA. Instead, the process will be initiated during the next stage in the development of the Local Plan. This process will involve consultation with Natural England.

2 Sustainability Issues and SA Framework of Objectives

2.1 Key environment and sustainability issues within the District

During the SA process for the Strategic Local Plan a 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 and measures developed in the Plan.

The following key issues and opportunities were identified and reported in the SA Report (December 2015) which accompanied the Publication version of the Strategic Local Plan. This list of issues has been partly updated for this SA Working Note and will be reviewed and further updated as the SA work for the Local Plan is progressed.

- Whilst levels of nitrogen oxides (NO_x), nitrogen dioxide (NO₂) and particulates (PM₁₀) 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.

- Whilst the condition and management of both national and local sites designated for biodiversity in the District has been improving more could still be done to improve the quality of these sites.
- The planting of new trees at Heartwood Forest should help increase biodiversity. Numbers of many species of butterflies and birds have already increased.
- Although CO₂ emissions have been decreasing in the past (prior to 2011), there is some indication that they may be increasing once again in the District. Road transport now contributes the highest proportion of emissions from any sector.
- The District contains many heritage assets, and three Scheduled Ancient Monuments within the District are registered as at risk by Historic England: Wheathampstead earthwork incorporating Devils Dyke and the Slad; 'The Aubreys' camp, Redbourn; and The Benedictine Priory of St Mary (Sopwell Priory) and the post-medieval mansions known as Sopwell House or Lee Hall.
- 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 percentage of household waste composted and recycled is increasing, and the amount of waste collected per head is also now decreasing.
- South-west Hertfordshire's soils are mainly classified as grade 3 agricultural land, with some graded 2. St Albans contains mostly slightly acid loamy and clayey soils with impeded drainage.
- There are some issues with river water quality in St Albans, with the status of a number its rivers considered to be either 'bad or 'poor'.
- Over abstraction of water resources is an issue in the county and region.
- Water consumption per capita is above the national average.
- Waste water treatment works may be near capacity thresholds by the 2030's.
- Whilst there is generally a low flood risk, parts of the District are at risk from flooding, which may expand with climate change.
- Climate change impacts indicate a 5% loss of available water resource by 2035.
- The health of people in St Albans is generally better than the average for England. Deprivation levels are low and life expectancy for both men and women is longer than the England average. However there are health inequalities within St Albans which should be reduced.
- The number of noise complaints being made to the Council is increasing.
- The 2017 ONS household projection figure shows a 2017 estimated population figure for the District of 149,200. This amounts to a 6% increase over the 2011 Census figure of 140,664. .
- An ageing population means that there are fewer economically active people to support an increasing number of people coming up to retirement age. The requirements of an ageing population need to be taken into account.
- 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.
- Levels of crime are continuing to fall.
- There is high car usage in the District and as a result traffic congestion is an issue.
- St Albans ranks well overall in terms of deprivation in comparison to other local authorities in England, and has become relatively less 'deprived' since 2010. It is the least deprived district within Hertfordshire and the East of England. There are some pockets of deprivation within the District; however none of the wards in the District are within the 30% most nationally deprived.
- St Albans green infrastructure provides an opportunity to encourage greater numbers of the population to undertake regular physical activity. Accessible facilities and activities need to be provided for young people.
- A quarter of the population in the County are inactive. Fewer women than men are physically active, physical activity decreases with age, and those who have a limiting illness/disability are less active than those who do not. Socio-economic classification also plays a part with the more deprived being less active on average.
- The number of people receiving disability allowance as they are unable to work has been increasing steadily.
- Some GP surgeries, particularly those in St Albans, are over-crowded. Over the District there is some capacity, however with the level of housing proposed there is still a need to provide additional primary health care provision, as the existing level of capacity is not large enough or in the right location.
- The District has a high proportion of residents who are highly skilled and educated, but there are also pockets of deprivation and exclusion.
- Encouraging a diverse and sustainable economy and increasing participation in education and skills development at all ages.
- The rising birth rate is forecast to result in capacity issues in schools, with some deficits in the availability of school places.
- Employment rates in the region remain high, with the professional scientific and technical sectors accounting for the largest proportion of businesses.
- Retail vacancy rates have increased in the City Centre, and pedestrian footfall has reduced.
- The District has very little employment development land and its existing employment areas are coming under pressure for other uses.
- Unemployment levels are low and the District has a relatively high proportion of jobs per person of working age.
- About 40% of the resident workforce commutes out of the District for work.
- Pockets of deprivation and exclusion exist in relation to income and employment.
- The majority of businesses in the District (74%) employ less than five employees.
- A higher than average number of new businesses started up in 2010, reflecting the entrepreneurial skills base that exists in the local area.

2.2 SA Framework of Objectives

The framework of SA Objectives that has been used for all previous SA work is comprised of twenty objectives each supported by a series of sub-objectives and site specific assessment questions. The full SA Framework is provided in Appendix A, with Table 7 providing the 20 main objectives. For consistency this framework will be used for the SA of the Local Plan.

Table 7: Sustainability Appraisal Framework

	Reference Term	SA Objective
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
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
3	Flood risk	Ensure that new developments avoid areas which are at risk from flooding and natural flood storage areas
4	Soils	Minimise development of land with high quality soils and minimise the degradation/loss of soils due to new developments
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 ₂
6	Climate change proof	Ensure that developments are capable of withstanding the effects of climate change (adaptation to climate change)
7	Air Quality	Achieve good air quality, especially in urban areas
8	Use of brownfield sites	Maximise the use of previously developed land and buildings, and the efficient use of land
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
10	Historic & cultural assets	To identify, maintain and enhance the historic environment and cultural assets
11	Landscape & Townscape	To conserve and enhance landscape and townscape character and encourage local distinctiveness
12	Health	To encourage healthier lifestyles and reduce adverse health impacts of new developments
13	Sustainable locations	To deliver more sustainable patterns of location of development.
14	Equality & social exclusion	Promote equity & address social exclusion by closing the gap between the poorest communities and the rest
15	Good quality housing	Ensure that everyone has access to good quality housing that meets their needs
16	Community Identity & participation	Enhance community identity and participation
17	Crime and fear of crime	Reduce both crime and fear of crime
18	Sustainable prosperity and growth	Achieve sustainable levels of prosperity and economic growth
19	Fairer access to 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
20	Revitalise town centres	Revitalise town centres to promote a return to sustainable urban living

3 Local Plan Vision and Objectives

During the development of the Strategic Local Plan the SA assessed the compatibility of the Plan's seven Strategic Objectives against the objectives in the SA framework. The results of this assessment are summarised in Table 8.

Table 8: Compatibility between SA Objectives and SLP Objectives

		Strategic Local Plan Objectives (Abridged)							
		1. Our special character	2. Mixed and balanced / sustainable communities	3. A thriving economy	4. Celebration of our Culture	5. A connected district with ease of movement	6. A healthy and sustainable environment for a healthy population	7. Delivering Infrastructure	
SA Objectives (Abridged)	1	Biodiversity	-	N	?	-	-	C	?
	2	Water quality and quantity	C	N	-	-	-	C	-
	3	Flood risk	-	?	-	-	-	-	-
	4	Soils	-	N	?	-	-	-	?
	5	CO ₂ emissions	-	N	N	-	C	-	-
	6	Climate change proof	-	-	-	-	-	-	-
	7	Air quality	-	N	N	-	C	-	-
	8	Use of brownfield land	-	-	-	-	-	-	-
	9	Resource efficiency	C	-	-	-	-	-	-
	10	Historic and cultural assets	C	?	?	C	-	-	?
	11	Landscape & townscape	C	?	?	-	-	C	?
	12	Health	-	C	-	-	-	C	-
	13	Sustainable locations	-	-	-	-	C	-	-
	14	Equity and social exclusion	-	C	-	-	-	-	-
	15	Good quality housing	-	C	-	-	-	-	-
	16	Community identity and participation	C	C	-	-	-	-	-
	17	Crime	-	C	-	-	-	-	-
	18	Sustainable prosperity and growth	-	-	C	C	-	-	C
	19	Fairer access to jobs and services	-	-	C	-	C	-	-
	20	Revitalise town centres	-	-	C	-	-	-	-

(N) Potentially incompatible	(C) Compatible	(?) Uncertain	(-) No significant relationship
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The Compatibility Matrix indicated that generally, the SLP objectives were compatible with the SA objectives. However the assessment indicated that there were some potential conflicts and some uncertainties over the compatibility between the SA and SLP objectives. In general these related to situations where the achievement of the SLP objectives relating to housing provision and economic growth might hamper the achievement of some of the SA environmental objectives.

If the Local Plan objectives are updated during the next stages of development an additional compatibility assessment will need to be undertaken. However, the general conclusions of this compatibility analysis are likely to be applicable to the new Local Plan position.

4 Assessment of the issues and approach to priorities

4.1 Introduction

The Regulation 18 consultation document for the draft St Albans Local Plan 2020-2036 seeks views on how the Local Plan should respond to the issues and opportunities faced in the District in terms of providing new development to meet the needs of the local population.

The document does not propose clear-cut options for the issues covered but instead asks questions relating to the coverage and potential approaches. This makes it challenging to assess approaches/options against the SA framework.

However, though this is a new Local Plan, the work undertaken in developing the SLP has already undertaken assessment on a wide range of options, including those relating to housing numbers and the distribution of development – these being two topics which are covered in the new Regulation 18 consultation. The sections below therefore make reference to the previous SA work where relevant.

4.2 Methodology

The approach taken in the SA is to assess each Plan option, and where appropriate combination of options, against each of the objectives in the SA framework. The findings of the assessment are then 'scored' using the significance criteria shown in Figure 2. The assessment scoring is supported by an assessment commentary to provide the rationale behind the score allocated. This methodology has been used in all previous rounds of SA and will be the approach taken in the new stage of SA, as options are developed.

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

Figure 2: Significance criteria

The Issues and Options document contains a series of potential approaches to be taken forward in developing the Local Plan. At this stage it is not possible to provide any detailed assessment of the potential effects of the different approaches. A greater level

of certainty will be possible as the Local Plan is developed further and more detail is provided in relation to the strategies, policies and site allocations. The SA of the Publication Local Plan will use a detailed assessment methodology which considers the geographical scope of effects (local, regional or national), temporal scope (short, medium or long term), permanence (temporary or permanent). The assessment will also consider cumulative/synergistic effects, cross-boundary effects and interrelationships between the SA objectives.

4.3 'Build homes in the right places'

The main issue that the Local Plan will need to address is the provision of new homes during the Plan period.

The Government's 2017 consultation document "Planning for the right homes in the right places" sets out a new draft national standard methodology for calculating housing 'need'. This methodology produces a housing need for the District of 913 dwellings per annum (dpa).

4.3.1 Previous SA

The Council has previously taken different approaches to the number of new homes that should be provided within the Plan (previously Core Strategy and Strategic Local Plan). The approach taken when developing the draft SLP in 2012 was one based on Green Belt constraint which sought to provide approximately 250 dpa in order to meet the authority's then aim to provide 100 affordable houses per annum (based on 40% of new homes being 'affordable homes') whilst limiting greenfield development in the Green Belt. For the submission SLP this approach was changed to one which sought a different balance between Green Belt constraint and delivering housing, affordable housing and employment development in the Green Belt, to deliver approximately 450 dpa, based on specific migration and household formation assumptions.

Whilst the Council are not considering options for the level of housing growth as part of this new Regulation 18 stage (as it has assumed that it will be seeking to meet the identified level of need in full), during the development of the SLP a range of housing number options were considered and assessed by the SA. The highest of the options considered (900 dpa) closely equates to the number which results from the Government's new methodology (913 dpa). The findings of the assessment are summarised in Table 9. The detailed assessment for each option is provided in the SA Working Note which can be accessed at the following web link:

<https://www.stalbans.gov.uk/planning/Planningpolicy/library/localplan.aspx>

The seven options considered were as follows:

- 200 dwellings per annum (dpa);
- 250 dpa;
- 350 dpa;
- 450 dpa;
- 550 dpa;
- 750 dpa; and
- 900 dpa.

Each of the options was assessed against the 20 SA Objectives that make up the SA Framework. Whilst the standard SA 'scoring' methodology was used for some of the SA Objectives (i.e. assigning an individual 'score' (or 'scores') for each option against each

SA Objective - as shown in the table below), for other SA Objectives a variation of the 'scoring' methodology was developed that more clearly demonstrates the implications of moving up through the range of housing number options. This alternative method uses a sliding scale of intensity of the green and red colours that depict the variation in positive and negative effects.

Table 9: Summary of Assessment of Housing Requirement / Target 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	14. Equality/ Social Inclusion	15. Good Quality Housing	16. Community Identity and	17. Crime and Fear of Crime	18. Sustainable Prosperity and	19. Fairer Access to Services	20. Revitalise Town Centres
200 dpa			-							?		-	-			-	-	-	-	
250 dpa			-							?		-	-			-	-	-	-	
350 dpa			-							?		-	-			-	-	?	-	
450 dpa			-							?		✓	-			-	-	?	-	
550 dpa			-							?		✓	-			-	-	?	-	
750 dpa			-							?		✓	-			-	-	✓	-	
900 dpa			-							?		✓	-			-	-	✓	-	

The assessment of the seven options for the level of housing provision, that were put forward as illustrative approaches to setting a Plan housing requirement / target, identified that the higher levels of growth would have significant adverse effects against several of the environmental SA objectives but would 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.

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.

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.

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 principles included in the assessment above 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, which will be assessed in detail during the next stage of the SA.

4.3.2 New Regulation 18 stage

The Council has identified five potential sources to deliver the 9,000 to 10,000 homes that are required over and above the 5,000 'business as usual' dwellings. The sources for this additional housing provision are as follows:

- 1 - Add more homes into existing built-up areas
- 2 - Build on 8 areas that least meet Green Belt purposes
- 3 - Expand existing villages into the Green Belt
- 4 - Further expand existing towns into the Green Belt (500 – 5,000 homes)
- 5 - Create new 'Garden Village(s)' in the Green Belt (1,500 – 10,000 homes)

4.3.3 SA commentary

4.3.3.1 Previous assessment of options for distributing housing development

When considering approaches to the distribution of development at this new Regulation 18 stage, the assessment carried out in 2014 is relevant, where 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). The findings of the assessment are summarised in Table 10. The

detailed assessment for each option is provided in the SA Working Note which can be accessed at the following web link:

<https://www.stalbans.gov.uk/planning/Planningpolicy/library/localplan.aspx>

Table 10: 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	14. Equality/ Social Inclusion	15. Good Quality Housing	16. Community Identity and	17. Crime and Fear of Crime	18. Sustainable Prosperity	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 will remain valid as the start point for the Local Plan 2020-2036.

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.

The 'Build homes in the right place' section of the Issues and Options document lists 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.

4.3.3.2 '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.

4.3.3.3 '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.

4.3.3.4 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.

4.3.3.5 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.

4.3.3.6 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.

4.4 'Building the right kind of homes'

4.4.1 Proposed approach

The Council's approach is that local need can be briefly characterised as:

- *Affordable Housing*
 - *Social rented housing (60% of market rent)*
 - *Affordable rented housing (80% of market rent)*
 - *Part-buy / part-rented housing*
- *Small first time buyer flats (1-2 beds)*
- *Small/medium sized first family homes (2-3 beds)*
- *Homes for people downsizing*
- *Homes for older people (flexi-care, nursing care homes, residential care homes)*
- *Self-built homes*

4.4.2 SA commentary

The proposed approach covers the needs for the majority of the housing types and community groups and is therefore supported by the SA.

As the Plan is developed further the SA will assess the approach and policies that are being developed to cover this topic area.

Of relevance is the SA of the draft Strategic Local Plan Policies SLP9 'Affordable housing' and SLP10 'Housing Size, Type and Mix' which covered the equivalent topic area under the 'Deliver local housing needs' objective. The SA of those policies identified significant positive effects against the SA objective relating to 'Good quality housing' and minor positive effects against the other social objectives.

4.5 'Provide local jobs'

4.5.1 Proposed approach

The Council's proposed approach to how economic development, employment land and jobs should be covered in the Local Plan is:

- *Support a healthy and varied local economy, with a focus on knowledge and creative industries, financial and business services, green technology and tourism.*
- *Offer employers a highly skilled and flexible workforce and individuals the very best opportunities to learn, train, start businesses, develop entrepreneurial opportunities and improve their employability.*

4.5.2 SA commentary

The approach outlined above is consistent with the approach included in Policy SLP15 of the SLP, which sought the "... provision of sufficient land and floorspace to cater for full employment and to provide for different kinds of employment use." The SA for Policy SLP15 identified significant positive effects against the economic objectives, as protecting and expanding employment opportunities in the District will support the local economy, provide more local employment opportunities and could also reduce levels of

out-commuting. If the protected and expanded employment sites are close to town centres, the policy could help in their revitalisation, although the effects were considered to be uncertain.

The approach identified in the Regulation 18 document is therefore supported by the SA.

4.6 'Protect the Green Belt'

This section of the Issues and Options document makes reference to the Green Belt Review which was undertaken during the development of the Strategic Local Plan (SLP). The eight 'Broad Locations' in the District which were identified by that review as least meeting Green Belt purposes were assessed by the SA of the SLP (see Section 4.3.3.3).

The Local Plan will aim to protect the Green Belt as much as possible, whilst acknowledging that some development on the Green Belt will be required in order to meet the local need for new homes. When the approach relating to the Green Belt is developed for the new Local Plan it will be subject to SA and the findings of the assessment will be included in the SA Report that will be produced for the Publication stage.

The new assessment will be informed by the SA of Policy SLP2 'Metropolitan Green Belt' in the draft Strategic Local Plan which sought to protect the Green Belt from inappropriate development. The SA of that policy identified that 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.

4.7 'Protect our historic buildings, wildlife sites and areas of natural beauty'

The Council's proposed approach for the new Local Plan is that the historic environment, key ecological habitats and sites of natural beauty should be protected and not built on. This approach was one that was also taken in the policies of the draft Strategic Local Plan.

The SA of 'Policy SLP3 Historic Environment and Townscape Character', which aimed to conserve, enhance and ensure the enjoyment of the District's historic environment, identified significant positive effects for the SA objectives covering 'Historic and cultural assets' and 'Landscape & townscape', whilst the SA of 'Policy SLP26 Natural Environment' identified significant positive effects for the SA objectives covering 'Biodiversity', 'Water' and 'Landscape & townscape'. The assessment of this policy will therefore be used to inform future assessments of policies relating to the protection and enhancement of both the historic and natural environment.

4.8 'Get the transport, schools and infrastructure we need'

The infrastructure that the Council considers to be necessary to support the scale of development that the Government is requiring includes the following:

- *Better public transport, including trains and buses*
- *New or improved roads and junctions*
- *More car parking*
- *New or improved cycling and walking facilities*
- *Extra primary and secondary schools*
- *New parks, allotments, playing fields*

- *New GP and other healthcare facilities*
- *New neighbourhood centres, shops and other community facilities*

4.8.1 SA commentary

The provision of new physical, social and green infrastructure to support new housing and employment development is a key factor in delivering sustainable development. Providing the infrastructure will avoid overloading existing services and facilities and will help to reduce the need to travel. As mentioned in Section 4.3.3.1, larger strategic sites provide the best opportunities for infrastructure provision and planning gain opportunities.

The SA will provide an assessment of the approach and policies relating to infrastructure provision that are developed for inclusion in the Local Plan, informed by the assessments for the equivalent policies in the draft Strategic Local Plan.

Policy SLP30 'Delivery of Infrastructure' in the draft Strategic Local Plan required that new development should provide/contribute towards new physical, social and green infrastructure for the District. Other policies of relevance to infrastructure provision included 'Policy SLP6 'Education Facilities'; Policy SLP7 'Community, Sport and Recreational Facilities'; Policy SLP25 'Transport Strategy'; and Policy SLP27 'Green Infrastructure'. The SA of these five policies identified significant positive effects against the SA objectives for 'Biodiversity', 'Health' and a range of other potential positive effects. Ensuring that new physical infrastructure is provided would help to avoid overloading existing infrastructure, such as waste water treatment works, thereby protecting material assets, as well as helping to avoid adverse effects on the natural environment. The provision of social infrastructure would support social objectives, whilst new physical infrastructure would help support the local economy.

5 Conclusions and Next Steps

5.1 Conclusions

Given the 'high level' form and content of the Issues and Options questionnaire, during this new stage of SA there has been 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 have been reiterated and cross-referenced in order to identify the potential effects that could result if certain approaches are taken forwards against others.

The need to provide the number of homes over the Plan period that has been identified by the latest Government methodology means that a balance will need to be struck between identifying sites to allocate for new housing and employment development whilst still protecting the District's environment, including the Green Belt.

5.2 Next Steps

Following the consultation on the Issues and Options document the Local Plan will be developed further, with the next stage of consultation being on the Publication (Pre-Submission) version of the Local Plan which is due to be undertaken in autumn 2018. Prior to that consultation the SA will provide input during the development of the Plan by providing assessments of the strategies and policies being developed, as well as the sites being considered. In undertaking this process the SA will consider reasonable alternatives and will provide recommendations as to how potential adverse effects could be mitigated and how the sustainability credentials of the Local Plan can be enhanced.

Appendix E12 Local Plan SA Working Note 2 (May 2018)

1 Introduction

1.1. Background

St Alban City and District Council (SADC) are currently preparing a Local Plan to replace the Local Plan 1994. The Local Plan will cover the period 2020-2036. During its preparation this Local Plan must be subject to both Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) under the 'Planning and Compulsory Purchase Act' (2004) and 'The Environmental Assessment of Plans and Programmes Regulations' (2004) respectively. 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 Plan against key sustainability issues. The main purpose of the SA is to improve the environmental and sustainability performance of the plan by assessing whether it is likely to result in any significant effects (positive or negative) on topics related to environmental, social and economic sustainability.

This Sustainability Appraisal Working Note has been produced to inform the ongoing plan making process following the consultation at the Regulation 18 stage, but prior to the Publication stage (Regulation 19). Independent consultants TRL Ltd have been appointed by the Council to undertake SA and SEA in support of the Local Plan.

The work on both the Local Plan and the SA/SEA is being 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. In order to ensure consistency with the previous SA, the SA framework and the SA approach used for this new round of SA are entirely consistent with those previously applied.

SA (incorporating SEA) has been 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. Where relevant and appropriate this SA Working Note refers back to the assessments that were undertaken for the SLP and DLP.

1.2 Local Plan Alternatives

This SA Working Note has been produced to examine the sustainability credentials for the alternatives being considered during this new phase of work on the Local Plan. It builds on the findings of the previous SA activities on the Strategic Local Plan which also assessed options for scale and location of new development.

This phase of work on the Local Plan is considering alternatives in relation to the following:

- The level of housing growth: eight options for new housing numbers have been developed. These range from 200 new dwellings per annum (dpa) through a range of other options up to 1,200 dpa (see Section 2.1. for full details); and
- Potential broad Locations for delivering housing: 12 Broad Locations in the Green Belt have been evaluated. These sites are the reasonable alternatives which have been identified following a three stage site selection process undertaken by the Council following the call for sites that was undertaken in early 2018 (see Section 2.2).

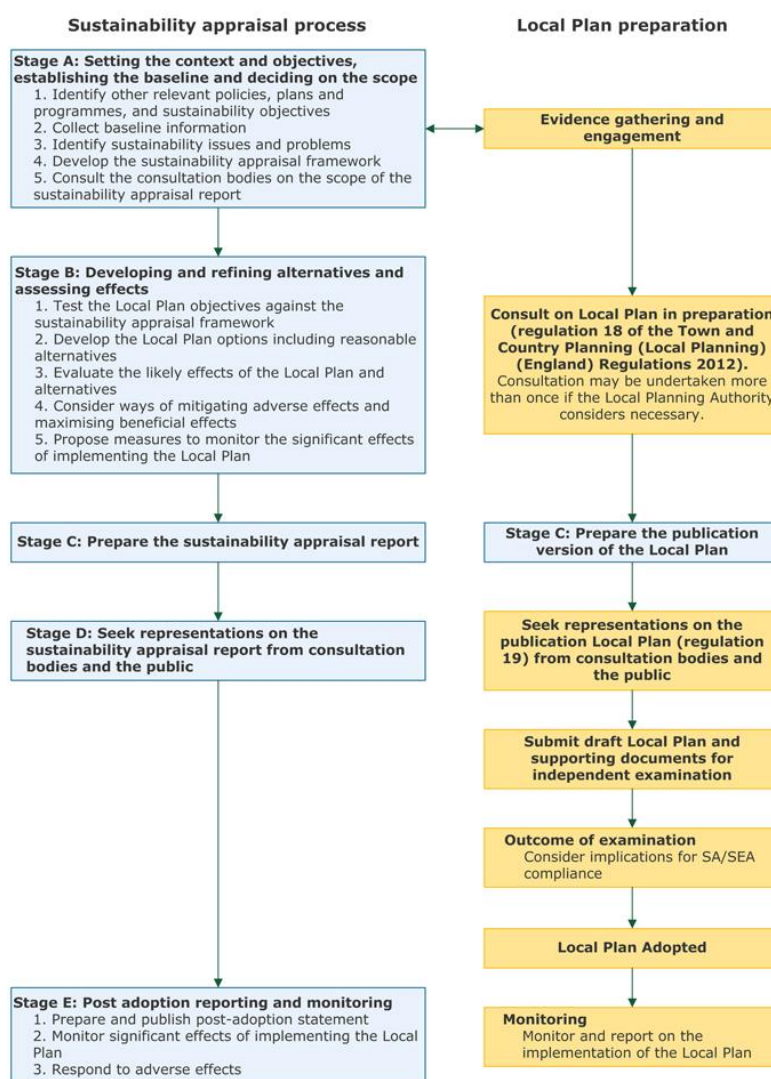
1.3 The SA Process

The process for undertaking SA of Local Plans is summarised in Figure 1.

During Stage A of the process a scoping exercise was undertaken in order to identify the key issues and opportunities within the District, which can then inform the development of the Local Plan, and to develop the SA methodology for undertaking the assessment of the Local Plan. The Scoping Report for this SA was prepared and published for consultation in 2006, with the information provided in that report having been updated on several subsequent occasions, most recently in 2015. This SA Working Note forms part of Stage B of the SA process.

Figure 1: Relationships between Local Plan preparation and SA processes

(Source: Planning Practice Guidance, 2016)



A framework of SA Objectives was developed at the start of the SA process in 2005 and this framework has been used as a consistent basis for all Plan evaluation work that has been undertaken since the start of the process (see Table 1). This will continue to be the case.

Table 1: Sustainability Appraisal Framework

	Reference Term	SA Objective
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
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
3	Flood risk	Ensure that new developments avoid areas which are at risk from flooding and natural flood storage areas
4	Soils	Minimise development of land with high quality soils and minimise the degradation/loss of soils due to new developments
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 ₂
6	Climate change proof	Ensure that developments are capable of withstanding the effects of climate change (adaptation to climate change)
7	Air Quality	Achieve good air quality, especially in urban areas
8	Use of brownfield sites	Maximise the use of previously developed land and buildings, and the efficient use of land
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
10	Historic & cultural assets	To identify, maintain and enhance the historic environment and cultural assets
11	Landscape & Townscape	To conserve and enhance landscape and townscape character and encourage local distinctiveness
12	Health	To encourage healthier lifestyles and reduce adverse health impacts of new developments
13	Sustainable locations	To deliver more sustainable patterns of location of development.
14	Equality & social exclusion	Promote equity & address social exclusion by closing the gap between the poorest communities and the rest
15	Good quality housing	Ensure that everyone has access to good quality housing that meets their needs
16	Community Identity & participation	Enhance community identity and participation
17	Crime and fear of crime	Reduce both crime and fear of crime
18	Sustainable prosperity and growth	Achieve sustainable levels of prosperity and economic growth
19	Fairer access to 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
20	Revitalise town centres	Revitalise town centres to promote a return to sustainable urban living

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. SA is a decision aiding tool rather than a decision making one and the contents of this report should therefore be considered in this light. This new round of SA involves the assessment of options that are being considered as part of the development of the Local Plan.

The significance criteria used in the assessment are shown in Table 2.

Table 2: Sustainability Appraisal Significance Criteria

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

For the assessment of the options relating to housing numbers a variation of the ‘scoring’ methodology has been developed that more clearly presents the findings of the assessment against several of the SA Objectives. Details of this alternative approach are provided in the introduction section of Appendix A.

2 Details of the Alternatives Considered

This section provides details of the two different categories of alternatives being considered in this phase of the Local Plan.

2.1 Housing Requirement

2.1.1 Introduction

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.

The Government’s 2017 consultation document “Planning for the right homes in the right places” sets out a new draft national standard methodology for calculating housing ‘need’. This methodology produces a housing need for the District of 913 dwellings per annum (dpa).

2.1.2 Previous consideration of housing requirement options

The Council has previously taken different approaches to the number of new homes that should be provided within the Plan (previously Core Strategy and Strategic Local Plan). The approach taken when developing the draft SLP in 2012 was one based on Green Belt constraint which sought to provide approximately 250 dpa in order to meet the authority’s then aim to provide 100 affordable houses per annum (based on 40% of new homes being ‘affordable homes’) whilst limiting greenfield development in the Green Belt.

For the submission SLP this approach was changed to one which sought a different balance between Green Belt constraint and delivering housing, affordable housing and employment development in the Green Belt, to deliver approximately 450 dpa, based on specific migration and household formation assumptions.

In 2014 seven options for the level of housing provision were put forward as illustrative approaches to setting an SLP housing requirement / target. These options, including details as to how they were arrived at, 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 Co-operate (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 considered in 2014 were rounded to the 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.*

(Source, SA Working Note, September 2014).

The new Government figure of 913 dpa is close to the highest figure (900 dpa) that was considered during the development of the Strategic Local Plan and therefore the assessment of the 900 dpa can be 'carried forward' for the assessment of the 913 dpa.

2.1.3 Additional options for Local Plan

In addition to the seven options that have been previously considered (using the assumption above that the new housing requirement/target of 913 dpa is equivalent to the 900 dpa previously considered) the Council have now identified one additional option for consideration and assessment.

This new option, of 1,200 dpa, provides 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. Such an approach needs to be considered as a reasonable alternative given the guidance from Government for local authorities to undertake joint planning through the Duty to Cooperate, rather than just focusing on their own local authority needs and delivery.

The eight options that are being / have been considered during the development of the Plan are therefore as follows:

- 200 dwellings per annum (dpa);
- 250 dpa;
- 350 dpa;
- 450 dpa;
- 550 dpa;
- 750 dpa;
- 900 dpa (also covering the 913 dpa from the new Government figure); and
- 1,200 dpa.

The findings of the assessment of these options are provided in Section 3.1.

2.2 Broad Locations

2.2.1 Introduction

Following the call for sites that was undertaken in early 2018 the Council has used a three stage site selection methodology to identify strategic sites (Broad Locations) that could be considered for inclusion in the Local Plan in order to contribute to meeting housing, infrastructure and other development needs over the plan period.

The site selection methodology used a Red Amber Green (RAG) 'scoring' approach at each of the three stages to identify which sites should go forward to the next stage of the process. Any sites with a 'Red' rating were ruled out from further consideration. Only those sites with a 'Green' or 'Amber' rating at the end of Stage 3 of the process are now considered by the Council to be 'reasonable alternatives' that require SA/SEA.

2.2.2 Broad Locations for SA/SEA

The 'reasonable alternative' Broad Locations which have been identified through the three stage site selection process, including their Stage 3 score (Green or Amber) are as follows:

- East Hemel Hempstead (North) - (Green)
- East Hemel Hempstead (South) - (Green)
- South East Hemel Hempstead - (Amber)
- North Hemel Hempstead - (Amber)
- East St Albans - (Green)
- North St Albans - (Green)
- North West Harpenden - (Green)
- North East Harpenden - (Green)
- West of London Colney - (Green)
- West of Chiswell Green - (Green)
- Park Street Garden Village - (Amber)
- North East of Redbourn - (Amber)

The findings of the SA/SEA of these 12 Broad Locations are provided in Section 0.

3 Sustainability Appraisal Findings

The findings of the independent Sustainability Appraisal that has been undertaken on the two areas for which options are being considered are provided in the following sub-sections.

3.1 Housing Requirement

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

Table 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.

3.2 Broad Location Options

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

Table 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 have been identified against the SA Objective for housing (SA15) for the ten sites which would deliver greater than 500 new dwellings. Minor positive effects have been 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 have been 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 have therefore been 'scored' with a minor positive for SA 13, with the exception of the two 'edge of village' sites at Chiswell Green and Redbourn which have 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 has been 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 have been 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 have 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 have been 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. Further information will need to be obtained for next rounds of assessment.

Four sites (East St Albans, London Colney, Park Street and Redbourn) have areas of flood risk within their boundary and a minor adverse effect has been 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 have been predicted.

For the landscape objective (SA11) all the sites have been 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 have also been 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 Redbourn) have been 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 have been 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 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.

4 Next Steps

This SA Working Note has been produced to help inform the development of the Local Plan for Publication (Regulation 19 stage).

The next step in the SA/SEA process will be to prepare an SA Report to accompany the Local Plan at that stage. That SA Report will provide detailed assessments of the strategies, policies and strategic sites included in the Publication Local Plan and will fully meet the requirements set out in the ‘SEA Regulations’

Appendix A Housing number alternatives

Introduction

This appendix provides the detailed assessment of eight potential options for the level of housing provision in the Local Plan that have been considered during the development of the Plan, including that during the development of the Strategic Local Plan. The eight options are as follows:

- 200 dwellings per annum (dpa);
- 250 dpa;
- 350 dpa;
- 450 dpa;
- 550 dpa;
- 750 dpa;
- 900 dpa; and
- 1,200 dpa.

Descriptions of these options are provided in Section 2.1.3..

Each of the options has been assessed against the 20 SA Objectives that make up the SA Framework (see Table 1). Whilst the standard SA 'scoring' methodology has been used for some of the SA Objectives (i.e. assigning an individual 'score' (or 'scores') for each option against each SA Objective - as shown in Table 2, for other SA Objectives a variation of the 'scoring' methodology has been developed that more clearly demonstrates the implications of moving up through the range of housing number options. This alternative method uses a sliding scale of intensity of the green and red colours that depict the variation in positive and negative effects.



SA Objectives (abridged)	200 dpa	250 dpa	350 dpa	450 dpa	550 dpa	750 dpa	900 dpa	1,200 dpa							
Biodiversity															
	Least Effect	→	→	→	→	→	→	Greatest Effect							
	<p>The larger the housing requirement the greater the need will be to develop on greenfield sites, which have an inherent value for biodiversity and will inevitably lead to some adverse effects on habitats and species. Increased numbers of new dwellings will also increase pressure on local biodiversity (including designated sites) through increased recreation, dog walking, predation by domestic cats etc. The significance of the effects will be dependent on the characteristics of the specific development sites taken forward for new housing provision.</p> <p>To counter this, development on strategic Green Belt sites could provide opportunities for habitat creation and enhancement which would have benefits if the sites are currently of low biodiversity value. This could help in achieving Biodiversity Action Plan targets and Community Forest objectives. The larger sites will have the potential to realise the greatest benefits, for example through habitat creation/enhancement and ecological network links, and there could therefore be advantages of developing a few larger sites rather than several smaller ones.</p>														
Water quality/ quantity															
	Least Effect	→	→	→	→	→	→	Greatest Effect							
	<p>The larger the housing requirement the greater would be the pressure on the region's scarce water resources. St Albans District is within an area already identified as 'over-abstracted' in terms of water supply. Therefore any addition to the number of dwellings in the District will increase this pressure on water resources, even if they are built to high standards for water efficiency. The effect is likely to become more significant over time as more dwellings are built and risk of periodic water shortages increases.</p> <p>There would also be greater pressure on sewerage and sewage treatment works which could increase the risk of sewer flooding and result in adverse effects on water quality of local water courses and groundwater. Higher levels of growth would also involve increased new areas of impermeable surfacing with associated risks of pollution from run-off into water courses. There is some uncertainty whether the local waste water treatment works will be able to accommodate this level of growth. 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. Whilst further stages of the Water Cycle Study may be required, on-going discussions with the water utility providers will prove useful in identifying whether any supply and capacity issues arise from the approach to growth and development in the District.</p> <p>New housing development will result in some new areas of impermeable surfacing with associated risks of pollution from run-off into water courses. However it is expected that the design of development (e.g. incorporation of SUDS) will help to reduce this risk.</p>														
Flood risk	No predicted effects	-	No predicted effects	-	No predicted effects	-	No predicted effects	-	No predicted effects	-	No predicted effects	-	No predicted effects	-	
	<p>The District is relatively unconstrained in terms of the area of Flood Risk Zones and it should be possible to deliver all the levels of growth without having to build in Flood Risk Zones. Increased levels of development, and associated impermeable surfaces, would however increase the risk from pluvial flooding.</p>														
Soils															
	Least Effect	→	→	→	→	→	→	→	→	→	→	→	→	→	Greatest Effect
	<p>The larger the housing requirement the greater would be the levels of soil sealing. It may also result in an increase in the amount of the best and most versatile agricultural land that would need to be developed - this would be dependent on the soil characteristics of the individual development sites that are selected for inclusion in the Local Plan.</p> <p>Any new housing development on brownfield sites may provide opportunities for remediating contaminated land, where it exists.</p>														
Greenhouse gas emissions															
	Least Effect	→	→	→	→	→	→	→	→	→	→	→	→	→	Greatest Effect
	<p>Housing development will inevitably result in an increase in greenhouse gas emissions from energy used in the construction and occupation of new housing and associated activities including increases in traffic. The larger the number of houses built the greater the increase is likely to be. Delivering this number of new dwellings would require substantial development in non-town centre locations. This could result in increased car use to access services and facilities with associated increases in CO₂ emissions, particularly if existing congestion is exacerbated. However, any large developments required to deliver the higher levels of growth may provide opportunities for significant transport infrastructure and a step change in sustainable travel and could also potentially increase the viability of existing public transport</p>														

SA Objectives (abridged)	200 dpa	250 dpa	350 dpa	450 dpa	550 dpa	750 dpa	900 dpa	1,200 dpa						
	<p>services and/or provide contributions towards new services. All this would help to reduce the levels of growth of transport related CO₂ emissions from new development.</p> <p>Unless appropriate mitigation can be put in place, the higher levels of growth would exacerbate current traffic problems in St Albans, Hemel Hempstead and other locations prone to congestion, which would result in further increases in greenhouse gas emissions.</p> <p>About 40% of the resident workforce currently commuting out of the District for work. This level of out-commuting contributes to CO₂ emissions and therefore future increases in emissions, based on the different options for housing growth, will be dependent on whether suitable new employment opportunities are provided in order to avoid increases in the percentage levels of out-commuting. It should be noted however, that a high proportion of out commuting journeys are by sustainable travel modes (train). In addition the Plan will contain policies to increase opportunity for sustainable travel.</p> <p>The options for growth are limited to considering different numbers of new dwellings and do not include options for levels of employment growth. Any mis-match between the number of new dwellings provided and the number of new employment opportunities created could result in an increase in the already high levels of out-commuting from the area with associated increases in GHG emissions. This situation would be exacerbated under the highest growth options.</p> <p>The scale of development required to meet the higher levels of new housing provision would enable opportunities for installing Combined Heat and Power systems which can reduce carbon emissions by up to 30% compared to the separate means of conventional generation via a boiler and power station.</p>													
Climate change proof	No predicted effects	-	No predicted effects	-	No predicted effects	-	No predicted effects	-	No predicted effects	-	No predicted effects	-	No predicted effects	-

SA Objectives (abridged)	200 dpa	250 dpa	350 dpa	450 dpa	550 dpa	750 dpa	913 dpa	1,200 dpa
Air quality								
	Least Effect	→	→	→	→	→	→	Greatest Effect
	<p>The higher the levels of construction and the subsequent vehicle activity that would result, the higher will be the emissions of airborne pollutants that affect air quality (e.g. NO_x). This would exacerbate some of the air quality issues that currently exist in the District and neighbouring areas. However, any large developments required to deliver the higher levels of growth may incorporate sustainable transport infrastructure and facilities and could potentially increase the viability of existing public transport services and/or provide contributions towards new services. This would help to reduce the levels of growth of transport related airborne pollutant emissions from new development.</p> <p>Development of new housing will contribute to background emissions through an increase in the number of vehicles on the road. The higher levels of growth would exacerbate current traffic problems in St Albans, Hemel Hempstead and other locations prone to congestion, which would worsen local air quality (NB: there is already an Air Quality Management Zone designated in St Albans city and in Hemel Hempstead. However, continuing improvements in vehicle engine and exhaust technologies should act as a counteracting measure.</p>							
Use of brownfield sites								
	Least Effect	→	→	→	→	→	→	Greatest Effect
	<p>The larger the housing requirement would mean the greater the amount of development needed on greenfield sites – as opposed to that in existing urban areas and other previously developed land . By their nature the greenfield sites have not been subject to previous non-agricultural use and therefore development would not involve the remediation of contaminated land.</p>							
Resource efficiency								
	Least Effect	→	→	→	→	→	→	Greatest Effect
	<p>The larger the housing requirement the greater would be the demands for natural resource use in construction, as well as the subsequent energy usage and waste generation once the dwellings are occupied. Higher levels of growth would also put the greatest strain on waste and sewerage infrastructure, particularly as waste water treatment works may be near capacity thresholds by the 2030's. The highest levels of growth could result in sterilisation of mineral resources if sites within the Sand and Gravel Belt have to be developed.</p>							

	The scale of development required to meet the higher levels of new housing provision would enable opportunities for installing Combined Heat and Power systems which can reduce carbon emissions by up to 30% compared to the separate means of conventional generation via a boiler and power station.													
Historic environment	Effects dependent on site location.	?	Effects dependent on site location.	?	Effects dependent on site location.	?	Effects dependent on site location.	?	Effects dependent on site location.	?	Effects dependent on site location.	?	Effects dependent on site location.	?
	<p>Housing development could have adverse effects on known or undiscovered heritage assets. Much of the District is of significant historic or cultural importance and therefore higher levels of housing could result in increased impacts on historic landscapes and features. The higher the level of housing the greater the potential there is for adverse effects on the historic environment and people's enjoyment of it.</p> <p>Effects will be dependent on the specific sites taken forward for development.</p> <p>There could be opportunities for some new development to contribute towards enhancements of the District's historic environment. Again, these opportunities would be on a site specific basis, rather than being a generic potential planning outcome.</p>													
Landscape & townscape	Least Effect → → → → → → Greatest Effect													
	<p>With a large proportion of the District being within the Metropolitan Green Belt, and the constraint that this brings, there is a challenge to identify a sufficient size and number of development sites to meet the District's housing and employment needs whilst taking account of the role and function of the Green Belt. The larger the housing requirement the greater would be the need for developing on greenfield sites in the Green Belt, therefore requiring Green Belt release with associated adverse effects on local landscapes and erosion of green links between some existing residential areas and the countryside, as well as the potential for eroding gaps between settlements. There would also be a loss of tranquillity and increased light pollution in the area affected by the new developments. The nature and magnitude of the effects will be location dependent.</p> <p>To deliver the higher levels of growth will require higher densities of housing (net density of at least 40 dwellings per hectare) on the edge of settlement Green Belt sites. This will require careful planning in order to provide a sensitive transition from urban to countryside, particularly where the existing urban element is of a lower density than 40 dwellings per hectare and on small sites.</p> <p>The larger sites that would be required to deliver the higher levels of growth could provide opportunities to enhance the local landscape and also improve access to the natural environment, for example by providing new country parks and by improving the provision of walking and cycling routes outside the urban areas.</p> <p>Depending on location, new housing developments could contribute towards townscape improvements.</p>													
Health	No predicted effects	-	No predicted effects	-	No predicted effects	-	Positive effect relating to reduction in levels of stress (see below).	✓	Positive effect relating to reduction in levels of stress (see below).	✓	Positive effect relating to reduction in levels of stress (see below).	✓	Positive effect relating to reduction in levels of stress (see below).	✓
	<p>Effects on the health objective would be dependent on how the different levels of growth are delivered in terms of a variety of factors such as: the provision of new health facilities that ensure that existing services are not over-stretched; the design of developments to enable the take up of active travel modes; provision of a range of homes to meet the needs of all groups in society etc.</p> <p>The higher levels of housing growth would help to meet the housing needs of the local population and reduce any existing issues of overcrowding and stress related to inadequacy of housing provision. This would enhance the general well-being of those affected.</p> <p>However, the higher levels of housing provision would put pressure on existing health care facilities, although if new neighbourhoods were to be created there would be opportunities for the provision of new healthcare facilities that could be accessed by both the new and existing residents of the area concerned.</p> <p>New open space provided through new developments, particularly large developments that would be required to deliver the higher levels of growth, would help to encourage healthy recreation activities and support improvements in health and wellbeing across the District.</p>													
Sustainable locations	Effects dependent on site location	?	Effects dependent on site location	?	Effects dependent on site location	?	Effects dependent on site location	?	Effects dependent on site location	?	Effects dependent on site location	?	Effects dependent on site location	?
	Opportunities to locate high levels of development within urban areas close to town centre facilities are limited 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. The greater the amount of housing required the greater would be the number and scale of such edge of town sites.													

	The scale of development that would need to be taken forward to deliver the higher levels of new dwellings would be required to incorporate a range of local facilities thereby reducing the need to travel to access everyday needs.															
Equality & social exclusion																
	Least Effect	→	→	→	→	→	→	→	→	→	→	→	→	Greatest Effect		
	Higher levels of housing growth would result in increased levels of developer contributions (through Section 106 and CIL contributions) which could result in an increased provision of health, education, recreation and community facilities, as well as supporting the viability of existing services and facilities. In addition the large developments that would be required to deliver the higher levels of growth would be required to provide a range of on-site services and facilities. These factors could benefit both existing and new residents of the District. One counter-point is that the higher levels of growth would put more pressure on existing local infrastructure, particularly schools, which may already be under pressure.															
Good quality housing																
	Least Effect	→	→	→	→	→	→	→	→	→	→	→	→	Greatest Effect		
	The greater the level of housing, the greater the contribution towards achieving the objective to ensure that everyone has access to good quality housing that meets their needs - in terms of the number, range and type of housing. The provision of an average of 913 dpa across the Local Plan period would fully meet the need of the District as identified by central Government, whilst levels below this figure would leave some of that need being left unmet - to varying degrees depending on the level concerned. The highest level of 1,200 dpa provides 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 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. The higher levels of housing would provide proportionately higher levels of affordable housing which would help to address this issue.															
Community identity & participation	Uncertain effects	?	Uncertain effects	?	Uncertain effects	?	Uncertain effects	?	Uncertain effects	?	Uncertain effects	?	Uncertain effects	?	Uncertain effects	?
	The higher levels of housing growth should result in a greater provision of community facilities through developer contributions and new on-site facilities in the case of the large Green Belt sites that would be required to deliver the higher levels of growth. However the higher levels of growth would 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 level of these effects is uncertain.															
Crime and fear of crime	No predicted effects	-	No predicted effects	-	No predicted effects	-	No predicted effects	-	No predicted effects	-	No predicted effects	-	No predicted effects	-	No predicted effects	-
Sustainable prosperity and growth	No predicted effects	-	No predicted effects	-	Effects are dependent on whether any new employment development is delivered by this option.	?	Effects are dependent on whether any new employment development is delivered by this option.	?	Effects are dependent on whether any new employment development is delivered by this option.	?	This option would require development at east Hemel Hempstead, which is likely to be accompanied by employment growth.	✓	This option would require development at east Hemel Hempstead, which is likely to be accompanied by employment growth.	✓	This option would require development at east Hemel Hempstead, which is likely to be accompanied by employment growth.	✓
	sites at east Hemel Hempstead would bring with them new employment development. However as part of the Local Plan as a whole, significant employment will come forward. Any increase in housing numbers will help to support the vitality and viability of the local economy through increased spending. The greater the number of houses the greater that this effect will be. There would also be economic benefits resulting from the construction of the housing, including jobs in construction. Providing new homes will also support the economy by providing necessary dwellings for local workers.															
Fairer access	Uncertain effects	?	Uncertain effects	?	Uncertain effects	?	Uncertain effects	?	Uncertain effects	?	Uncertain effects	?	Uncertain effects	?	Uncertain	?

to services		effects
	<p>The effects against this objective, in relation to encouraging the provision of and access to jobs and services, will be dependent on the balance between new housing provision and the provision of new jobs.</p>	
Revitalise town centres	 <p>Least Effect → → → → → Greatest Effect</p> <p>Higher levels of housing growth would help to support the viability of local centres and town centres.</p>	

Appendix B Broad Locations

Introduction

This appendix provides the detailed assessment of 12 broad locations that are being considered for their suitability to provide sites for future housing as part of the new phase of Local Plan development. The broad locations are as follows:

- 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

Each of the options has been assessed against the 20 SA Objectives that make up the SA Framework (see Table 1) using the 'scoring' method detailed in Table 2.

SA Objectives (abridged)	East Hemel Hempstead (North)	East Hemel Hempstead (South)	South East Hemel Hempstead	North Hemel Hempstead	East St Albans	North St Albans
Biodiversity	Greenfield nature of this site means that there will be some loss of habitats. The Nicky Line, which is a local wildlife site, runs through the north of the site. Any increased usage of the Nicky Line for walking and cycling could have adverse effects on this wildlife site.	* Greenfield nature of this site means that there will be some loss of habitats.	* Greenfield nature of this site means that there will be some loss of habitats. The Westwick Row Wood wildlife site is located in close proximity to the area. Additional housing could adversely affect the wildlife site.	* Greenfield nature of this site means that there will be some loss of habitats.	* Greenfield nature of this site means that there will be some loss of habitats. Home Wood local wildlife site and ancient woodland is located adjacent to the site. Additional housing could adversely affect the wildlife site. Any new access off Hatfield Road would result in the removal of a hedgerow.	* Greenfield nature of this site means that there will be some loss of habitats. Long Spring and Soothouse Wood local wildlife site and ancient woodland is located directly adjacent to the site. Additional housing could adversely affect the wildlife site. The trees lining the southeast boundary of the site are the subject of a TPO.
	The size of the development would provide opportunities for biodiversity gains on what is currently agricultural land.	✓			The site has been identified as having the potential for delivering significant green infrastructure improvements which would support this SA objective.	✓
Water quality/ quantity	The development would be required to deliver excellence in water management. No site specific predicted effects.	- The development would be required to deliver excellence in water management. No site specific predicted effects.	- The development would be required to deliver excellence in water management. No site specific predicted effects.	- The development would be required to deliver excellence in water management. No site specific predicted effects.	- The development would be required to deliver excellence in water management. No site specific predicted effects.	- The development would be required to deliver excellence in water management. No site specific predicted effects.
Flood risk	Site is not in a flood risk zone. No predicted effects.	- Site is not in a flood risk zone. No predicted effects.	- Site is not in a flood risk zone. No predicted effects.	- Site is not in a flood risk zone. No predicted effects.	- Some small parts of the eastern area of the site are in flood risk zones 2 and 3 relating to Butterwick Brook and there would therefore be a flood risk for new development. However, the majority of the site is in the lower risk flood zone 1 and therefore the flood risk area could be avoided.	* Site is not in a flood risk zone. No predicted effects.

SA Objectives (abridged)	East Hemel Hempstead (North)	East Hemel Hempstead (South)	South East Hemel Hempstead	North Hemel Hempstead	East St Albans	North St Albans
Soils	Greenfield site and therefore soil sealing would result from new development. The majority of the site is located on best and most versatile (BMV) agricultural land (Grade 2 and Grade 3a).	** Greenfield site and therefore soil sealing would result from new development. No	* Greenfield site and therefore soil sealing would result from new development. No 'Best and Most Versatile' agricultural land associated with the site.	* Greenfield site and therefore soil sealing would result from new development. No 'Best and Most Versatile' agricultural land associated with the site.	* Site is mainly greenfield and therefore soil sealing would result from new development. Approximately 25% of the site is located on best and most versatile (BMV) agricultural land (Grade 2 and 3a).	** Greenfield site and therefore soil sealing would result from new development. >50% of the site is located on best and most versatile (BMV) agricultural land (Grade 3a).
		It is uncertain as to the amount of 'Best and Most Versatile' agricultural land (if any) that is associated with the site.	? It is uncertain as to the amount of 'Best and Most Versatile' agricultural land (if any) that is associated with the site.	? It is uncertain as to the amount of 'Best and Most Versatile' agricultural land (if any) that is associated with the site.		
Greenhouse gas emissions	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. The size of development proposed at this location could result in public transport service improvement.	✓ The proximity of employment opportunities and the local centre at Leverstock Green to the residential development would reduce the need to travel thereby limiting growth in greenhouse gas emissions. The size of development proposed at this location could result in public transport service improvement.	✓ The proximity of employment opportunities and the local centre at Leverstock Green to the residential development would reduce the need to travel thereby limiting growth in greenhouse gas emissions. The size of development proposed at this location could result in public transport service improvement.	✓ 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. The size of development proposed at this location could result in public transport service improvement.	✓ The site is relatively accessible to some services (e.g. supermarket), facilities and open space which should help reduce the need to travel and minimise increases in greenhouse gas emissions. This site is well served by a number of bus services and there would be some opportunity for improving services.	✓ 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. Improvements to bus frequency may be feasible as a result of any new development.
	The site is some distance from Hemel Hempstead town centre and railway stations (>5km) and Redbourn (5km), which will result in additional vehicle trips. However the potential for public transport service improvement would help to mitigate.	* The site is some distance (over 5km) from the town centre and Hemel Hempstead and Apsley railway stations (>5km), which will result in additional vehicle trips. However the potential for public transport service improvement would help to mitigate.	* The site is some distance (over 5km) from the town centre and Hemel Hempstead and Apsley railway stations (>5km), which will result in additional vehicle trips. However the potential for public transport service improvement would help to mitigate.	* The site is some distance (over 5km) from the town centre and Hemel Hempstead and Apsley railway stations (>5km), which will result in additional vehicle trips. However the potential for public transport service improvement would help to mitigate.	* The site is some distance (over 5km) from the town centre and Hemel Hempstead and Apsley railway stations (>5km), which will result in additional vehicle trips. However the potential for public transport service improvement would help to mitigate.	* The site is some distance from the City centre (>3km), as well as alternative service and facilities in Hatfield, which will result in additional vehicle trips. Also, it is approximately 3km from the nearest railway station. However the potential for public transport service improvement would help to mitigate.
Climate change proof	No predicted effects.	- No predicted effects.	- No predicted effects.	- No predicted effects.	- No predicted effects.	- No predicted effects.

SA Objectives (abridged)	East Hemel Hempstead (North)	East Hemel Hempstead (South)	South East Hemel Hempstead	North Hemel Hempstead	East St Albans	North St Albans
Air quality	<p>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 airborne emissions. Development of new neighbourhood and local centres will further support this.</p> <p>The size of development proposed at this location could result in public transport service improvement.</p>	<p>The proximity of employment opportunities and the local centre at Leverstock Green to the residential development would reduce the need to travel thereby limiting growth in airborne emissions. Development of new neighbourhood and local centres will further support this.</p> <p>The size of development proposed at this location could result in public transport service improvement.</p>	<p>The proximity of employment opportunities and the local centre at Leverstock Green to the residential development would reduce the need to travel thereby limiting growth in airborne emissions. Development of new neighbourhood and local centres will further support this.</p> <p>The size of development proposed at this location could result in public transport service improvement.</p>	<p>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 airborne emissions. Development of new neighbourhood and local centres will further support this.</p> <p>The size of development proposed at this location could result in public transport service improvement.</p>	<p>The site is relatively accessible to some services (e.g. supermarket), facilities and open space which should help reduce the need to travel and minimise increases in airborne emissions. Development of a new neighbourhood centre will further support this.</p>	<p>The site is located relatively close to local shops, schools, and bus services on Harpenden Road which will help to reduce the need to travel by private car and minimise increases in airborne emissions. Development of a new neighbourhood centre will further support this.</p>
	<p>The site is some distance from Hemel Hempstead town centre and railway stations (>5km) and Redbourn (5km) which will result in additional vehicle trips with associated airborne emissions. 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 (ex M10).</p>	<p>The site is some distance (over 5km) from the town centre and Hemel Hempstead and Apsley railway stations (>5km), which will result in additional vehicle trips with associated airborne emissions. However the potential for public transport service improvement would help to mitigate.</p> <p>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 (ex M10).</p>	<p>The site is some distance (over 5km) from the town centre and Hemel Hempstead and Apsley railway stations (>5km), which will result in additional vehicle trips with associated airborne emissions. However the potential for public transport service improvement would help to mitigate.</p> <p>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 (ex M10).</p>	<p>The site is some distance (over 5km) from the town centre and Hemel Hempstead and Apsley railway stations (>5km), which will result in additional vehicle trips with associated airborne emissions. However the potential for public transport service improvement would help to mitigate.</p> <p>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 (ex M10).</p>	<p>The site is some distance from the City centre (>3km), as well as alternative service and facilities in Hatfield, which will result in additional vehicle trips that could exacerbate existing air quality issues. Also, it is approximately 3km from the nearest railway station. However the potential for public transport service improvement would help to mitigate.</p>	<p>The distance of the site from the city centre (>2km) could encourage increased car use, with associated increases in airborne emissions. This could exacerbate city centre air quality issues. However the potential for public transport service improvement would help to mitigate.</p>

SA Objectives (abridged)	East Hemel Hempstead (North)	East Hemel Hempstead (South)	South East Hemel Hempstead	North Hemel Hempstead	East St Albans	North St Albans
Use of brownfield sites	This is a greenfield site and development would not therefore support this objective. *	This is a greenfield site and development would not therefore support this objective. *	This is a greenfield site and development would not therefore support this objective. *	This is a greenfield site and development would not therefore support this objective. *	Although the development would involve the retention and repair of a number of buildings, this site is largely greenfield and therefore negative effects are identified for this SA objective. *	This is a greenfield site and development would not therefore support this objective. *
Resource efficiency	The development would be required to deliver excellence in energy efficiency and appropriate renewable energy production and supply mechanisms. The site is located within a Wind Turbine Opportunity Area, although there will be limited potential to realise the opportunity. ✓	The development would be required to deliver excellence in energy efficiency and appropriate renewable energy production and supply mechanisms. The development would be required to deliver a Combined Heat & Power system and large scale solar power generation. The site is located within a Wind Turbine Opportunity Area, although there will be limited potential to realise the opportunity. ✓	The development would be required to deliver excellence in energy efficiency and appropriate renewable energy production and supply mechanisms. The site is located within a Wind Turbine Opportunity Area, although there will be limited potential to realise the opportunity. ✓	The development would be required to deliver excellence in energy efficiency and appropriate renewable energy production and supply mechanisms. The site is not located in a Wind Turbine Opportunity Area. ✓	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. The site is not located in a District Heating Opportunity Area and its scale would not be sufficient to support district heating. The site is located within a Wind Opportunity Area, however potential to deliver wind turbines in the context of a residential development is very limited given proximity to roads, potential new development and land availability. ✓	The development would be required to deliver excellence in energy efficiency and appropriate renewable energy production and supply mechanisms. The site is not located in a District Heating Opportunity Area and its scale would not be sufficient to support district heating. The site is located within a Wind Opportunity Area, however potential to deliver wind turbines in the context of a residential development is very limited given proximity to roads, potential new development and land availability. ✓

SA Objectives (abridged)	East Hemel Hempstead (North)	East Hemel Hempstead (South)	South East Hemel Hempstead	North Hemel Hempstead	East St Albans	North St Albans
					The site is located within the sand and gravel belt minerals consultation area. Developing in this area would have negative sustainability implications on resource efficiency due to the sterilisation of the minerals, limiting their extraction potential in the future. However given the close proximity to existing development it is unlikely that extraction would be permitted in this location.	
Historic environment	<p>The site is not subject to any significant heritage or archaeological constraint.</p> <p>The site contains three Grade II listed buildings associated with Wood End Farm and development would impact on the setting of these buildings.</p> <p>A Scheduled Monument (SM), The Aubreys (fort/camp), is located to the northeast of the site.</p> <p>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.</p>	<p>The site is not subject to any significant heritage or archaeological constraint.</p> <p>Development could affect the setting of the Listed Buildings at Westwick Row (Grade II* Westwick Row Cottage and the Grade II King Charles II Cottage) which are in close proximity to the south-west boundary of the site. It could also affect the Grade II Listed Building Dell Cottage, Leverstock Green which is in close proximity to the south-west boundary of the site.</p> <p>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.</p>	<p>The site is not subject to any significant heritage or archaeological constraint.</p> <p>Development could affect the setting of the Listed Buildings at Westwick Row (Grade II* Westwick Row Cottage and the Grade II King Charles II Cottage) which are adjacent to the north-west boundary of the site and the Grade II listed Corner Farm and 1 Beechtree Cottages, both of which are located along the south-west boundary of the site.</p> <p>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.</p>	<p>The site is not subject to any significant heritage or archaeological constraint.</p> <p>Development could affect the setting of the Grade II Listed Buildings at Great Revel End Farm which is in close proximity to the north-east boundary of the site and also the Grade II Listed Buildings in Dacorum at Holtsmere Manor and Holtsmere End Farm.</p>	<p>The site is not subject to any significant heritage or archaeological constraint.</p> <p>Development could affect the setting of the Grade II Listed Buildings at Kay Walk (Winches Farm and The Lodge) to the west of the site.</p> <p>In addition, the findings of archaeological studies in nearby areas suggest that there may be some archaeological interest in the area.</p>	<p>The site is not subject to any significant heritage or archaeological constraint.</p> <p>No predicted effects.</p>

SA Objectives (abridged)	East Hemel Hempstead (North)	East Hemel Hempstead (South)	South East Hemel Hempstead	North Hemel Hempstead	East St Albans	North St Albans
Landscape & townscape	<p>The site is not in an area designated as a Landscape Conservation Area.</p> <p>Development of this area would lead to a high degree of landscape impact and would erode the gap between Hemel Hempstead and Redbourn.</p> <p><i>Key potential visual effects of new development in the west of the sub area, where new development would be located, would be at a local level (SKM, 2014).</i></p> <p>The site is in agricultural use and retains some countryside character despite the close proximity of residential, employment, and the M1. The site contains some sensitive landscape areas (Upper Ver Valley).</p> <p>Views from the right of way that runs through the site would be affected by new development.</p>	<p>The site is not in an area designated as a Landscape Conservation Area.</p> <p>Development of this area would affect the openness of landscape character and lead to a high degree of landscape impact.</p> <p><i>The openness of the landscape in the south of the sub area, where new housing development would be located, means that new development could be visually prominent (SKM, 2014).</i></p> <p>Views from the right of way that runs through the site would be affected by new development.</p>	<p>The site is not in an area designated as a Landscape Conservation Area.</p> <p>Development of this area would affect the openness of landscape character and lead to a high degree of landscape impact.</p>	<p>The site is not in an area designated as a Landscape Conservation Area.</p> <p>Development would affect the openness and character of the landscape in this location and would be visually intrusive from the surrounding area.</p> <p>Development would erode the gap between Hemel Hempstead and Redbourn.</p> <p>Views from the right of way that runs through the site would be affected by new development.</p>	<p>The site is not in an area designated as a Landscape Conservation Area.</p> <p>Development would affect the openness and character of the landscape in this location. However the site is of relatively low landscape sensitivity and is 'urban fringe' in character.</p> <p><i>Key potential visual effects of new development would be at a very local level. Notable effects would be in relation to surrounding residents, people travelling along Sandpit Lane and users of the bridleway along North Drive. Areas of woodland and hedgerows would provide some visual containment (SKM, 2014).</i></p> <p>Development would impact on views from the two Public Rights of Way (PRoW) within the site area.</p> <p>The landscape quality of the land is not particularly high, although it benefits from established trees and hedgerows, with ancient woodland nearby which could be adversely affected.</p>	<p>The site is not in an area designated as a Landscape Conservation Area.</p> <p>Development would involve the loss of unspoilt countryside, with some long distance views. The north east part of the site in particular maintains open countryside character.</p> <p>Development would also have impacts on views from the rights of way adjacent to the area.</p> <p><i>Key potential visual effects of new development would be at a local level. Notable effects would be in relation to residents on the edge of St Albans, dispersed properties within the northern part of the sub-area, and users of local roads, train passengers and walkers (SKM, 2014).</i></p> <p>Development would impact on the right of way that runs around the south east and north east boundaries of the area.</p>
	<p>The development would be required to deliver strategic and public open space, recreation space and countryside access links, including a new Country Park. The site has been identified as having a high potential for delivering significant green infrastructure improvements. Development would also</p>	<p>The development would be required to deliver strategic and public open space, recreation space and countryside access links, including a new Country Park.</p> <p>Development would also require the retention of important trees and landscape features.</p>	<p>The development would be required to deliver strategic and public open space, recreation space and countryside access links.</p> <p>Development would also require the retention of important trees and landscape features.</p>	<p>The development would be required to deliver strategic and public open space, recreation space and countryside access links, including a new Country Park.</p> <p>Development would also require the retention of important trees and landscape features.</p>	<p>The development would be required to deliver strategic and local public open space and recreation space. Development would also require the retention of important trees, including extensive TPOs and Ancient Woodland.</p>	<p>The development would be required to deliver strategic and public open space, recreation space and countryside access links.</p> <p>Development would also require the retention of important trees and landscape features.</p>

SA Objectives (abridged)	East Hemel Hempstead (North)	East Hemel Hempstead (South)	South East Hemel Hempstead	North Hemel Hempstead	East St Albans	North St Albans
	require the retention of important trees and landscape features.					
Health	<p>The site is not well served by existing open space nearby. However, opportunity exists for new areas of public open space and woodland planting on the southern part of the potential development. Part of this southern part could also be used for playing fields for a nearby school.</p> <p>The Nickey Line (footpath and cycleway) runs across the northern section of the site. This provides the opportunity for new residents to live active lifestyles.</p> <p>Additional footpath and cycle network links could be provided by the scale of new development that this site could deliver.</p>	<p>✓ A number of public open spaces lie in close proximity to the site. In addition 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.</p> <p>Additional footpath and cycle network links could be provided by the scale of new development that this site could deliver.</p>	<p>✓ A number of public open spaces lie in close proximity to the site. In addition 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.</p> <p>Additional footpath and cycle network links could be provided by the scale of new development that this site could deliver.</p>	<p>✓ 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.</p> <p>In addition, the Nickey Line (footpath and cycleway) is close to the site.</p>	<p>✓ 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.</p> <p>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.</p> <p>Development would provide the opportunity to create footpath/cycle links to the Alban Way.</p>	<p>✓ The topography of the area would enable walking and cycling to access services facilities.</p> <p>There are however limited opportunities to link into existing footpath and cycle networks.</p> <p>The scale of development may be sufficient to justify some strategic open space provision to complement existing open space that exists in the local area.</p>

SA Objectives (abridged)	East Hemel Hempstead (North)	East Hemel Hempstead (South)	South East Hemel Hempstead	North Hemel Hempstead	East St Albans	North St Albans
	<p>A small area of the site lies within the Buncefield Oil Storage Depot HSE Consultation Zone.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Oil and gas pipelines cross the site and would need to be taken into consideration in planning the layout of development.</p> <p>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.</p> <p>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.</p>	<p>Oil and gas pipelines cross the site and would need to be taken into consideration in planning the layout of development.</p> <p>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.</p>	<p>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.</p> <p>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.</p>	<p>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.</p>	

SA Objectives (abridged)	East Hemel Hempstead (North)	East Hemel Hempstead (South)	South East Hemel Hempstead	North Hemel Hempstead	East St Albans	North St Albans
Sustainable locations	<p>The site is some distance from Hemel Hempstead town centre. However the scale of development that could be provided at this site would enable the delivery of neighbourhood and local centres.</p> <p>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.</p> <p>The site is very 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.</p>	<p>✓</p> <p>The site is some distance from Hemel Hempstead town centre. However the scale of development that could be provided at this site would enable the delivery of neighbourhood and local centres.</p> <p>The site is very 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.</p>	<p>✓</p> <p>The site is some distance from Hemel Hempstead town centre. However the scale of development that could be provided at this site would enable the delivery of neighbourhood and local centres.</p> <p>The site is relatively 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.</p>	<p>✓</p> <p>The site is some distance from Hemel Hempstead town centre. However the scale of development that could be provided at this site would enable the delivery of a new neighbourhood and local centres.</p> <p>The site is relatively 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.</p>	<p>✓</p> <p>The edge of City location makes this site a relatively accessible and sustainable location for housing. Whilst the City centre is over 3km from the site, there are local shops, services, education and employment opportunities within walking distance and there are bus stops close by. A large supermarket is less than 1km from the site.</p> <p>Development of a new neighbourhood centre will further support this objective.</p>	<p>✓</p> <p>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.</p> <p>Development of a new neighbourhood centre will further support this objective.</p>
Equality & social exclusion	<p>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.</p>	<p>✓</p> <p>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.</p> <p>Development at this location may provide a Gypsy and Traveller site.</p>	<p>✓</p> <p>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.</p>	<p>✓</p> <p>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.</p>	<p>✓</p> <p>Improvements to Oaklands College that would result from new development would provide social and community facilities which would be accessible to the new and nearby existing population.</p> <p>New development would 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.</p>	<p>✓</p> <p>There may be some potential to exploit links with adjoining leisure and education uses to create community facilities and improved open space.</p>

SA Objectives (abridged)	East Hemel Hempstead (North)	East Hemel Hempstead (South)	South East Hemel Hempstead	North Hemel Hempstead	East St Albans	North St Albans
Good quality housing	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. ✓	Development at the site could provide a minimum of 1,000 new homes with the potential to meet a variety of accommodation needs and to deliver significant levels of affordable homes. ✓	Development at the site could provide a minimum of 2,400 new homes in combination with East Hemel (South), with the potential to meet a variety of accommodation needs and to deliver significant levels of affordable homes. ✓	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. ✓	Development at the site could provide a minimum of 900 new homes (+348 permitted) with the potential to meet a variety of accommodation needs and to deliver significant levels of affordable homes. ✓	Development at the site could provide a minimum of 1,100 new homes with the potential to meet a variety of accommodation needs and to deliver a large number of affordable homes. ✓
Community identity & participation	The scale of development that this site would provide the potential to develop new facilities (education, health, community etc.) that would be accessible to the new and nearby existing population. This could help to encourage participation in community life and promote integration. ✓	The scale of development that this site would provide the potential to develop new facilities (education, health, community etc.) that would be accessible to the new and nearby existing population. This could help to encourage participation in community life and promote integration. ✓	The scale of development that this site would provide the potential to develop new facilities (education, health, community etc.) that would be accessible to the new and nearby existing population. This could help to encourage participation in community life and promote integration. ✓	The scale of development that this site would provide the potential to develop new facilities (education, health, community etc.) that would be accessible to the new and nearby existing population. This could help to encourage participation in community life and promote integration. ✓	Improvements to Oaklands College that would result from new development would provide social and community facilities that could help to improve participation. ✓	No predicted effects. -
Crime and fear of crime	No predicted effects. -	No predicted effects. -	No predicted effects. -	No predicted effects. -	No predicted effects. -	No predicted effects. -
Sustainable prosperity and growth	Large scale housing development would help support the local economy, in particular the regeneration of the Maylands area that is supported in Hertfordshire's Strategic Economic Plan (March 2014). In addition, new neighbourhood / local centres and potential commercial opportunities will help support the local economy. ✓	Large scale housing development would help support the local economy, in particular the regeneration of the Maylands area that is supported in Hertfordshire's Strategic Economic Plan (March 2014). In addition, new neighbourhood / local centres and potential commercial opportunities will help support the local economy. ✓	Large scale housing development would help support the local economy, in particular the regeneration of the Maylands area that is supported in Hertfordshire's Strategic Economic Plan (March 2014). In addition, new neighbourhood / local centres and potential commercial opportunities will help support the local economy. ✓	The potential contribution to economic growth through the development of this site is limited. However, the provision of new housing 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. ✓	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. A new neighbourhood centre and potential commercial opportunities will also help support the local economy. In addition, a better educated population that could result from improved further education provision may also help to improve local economy. ✓	The potential contribution to economic growth through the development of this site is limited. However, the provision of new housing would help to support the local services in St Albans, maintaining their viability and boosting the local economy. A new neighbourhood centre and potential commercial opportunities will also help support the local economy. ✓

SA Objectives (abridged)	East Hemel Hempstead (North)	East Hemel Hempstead (South)	South East Hemel Hempstead	North Hemel Hempstead	East St Albans	North St Albans
Fairer access to services	<p>Development of this site would support growth at Maylands Business Park which would help to encourage local provision of and access to jobs.</p> <p>New neighbourhood / local centres and potential commercial opportunities would offer new employment opportunities.</p>	<p>Development of this site would support growth at Maylands Business Park which would help to encourage local provision of and access to jobs.</p> <p>New neighbourhood / local centres and potential commercial opportunities would offer new employment opportunities.</p>	<p>Development of this site would support growth at Maylands Business Park which would help to encourage local provision of and access to jobs.</p> <p>New neighbourhood / local centres and potential commercial opportunities would offer new employment opportunities.</p>	<p>New neighbourhood / local centres and potential commercial opportunities would offer new employment opportunities.</p>	<p>New neighbourhood centre and potential commercial opportunities would offer new employment opportunities.</p> <p>New housing at this site could result in developments at Oaklands College that would help to support this objective.</p>	<p>A new neighbourhood centre and potential commercial opportunities would offer new employment opportunities.</p>
Revitalise town centres	<p>Development at this edge of town location does not directly support the objective to focus new development in the centre of urban areas.</p> <p>However, 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.</p>	<p>Development at this edge of town location does not directly support the objective to focus new development in the centre of urban areas.</p> <p>However, 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.</p>	<p>Development at this edge of town location does not support the objective to focus new development in the centre of urban areas.</p> <p>However, 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.</p>	<p>Development at this edge of town location does not directly support the objective to focus new development in the centre of urban areas.</p> <p>However, 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.</p>	<p>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.</p>	<p>Development at this edge of city location does not support the objective to focus new development in the centre of urban areas.</p> <p>However, it would help support nearby local centres as well as resulting in the development of a new local centre.</p>

SA Objectives (abridged)	North West Harpenden	North East Harpenden	West of London Colney	West of Chiswell Green	Park Street Garden Village	North east of Redbourn
Biodiversity	Greenfield nature of this site means that there will be some loss of habitats. No designated areas affected. The site contains a small remnant woodland area which is subject to a TPO. *	Greenfield nature of this site means that there will be some loss of habitats. No designated areas affected. *	Greenfield nature of this site means that there will be some loss of habitats. 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. *	Greenfield nature of this site means that there will be some loss of habitats. No designated areas affected. *	The largely greenfield nature of this site means that there will be some loss of habitats. The site includes areas of grassland and wetland used by breeding, wintering and wading birds. The size of the development would provide opportunities for biodiversity gains. The development would be required to provide managed woodland and ecological network links. Countryside access links will encourage people to come into contact with, understand, and enjoy nature. ✓	Greenfield nature of this site means that there will be some loss of habitats. *
Water quality/ quantity	The development would be required to deliver excellence in water management. No site specific predicted effects. -	The development would be required to deliver excellence in water management. No site specific predicted effects. -	The development would be required to deliver excellence in water management. No site specific predicted effects. -	The development would be required to deliver excellence in water management. No site specific predicted effects. -	The development would be required to deliver excellence in water management. No site specific predicted effects. -	The development would be required to deliver excellence in water management. No site specific predicted effects. -
Flood risk	Site is not in a flood risk zone. No predicted effects. -	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. ?	The River Colne runs through the centre of the site and this part of the site lies in flood risk zones 2 and 3. There would therefore be a flood risk for new development. However, a large part of the site is in the lower risk flood zone 1 and therefore the flood risk area could be avoided. *	Area is not in a flood risk zone. No predicted effects. *	The River Ver runs through the north west corner of the site and this part of the site lies in flood risk zones 2 and 3. There would therefore be a flood risk for new development. However, the majority of the site is in the lower risk flood zone 1 and therefore the flood risk area could be avoided. *	The eastern section of the site lies partly in flood risk zones 2 and 3 of the River Ver and there would therefore be a flood risk for new development. However, the majority of the site is in the lower risk flood zone 1 and therefore the flood risk area could be avoided. *

SA Objectives (abridged)	North West Harpenden	North East Harpenden	West of London Colney	West of Chiswell Green	Park Street Garden Village	North east of Redbourn
Soils	Greenfield site and therefore soil sealing would result from new development. *	Greenfield site and therefore soil sealing would result from new development. *	Greenfield site and therefore soil sealing would result from new development. *	Greenfield site and therefore soil sealing would result from new development. *	Site is mainly greenfield and therefore soil sealing would result from new development. *	Greenfield site and therefore soil sealing would result from new development. *
	It is uncertain as to the amount of 'Best and Most Versatile' agricultural land (if any) that is associated with the site. ?	It is uncertain as to the amount of 'Best and Most Versatile' agricultural land (if any) that is associated with the site. ?	It is uncertain as to the amount of 'Best and Most Versatile' agricultural land (if any) that is associated with the site. ?	It is uncertain as to the amount of 'Best and Most Versatile' agricultural land (if any) that is associated with the site. ?	It is uncertain as to the amount of 'Best and Most Versatile' agricultural land (if any) that is associated with the site. ? Development would provide the potential to remediate any contaminated land associated with the site's former use as an aerodrome. ?	It is uncertain as to the amount of 'Best and Most Versatile' agricultural land (if any) that is associated with the site. ?
Greenhouse gas emissions	The site is in a relatively sustainable location with good access to local facilities in Harpenden 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 to promote car free access to Harpenden town centre and the railway station. ✓	The site is in a relatively sustainable location with good access to local facilities in Harpenden and close to bus routes. This will help to reduce private car usage. ✓	The site is in a relatively sustainable location with good access to local facilities in London Colney and close to bus routes. This will help to reduce private car usage. This site is a flat level walk or cycle from the local centre which would encourage walking and cycling to access facilities. ✓	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. ✓	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. 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. ✓	The site is in a relatively sustainable location with good access to local facilities in Redbourn and close to bus routes. This will help to reduce private car usage. This site is a relatively level walk or cycle from the village centre which would encourage walking and cycling to access facilities. ✓

SA Objectives (abridged)	North West Harpenden	North East Harpenden	West of London Colney	West of Chiswell Green	Park Street Garden Village	North east of Redbourn
	The site is located approximately 1.5km from the town centre, which while being walkable is also likely to generate additional car trips, with associated greenhouse gas emissions. However the potential for public transport service improvement would help to mitigate. *	The site is over 1.5km from the town centre and main supermarkets which will generate additional car trips, with associated greenhouse gas emissions. There are also some topography and distance disadvantages for walking and cycling access to rail and the town centre. *	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. *	The site is some distance from city/town centres (St Albans, Hemel Hempstead, and Watford) which will result in additional vehicle trips. *	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. *	This site is located some distance from the city/town centres (St Albans and Hemel Hempstead) which will result in increased car use and growth in the level of greenhouse gas emissions. *
Climate change proof	No predicted effects. -	No predicted effects. -	No predicted effects. -	No predicted effects. -	No predicted effects. -	No predicted effects. -
Air quality	The site is in a relatively sustainable location on the edge of Harpenden 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 to promote car free access to Harpenden town centre and the railway station. ✓	The site is in a relatively sustainable location on the edge of Harpenden with good access to local facilities and close to bus routes. This will help to reduce private car usage. ✓	The site is in a relatively sustainable location with good access to local facilities and close to bus routes. This will help to reduce private car usage. This site is a flat level walk or cycle from the local centre which would encourage walking and cycling to access facilities. ✓	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 airborne emissions. ✓	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. 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 site is in a relatively sustainable location with good access to local facilities and close to bus routes. This will help to reduce private car usage. This site is a relatively level walk or cycle from the village centre which would encourage walking and cycling to access facilities. ✓

SA Objectives (abridged)	North West Harpenden	North East Harpenden	West of London Colney	West of Chiswell Green	Park Street Garden Village	North east of Redbourn
	The site is located approximately 1.5km from the town centre, which while being walkable is also likely to generate additional car trips, with associated airborne emissions. However the potential for public transport service improvement would help to mitigate. *	The site is over 1.5km from the town centre and main supermarkets which will generate additional car trips, with associated airborne emissions. There are also some topography and distance disadvantages for walking and cycling access to rail and the town centre. *	The distance of the site from the main town centres may encourage car use, rather than sustainable modes of transport, affecting air quality. *	The site is some distance from city/town centres (St Albans, Hemel Hempstead, and Watford) which will result in additional vehicle trips with associated airborne emissions. *	This site is located some distance from the city/town centres (St Albans and Watford) which will result in additional vehicle trips with associated airborne emissions. 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. *	This site is located some distance from the city/town centres (St Albans and Hemel Hempstead) which will generate additional car trips, with associated airborne emissions. *
Use of brownfield sites	This is a greenfield site and development would not therefore support this objective. *	This is a greenfield site and development would not therefore support this objective. *	This is a greenfield site and development would not therefore support this objective. *	This is a greenfield site and development would not therefore support this objective. *	Part of the site is previously developed land. *	This is a greenfield site and development would not therefore support this objective. ? *
Resource efficiency	The development would be required to deliver excellence in energy efficiency and appropriate renewable energy production and supply mechanisms. The site is not located in a District Heating Opportunity Area and its scale would not be sufficient to support district heating. The site is located within a Wind Opportunity Area, however potential to deliver wind turbines in the context of a residential development is very limited given proximity to roads, potential new development and land availability. ✓	The development would be required to deliver excellence in energy efficiency and appropriate renewable energy production and supply mechanisms. The site is not located in a District Heating Opportunity Area and its scale would not be sufficient to support district heating. The site is located at the edge of a Wind Opportunity Area, however potential to deliver wind turbines in the context of a residential development is very limited given proximity to roads, potential new ✓	The development would be required to deliver excellence in energy efficiency and appropriate renewable energy production and supply mechanisms. The site is not located in a District Heating Opportunity Area and its scale would not be sufficient to support district heating. The site is located within a Wind Opportunity Area, however potential to deliver wind turbines in the context of a residential development is very limited given proximity to roads, potential new development and land availability. ✓	The development would be required to deliver excellence in energy efficiency and appropriate renewable energy production and supply mechanisms. The site is not located in a District Heating Opportunity Area and its scale would not be sufficient to support district heating. The site is located within a Wind Opportunity Area, however potential to deliver wind turbines in the context of a residential development is very limited given proximity to roads, potential new development and land availability. ✓	The development would be required to deliver excellence in energy efficiency and appropriate renewable energy production and supply mechanisms. The site is not located in a District Heating Opportunity Area but the scale of development provides opportunities for renewable energy production to be incorporated. The site is located within a Wind Opportunity Area. The site is located on a sand and gravel belt – but minerals have already been extracted at this location. ✓	The development would be required to deliver excellence in energy efficiency and appropriate renewable energy production and supply mechanisms. The site is not located in a District Heating Opportunity Area and its scale would not be sufficient to support district heating. The site is located within a Wind Opportunity Area, however potential to deliver wind turbines in the context of a residential development is very limited given proximity to roads, potential new development and land availability. ✓

SA Objectives (abridged)	North West Harpenden	North East Harpenden	West of London Colney	West of Chiswell Green	Park Street Garden Village	North east of Redbourn
		development and land availability.	The site is in the sand and gravel minerals consultation area. Developing in this area may have negative sustainability implications on resource efficiency due to the sterilisation of the minerals, limiting their extraction potential in the future.	?		
Historic environment	The site contains the Grade II Listed Building at Cooters End Farm and could impact on its settings. The Old Bell PH (Grade 2) is also close to the site.	? The site is not subject to any significant heritage or archaeological constraint. No predicted effects.	- The site contains the Grade II* Listed Building 'All Saints Pastoral Centre & Chapel' as well as the Grade II 'Voluntary Mission Movement' and 'Farm Cottage & adjoining garden walls at All Saints Pastoral Centre'. <i>'Colne Chapel moated site'</i> Scheduled Ancient Monument is situated adjacent to the site and development would affect its setting. In addition, development would affect the setting of Napsbury Park which is designated as a Registered Historic Park and Garden and a Conservation Area.	* The site is not subject to any significant heritage or archaeological constraint. No predicted effects.	- The site is not subject to any significant heritage or archaeological constraint. A small area near the western boundary of the site lies within the Park Street and Frogmore Conservation Area and there are Grade II Listed Buildings close to the same boundary. The settings of these heritage assets may be affected by any new development, although the topography and existing screening should minimise any adverse effects. The prior gravel extraction on the site will already have destroyed any archaeological remains – if they existed. Development could affect the settings of the <i>'Colne Chapel moated site'</i> Scheduled Ancient Monument and Napsbury Park which is designated as a Registered Historic Park and Garden and a Conservation Area – both of which are in the other side of the railway to this site.	? The southern corner of the site lies in the Redbourn Conservation Area and also includes a Grade II Listed Building ('Barn at Scout Farm'). In addition there are other Grade II Listed Buildings in close proximity to the site on High Street. Development would affect the settings of these heritage assets and could have some direct effects.

SA Objectives (abridged)	North West Harpenden	North East Harpenden	West of London Colney	West of Chiswell Green	Park Street Garden Village	North east of Redbourn
Landscape & townscape	<p>The site is in an area designated as a Landscape Conservation Area within the SADC Local Plan Review 1994.</p> <p>Development may have some impact on the setting of Harpenden when approached from the north.</p> <p>Development of the part of the site to the north of Cooters End Lane would be more intrusive into countryside than that to the south.</p> <p>Development would have local visual impacts. <i>Notable effects would be in relation to residents within the sub-area (e.g. Cooters End Farm, residents of properties on the opposite side of the valley and people travelling along the local road network) (SKM, 2014).</i></p> <p>Development would impact on views from rights of way, including the long-distance Chiltern Way which runs along the Luton Road to the south-west of the site and Cooters Lane to the north-west of the site.</p>	<p>The site is in an area designated as a Landscape Conservation Area within the SADC Local Plan Review 1994.</p> <p>Development would have local visual impacts as well as visual effects on the opposite side of the Lea Valley.</p> <p><i>Potential visual effects of new development would be at both a local level and wider. Key local visual receptors comprise the residents on this edge of Harpenden, road users and people using local Public Rights of Way (including those within the sub-area). Wider effects are likely particularly in relation to visual effects on receptors on the southwest side of the Lea Valley, particularly more elevated developments within the sub-area (SKM, 2014).</i></p> <p>Development would affect people using the Public Rights of Way that cross the site and run along the boundary.</p>	<p>The site is not in an area designated as a Landscape Conservation Area.</p> <p>Development at this site could affect the landscape setting of Napsbury Park and Conservation Area.</p> <p><i>Key potential visual effects of new development would be at a local level. Notable effects would be in relation to surrounding residents and people using Public Rights of Way. Hedgerows and urban form would provide some visual containment (SKM, 2014).</i></p>	<p>The site is not in an area designated as a Landscape Conservation Area.</p> <p>The land parcel is well related to Chiswell Green and has more of an urban fringe character than an open countryside one.</p> <p>However, much of the area lies on a prominent ridge, with long views to the south west.</p> <p><i>Key potential visual effects of new development would be at a local level. Notable effects would be in relation to residents on the western edge of Chiswell Green and dispersed properties within this part of the sub-area (SKM, 2014).</i></p>	<p>The site is not in an area designated as a Landscape Conservation Area.</p> <p>Development of this site would result in the loss of open countryside. However the site is relatively well screened from the local area.</p>	<p>The site is not in an area designated as a Landscape Conservation Area.</p> <p>Development at this site would result in encroachment into open countryside to the north east of Redbourn and affect the setting of the village</p> <p>A public footpath crosses the site and development would have impacts on views and amenity for those using the footpath.</p>
	<p>The development would be required to deliver recreation space and public open space. In addition development would be required to retain existing landscape features, including hedgerows, and small remnant woodland.</p>	<p>The development would be required to deliver recreation space and public open space. In addition development would be required to retain existing landscape features, including important trees.</p>	<p>The development would be required to deliver recreation space and public open space. In addition development would be required to retain existing landscape features, including important trees.</p>	<p>The development would be required to deliver recreation space and public open space. In addition development would be required to retain existing landscape features, including important trees.</p>	<p>The development would be required to deliver strategic and public open space, recreation space and countryside access links, including a new Country Park.</p> <p>Development would also require the retention of important trees and</p>	<p>The development would be required to deliver recreation space and public open space. In addition development would be required to retain existing landscape features, including important trees.</p>

SA Objectives (abridged)	North West Harpenden	North East Harpenden	West of London Colney	West of Chiswell Green	Park Street Garden Village	North east of Redbourn
					landscape features. 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.	
Health	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.	✓ The site is located close to footpaths and cycle routes which provides the opportunity for new residents to live active lifestyles. New recreation space provided as part of any development would further support this objective.	✓ 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. This site is a flat level walk or cycle from the local centre which would encourage walking and cycling to access facilities.	✓ The topography of the area would enable walking and cycling to access services facilities. New recreation space provided as part of any development would further support this objective.	✓ The 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.	✓ The topography of the area would enable walking and cycling to access services facilities. Development could provide additional public open space.
		There are some topography and distance disadvantages for walking and cycling access to the railway station and the town centre. 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.	*? 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.	? The topography of the area would enable walking and cycling to access services facilities. New recreation space provided as part of any development would further support this objective.	An oil pipeline crosses the northern section of the site and would need to be taken into consideration in planning the layout of development. The site is close to the M25 motorway and there could therefore be noise disturbance for the new residents.	? 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.
Sustainable locations	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.	✓ 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.	✓ Whilst being some distance from the main city/town centres (St Albans, Hemel Hempstead, and Watford), the site is in a relatively sustainable location with good access to services	✓ Whilst the site is some distance from the main city/town centres (St Albans, Hemel Hempstead, and Watford), it is within walking distance of bus stops in Watford Road and	- This site is located some distance from the city/town centres (St Albans and Watford); however there is are new neighbourhood and local centres planned as part of	✓ Whilst being some distance from the main city/town centres (St Albans and Hemel Hempstead), the site is in a relatively sustainable location with good access to local services and facilities

SA Objectives (abridged)	North West Harpenden		North East Harpenden		West of London Colney		West of Chiswell Green		Park Street Garden Village		North east of Redbourn	
					and facilities and close to bus routes. It is also close to a major supermarket.		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. A mixed neutral /minor positive effect has therefore been predicted against this objective.	✓	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.		and close to bus routes. However new development in Redbourn would not provide the access to a wide range of services and facilities, which would be the case for development at towns. A mixed neutral /minor positive effect has therefore been predicted against this objective.	✓
Equality & social exclusion	There may be some potential to create new small scale local community facilities and improved open space.	✓	There may be some potential to create new small scale local community facilities and improved open space.	✓	There may be some potential to create new small scale local community facilities and improved open space.	✓	There may be some potential to create new small scale local community facilities and improved open space.	✓	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.	✓	There may be some potential to create new small scale local community facilities and improved open space.	✓
Good quality housing	Development at the site could 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.	✓✓	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.	✓✓	Development at the site could 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.	✓	Development at the site could provide a minimum of 365 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 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 the site could provide approximately 1,000 new homes with the potential to meet a variety of accommodation needs and to deliver affordable homes in this part of the District.	✓✓
Community identity & participation	No predicted effects.	-	No predicted effects.	-	Development at this location could assist in physical and social integration of Napsbury with London Colney, where there is currently little integration.	✓	No predicted effects.	-	The principle behind the garden village concept, which requires them to be locally led and include consultation with the local community, should help to support this objective.	✓	No predicted effects.	-
Crime and fear of crime	No predicted effects.	-	No predicted effects.	-	No predicted effects.	-	No predicted effects.	-	No predicted effects.	-	No predicted effects.	-

SA Objectives (abridged)	North West Harpenden	North East Harpenden	West of London Colney	West of Chiswell Green	Park Street Garden Village	North east of Redbourn
Sustainable prosperity and growth	The potential contribution to economic growth through the development of this site is limited. However, the provision of new housing would help to support the local services in Harpenden, maintaining their viability and boosting the local economy.	✓ The potential contribution to economic growth through the development of this site is limited. However, the provision of new housing would help to support the local services in Harpenden, maintaining their viability and boosting the local economy.	✓ The potential contribution to economic growth through the development of this site is limited. However, the provision of new housing would help to support the local services in London Colney, maintaining their viability and boosting the local economy.	✓ The potential contribution to economic growth through the development of this site is limited. However, the provision of new housing would help to support the local services in Chiswell Green, maintaining their viability and boosting the local economy.	✓ 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.	✓ The potential contribution to economic growth through the development of this site is limited. However, the provision of new housing would help to support the local services in Redbourn, maintaining their viability and boosting the local economy.
Fairer access to services	The scale of housing development proposed at this site is not of a scale sufficient to provide opportunities for mixed use development that would offer new employment opportunities.	- The scale of housing development proposed at this site is not of a scale sufficient to provide opportunities for mixed use development that would offer new employment opportunities.	- The scale of housing development proposed at this site is not of a scale sufficient to provide opportunities for mixed use development that would offer new employment opportunities.	- The scale of housing development proposed at this site is not of a scale sufficient to provide opportunities for mixed use development that would offer new employment opportunities.	- New neighbourhood / local centres and potential commercial opportunities would offer new employment opportunities.	✓ The scale of housing development proposed at this site is not of a scale sufficient to provide opportunities for mixed use development that would offer new employment opportunities.
Revitalise town centres	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.	✓ 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.	✓ 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.	✓ 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.	✓ 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.	✓ 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 village.



St Albans Local Plan

Publication

Sustainability Appraisal Report

Appendix F: Policy Assessment

September 2018

Contents

Methodology	1
Development Strategy and Metropolitan Green Belt	3
Policy S1 Spatial Strategy and Settlement Hierarchy	3
Policy S2 Development Strategy	6
Policy S3 Metropolitan Green Belt	9
Homes, Affordable Homes and Workplaces	13
Policy S4 Housing Strategy and Housing Requirement/Target.....	13
Policy S5 Economic Development Strategy and Employment Land Provision.....	20
Policy S6 Broad Locations for Development.....	23
Policy S6 i) East Hemel Hempstead (North) Broad Location.....	23
Policy S6 iii) East Hemel Hempstead (South) Broad Location.....	34
Policy S6 iv) North Hemel Hempstead Broad Location	40
Policy S6 v) East St Albans Broad Location	45
Policy S6 vi) North St Albans Broad Location.....	51
Policy S6 vii) North East Harpenden Broad Location	56
Policy S6 viii) North West Harpenden Broad Location	60
Policy S6 ix) West of London Colney Broad Location.....	65
Policy S6 x) West of Chiswell Green Broad Location	70
Policy S6 xi) Park Street Garden Village Broad Location.....	74
Policy L1 Housing Size, Type, Mix and Density	81
Policy L2 Older Persons Housing and Special Needs Housing	83
Policy L3 Provision of and Contributions towards Affordable Housing	85
Policy L4 Affordable housing development in the Green Belt (rural exceptions sites) .	87
Policy L5 Small Scale Development in Green Belt Settlements and the Green Belt	87
Policy L6 Extension or Replacement of Dwellings in the Green Belt	87
Policy L7 Gypsies, Travellers and Travelling Show People.....	89
Policy L8 Primarily Residential Areas	91
Policy L9 Primarily Business Use Areas	93
Policy L10 Strategic Office Locations	93
Policy L11 Special Employment Locations in the Green Belt - BRE, Bricket Wood	95
Policy L11 Special Employment Locations in the Green Belt - Rothamsted Research, Harpenden.....	98
Retail, Leisure and Commercial Uses and Development	101
Policy L12 Centres for Retail, Services and Leisure.....	101
Policy L13 Attractive and vibrant cultural and civic areas	104
Policy L14 Location of Non-residential uses serving residential areas.....	107
Policy L15 Leisure Uses	109
Policy L16 Mixed Use Opportunity Areas	111
Infrastructure and Community Facilities.....	115
Policy L17 Infrastructure	115
Policy L18 Transport Strategy	117
Policy L19 Highways / Access Considerations for New development	121
Policy L20 New Development Parking Guidance and Standards.....	123
Policy L21 Education	125
Policy L22 Community, Leisure and Sports Facilities.....	128

Design, Conservation and Enhancement of the natural, built and historic environment 132

Policy L23 Urban Design and Layout of New Development 132

Policy L24 Development Amenity Standards..... 136

Policy L25 Energy and Environmental Performance of New Development 138

Policy L26 Local Green Space 141

Policy L27 Green Space Not Designated as Local Green Space..... 141

Policy L28 Green Space Standards and New Green Space Provision 141

Policy L29 Green and Blue Infrastructure, Countryside, Landscape and Trees..... 143

Policy L30 Historic Environment and Townscape Character..... 149

Appendix F: Policy Assessment

Methodology

The following tables outline the symbols and abbreviations used to document the results of the assessment process.

Key to Assessment Scores

Scale		
Symbol	Meaning	Comment
L	Local	Within St Albans City and District
R	Regional	Neighbouring local authorities and London
N	National	UK or a wider global impact

Permanence		
Symbol	Meaning	Comment
P	Permanent	E.g. Effects lasting during and beyond the life of the plan
T	Temporary	E.g. Effects during construction

Timescale	
In the Short Term	0-10 years
In the Medium Term	10-20 years
In the Long Term	After life of plan

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

The table below outlines the Sustainability Objectives that have been used to focus the assessment process and details the reference term which is used in the assessment tables for the sake of brevity. The full framework of objectives and associated sub-objectives can be found in Appendix C.

SA Objective		Reference Term
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	Biodiversity
2	To protect, maintain and enhance water resources (including water quality and quantity) while taking into account the impacts of climate change	Water quality/ quantity
3	Ensure that new developments avoid areas which are at risk from flooding and natural flood storage areas	Flood risk
4	Minimise development of land with high quality soils and minimise the degradation/loss of soils due to new developments	Soils
5	Reduce the impacts of climate change, with a particular focus on reducing the consumption of fossil fuels and levels of CO ₂	Greenhouse gas emissions
6	Ensure that developments are capable of withstanding the effects of climate change (adaptation to climate change)	Climate change proof
7	Achieve good air quality, especially in urban areas	Air quality
8	Maximise the use of previously developed land and buildings, and the efficient use of land	Use of brownfield sites
9	To use natural resources, both finite and renewable, as efficiently as possible, and re-use finite resources or recycled alternatives wherever possible	Resource efficiency
10	To identify, maintain and enhance the historic environment, heritage assets and their settings and cultural assets	Historic environment
11	To conserve and enhance landscape and townscape character and encourage local distinctiveness	Landscape & Townscape
12	To encourage healthier lifestyles and reduce adverse health impacts of new developments	Health
13	To deliver more sustainable patterns of location of development.	Sustainable locations
14	Promote equity & address social exclusion by closing the gap between the poorest communities and the rest	Equality & social inclusion
15	Ensure that everyone has access to good quality housing that meets their needs	Good quality housing
16	Enhance community identity and participation	Community identity & participation
17	Reduce both crime and fear of crime	Crime and fear of crime
18	Achieve sustainable levels of prosperity and economic growth	Sustainable prosperity and 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	Fairer access to jobs & services
20	Revitalise town centres to promote a return to sustainable urban living	Revitalise town centres

Development Strategy and Metropolitan Green Belt

Policy S1 Spatial Strategy and Settlement Hierarchy

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	Giving 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.	P	L	✓	✓	✓
2	Water quality/ quantity	No predicted effects.	-	-	-	-	-
3	Flood risk	No predicted effects.	-	-	-	-	-
4	Soils	Giving 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. This should minimise levels of soil sealing and the degradation/loss of soils.	P	L	✓	✓	✓
5	Greenhouse gas emissions	Giving 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 (GHG) emissions from transport.	P	N	✓	✓	✓
6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	Transport is a key source of air pollution. Giving priority to urban locations for new developments, particularly the larger urban centres, should help to reduce the need to travel to access facilities and the average distances travelled which would have a positive effect on reducing the growth of airborne emissions from transport.	P	L	✓	✓	✓
8	Use of brownfield sites	Requiring the efficient use of land by increasing the density of development in the most accessible parts of the urban centres will support this objective	P	L	✓	✓	✓

9	Resource efficiency	No predicted effects.	-	-	-	-	-
10	Historic environment	The policy requires large-scale developments at the main urban settlements to respect local character and heritage. Encouraging lower housing densities in the villages and other smaller settlements should help them to retain their local distinctiveness and protect any heritage assets and their settings.	P	L	✓	✓	✓
11	Landscape & Townscape	The policy requires large-scale developments at the main urban settlements to respect local character and heritage. This will also help to minimise effects on local townscapes. Concentrating growth in the District's main settlements and also to the east of Hemel Hempstead and restraining growth within the Green Belt should minimise impacts on the District's rural landscapes. Encouraging lower housing densities in the villages and other settlements should help them to retain their character. For example, allowing only small scale infilling in the small settlements within the Green Belt should help minimise impacts on local character.	P	L	✓	✓	✓
		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.	P	L	✗	✗	✗
12	Health	Giving priority to urban locations for new developments, particularly the larger urban centres, should help to provide opportunities for physical activity by providing walkable and cycleable neighbourhoods. This would help to encourage healthier lifestyles.	P	L	✓	✓	✓
13	Sustainable locations	Giving priority to urban locations for new developments, particularly the larger urban centres, should reduce the need to travel, as a larger proportion of residents would be closer to key services and facilities.	P	L	✓	✓	✓
14	Equality & social inclusion	Giving priority to urban locations for new developments, particularly the larger urban centres, which are most accessible by all forms of transport, should improve access to facilities and services, particularly for those without access to a private car.	P	L	✓	✓	✓
15	Good quality housing	Whilst the majority of new housing development will be concentrated at the main settlements, the policy should allow for some small scale infilling in the small settlements within the Green Belt, thereby allowing for some provision of housing in rural areas.	P	L	✓	✓	✓
16	Community identity & participation	No predicted effects.	-	-	-	-	-
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-
18	Sustainable prosperity & growth	Giving priority to urban locations for new developments, particularly the larger urban centres close to a large proportion of the District's residents should help to support the local economy.	P	L	✓	✓	✓

19	Fairer access to jobs & services	Giving priority to urban locations for new developments, particularly the larger urban centres close to the District's major residential areas could improve access to employment opportunities.	P	L	✓	✓	✓
20	Revitalise town centres	Giving priority to urban locations for new developments, particularly the larger urban centres, could contribute to improving the viability and vitality of their town centres and local centres.	P	L	✓	✓	✓
Summary of assessment		<p>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.</p> <p>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.</p>					

Policy S2 Development Strategy

NB: the assessment of Policy S2 does not cover the effects specific to the Broad Locations that are 'facilitated' by Policy S2. The 'location specific' effects are covered in the assessments for Policy S6 i-xi.

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	No strategy specific predicted effects.	-	-	-	-	-
2	Water quality/ quantity	No strategy specific predicted effects.	-	-	-	-	-
3	Flood risk	No strategy specific predicted effects.	-	-	-	-	-
4	Soils	No strategy specific predicted effects.	-	-	-	-	-
5	Greenhouse gas emissions	Focusing development on Broad Locations on the edge of major settlements will help to reduce the need to travel and therefore reduce the growth in Greenhouse Gas (GHG) emissions. Development of a few larger sites, rather than a larger number of smaller sites, will also 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.	P	N	✓	✓	✓
		By concentrating new development at Broad Locations on the edge of major settlements there could be implications for increasing GHG emissions if traffic congestion issues are created or exacerbated. However this would be the case whatever strategy is used for distributing the scale of new housing planned for the District.	P	N	✗	✗	✗
6	Climate change proof	No strategy specific predicted effects.	-	-	-	-	-
7	Air quality	Focusing development on Broad Locations on the edge of major settlements both within and neighbouring the District will help to reduce the need to travel and in so doing reduce levels of airborne emissions from private vehicles.	P	L	✓	✓	✓

		Concentrating new development at Broad Locations on the edge of major settlements could result in traffic congestion issues being created or exacerbated. This would have implications for local air quality. However this would be the case whatever strategy is used for distributing the scale of new housing planned for the District.	P	L	x	x	x
8	Use of brownfield sites	No strategy specific predicted effects.	-	-	-	-	-
9	Resource efficiency	Concentrating new development at Broad Locations provides the opportunity for the delivery of appropriate renewable energy production and supply mechanisms.	P	L	✓	✓	✓
10	Historic environment	No strategy specific predicted effects.	-	-	-	-	-
11	Landscape & Townscape	Whilst individual developments on greenfield sites may have adverse effects on local landscapes, by focusing development on Broad Locations on the edge of major settlements the strategy will help to minimise the overall District-wide effects on landscapes.	P	L	✓	✓	✓
		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.	P	L	x	x	x
12	Health	The large sites needed to deliver this strategy provide the potential for the creation and access to new open spaces. This could encourage new residents to live active lifestyles.	P	L	✓	✓	✓
13	Sustainable locations	Focusing development on Broad Locations on the edge of major settlements will help to reduce the need to travel to access services and facilities. The large sites proposed under this strategy would also provide opportunities for strategic infrastructure improvements which would help further in reducing the need to travel.	P	L	✓	✓	✓
14	Equality & social inclusion	Focusing development on Broad Locations on the edge of major settlements provides opportunities for the increased provision of health, education, recreation and community facilities, as well as supporting the viability of existing services and facilities.	P	L	✓	✓	✓
15	Good quality housing	No strategy specific predicted effects.	-	-	-	-	-
16	Community identity & participation	Focusing development on Broad Locations provides the potential for community facilities to be included as part of new development, facilities that would also be accessible to the existing residents. The development of large scale, relatively self-sufficient developments may limit the integration of the new residents with existing communities.	-	-	?	?	?
17	Crime and fear of crime	No strategy specific predicted effects.	-	-	-	-	-

18	Sustainable prosperity & growth	No strategy specific predicted effects.	-	-	-	-	-
19	Fairer access to jobs & services	No strategy specific predicted effects.	-	-	-	-	-
20	Revitalise town centres	The focus of development on major settlements would support the vitality of their town centres.	P	L	✓	✓	✓
Summary of assessment		<p>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.</p> <p>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.</p>					

Policy S3 Metropolitan Green Belt

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	Restricting development in the Green Belt should have a positive effect on biodiversity as it is likely that greenfield sites in the Green Belt land will have some biodiversity value. The policy seeks to proactively manage the Green Belt by promoting healthy ecosystem services. However it should be noted that brownfield sites, which are more likely to be developed as a result of this policy, could also have some biodiversity value and this needs to be considered on a site by site basis. The policy encourages provision of space for recreational needs which could encourage people to come into contact with, understand, and enjoy the natural environment. Supporting productive and sustainable farming and forestry could enhance wider biodiversity.	P	L	✓	✓	✓
		New schools, recreation facilities and transport infrastructure could have adverse effects on biodiversity, dependent on the location specifics.	-	-	?	?	?
2	Water quality/ quantity	The policy seeks to proactively manage the Green Belt by promoting healthy ecosystem services. This should have positive implications for water quality.	P	L	✓	✓	✓
3	Flood risk	The policy seeks to proactively manage the Green Belt in relation to adaptation to climate change. This could have implications for managing flood risk.	-	-	?	?	?
4	Soils	Restricting development on greenfield sites in the Green Belt should minimise levels of soil sealing and the degradation/loss of soils, although there will still be soil sealing and loss at sites not protected by this policy.	P	L	✓	✓	✓

5	Greenhouse gas emissions	Restricting development in the Green Belt will result in development taking place at the larger settlements. This should help to reduce the need to travel to access services and facilities, thereby reducing growth in greenhouse gas emissions. In addition the policy seeks to proactively manage the Green Belt in relation to climate change mitigation. This should have implications for reducing greenhouse gas emissions.	P	N	✓	✓	✓
6	Climate change proof	The policy seeks to proactively manage the Green Belt in relation to climate change adaptation.	P	L	✓	✓	✓
7	Air quality	Restricting development in the Green Belt will result in development taking place at the larger settlements. This should help to reduce the need to travel to access services and facilities, thereby reducing growth in airborne emissions.	P	L	✓	✓	✓
8	Use of brownfield sites	Restricting development in the Green Belt would result in more development taking place on brownfield sites.	P	L	✓	✓	✓
9	Resource efficiency	No predicted effects.	-	-	-	-	-
10	Historic environment	New schools, recreation facilities and transport infrastructure could have adverse effects on the historic environment, dependent on the location specifics.	-	-	?	?	?
11	Landscape & Townscape	Restricting development in the Green Belt should have a positive effect on this objective 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.	P	L	✓✓	✓✓	✓✓
		New schools, recreation facilities and transport infrastructure could have adverse effects on local landscapes, dependent on the location specifics.	-	-	?	?	?
12	Health	Restricting development in the Green Belt will result in increased population densities within urban areas. 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. The policy could also result in improved access to healthcare facilities. The policy specifies that small-scale outdoor sport and recreational facilities and uses and detached playing fields for state schools are not considered to be inappropriate development in the Green Belt. It also encourages provision of space for recreational needs. Both of these policy elements could encourage people to lead healthier lifestyles.	P	L	✓	✓	✓
13	Sustainable locations	Restricting development in the Green Belt will result in increased development at the larger settlements. This should mean that homes, employment and other services are within close proximity and therefore reduce the need to travel further.	P	L	✓	✓	✓

14	Equality & social inclusion	Restricting development in the Green Belt will result in increased development at the larger settlements, meaning that homes, employment and other services are easily accessible, particularly for those without access to private transport. The policy also encourages provision of space for recreational needs and school provision which should improve access to facilities and services.	P	L	✓	✓	✓
15	Good quality housing	No predicted effects.	-	-	-	-	-
16	Community identity & participation	The Green Belt is valued by the local community and its protection will therefore have a positive effect on this objective.	P	L	✓	✓	✓
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-
18	Sustainable prosperity & growth	Restricting development in the Green Belt will result in restricted 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.	P	L	✗	✗	✗
		The policy supports productive and sustainable farming and forestry which could have benefits for local enterprises working in these areas. The policy also supports the provision of infrastructure in the Green Belt which will help to support the economy.	P	L	✓	✓	✓
19	Fairer access to jobs & services	Restricting development in the Green Belt could restrict the growth of the rural economy by preventing expansion of existing businesses or the development of new ones meaning that local provision of and access to jobs and services could be adversely affected.	P	L	✗	✗	✗
		The policy would enable the provision of new educational facilities in the Green Belt which would support this objective.	P	L	✓	✓	✓
20	Revitalise town centres	The protection of the Green Belt would help to encourage urban living and could help to revitalise and support town centres.	-	-	?	?	?

<p>Summary of assessment</p>	<p>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.</p> <p>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.</p> <p>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.</p>
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Homes, Affordable Homes and Workplaces

Policy S4 Housing Strategy and Housing Requirement/Target

NB: the assessment of Policy S4 does not cover the effects associated with the specific Broad Locations that have been identified in the Local Plan for delivering significant levels of housing. Those 'location specific' effects are covered in the assessments for Policy S6 i-xi.

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	In order to meet the housing need it will be necessary to develop on greenfield sites, which have an inherent value for biodiversity and this will inevitably lead to some adverse effects on habitats and species. Increased numbers of new dwellings will also increase pressure on local biodiversity (including designated sites) through increased recreation, dog walking, predation by domestic cats etc. The significance of the effects will be dependent on the characteristics of the specific development sites taken forward for new housing provision. It should also be noted that some previously developed sites can also have a high biodiversity value.	P	L	*	*	*
		As mentioned above the effects will be dependent on the specific sites taken forward for development and therefore there is uncertainty as to the actual effects. Also, through the new housing development there will be some opportunities to improve local green infrastructure to the benefit of biodiversity.	-	-	?	?	?

2	Water quality/ quantity	St Albans District is within an area already identified as 'over-abstracted' ¹ in terms of water supply. Therefore any addition to the number of dwellings in the District will increase this pressure on water resources, even if they are built to high standards for water efficiency. The effect is likely to become more significant over time as more dwellings are built and risk of periodic water shortages increases.	P	L	x	x	x
		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. Whilst further stages of the Water Cycle Study may be required, on-going discussions with the water utility providers will prove useful in identifying whether any supply and capacity issues arise from the approach to growth and development in the District. New housing development will result in some new areas of impermeable surfacing with associated risks of pollution from run-off into water courses. However it is expected that the design of development (e.g. incorporation of SUDS) will help to reduce this risk.	-	-	?	?	?
3	Flood risk	This level of growth could be delivered without having to build new dwellings in areas at risk from flooding.	-	-	-	-	-
4	Soils	Development of new housing on greenfield sites will inevitably result in the loss of soil, through soil sealing.	P	L	x	x	x
5	Greenhouse gas emissions	Delivery of 14,600 additional homes in the period 2020-2036 will inevitably result in an increase in greenhouse gas emissions from energy used in the construction and occupation of new housing and associated activities including increases in traffic. However, any large developments required to deliver this level of growth may provide opportunities for significant transport infrastructure and a step change in sustainable travel and could also potentially increase the viability of existing public transport services and/or provide contributions towards new services. All this would help to reduce the levels of growth of transport related CO ₂ emissions from new development. Delivering this number of new dwellings would require substantial development in non-town centre locations. This could result in increased car use to access services and facilities with associated increases in CO ₂ emissions, particularly if existing congestion is exacerbated.	P	N	x	x	x

¹ The Colne Catchment Licensing Strategy (Environment Agency, 2013)

		The scale of development required to meet this level of new housing provision would enable opportunities for installing Combined Heat and Power systems which can reduce carbon emissions by up to 30% compared to the separate means of conventional generation via a boiler and power station ² .	-	-	?	?	?
6	Climate change proof	No predicted effects	-	-	-	-	-
7	Air quality	Development of new housing will contribute to background emissions through an increase in the number of vehicles on the road. The level of housing proposed could exacerbate current traffic problems in St Albans, Hemel Hempstead and other locations prone to congestion, which would worsen local air quality.	P	L	*	*	*
		However, any large developments required to deliver this level of growth may incorporate sustainable transport infrastructure and facilities and could potentially increase the viability of existing public transport services and/or provide contributions towards new services. This would help to reduce the levels of growth of transport related airborne pollutant emissions from new development. In addition, continuing improvements in vehicle engine and exhaust technologies should act as a counteracting measure.	-	-	?	?	?
8	Use of brownfield sites	Delivery of 14,600 additional homes in the period 2020-2036 will inevitably result in the use of sites that are not classified as previously developed land.	P	L	*	*	*
9	Resource efficiency	Housing growth of this level will place demands on natural resources and result in increased waste generation. Design measures in other policies will help to reduce any adverse effects. The levels of growth would also place strain on waste and sewerage infrastructure, particularly as particularly as waste water treatment works may be near capacity thresholds by the 2030's.	P	L	*	*	*
10	Historic environment	Housing development could have adverse effects on known or undiscovered heritage assets. The proposed level of housing development increases the risk for adverse effects on the historic environment. Effects will however be dependent on the specific sites taken forward for development. There could be opportunities for some new development to contribute towards enhancements of the District's historic environment. These opportunities would be on a site specific basis, rather than being a generic potential planning outcome.	-	-	?	?	?

² <https://www.gov.uk/guidance/combined-heat-and-power>

11	Landscape & Townscape	Greenfield sites in the Green Belt will be required to deliver this level of housing with associated adverse effects on local landscapes and erosion of green links between some existing residential areas and the countryside as well as the potential for eroding gaps between settlements. There would also be a loss of tranquillity and increased light pollution in the area affected by the new developments. The nature and magnitude of the effects will be location dependent.	P	L	x	x	x
		Depending on location, new housing developments could contribute towards townscape improvements.	-	-	?	?	?
12	Health	The provision of this level of housing growth 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.	P	L	✓	✓	✓
		Effects on the health objective would be dependent on how the level of growth is delivered in terms of a variety of factors such as: the provision of new health facilities that ensure that existing services are not over-stretched; the design of developments to enable the take up of active travel modes; provision of a range of homes to meet the needs of all groups in society etc. New open space provided through new developments, particularly large developments that would be required to deliver this level of growth, would help to encourage healthy recreation activities and support improvements in health and wellbeing across the District.	-	-	?	?	?
13	Sustainable locations	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. However, 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.	P	L	x	x	x

		<p>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 (Appendix 5 of the Draft Publication Local Plan lists the current small sites with permission). These will include housing 'commitments' arising from current planning policy (existing and anticipated permissions outside the Broad Locations, together with 'windfall' site estimates) which will continue to be an important source of housing land supply. The Housing Trajectory in Appendix 2 of the Publication Draft Local Plan identifies that approximately 4,000 homes are expected to be delivered from this source. This includes some larger redevelopments and many smaller sites. Most will be in the main urban areas and will not affect greenfield Green Belt land (there will be a small proportion on previously developed land, and in villages, in the Green Belt).</p> <p>New policies are expected to deliver a further 880 homes under the 'Local Plan / NPPF - Delivering Urban Optimisation' category. The bulk of this housing will therefore be built in highly sustainable locations, supporting this objective.</p>	P	L	✓	✓	✓
14	Equality & social inclusion	<p>The level of housing growth would result in levels of developer contributions (through CIL & S106) which could result in an increased provision of health, education, recreation and community facilities, as well as supporting the viability of existing services and facilities. This could benefit both existing and new residents of the District.</p> <p>One counter-point is that the level of growth would put more pressure on existing local infrastructure, particularly schools, which may already be under pressure.</p>	P	L	✓	✓	✓
15	Good quality housing	<p>An average of 913 net new dwellings will be provided per annum across the Plan period which 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 a mix of family homes.</p>	P	L	✓✓	✓✓	✓✓
16	Community identity & participation	<p>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 level of these effects is uncertain.</p>	-	-	?	?	?
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-

18	Sustainable prosperity & growth	Providing new homes will support the economy by providing necessary dwellings for local workers and create jobs in construction.	P	L	✓	✓	✓
19	Fairer access to jobs & services	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.	P	L	✓	✓	✓
20	Revitalise town centres	The level of growth will help to support the viability of local centres and town centres.	P	L	✓	✓	✓
Summary of assessment		<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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').</p>					

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.

Policy S5 Economic Development Strategy and Employment Land Provision

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	Developing new employment sites could have an adverse effect on biodiversity however this will be dependent on the nature of the site chosen.	-	-	?	?	?
2	Water quality/ quantity	St Albans District is within an area already identified as 'over-abstracted' (Colne CAMS, EA). Providing new employment, including approximately 10,000 jobs at East Hemel Hempstead (Central) Broad Location, could put direct pressure on these already under pressure water resources depending on the type of new development, e.g. office accommodation versus manufacturing plant. The effect could become more significant over time as the risk of periodic water shortages increase.	-	-	?	?	?
3	Flood risk	No predicted effects.			-	-	-
4	Soils	The development of new employment sites would result in soil loss.	P	L	x	x	x
5	Greenhouse gas emissions	Activities relating to the new employment sites, e.g. transport, will result in some increases in GHG emissions.	P	L	x	x	x
		Safeguarding existing employment land could reduce the need to travel and private car use if it is located close to residential areas and where sustainable transport infrastructure already exists. This could reduce growth in greenhouse gas emissions. In addition, expanding employment opportunities in the District could help to avoid increases in the levels of out-commuting thereby reducing growth in GHG emissions.	P	N	✓	✓	✓
6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	Transport relating to the new employment sites, will result in some increases in airborne emissions.	P	L	x	x	x
		Safeguarding existing employment land could reduce the need to travel and private car use if it is located close to residential areas and where sustainable transport infrastructure already exists. This could reduce growth in airborne emissions. In addition, expanding employment opportunities in the District could reduce levels of traffic thereby reducing growth in airborne emissions.	P	L	✓	✓	✓

8	Use of brownfield sites	Safeguarding existing employment land will help to support this objective.	P	L	✓	✓	✓
9	Resource efficiency	Safeguarding existing employment land areas should progress this objective due to its location and the ability to use existing infrastructure.	P	L	✓	✓	✓
10	Historic environment	New employment development could have adverse effects on known or undiscovered historic and cultural heritage. Redevelopment of employment sites may help to improve certain historic areas of the town centres.	-	-	?	?	?
11	Landscape & Townscape	Developing new employment sites could have an effect on this objective however this is dependent on the nature of the site chosen. Redevelopment of employment sites may help to local townscapes.	-	-	?	?	?
12	Health	Increasing employment opportunities within the District could result in improved health and well-being of local residents.	P	L	✓	✓	✓
		Safeguarding existing employment land may reduce the need to travel and encourage the use of more active modes of transport, such as walking and cycling, if it is located in close proximity to existing residential areas and where existing sustainable transport infrastructure exists.					
13	Sustainable locations	Safeguarding existing employment land may reduce the need to travel and private car use if it is located in close proximity to existing residential areas and where existing sustainable transport infrastructure exists. The provision of significant new employment development within the East Hemel Hempstead Broad Locations supports this objective.	P	L	✓	✓	✓
14	Equality & social inclusion	Safeguarding existing employment land may reduce the need to travel by private car to access these employment opportunities thereby helping to progress this objective by reducing social exclusion.	P	L	✓	✓	✓
15	Good quality housing	No predicted effects.	-	-	-	-	-
16	Community identity & participation	No predicted effects.	-	-	-	-	-
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-
18	Sustainable prosperity & growth	Protecting and expanding employment opportunities in the District will progress this objective by supporting the local economy. The provision of significant new employment development within the East Hemel Hempstead (Central) Broad Locations supports this objective. Significant positive effects have been predicted.	P	L	✓✓	✓✓	✓✓
19	Fairer access to jobs & services	Protecting and expanding employment opportunities in the District should provide more local employment opportunities. The provision of significant new employment development within the East Hemel Hempstead (Central) Broad Location, with approximately 10,000 new jobs planned, supports this objective. Significant positive effects have been predicted.	P	L	✓✓	✓✓	✓✓

20	Revitalise town centres	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 this objective.	P	L	✓	✓	✓
Summary of assessment		<p>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.</p> <p>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.</p> <p>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.</p>					

Policy S6 Broad Locations for Development

Policy S6 i) East Hemel Hempstead (North) Broad Location

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	Greenfield nature of this site means that there will be some loss of habitats. The Nicky Line, which is a local wildlife site, runs through the north of the site. Any increased usage of the Nicky Line for walking and cycling could have adverse effects on this wildlife site.	P	L	x	x	x
		The size of the development would provide opportunities for biodiversity gains on what is currently agricultural land.	P	L	✓	✓	✓
2	Water quality/ quantity	The development would be required to deliver excellence in water management. No site specific predicted effects.	-	-	-	-	-
3	Flood risk	Site is not in a flood risk zone. No predicted effects.	-	-	-	-	-

4	Soils	<p>Greenfield site and therefore soil sealing would result from new development. Approximately 92% of the site area is covered by detailed Agricultural Land Classification mapping³. Of that area approximately 30% is classified as best and most versatile (BMV) agricultural land (Grade 2 and Grade 3a), which equates to approximately 28% of the total site area.</p> <p>In relation to the remaining 8% without detailed ALC classification, the regional scale mapping for ALC undertaken by Natural England in 2017 classifies this area as 'Moderate likelihood of BMV land (20-60% area BMV)⁴.</p> <p>Based on the above, as 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) a significant adverse effect has been identified for this site against the soils objective.</p>	P	L	xx	xx	xx
5	Greenhouse gas emissions	<p>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.</p> <p>The size of development proposed at this location could result in public transport service improvement.</p>	P	N	✓	✓	✓
		<p>The site is some distance from Hemel Hempstead town centre and railway stations (>5km) and Redbourn (5km), which will result in additional vehicle trips. However the potential for public transport service improvement would help to mitigate.</p>	P	N	x	x	x
6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	<p>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 airborne emissions. Development of new neighbourhood and local centres will further support this.</p> <p>The size of development proposed at this location could result in public transport service improvement.</p>	P	L	✓	✓	✓
		<p>The site is some distance from Hemel Hempstead town centre and railway stations (>5km) and Redbourn (5km) which will result in additional vehicle trips with associated airborne emissions.</p> <p>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 (ex M10).</p>	P	L	x	x	x

³ www.magic.gov.uk

⁴ <http://publications.naturalengland.org.uk/publication/6205542189498368?category=5208993007403008>

8	Use of brownfield sites	This is a greenfield site and development would not therefore support this objective.	P	L	x	x	x
9	Resource efficiency	The development would be required to deliver excellence in energy efficiency and appropriate renewable energy production and supply mechanisms. The site is located within a Wind Turbine Opportunity Area, although there will be limited potential to realise the opportunity.	P	L	✓	✓	✓
10	Historic environment	The site is not subject to any significant heritage or archaeological constraint. The site contains three Grade II listed buildings associated with Wood End Farm and development would impact on the setting of these buildings. A Scheduled Monument (SM), The Aubreys (fort/camp), is located to the northeast of the site. 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.	-	-	?	?	?
11	Landscape & Townscape	The site is not in an area designated as a Landscape Conservation Area. Development of this area would lead to a high degree of landscape impact and would erode the gap between Hemel Hempstead and Redbourn. <i>Key potential visual effects of new development in the west of the sub area, where new development would be located, would be at a local level (SKM, 2014⁵).</i> The site is in agricultural use and retains some countryside character despite the close proximity of residential, employment, and the M1. The site contains some sensitive landscape areas (Upper Ver Valley). Views from the right of way that runs through the site would be affected by new development.	P	L	x	x	x
		The development would be required to deliver strategic and public open space, recreation space and countryside access links, including a new Country Park. The site has been identified as having a high potential for delivering significant green infrastructure improvements. Development would also require the retention of important trees and landscape features.	P	L	✓	✓	✓

⁵ Green Belt Review Sites & Boundaries Study, Final Report, February 2014

12	Health	<p>The site is not well served by existing open space nearby. However 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.</p> <p>The Nickey Line (footpath and cycleway) runs across the northern section of the site. This provides the opportunity for new residents to live active lifestyles.</p> <p>Additional footpath and cycle network links could be provided by the scale of new development that this site could deliver.</p>	P	L	✓	✓	✓
		<p>A small area of the site lies within the Buncefield Oil Storage Depot HSE Consultation Zone.</p> <p>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.</p> <p>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.</p> <p>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.</p>	-	-	?	?	?
13	Sustainable locations	<p>The site is some distance from Hemel Hempstead town centre. However the scale of development that could be provided at this site would enable the delivery of neighbourhood and local centres.</p> <p>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.</p> <p>The site is very 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.</p>	P	L	✓✓	✓✓	✓✓
14	Equality & social inclusion	<p>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.</p>	P	L	✓	✓	✓
15	Good quality housing	<p>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.</p>	P	L	✓✓	✓✓	✓✓

16	Community identity & participation	The scale of development that this site would provide the potential to develop new facilities (education, health, community etc.) that would be accessible to the new and nearby existing population. This could help to encourage participation in community life and promote integration.	P	L	✓	✓	✓
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-
18	Sustainable prosperity & growth	Large scale housing development would help support the local economy, in particular the regeneration of the Maylands area that is supported in Hertfordshire's Strategic Economic Plan (March 2014). In addition, new neighbourhood / local centres and potential commercial opportunities will help support the local economy.	P	L	✓	✓	✓
19	Fairer access to jobs & services	Development of this site would support growth at Maylands Business Park which would help to encourage local provision of and access to jobs. New neighbourhood / local centres and potential commercial opportunities would offer new employment opportunities. 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.	P	L	✓	✓	✓
20	Revitalise town centres	Development at this edge of town location does not directly support the objective to focus new development in the centre of urban areas. However, 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.	P	L	✓	✓	✓
Summary of assessment		<p>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.</p> <p>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'</p>					

	<p>objective as the development will be required to deliver appropriate renewable energy production and supply mechanisms.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>
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	<p>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.</p> <p><u>Mitigation of significant adverse effects</u></p> <p>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.</p>
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Policy S6 ii) East Hemel Hempstead (Central) Broad Location

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	Greenfield nature of this site means that there will be some loss of habitats.	P	L	*	*	*
2	Water quality/ quantity	No predicted effects.	-	-	-	-	-
3	Flood risk	Site is not in a flood risk zone. No predicted effects.	-	-	-	-	-
4	Soils	Greenfield site and therefore soil sealing would result from new development. Approximately 93% of the site area is covered by detailed Agricultural Land Classification mapping ⁶ . Of that area approximately 30% is classified as best and most versatile (BMV) agricultural land (Grade 2 and Grade 3a), which equates to approximately 29% of the total site area. In relation to the remaining 7% without detailed ALC classification, the regional scale mapping for ALC undertaken by Natural England in 2017 classifies this area as 'Moderate likelihood of BMV land (20-60% area BMV)' ⁷ . Based on the above, as 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) a significant adverse effect has been identified for this site against the soils objective.	P	L	**	**	**
5	Greenhouse gas emissions	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.	P	N	✓	✓	✓
		Commercial development at this location will generate additional traffic which will result in increased levels of greenhouse gas emissions.	P	L	*	*	*

⁶ www.magic.gov.uk

⁷ <http://publications.naturalengland.org.uk/publication/6205542189498368?category=5208993007403008>

6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	The development will be required to deliver a multi-modal transport interchange which should help to reduce private car usage.	P	L	✓	✓	✓
		Commercial development at this location will generate additional traffic which could exacerbate air quality issues in 'St Albans AQMA No.2' which is adjacent to the junction of the M1 and A414.	P	L	✗	✗	✗
8	Use of brownfield sites	This is a greenfield site and development would not therefore support this objective.	P	L	✗	✗	✗
9	Resource efficiency	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. The site is located within a Wind Turbine Opportunity Area, although there will be limited potential to realise the opportunity.	P	L	✓✓	✓✓	✓✓
10	Historic environment	The site is not subject to any significant heritage or archaeological constraint. The site contains a Grade II Listed Building (Breakspears, Green Lane). 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.	-	-	?	?	?
11	Landscape & Townscape	The site is not in an area designated as a Landscape Conservation Area. Development of this area would affect the openness of landscape character and lead to a high degree of landscape impact. Views from the right of way that runs through the site would be affected by new development.	P	L	✗	✗	✗
		Development would require the retention of important trees and landscape features.	P	L	✓	✓	✓
12	Health	The site lies mostly within the Buncefield Oil Storage Depot HSE Consultation Zone (housing would not be permitted in this zone). Oil and gas pipelines cross the site and would need to be taken into consideration in planning the layout of development.	-	-	?	?	?
13	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.	P	L	✓✓	✓✓	✓✓
14	Equality & social inclusion	Development at this location would be required to provide a new 15 pitch Gypsy and Traveller site.	P	L	✓	✓	✓

15	Good quality housing	Development at this location would be required to provide a new 15 pitch Gypsy and Traveller site. This would help meet the housing need of the gypsy and traveller community.	P	L	✓	✓	✓
16	Community identity & participation	No predicted effects.	-	-	-	-	-
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-
18	Sustainable prosperity & growth	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.	P	L	✓✓	✓✓	✓✓
19	Fairer access to jobs & services	The development of the site should provide approximately 10,000 new jobs over time, including a mix of employment types.	P	L	✓✓	✓✓	✓✓
20	Revitalise town centres	No predicted effects.	-	-	-	-	-
Summary of assessment		<p>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.</p> <p>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.</p> <p>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.</p> <p>Positive effects have been predicted for several of the social objectives, including significant positive effects for the 'sustainable locations' objective.</p> <p>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</p>					

	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p><u>Mitigation of significant adverse effects</u></p> <p>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.</p>
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Policy S6 iii) East Hemel Hempstead (South) Broad Location

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	Greenfield nature of this site means that there will be some loss of habitats. The Westwick Row Wood wildlife site is located in close proximity to the area. Additional housing could adversely affect the wildlife site.	P	L	*	*	*
2	Water quality/ quantity	The development would be required to deliver excellence in water management. No site specific predicted effects.	-	-	-	-	-
3	Flood risk	Site is not in a flood risk zone. No predicted effects.	-	-	-	-	-
4	Soils	Greenfield site and therefore soil sealing would result from new development.	P	L	*	*	*

		<p>Approximately 59% of the site area is covered by detailed Agricultural Land Classification mapping⁸ (the area of the site that lies to the north-west of Westwick Row Farm). Of that area approximately 32% is classified as BMV, which equates to approximately 19% of the total site area.</p> <p>In relation to the remaining 41% without detailed ALC classification, regional scale mapping for ALC undertaken by Natural England in 2017 classifies the part of this area closest to Westwick Row Farm as '<i>Moderate likelihood of BMV land (20-60% area BMV)</i>', with the other south-eastern half of this unmapped part of the site, classified as '<i>High likelihood of BMV land (>60% area BMV)</i>'⁹.</p> <p>Based on the above, as the site contains some best and most versatile (BMV) agricultural land (Grade 2 and Grade 3a), but at a known level that is less than 25% (approximately 19%) of the total site area, a minor adverse effect has been identified for this site against the soils objective. However this could become significant if future detailed mapping for the remaining area of the site were to take this known level to be greater than 25%.</p>					
5	Greenhouse gas emissions	<p>The proximity of employment opportunities and the local centre at Leverstock Green to the residential development would reduce the need to travel thereby limiting growth in greenhouse gas emissions.</p> <p>The size of development proposed at this location could result in public transport service improvement.</p>	P	N	✓	✓	✓
		<p>The site is some distance (over 5km) from the town centre and Hemel Hempstead and Apsley railway stations (>5km), which will result in additional vehicle trips. However the potential for public transport service improvement would help to mitigate.</p>	P	N	x	x	x
6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	<p>The proximity of employment opportunities and the local centre at Leverstock Green to the residential development would reduce the need to travel thereby limiting growth in airborne emissions. Development of new neighbourhood and local centres will further support this.</p> <p>The size of development proposed at this location could result in public transport service improvement.</p>	P	L	✓	✓	✓

⁸ www.magic.gov.uk

⁹ <http://publications.naturalengland.org.uk/publication/6205542189498368?category=5208993007403008>

		<p>The site is some distance (over 5km) from the town centre and Hemel Hempstead and Apsley railway stations (>5km), which will result in additional vehicle trips with associated airborne emissions. However the potential for public transport service improvement would help to mitigate.</p> <p>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.</p>	P	L	x	x	x
8	Use of brownfield sites	This is a greenfield site and development would not therefore support this objective.	P	L	x	x	x
9	Resource efficiency	<p>The development would be required to deliver excellence in energy efficiency and appropriate renewable energy production and supply mechanisms.</p> <p>The site is located within a Wind Turbine Opportunity Area, although there will be limited potential to realise the opportunity.</p>	P	L	✓	✓	✓
10	Historic environment	<p>The site is not subject to any significant heritage or archaeological constraint. However, development could affect the Listed Buildings of Westwick Row Cottage (Grade II*) and the Grade II King Charles II Cottage and Westwick Row Farm which are all within the site area. Development could also affect the setting of the Listed Buildings of Dell Cottage, Leverstock Green (Grade II) which is adjacent to the north-west boundary of the site in Dacorum Borough, and the Grade II Corner Farm and 1 Beechtree Cottages, both of which are located along the south-west boundary of the site.</p> <p>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.</p>	-	-	?	?	?
11	Landscape & Townscape	<p>The site is not in an area designated as a Landscape Conservation Area. Development of this area would affect the openness of landscape character and lead to a high degree of landscape impact.</p> <p><i>The openness of the landscape in the south of the sub area, where new housing development would be located, means that new development could be visually prominent (SKM, 2014).</i></p> <p>Views from the right of way that runs through the site would be affected by new development.</p>	P	L	x	x	x
		<p>The development would be required to deliver strategic and public open space, recreation space and countryside access links, including a new Country Park. Development would also require the retention of important trees and landscape features.</p>	P	L	✓	✓	✓

12	Health	A number of public open spaces lie in close proximity to the site. In addition 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. Additional footpath and cycle network links could be provided by the scale of new development that this site could deliver.	P	L	✓	✓	✓
		Oil and gas pipelines cross the site and would need to be taken into consideration in planning the layout of development. 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. 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.	-	-	?	?	?
13	Sustainable locations	The site is some distance from Hemel Hempstead town centre. However the scale of development that could be provided at this site would enable the delivery of neighbourhood and local centres. The site is very 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.	P	L	✓✓	✓✓	✓✓
14	Equality & social inclusion	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. 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.	P	L	✓	✓	✓
15	Good quality housing	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. Development at this location would be required to provide a new 15 pitch Gypsy and Traveller site. This would help meet the housing need of the gypsy and traveller community.	P	L	✓✓	✓✓	✓✓
16	Community identity & participation	The scale of development that this site would provide the potential to develop new facilities (education, health, community etc.) that would be accessible to the new and nearby existing population. This could help to encourage participation in community life and promote integration.	P	L	✓	✓	✓
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-

18	Sustainable prosperity & growth	Large scale housing development would help support the local economy, in particular the regeneration of the Maylands area that is supported in Hertfordshire's Strategic Economic Plan (March 2014). In addition, new neighbourhood / local centres and potential commercial opportunities will help support the local economy.	P	L	✓	✓	✓
19	Fairer access to jobs & services	Development of this site would support growth at Maylands Business Park which would help to encourage local provision of and access to jobs. New neighbourhood / local centres and potential commercial opportunities would offer new employment opportunities.	P	L	✓	✓	✓
20	Revitalise town centres	Development at this edge of town location does not directly support the objective to focus new development in the centre of urban areas. However, 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.	P	L	✓	✓	✓
Summary of assessment		<p>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.</p> <p>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.</p> <p>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.</p> <p>Positive effects have been predicted for the majority of the social objectives, including significant positive effects for</p>					

	<p>the 'sustainable locations' and 'good quality housing' objectives.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>
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Policy S6 iv) North Hemel Hempstead Broad Location

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).

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	Greenfield nature of this site means that there will be some loss of habitats.	P	L	-	*	*
2	Water quality/ quantity	The development would be required to deliver excellence in water management. No site specific predicted effects.	-	-	-	-	-
3	Flood risk	Site is not in a flood risk zone. No predicted effects.	-	-	-	-	-
4	Soils	Greenfield site and therefore soil sealing would result from new development. Approximately 36% of the site area is covered by detailed Agricultural Land Classification mapping ¹⁰ (the area of the site that lies to the south of Little Revel End). Of that area approximately 40% is classified as BMV, which equates to approximately 15% of the total site area. In relation to the remaining 64% without detailed ALC classification, regional scale mapping for ALC undertaken by Natural England in 2017 classifies the area as 'Moderate likelihood of BMV land (20-60% area BMV) ¹¹ . Based on the above, as the site contains some best and most versatile (BMV) agricultural land (Grade 2 and Grade 3a), but at a known level that is less than 25% (approximately 15%) of the total site area, a minor adverse effect has been identified for this site against the soils objective. However this could become significant if future detailed mapping for the remaining area of the site were to take this known level to be greater than 25%.	P	L	-	*	*

¹⁰ www.magic.gov.uk

¹¹ <http://publications.naturalengland.org.uk/publication/6205542189498368?category=5208993007403008>

5	Greenhouse gas emissions	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. The size of development proposed at this location could result in public transport service improvement.	P	N	-	✓	✓
		The site is some distance (over 5km) from the town centre and Hemel Hempstead and Apsley railway stations (>5km), which will result in additional vehicle trips. However the potential for public transport service improvement would help to mitigate.	P	N	-	x	x
6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	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 airborne emissions. Development of new neighbourhood and local centres will further support this. The size of development proposed at this location could result in public transport service improvement.	P	L	-	✓	✓
		The site is some distance (over 5km) from the town centre and Hemel Hempstead and Apsley railway stations (>5km), which will result in additional vehicle trips with associated airborne emissions. However the potential for public transport service improvement would help to mitigate. 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.	P	L	-	x	x
8	Use of brownfield sites	This is a greenfield site and development would not therefore support this objective.	P	L	-	x	x
9	Resource efficiency	The development would be required to deliver excellence in energy efficiency and appropriate renewable energy production and supply mechanisms. The site is not located in a Wind Turbine Opportunity Area.	P	L	-	✓	✓
10	Historic environment	The site is not subject to any significant heritage or archaeological constraint. Development could affect the setting of the Grade II Listed Buildings at Great Revel End Farm which is in close proximity to the north-east boundary of the site and also the Grade II Listed Buildings in Dacorum at Holtsmere Manor and Holtsmere End Farm.	-	-	-	?	?

11	Landscape & Townscape	The site is not in an area designated as a Landscape Conservation Area. Development would affect the openness and character of the landscape in this location and would be visually intrusive from the surrounding area. Development would also erode the gap between Hemel Hempstead and Redbourn. Views from the right of way that runs through the site would be affected by new development.	P	L	-	x	x
		The development would be required to deliver strategic and public open space, recreation space and countryside access links, including a new Country Park. Development would also require the retention of important trees and landscape features.	P	L	-	✓	✓
12	Health	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. In addition, the Nickey Line (footpath and cycleway) is close to the site.	P	L	-	✓	✓
		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. 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.	-	-	-	?	?
13	Sustainable locations	The site is some distance from Hemel Hempstead town centre. However the scale of development that could be provided at this site would enable the delivery of a new neighbourhood and local centres. The site is relatively 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.	P	L	-	✓	✓
14	Equality & social inclusion	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.	P	L	-	✓	✓
15	Good quality housing	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.	P	L	-	✓✓	✓✓
16	Community identity & participation	The scale of development that this site would provide the potential to develop new facilities (education, health, community etc.) that would be accessible to the new and nearby existing population. This could help to encourage participation in community life and promote integration.	P	L	-	✓	✓

17	Crime and fear of crime	No predicted effects.	-	-	-	-	-
18	Sustainable prosperity & growth	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.	P	L	-	✓	✓
19	Fairer access to jobs & services	New neighbourhood / local centres and potential commercial opportunities would offer new employment opportunities.	P	L	-	✓	✓
20	Revitalise town centres	Development at this edge of town location does not directly support the objective to focus new development in the centre of urban areas. However, 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.	P	L	-	✓	✓
Summary of assessment		<p>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.</p> <p>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.</p> <p>Uncertain effects have been identified for the 'historic environment' objective as development could affect the settings of Listed Buildings which are in close proximity.</p> <p>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.</p> <p>Positive effects have been predicted for the majority of the social objectives, including significant positive effects for</p>					

	<p>the 'sustainable locations' and 'good quality housing' objectives.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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).</p>
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Policy S6 v) East St Albans Broad Location

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	Greenfield nature of this site means that there will be some loss of habitats. Home Wood local wildlife site and ancient woodland is located adjacent to the site. Additional housing could adversely affect the wildlife site. Any new access off Hatfield Road would result in the removal of a hedgerow.	P	L	*	*	*
		The site has been identified as having the potential for delivering significant green infrastructure improvements which would support this SA objective.	P	L	✓	✓	✓
2	Water quality/ quantity	The development would be required to deliver excellence in water management. No site specific predicted effects.	-	-	-	-	-
3	Flood risk	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.	-	-	?	?	?
4	Soils	Site is mainly greenfield and therefore soil sealing would result from new development. Approximately 32% of the site area is covered by detailed Agricultural Land Classification mapping ¹² (an area of the site to the east of North Drive and South Drive). Of that area approximately 45% is classified as BMV, which equates to	P	L	*	*	*

¹² www.magic.gov.uk

		<p>approximately 14% of the total site area.</p> <p>In relation to the remaining 68% without detailed ALC classification, regional scale mapping for ALC undertaken by Natural England in 2017 classifies the area as 'Moderate likelihood of BMV land (20-60% area BMV)¹³.</p> <p>Based on the above, as the site contains some best and most versatile (BMV) agricultural land (Grade 2 and Grade 3a), but at a known level that is less than 25% (approximately 14%) of the total site area, a minor adverse effect has been identified for this site against the soils objective. However this could become significant if future detailed mapping for the remaining area of the site were to take this known level to be greater than 25%.</p>					
5	Greenhouse gas emissions	<p>The site is relatively accessible to some services (e.g. supermarket), facilities and open space which should help reduce the need to travel and minimise increases in greenhouse gas emissions.</p> <p>This site is well served by a number of bus services and there would be some opportunity for improving services.</p>	P	N	✓	✓	✓
		<p>The site is some distance from the City centre (>3km), as well as alternative service and facilities in Hatfield, which will result in additional vehicle trips. Also, it is approximately 3km from the nearest railway station. However the potential for public transport service improvement would help to mitigate.</p>	P	N	✗	✗	✗
6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	<p>The site is relatively accessible to some services (e.g. supermarket), facilities and open space which should help reduce the need to travel and minimise increases in airborne emissions. Development of a new neighbourhood centre will further support this.</p>	P	L	✓	✓	✓
		<p>The site is some distance from the City centre (>3km), as well as alternative service and facilities in Hatfield, which will result in additional vehicle trips that could exacerbate existing air quality issues. Also, it is approximately 3km from the nearest railway station. However the potential for public transport service improvement would help to mitigate.</p>	P	L	✗	✗	✗
8	Use of brownfield sites	Although the development would involve the retention and repair of a number of buildings, this site is largely greenfield and therefore negative effects are identified for this SA objective.	P	L	✗	✗	✗
9	Resource efficiency	The development would be required to deliver excellence in energy efficiency and appropriate renewable energy production and supply mechanisms, including a site	P	L	✓	✓	✓

¹³ <http://publications.naturalengland.org.uk/publication/6205542189498368?category=5208993007403008>

		<p>wide Combined Heat & Power system.</p> <p>The site is not located in a District Heating Opportunity Area and its scale would not be sufficient to support district heating.</p> <p>The site is located within a Wind Opportunity Area, however potential to deliver wind turbines in the context of a residential development is very limited given proximity to roads, potential new development and land availability.</p> <p>The site is located within the sand and gravel belt minerals consultation area, however 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.</p>					
10	Historic environment	<p>The site is not subject to any significant heritage or archaeological constraint.</p> <p>Development could affect the setting of the Grade II Listed Buildings at Kay Walk (Winches Farm and The Lodge) to the west of the site.</p> <p>In addition, the findings of archaeological studies in nearby areas suggest that there may be some archaeological interest in the area.</p>	-	-	?	?	?
11	Landscape & Townscape	<p>The site is not in an area designated as a Landscape Conservation Area.</p> <p>Development would affect the openness and character of the landscape in this location. However the site is of relatively low landscape sensitivity and is 'urban fringe' in character.</p> <p><i>Key potential visual effects of new development would be at a very local level. Notable effects would be in relation to surrounding residents, people travelling along Sandpit Lane and users of the bridleway along North Drive. Areas of woodland and hedgerows would provide some visual containment (SKM, 2014).</i></p> <p>Development would impact on views from the two Public Rights of Way (PRoW) within the site area.</p> <p>The landscape quality of the land is not particularly high, although it benefits from established trees and hedgerows, with ancient woodland nearby which could be adversely affected.</p>	P	L	x	x	x
		<p>The development would be required to deliver strategic and local public open space and recreation space. Development would also require the retention of important trees, including extensive TPOs and Ancient Woodland.</p>	P	L	✓	✓	✓
12	Health	<p>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.</p> <p>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.</p> <p>Development would provide the opportunity to create footpath/cycle links to the Alban</p>	P	L	✓	✓	✓

		Way.					
		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.	-	-	?	?	?
13	Sustainable locations	The edge of City location makes this site a relatively accessible and sustainable location for housing. Whilst the City centre is over 3km from the site, there are local shops, services, education and employment opportunities within walking distance and there are bus stops close by. A large supermarket is less than 1km from the site. Development of a new neighbourhood centre will further support this objective.	P	L	✓	✓	✓
14	Equality & social inclusion	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.	P	L	✓✓	✓✓	✓✓
15	Good quality housing	Development at the site could provide a minimum of 900 new homes (+348 permitted) with the potential to meet a variety of accommodation needs and to deliver significant levels of affordable homes.	P	L	✓✓	✓✓	✓✓
16	Community identity & participation	Improvements to Oaklands College that would result from new development would provide social and community facilities that could help to improve participation.	P	L	✓	✓	✓
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-
18	Sustainable prosperity & growth	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. A new neighbourhood centre and potential commercial opportunities will also help support the local economy. In addition, a better educated population that could result from improved further education provision may also help to improve local economy.	P	L	✓	✓	✓
19	Fairer access to jobs & services	New neighbourhood centre and potential commercial opportunities would offer new employment opportunities. New housing at this site could result in developments at Oaklands College that would help to support this objective. 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.	P	L	✓	✓	✓
20	Revitalise town	Whilst development at this edge of City location does not support the objective to	P	L	✓	✓	✓

	centres	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.						
Summary of assessment		<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>						

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.

Policy S6 vi) North St Albans Broad Location

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	Greenfield nature of this site means that there will be some loss of habitats. Long Spring and Soothouse Wood local wildlife site and ancient woodland is located directly adjacent to the site. Additional housing could adversely affect the wildlife site. The trees lining the southeast boundary of the site are the subject of a TPO.	P	L	*	*	*
		The development would be required to provide managed woodland and ecological network links.	P	N	✓	✓	✓
2	Water quality/ quantity	The development would be required to deliver excellence in water management. No site specific predicted effects.	-	-	-	-	-
3	Flood risk	Site is not in a flood risk zone. No predicted effects.	-	-	-	-	-
4	Soils	Greenfield site and therefore soil sealing would result from new development. >50% of the site is located on best and most versatile (BMV) agricultural land (Grade 3a). Approximately 83% of the site area (total 45.9Ha) has detailed ALC mapping. Of this 40 Ha that has been mapped, approximately 65% is classified as best and most versatile (BMV) agricultural land (Grade 2 and 3a). The remainder of the site (the field directly behind the houses on Harpenden Road) does not have detailed ALC mapping. The regional scale mapping for ALC undertaken by Natural England in 2017 classifies this area as 'High likelihood of BMV land (>60% area bmv)'. Approximately 87% of the site area is covered by detailed Agricultural Land Classification mapping ¹⁴ . Of that area approximately 66% is classified as best and	P	L	**	**	**

¹⁴ www.magic.gov.uk

		<p>most versatile (BMV) agricultural land (Grade 2 and Grade 3a), which equates to approximately 57% of the total site area.</p> <p>In relation to the remaining 13% without detailed ALC classification (the field directly behind the houses on Harpenden Road), the regional scale mapping for ALC undertaken by Natural England in 2017 classifies this area as '<i>Moderate likelihood of BMV land (20-60% area BMV)</i>'¹⁵.</p> <p>Based on the above, as 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) a significant adverse effect has been identified for this site against the soils objective.</p>					
5	Greenhouse gas emissions	<p>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.</p> <p>Improvements to bus frequency may be feasible as a result of any new development.</p>	P	N	✓	✓	✓
		<p>The distance of the site from the city centre (>2km) is likely to encourage increased car use which will result in increases in greenhouse gas emissions. However the potential for public transport service improvement would help to mitigate.</p>	P	N	x	x	x
6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	<p>The site is located relatively close to local shops, schools, and bus services on Harpenden Road which will help to reduce the need to travel by private car and minimise increases in airborne emissions. Development of a new neighbourhood centre will further support this.</p>	P	L	✓	✓	✓
		<p>The distance of the site from the city centre (>2km) could encourage increased car use, with associated increases in airborne emissions. This could exacerbate city centre air quality issues. However the potential for public transport service improvement would help to mitigate.</p>	P	L	x	x	x
8	Use of brownfield sites	This is a greenfield site and development would not therefore support this objective.	P	L	x	x	x
9	Resource efficiency	<p>The development would be required to deliver excellence in energy efficiency and appropriate renewable energy production and supply mechanisms.</p> <p>The site is not located in a District Heating Opportunity Area and its scale would not be sufficient to support district heating.</p> <p>The site is located within a Wind Opportunity Area, however potential to deliver wind turbines in the context of a residential development is very limited given proximity to roads, potential new development and land availability.</p>	P	L	✓	✓	✓

¹⁵ <http://publications.naturalengland.org.uk/publication/6205542189498368?category=5208993007403008>

10	Historic environment	The site is not subject to any significant heritage or archaeological constraint. No predicted effects.	-	-	-	-	-
11	Landscape & Townscape	The site is not in an area designated as a Landscape Conservation Area. Development would involve the loss of unspoilt countryside, with some long distance views. The north east part of the site in particular maintains open countryside character. <i>Key potential visual effects of new development would be at a local level. Notable effects would be in relation to residents on the edge of St Albans, dispersed properties within the northern part of the sub-area, and users of local roads, train passengers and walkers (SKM, 2014).</i> Development would also impact on views from the right of way that runs around the south east and north east boundaries of the area.	P	L	*	*	*
		The development would be required to deliver strategic and public open space. Development would also require the retention of important trees and landscape features.	P	L	✓	✓	✓
12	Health	The topography of the area would enable walking and cycling to access services facilities. There are however limited opportunities to link into existing footpath and cycle networks. The development would be required to deliver strategic and public open space which will provide the opportunity for new residents to live active lifestyles.	P	L	✓	✓	✓
13	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.	P	L	✓	✓	✓
14	Equality & social inclusion	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.	P	L	✓	✓	✓
15	Good quality housing	Development at the site could provide a minimum of 1,100 new homes with the potential to meet a variety of accommodation needs and to deliver a large number of affordable homes.	P	L	✓✓	✓✓	✓✓
16	Community identity & participation	No predicted effects.	-	-	-	-	-
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-

18	Sustainable prosperity & growth	The potential contribution to economic growth through the development of this site is limited. However, the provision of new housing would help to support the local services in St Albans, maintaining their viability and boosting the local economy. A new neighbourhood centre and potential commercial opportunities will also help support the local economy.	P	L	✓	✓	✓
19	Fairer access to jobs & services	A new neighbourhood centre and potential commercial opportunities would offer new employment opportunities.	P	L	✓	✓	✓
20	Revitalise town centres	Development at this edge of city location does not support the objective to focus new development in the centre of urban areas. However, it would help support nearby local centres as well as resulting in the development of a new local centre.	P	L	✓	✓	✓
Summary of assessment		<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>					

	<p>Albans and Harpenden. Development of a new neighbourhood centre will further support this objective. .</p> <p>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..</p> <p>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.</p> <p><u>Mitigation of significant adverse effects</u></p> <p>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.</p>
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Policy S6 vii) North East Harpenden Broad Location

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	Greenfield nature of this site means that there will be some loss of habitats. No designated areas affected.	P	L	*	*	*
2	Water quality/ quantity	The development would be required to deliver excellence in water management. No site specific predicted effects.	-	-	-	-	-
3	Flood risk	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.	-	-	?	?	?
4	Soils	Greenfield site and therefore soil sealing would result from new development.	P	L	*	*	*
		It is uncertain as to the amount of 'Best and Most Versatile' agricultural land (if any) that is associated with the site. There is no detailed ALC mapping for this site. The regional scale mapping for ALC undertaken by Natural England in 2017 classifies this area as ' <i>Moderate likelihood of BMV land (20-60% area BMV)</i> ' ¹⁶ . If detailed mapping is undertaken for this location in the future the 'uncertain' assessment could change to minor adverse if some BMV, but less than 25% of the total area, were to be identified, or significant adverse if this was found to be greater than 25% of the total site area.	-	-	?	?	?
5	Greenhouse gas emissions	The site is in a relatively sustainable location with good access to local facilities in Harpenden and close to bus routes. This will help to reduce private car usage.	P	N	✓	✓	✓
		The site is over 1.5km from the town centre and main supermarkets which will generate additional car trips, with associated greenhouse gas emissions. There are also some topography and distance disadvantages for walking and cycling access to rail and the town centre.	P	N	*	*	*

¹⁶ <http://publications.naturalengland.org.uk/publication/6205542189498368?category=5208993007403008>

6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	The site is in a relatively sustainable location on the edge of Harpenden with good access to local facilities and close to bus routes. This will help to reduce private car usage.	P	L	✓	✓	✓
		The site is over 1.5km from the town centre and main supermarkets which will generate additional car trips, with associated airborne emissions. There are also some topography and distance disadvantages for walking and cycling access to rail and the town centre.	P	L	x	x	x
8	Use of brownfield sites	This is a greenfield site and development would not therefore support this objective.	P	L	x	x	x
9	Resource efficiency	The development would be required to deliver excellence in energy efficiency and appropriate renewable energy production and supply mechanisms. The site is not located in a District Heating Opportunity Area and its scale would not be sufficient to support district heating. The site is located at the edge of a Wind Opportunity Area, however potential to deliver wind turbines in the context of a residential development is very limited given proximity to roads, potential new development and land availability.	P	L	✓	✓	✓
10	Historic environment	The site is not subject to any significant heritage or archaeological constraint. No predicted effects.	-	-	-	-	-
11	Landscape & Townscape	The site is in an area designated as a Landscape Conservation Area within the SADC Local Plan Review 1994. Development would have local visual impacts as well as visual effects on the opposite side of the Lea Valley. <i>Potential visual effects of new development would be at both a local level and wider. Key local visual receptors comprise the residents on this edge of Harpenden, road users and people using local Public Rights of Way (including those within the sub-area). Wider effects are likely particularly in relation to visual effects on receptors on the southwest side of the Lea Valley, particularly more elevated developments within the sub-area (SKM, 2014).</i> Development would affect people using the Public Rights of Way that cross the site and run along the boundary.	P	L	x	x	x
		The development would be required to deliver recreation space and public open space. In addition development would be required to retain existing landscape features, including important trees.	P	L	✓	✓	✓

12	Health	The site is located close to footpaths and cycle routes which provides the opportunity for new residents to live active lifestyles. Development would be required to provide recreation space and public open space which would provide the opportunity for new residents to live active lifestyles and further support this objective.	P	L	✓	✓	✓
		There are some topography and distance disadvantages for walking and cycling access to the railway station and the town centre. 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.	-	-	?	?	?
13	Sustainable locations	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.	P	L	✓	✓	✓
14	Equality & social inclusion	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.	P	L	✓	✓	✓
15	Good quality housing	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.	P	L	✓✓	✓✓	✓✓
16	Community identity & participation	No predicted effects.	-	-	-	-	-
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-
18	Sustainable prosperity & growth	The potential contribution to economic growth through the development of this site is limited. However, the provision of new housing would help to support the local services in Harpenden, maintaining their viability and boosting the local economy.	P	L	✓	✓	✓
19	Fairer access to jobs & services	The scale of housing development proposed at this site is not of a scale sufficient to provide opportunities for mixed use development that would offer new employment opportunities.	-	-	-	-	-
20	Revitalise town centres	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.	P	L	✓	✓	✓
Summary of assessment		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.

Policy S6 viii) North West Harpenden Broad Location

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	Greenfield nature of this site means that there will be some loss of habitats. No designated areas affected. The site contains a small remnant woodland area which is subject to a TPO.	P	L	*	*	*
2	Water quality/ quantity	The development would be required to deliver excellence in water management. No site specific predicted effects.	-	-	-	-	-
3	Flood risk	Site is not in a flood risk zone. No predicted effects.	-	-	-	-	-
4	Soils	Greenfield site and therefore soil sealing would result from new development.	P	L	*	*	*
		It is uncertain as to the amount of 'Best and Most Versatile' agricultural land (if any) that is associated with the site. There is no detailed ALC mapping for this site. The regional scale mapping for ALC undertaken by Natural England in 2017 classifies this area as ' <i>Moderate likelihood of BMV land (20-60% area BMV)</i> ' ¹⁷ . If detailed mapping is undertaken for this location in the future the 'uncertain' assessment could change to minor adverse if some BMV, but less than 25% of the total area, were to be identified, or significant adverse if this was found to be greater than 25% of the total site area.	-	-	?	?	?

¹⁷ <http://publications.naturalengland.org.uk/publication/6205542189498368?category=5208993007403008>

5	Greenhouse gas emissions	The site is in a relatively sustainable location with good access to local facilities in Harpenden 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 to promote car free access to Harpenden town centre and the railway station.	P	N	✓	✓	✓
		The site is located approximately 1.5km from the town centre, which while being walkable is also likely to generate additional car trips, with associated greenhouse gas emissions. However the potential for public transport service improvement would help to mitigate.	P	N	✗	✗	✗
6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	The site is in a relatively sustainable location on the edge of Harpenden 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 to promote car free access to Harpenden town centre and the railway station.	P	L	✓	✓	✓
		The site is located approximately 1.5km from the town centre, which while being walkable is also likely to generate additional car trips, with associated airborne emissions. However the potential for public transport service improvement would help to mitigate.	P	L	✗	✗	✗
8	Use of brownfield sites	This is a greenfield site and development would not therefore support this objective.	P	L	✗	✗	✗
9	Resource efficiency	The development would be required to deliver excellence in energy efficiency and appropriate renewable energy production and supply mechanisms. The site is not located in a District Heating Opportunity Area and its scale would not be sufficient to support district heating. The site is located within a Wind Opportunity Area, however potential to deliver wind turbines in the context of a residential development is very limited given proximity to roads, potential new development and land availability.	P	L	✓	✓	✓
10	Historic environment	The site contains the Grade 2 Listed Building at Cooters End Farm and development could impact on its settings. The Old Bell PH (Grade 2) is also close to the site.	-	-	?	?	?

11	Landscape & Townscape	<p>The site is in an area designated as a Landscape Conservation Area within the SADC Local Plan Review 1994.</p> <p>Development may have some impact on the setting of Harpenden when approached from the north. The education site allocation to the east of Ambrose Lane, which is part of the Broad Location, will increase the effects on the local landscape. The SKM Green Belt review identified some of the allocation area as being an "Area of higher landscape/visual sensitivity".</p> <p>Development of the part of the site to the north of Cooters End Lane would be more intrusive into countryside than that to the south.</p> <p>Development would have local visual impacts. <i>Notable effects would be in relation to residents within the sub-area (e.g. Cooters End Farm, residents of properties on the opposite side of the valley and people travelling along the local road network) (SKM, 2014).</i></p> <p>Development would impact on views from rights of way, including the long-distance Chiltern Way which runs along the Luton Road to the south-west of the site and Cooters Lane to the north-west of the site.</p>	P	L	*	*	*
		<p>The development would be required to deliver recreation space and public open space. In addition development would be required to retain existing landscape features, including hedgerows, and small remnant woodland.</p>					
12	Health	<p>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.</p>	P	L	✓	✓	✓
13	Sustainable locations	<p>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.</p>	P	L	✓	✓	✓
14	Equality & social inclusion	<p>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.</p>	P	L	✓	✓	✓
15	Good quality housing	<p>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.</p>	P	L	✓✓	✓✓	✓✓
16	Community identity & participation	<p>No predicted effects.</p>	-	-	-	-	-
17	Crime and fear of crime	<p>No predicted effects.</p>	-	-	-	-	-

18	Sustainable prosperity & growth	The potential contribution to economic growth through the development of this site is limited. However, the provision of new housing would help to support the local services in Harpenden, maintaining their viability and boosting the local economy.	P	L	✓	✓	✓
19	Fairer access to jobs & services	The scale of housing development proposed at this site is not of a scale sufficient to provide opportunities for mixed use development that would offer new employment opportunities.	-	-	-	-	-
20	Revitalise town centres	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.	P	L	✓	✓	✓
Summary of assessment		<p>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).</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Positive effects have been predicted for the social objectives relating to 'health', 'sustainable locations', and 'equality & social inclusion'.</p> <p>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.</p> <p>In terms of the economic objectives positive effects are predicted for the 'sustainable prosperity & growth' and</p>					

	<p>'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.</p>
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Policy S6 ix) West of London Colney Broad Location

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	Greenfield nature of this site means that there will be some loss of habitats. 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.	P	L	*	*	*
2	Water quality/ quantity	The development would be required to deliver excellence in water management. No site specific predicted effects.	-	-	-	-	-
3	Flood risk	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 in the lower risk flood zone 1 and therefore the flood risk area could be avoided.	-	-	?	?	?
4	Soils	Greenfield site and therefore soil sealing would result from new development.	P	L	*	*	*
		It is uncertain as to the amount of 'Best and Most Versatile' agricultural land (if any) that is associated with the site. There is no detailed ALC mapping for this site. The regional scale mapping for ALC undertaken by Natural England in 2017 classifies this area as ' <i>High likelihood of BMV land (>60% area bmv)</i> ' ¹⁸ . If detailed mapping is undertaken for this location in the future the 'uncertain' assessment could change to minor adverse if some BMV, but less than 25% of the total area, were to be identified, or significant adverse if this was found to be greater than 25% of the total site area.	-	-	?	?	?
5	Greenhouse gas emissions	The site is in a relatively sustainable location with good access to local facilities in London Colney and close to bus routes. This will help to reduce private car usage. This site is a flat level walk or cycle from the local centre which would encourage walking and cycling to access facilities.	P	N	✓	✓	✓

¹⁸ <http://publications.naturalengland.org.uk/publication/6205542189498368?category=5208993007403008>

		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.	P	N	x	x	x
6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	The site is in a relatively sustainable location with good access to local facilities and close to bus routes. This will help to reduce private car usage. This site is a flat level walk or cycle from the local centre which would encourage walking and cycling to access facilities.	P	L	✓	✓	✓
		The distance of the site from the main town centres may encourage car use, rather than sustainable modes of transport, affecting air quality.	P	L	x	x	x
8	Use of brownfield sites	This is a greenfield site and development would not therefore support this objective.	P	L	x	x	x
9	Resource efficiency	The development would be required to deliver excellence in energy efficiency and appropriate renewable energy production and supply mechanisms. The site is not located in a District Heating Opportunity Area and its scale would not be sufficient to support district heating. The site is located within a Wind Opportunity Area, however potential to deliver wind turbines in the context of a residential development is very limited given proximity to roads, potential new development and land availability.	P	L	✓	✓	✓
		The site is in the sand and gravel minerals consultation area. Developing in this area may have negative sustainability implications on resource efficiency due to the sterilisation of the minerals, limiting their extraction potential in the future.	-	-	?	?	?
10	Historic environment	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.	P	L	x	x	x
11	Landscape & Townscape	The site is not in an area designated as a Landscape Conservation Area. Development at this site could affect the landscape setting of Napsbury Park and Conservation Area. <i>Key potential visual effects of new development would be at a local level. Notable effects would be in relation to surrounding residents and people using Public Rights of Way. Hedgerows and urban form would provide some visual containment (SKM, 2014).</i>	P	L	x	x	x

		The development would be required to deliver recreation space and public open space. In addition development would be required to retain existing landscape features, including important trees.	P	L	✓	✓	✓
12	Health	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. This site is a flat level walk or cycle from the local centre which would encourage walking and cycling to access facilities.	P	L	✓	✓	✓
		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.	-	-	?	?	?
13	Sustainable locations	Whilst being some distance from the main city/town centres (St Albans, Hemel Hempstead, and Watford), 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.	P	L	✓	✓	✓
14	Equality & social inclusion	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.	P	L	✓	✓	✓
15	Good quality housing	Development at the site could 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.	P	L	✓	✓	✓
16	Community identity & participation	Development at this location could assist in physical and social integration of Napsbury with London Colney.	P	L	✓	✓	✓
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-
18	Sustainable prosperity & growth	The potential contribution to economic growth through the development of this site is limited. However, the provision of new housing would help to support the local services in London Colney, maintaining their viability and boosting the local economy.	P	L	✓	✓	✓
19	Fairer access to jobs & services	The scale of housing development proposed at this site is not of a scale sufficient to provide opportunities for mixed use development that would offer new employment opportunities. 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.	P	L	✓	✓	✓

20	Revitalise town centres	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.	P	L	✓	✓	✓
Summary of assessment		<p>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.</p> <p>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 '<i>Colne Chapel moated site</i>' Scheduled Ancient Monument is situated to the south of the site and development could affect its setting.</p> <p>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 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).</p> <p>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.</p> <p>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.</p>					

	<p>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.</p>
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Policy S6 x) West of Chiswell Green Broad Location

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	Greenfield nature of this site means that there will be some loss of habitats. No designated areas affected.	P	L	*	*	*
2	Water quality/ quantity	The development would be required to deliver excellence in water management. No site specific predicted effects.	-	-	-	-	-
3	Flood risk	Area is not in a flood risk zone. No predicted effects.	-	-	-	-	-
4	Soils	Greenfield site and therefore soil sealing would result from new development.	P	L	*	*	*
		It is uncertain as to the amount of 'Best and Most Versatile' agricultural land (if any) that is associated with the site. There is no detailed ALC mapping for this site. The regional scale mapping for ALC undertaken by Natural England in 2017 classifies this area as ' <i>High likelihood of BMV land (>60% area bmv)</i> ' ¹⁹ . If detailed mapping is undertaken for this location in the future the 'uncertain' assessment could change to minor adverse if some BMV, but less than 25% of the total area, were to be identified, or significant adverse if this was found to be greater than 25% of the total site area.	-	-	?	?	?
5	Greenhouse gas emissions	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.	P	N	✓	✓	✓
		The site is some distance from city/town centres (St Albans, Hemel Hempstead, and Watford) which will result in additional vehicle trips.	P	N	*	*	*

¹⁹ <http://publications.naturalengland.org.uk/publication/6205542189498368?category=5208993007403008>

6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	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 airborne emissions.	P	L	✓	✓	✓
		The site is some distance from city/town centres (St Albans, Hemel Hempstead, and Watford) which will result in additional vehicle trips with associated airborne emissions.	P	L	✗	✗	✗
8	Use of brownfield sites	This is a greenfield site and development would not therefore support this objective.	P	L	✗	✗	✗
9	Resource efficiency	The development would be required to deliver excellence in energy efficiency and appropriate renewable energy production and supply mechanisms. The site is not located in a District Heating Opportunity Area and its scale would not be sufficient to support district heating. The site is located within a Wind Opportunity Area, however potential to deliver wind turbines in the context of a residential development is very limited given proximity to roads, potential new development and land availability.	P	L	✓	✓	✓
10	Historic environment	The site is not subject to any significant heritage or archaeological constraint. No predicted effects.	-	-	-	-	-
11	Landscape & Townscape	The site is not in an area designated as a Landscape Conservation Area. The land parcel is well related to Chiswell Green and has more of an urban fringe character than an open countryside one. However, much of the area lies on a prominent ridge, with long views to the south west. <i>Key potential visual effects of new development would be at a local level. Notable effects would be in relation to residents on the western edge of Chiswell Green and dispersed properties within this part of the sub-area (SKM, 2014).</i>	P	L	✗	✗	✗
		The development would be required to deliver recreation space and public open space. In addition development would be required to retain existing landscape features, including important trees.	P	L	✓	✓	✓
12	Health	The topography of the area would enable walking and cycling to access services facilities. New recreation space provided as part of any development would further support this objective.	P	L	✓	✓	✓

13	Sustainable locations	Whilst the site is some distance from the main city/town centres (St Albans, Hemel Hempstead, and Watford), 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. A mixed neutral /minor positive effect has therefore been predicted against this objective.	P	L	-	-	-	✓	✓	✓
14	Equality & social inclusion	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.	P	L	✓	✓	✓	✓	✓	✓
15	Good quality housing	Development at the site could provide a minimum of 365 new homes with the potential to meet a variety of accommodation needs and to deliver affordable homes in this part of the District.	P	L	✓	✓	✓	✓	✓	✓
16	Community identity & participation	No predicted effects.	-	-	-	-	-	-	-	-
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-	-	-	-
18	Sustainable prosperity & growth	The potential contribution to economic growth through the development of this site is limited. However, the provision of new housing would help to support the local services in Chiswell Green, maintaining their viability and boosting the local economy.	P	L	✓	✓	✓	✓	✓	✓
19	Fairer access to jobs & services	The scale of housing development proposed at this site is not of a scale sufficient to provide opportunities for mixed use development that would offer new employment opportunities.	-	-	-	-	-	-	-	-
20	Revitalise town centres	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.	P	L	✓	✓	✓	✓	✓	✓
Summary of assessment		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.

Policy S6 xi) Park Street Garden Village Broad Location

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	The largely greenfield nature of this site means that there will be some loss of habitats. The site includes areas of grassland and wetland used by breeding, wintering and wading birds.	P	L	*	*	*
		The size of the development would provide opportunities for biodiversity gains. The development would be required to provide managed woodland and ecological network links. Countryside access links will encourage people to come into contact with, understand, and enjoy nature.	P	N	✓	✓	✓
2	Water quality/ quantity	The development would be required to deliver excellence in water management. No site specific predicted effects.	-	-	-	-	-
3	Flood risk	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.	P	L	*	*	*
4	Soils	Site is mainly greenfield and therefore soil sealing would result from new development.	P	L	*	*	*

		<p>It is uncertain as to the amount of 'Best and Most Versatile' agricultural land (if any) that is associated with the site.</p> <p>There is no detailed ALC mapping for this site. The regional scale mapping for ALC undertaken by Natural England in 2017 classifies the majority of this site (approx. 75%) as 'Non-agricultural use'. Of the remaining site area there is an approximately: 50:50 split between the classifications of: 'Moderate likelihood of BMV land (20-60% area bmv)'; and 'High likelihood of BMV land (>60% area bmv)'²⁰. If detailed mapping is undertaken for this location in the future the 'uncertain' assessment could change to minor adverse if some BMV, but less than 25% of the total area, were to be identified, or significant adverse if this was found to be greater than 25% of the total site area.</p>	-	-	?	?	?
		Development could provide the potential to remediate any contaminated land associated with the site's former use as an aerodrome.					
5	Greenhouse gas emissions	<p>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.</p> <p>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.</p>	P	N	✓✓	✓✓	✓✓
		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.	P	N	x	x	x
6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	<p>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.</p> <p>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.</p>	P	L	✓	✓	✓

²⁰ <http://publications.naturalengland.org.uk/publication/6205542189498368?category=5208993007403008>

		This site is located some distance from the city/town centres (St Albans and Watford) which will result in additional vehicle trips with associated airborne emissions. 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.	P	L	*	*	*
8	Use of brownfield sites	Part of the site is previously developed land.	-	-	?	?	?
9	Resource efficiency	The development would be required to deliver excellence in energy efficiency and appropriate renewable energy production and supply mechanisms. The site is not located in a District Heating Opportunity Area but the scale of development provides opportunities for renewable energy production to be incorporated. The site is located within a Wind Opportunity Area. The site is located on a sand and gravel belt – but minerals have already been extracted at this location.	P	L	✓	✓	✓
10	Historic environment	The site is not subject to any significant heritage or archaeological constraint. 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. The prior gravel extraction on the site will already have destroyed any archaeological remains – if they existed. Development could 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.	-	-	?	?	?
11	Landscape & Townscape	The site is not in an area designated as a Landscape Conservation Area. Development of this site would result in the loss of open countryside. However the site is relatively well screened from the local area.	P	L	*	*	*
		The development would be required to deliver strategic and public open space, recreation space and countryside access links, including a new Country Park. Development would also require the retention of important trees and landscape features. 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.	P	L	✓	✓	✓

12	Health	The 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.	P	L	✓	✓	✓
		An oil pipeline crosses the northern section of the site and would need to be taken into consideration in planning the layout of development. The southern part of the site is close to the M25 motorway and there could therefore be noise disturbance for the new residents.	-	-	?	?	?
13	Sustainable locations	This site is located some distance from the city/town centres (St Albans and Watford); however 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.	P	L	✓	✓	✓
14	Equality & social inclusion	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.	P	L	✓	✓	✓
15	Good quality housing	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.	P	L	✓✓	✓✓	✓✓
16	Community identity & participation	The principle behind the garden village concept, which requires them to be locally led and include consultation with the local community, should help to support this objective.	P	L	✓	✓	✓
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-
18	Sustainable prosperity & growth	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.	P	L	✓	✓	✓

19	Fairer access to jobs & services	New neighbourhood / local centres and potential commercial opportunities would offer new employment opportunities. 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.	P	L	✓	✓	✓
20	Revitalise town centres	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.	P	L	✓	✓	✓
Summary of assessment		<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Significant positive effects have been identified for the 'greenhouse gas emissions' objective as the potential scale of</p>					

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

	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>
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Policy L1 Housing Size, Type, Mix and Density

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	Requiring higher density development in urban locations and the Broad Locations will help to reduce the amount of greenfield land that is required to meet the housing requirement. This will help to reduce adverse effects on biodiversity.	P	L	✓	✓	✓
2	Water quality/ quantity	No predicted effects.	-	-	-	-	-
3	Flood risk	No predicted effects.	-	-	-	-	-
4	Soils	Requiring higher density development in urban locations and the Broad Locations will help to reduce the amount of greenfield land that is required to meet the housing requirement. This will help to reduce adverse effects on soils.	P	L	✓	✓	✓
5	Greenhouse gas emissions	Supporting higher density development in accessible urban locations with good access to services supports this objective.	P	N	✓	✓	✓
6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	No predicted effects.	-	-	-	-	-
8	Use of brownfield sites	No predicted effects.	-	-	-	-	-
9	Resource efficiency	The building of more small to medium size units, which the policy encourages, is more resource efficient than large detached units. In addition the policy approach allows for high density development where appropriate, which should satisfy the SA objective's underlying criteria of maximising land use efficiency. In addition, higher density housing is more resource efficient in the use of construction material than lower density larger housing.	P	L	✓	✓	✓
10	Historic environment	The policy requires that the distinctive character of an area should not be compromised.	P	L	✓	✓	✓
11	Landscape & Townscape	The policy requires that the distinctive character of an area should not be compromised.	P	L	✓	✓	✓

12	Health	No predicted effects.	-	-	-	-	-
13	Sustainable locations	The policy supports higher density development in accessible urban locations with access to services.	P	L	✓	✓	✓
14	Equality & social inclusion	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.	P	L	✓	✓	✓
15	Good quality housing	Requiring all new housing developments to provide a mix of house types and styles should progress this objective.	P	L	✓	✓	✓
16	Community identity & participation	Provision of a mix of housing should help to contribute to retention of community, for example by enabling the younger and more elderly groups to remain living in the community.	P	L	✓	✓	✓
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-
18	Sustainable prosperity & growth	No predicted effects.	-	-	-	-	-
19	Fairer access to jobs & services	No predicted effects.	-	-	-	-	-
20	Revitalise town centres	Small to medium size units will be able to be accommodated in centres, and could therefore support their vitality.	P	L	✓	✓	✓
Summary of assessment		<p>Positive effects have been forecast against several of the SA objectives in relation to this policy.</p> <p>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.</p> <p>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.</p> <p>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'.</p>					

Policy L2 Older Persons Housing and Special Needs Housing

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	No predicted effects.	-	-	-	-	-
2	Water quality/ quantity	No predicted effects.	-	-	-	-	-
3	Flood risk	No predicted effects.	-	-	-	-	-
4	Soils	No predicted effects.	-	-	-	-	-
5	Greenhouse gas emissions	No predicted effects.	-	-	-	-	-
6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	No predicted effects.	-	-	-	-	-
8	Use of brownfield sites	No predicted effects.	-	-	-	-	-
9	Resource efficiency	No predicted effects.	-	-	-	-	-
10	Historic environment	No predicted effects.	-	-	-	-	-
11	Landscape & Townscape	No predicted effects.	-	-	-	-	-
12	Health	Setting minimum levels of provision of housing for older people and those with special needs will help to improve the wellbeing of those people who will be able to remain independent.	P	L	✓	✓	✓
13	Sustainable locations	No predicted effects.	-	-	-	-	-
14	Equality & social inclusion	Setting minimum levels of provision of housing for older people and those with special needs will help to support this objective.	P	L	✓	✓	✓
15	Good quality housing	Setting minimum levels of provision of housing for older people and those with special needs will provide the specialist housing required to meet the needs of these groups.	P	L	✓	✓	✓

16	Community identity & participation	No predicted effects.	-	-	-	-	-
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-
18	Sustainable prosperity & growth	No predicted effects.	-	-	-	-	-
19	Fairer access to jobs & services	No predicted effects.	-	-	-	-	-
20	Revitalise town centres	No predicted effects.	-	-	-	-	-
Summary of assessment		<p>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.</p> <p>There are no predicted effects against the environmental or economic objectives.</p>					

Policy L3 Provision of and Contributions towards Affordable Housing

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	No predicted effects.	-	-	-	-	-
2	Water quality/ quantity	No predicted effects.	-	-	-	-	-
3	Flood risk	No predicted effects.	-	-	-	-	-
4	Soils	No predicted effects.	-	-	-	-	-
5	Greenhouse gas emissions	No predicted effects.	-	-	-	-	-
6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	No predicted effects.	-	-	-	-	-
8	Use of brownfield sites	No predicted effects.	-	-	-	-	-
9	Resource efficiency	No predicted effects.	-	-	-	-	-
10	Historic environment	No predicted effects.	-	-	-	-	-
11	Landscape & Townscape	No predicted effects.	-	-	-	-	-
12	Health	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 therefore been predicted against this objective.	P	L	✓	✓	✓
13	Sustainable locations	No predicted effects.	-	-	-	-	-
14	Equality & social inclusion	In developments of over 100 dwellings the policy will ensure the integration of affordable housing into the community by requiring it to be provided on-site alongside	P	L	✓	✓	✓

		market housing. This will help to progress this objective. Including a target to provide approximately 60% of the affordable housing in the 'social rent'/'affordable rent' categories will help to meet the needs of the least affluent groups in society.					
15	Good quality housing	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.	P	L	✓✓	✓✓	✓✓
16	Community identity & participation	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.	P	L	✓	✓	✓
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-
18	Sustainable prosperity & growth	No predicted effects.	-	-	-	-	-
19	Fairer access to jobs & services	No predicted effects.	-	-	-	-	-
20	Revitalise town centres	No predicted effects.	-	-	-	-	-
Summary of assessment		<p>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.</p> <p>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.</p> <p>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.</p>					

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

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	No predicted effects.	-	-	-	-	-
2	Water quality/ quantity	No predicted effects.	-	-	-	-	-
3	Flood risk	No predicted effects.	-	-	-	-	-
4	Soils	Policy L5 requires that land should be previously developed or part of a previously developed property area. This should limit the amount of greenfield land needed for the developments under Policies L4, L5 and L6.	P	L	✓	✓	✓
5	Greenhouse gas emissions	No predicted effects.	-	-	-	-	-
6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	No predicted effects.	-	-	-	-	-
8	Use of brownfield sites	Policy L5 requires that land should be previously developed or part of a previously developed property area.	P	L	✓	✓	✓
9	Resource efficiency	No predicted effects.	-	-	-	-	-
10	Historic environment	Policy L5 requires that development should reflect the character of the settlement.	P	L	✓	✓	✓
11	Landscape & Townscape	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.	-	-	?	?	?

12	Health	No predicted effects.	-	-	-	-	-
13	Sustainable locations	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.	P	L	✓	✓	✓
14	Equality & social inclusion	No predicted effects.	-	-	-	-	-
15	Good quality housing	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.	P	L	✓	✓	✓
16	Community identity & participation	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.	P	L	✓	✓	✓
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-
18	Sustainable prosperity & growth	No predicted effects.	-	-	-	-	-
19	Fairer access to jobs & services	No predicted effects.	-	-	-	-	-
20	Revitalise town centres	No predicted effects.	-	-	-	-	-
Summary of assessment		<p>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.</p> <p>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.</p>					

Policy L7 Gypsies, Travellers and Travelling Show People

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	The effects against this objective are uncertain as they will depend on the characteristics of the specific pitch locations chosen.	-	-	?	?	?
2	Water quality/ quantity	No predicted effects.	-	-	-	-	-
3	Flood risk	No predicted effects.	-	-	-	-	-
4	Soils	No predicted effects.	-	-	-	-	-
5	Greenhouse gas emissions	No predicted effects.	-	-	-	-	-
6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	No predicted effects.	-	-	-	-	-
8	Use of brownfield sites	No predicted effects.	-	-	-	-	-
9	Resource efficiency	No predicted effects.	-	-	-	-	-
10	Historic environment	The effects against this objective are uncertain as they will depend on the characteristics of the specific pitch locations chosen.	-	-	?	?	?
11	Landscape & Townscape	The effects against this objective are uncertain as they will depend on the characteristics of the specific pitch locations chosen.	-	-	?	?	?
12	Health	No predicted effects.	-	-	-	-	-
13	Sustainable locations	The provision of two 15 pitch sites at the East Hemel Hempstead Broad Locations and two 15 pitch sites at Park Street Garden Village Broad Location will help to support this objective, given the proximity of those locations to services and facilities.	P	L	✓	✓	✓
14	Equality & social inclusion	Providing pitches for Gypsies, Travellers and Travelling Show People will make it easier for these groups to be able to access services.	P	L	✓	✓	✓
15	Good quality housing	Providing pitches for gypsies, travellers and travelling show people should improve accommodation for these minority groups.	P	L	✓	✓	✓

16	Community identity & participation	Providing pitches for Gypsies, Travellers and Travelling Show People recognises the needs of different groups of people within the District. Restricting sites to a maximum of 15 pitches should help with wider community cohesion.	P	L	✓	✓	✓
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-
18	Sustainable prosperity & growth	No predicted effects.	-	-	-	-	-
19	Fairer access to jobs & services	No predicted effects.	-	-	-	-	-
20	Revitalise town centres	No predicted effects.	-	-	-	-	-
Summary of assessment		<p>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.</p> <p>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.</p> <p>There are no predicted effects against the economic objectives.</p>					

Policy L8 Primarily Residential Areas

SA Objective		Assessment of Effect						
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects			
					In the short term	In the medium term	In the long term	
1	Biodiversity	No predicted effects.	-	-	-	-	-	
2	Water quality/ quantity	No predicted effects.	-	-	-	-	-	
3	Flood risk	No predicted effects.	-	-	-	-	-	
4	Soils	No predicted effects.	-	-	-	-	-	
5	Greenhouse gas emissions	No predicted effects.	-	-	-	-	-	
6	Climate change proof	No predicted effects.	-	-	-	-	-	
7	Air quality	No predicted effects.	-	-	-	-	-	
8	Use of brownfield sites	No predicted effects.	-	-	-	-	-	
9	Resource efficiency	No predicted effects.	-	-	-	-	-	
10	Historic environment	No predicted effects.	-	-	-	-	-	
11	Landscape & Townscape	No predicted effects.	-	-	-	-	-	
12	Health	Policy L8 should help to ensure that the amenity of existing residents is not adversely affected by any new non-residential development.	P	L	✓	✓	✓	
13	Sustainable locations	No predicted effects.	-	-	-	-	-	
14	Equality & social inclusion	Policy L8 allows older persons housing and care homes to be located in Primarily Residential Areas. This will help to reduce social exclusion.	P	L	✓	✓	✓	
15	Good quality housing	Policy L8 supports the provision of new homes and the retention of existing dwellings.	P	L	✓	✓	✓	

16	Community identity & participation	No predicted effects.	-	-	-	-	-
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-
18	Sustainable prosperity & growth	No predicted effects.	-	-	-	-	-
19	Fairer access to jobs & services	No predicted effects.	-	-	-	-	-
20	Revitalise town centres	No predicted effects.	-	-	-	-	-
Summary of assessment		<p>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.</p> <p>There are no predicted effects against the environmental or economic objectives.</p>					

Policy L9 Primarily Business Use Areas

Policy L10 Strategic Office Locations

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	No predicted effects.	-	-	-	-	-
2	Water quality/ quantity	No predicted effects.	-	-	-	-	-
3	Flood risk	No predicted effects.	-	-	-	-	-
4	Soils	No predicted effects.	-	-	-	-	-
5	Greenhouse gas emissions	No predicted effects.	-	-	-	-	-
6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	No predicted effects.	-	-	-	-	-
8	Use of brownfield sites	No predicted effects.	-	-	-	-	-
9	Resource efficiency	No predicted effects.	-	-	-	-	-
10	Historic environment	No predicted effects.	-	-	-	-	-
11	Landscape & Townscape	No predicted effects.	-	-	-	-	-
12	Health	No predicted effects.	-	-	-	-	-
13	Sustainable locations	No predicted effects.	-	-	-	-	-
14	Equality & social inclusion	No predicted effects.	-	-	-	-	-
15	Good quality housing	No predicted effects.	-	-	-	-	-

16	Community identity & participation	No predicted effects.	-	-	-	-	-
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-
18	Sustainable prosperity & growth	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. Support for high-speed broadband and next-generation telecommunications will also help to support this objective. Policy L10 prevents the loss of office space in Strategic Office Locations which will also support this objective.	P	L	✓	✓	✓
19	Fairer access to jobs & services	Protecting employment land and uses, as well as office space, from loss will help to retain employment and training opportunities.	P	L	✓	✓	✓
20	Revitalise town centres	No predicted effects.	-	-	-	-	-
Summary of assessment		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.					

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

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	The site is in close proximity (< 100m) 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.	-	-	?	?	?
2	Water quality/ quantity	No predicted effects.	-	-	-	-	-
3	Flood risk	No predicted effects.	-	-	-	-	-
4	Soils	No predicted effects.	-	-	-	-	-
5	Greenhouse gas emissions	This is a relatively isolated site which means that increased car usage is likely, thereby resulting in increased GHG emissions.	P	L	x	x	x
		There is a requirement for the provision of improved pedestrian and cycle links to Bricket Wood Station. This would help to enable sustainable travel and reduce growth in GHG emissions. In addition, 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.	P	L	✓	✓	✓
6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	This is a relatively isolated site which means that increased car usage is likely thereby resulting in increased airborne emissions.	P	L	x	x	x
		There is a requirement for the provision of improved pedestrian and cycle links to Bricket Wood Station. This would help to enable sustainable travel and reduce growth in airborne emissions.	P	L	✓	✓	✓
8	Use of brownfield sites	Development will make use of previously developed land. Refurbishing existing buildings could have a positive effect on this objective, although the effect will depend on the numbers which are replaced.	P	L	✓	✓	✓
9	Resource efficiency	Given the nature of the work undertaken by BRE (they are world leaders in low, zero and positive carbon construction) the new/refurbished buildings should be of high	P	L	✓	✓	✓

		environmental standards.						
10	Historic environment	The BRE Special Employment Location in the Green Belt is directly adjacent to a Scheduled Ancient Monument (scale model of the Mohne Dam), although it's setting should not be affected by the development.	-	-	-	-	-	-
11	Landscape & Townscape	The site is not visible from the surrounding area and therefore any improvements to the existing buildings will have no effects on the surrounding landscape.	-	-	-	-	-	-
12	Health	There is a requirement for the provision of improved pedestrian and cycle links to Bricket Wood Station. This would help to enable active travel modes.	P	L	✓	✓	✓	✓
13	Sustainable locations	The site is in a relatively unsustainable location for providing new employment opportunities as it is not within easy reach of town centres or public transport networks - however it is long established at this location, which cannot be changed.	P	L	✗	✗	✗	✗
14	Equality & social inclusion	The policy encourages development that opens parts of the site to public access and community related uses.	P	L	✓	✓	✓	✓
15	Good quality housing	No predicted effects.	-	-	-	-	-	-
16	Community identity & participation	The policy encourages development that opens parts of the site to public access and community related uses.	P	L	✓	✓	✓	✓
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-	-
18	Sustainable prosperity & growth	BRE is an important local business and national organisation and further job creation on this site would help to retain and increase the provision of knowledge based jobs in the District. Further economic related development of this site is also likely to enhance the local economy and support other local businesses.	P	L	✓	✓	✓	✓
19	Fairer access to jobs & services	Whilst the site is not in a particularly sustainable location for providing new employment opportunities any new employment development will nevertheless provide additional local provision of and access to jobs.	P	L	✓	✓	✓	✓
20	Revitalise town centres	No predicted effects.	-	-	-	-	-	-
Summary of assessment		<p>Development at this 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.</p> <p>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</p>						

	<p>changed.</p> <p>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.</p> <p>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.</p>
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Policy L11 Special Employment Locations in the Green Belt - Rothamsted Research, Harpenden

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	The greenfield nature of part of the site means that new development may have adverse effects on biodiversity.	P	L	x	x	x
2	Water quality/ quantity	No predicted effects.	-	-	-	-	-
3	Flood risk	This site is in a low risk flood zone and not in flood risk zone 2 or 3.	-	-	-	-	-
4	Soils	The partly greenfield nature of this site means some soil sealing will occur which may have impacts on soil functions.	P	L	x	x	x
5	Greenhouse gas emissions	The site is well served by buses running along St Albans Road and the railway station is 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 reducing greenhouse gas emissions related to travel to work. However, there are currently no cycle routes to the site, although Hertfordshire County Council proposes to extend the St Albans-Harpenden cycleway from the southern edge of Harpenden, past Rothamsted and into the town centre.	P	L	✓	✓	✓
6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	The site is well served by buses running along St Albans Road and the railway station is 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 reducing airborne emissions related to travel to work. However, there are currently no cycle routes to the site, although Hertfordshire County Council proposes to extend the St Albans-Harpenden cycleway from the southern edge of Harpenden, past Rothamsted and into the town centre.	P	L	✓	✓	✓
8	Use of brownfield sites	The site is mainly brownfield and a positive effect has therefore been identified.	P	L	✓	✓	✓
9	Resource efficiency	No predicted effects.	-	-	-	-	-

10	Historic environment	Part of the site is in the Harpenden Conservation Area and the site contains a Grade II Listed Building ('15 & 16 West Common, Harpenden'). It is also adjacent to a Grade II Listed Building ('Rivers Lodge, West Common'). It is uncertain as to whether there will be any adverse effect on these heritage assets from any new development/redevelopment.			?	?	?
11	Landscape & Townscape	The development of the site would not reduce the gap with neighbouring settlements. 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. The policy requires that harm to existing landscape features should be avoided and substantial new landscape provision provided.	P	L	✓	✓	✓
12	Health	The location of the site could encourage access by healthy modes of travel such as walking and cycling.	P	L	✓	✓	✓
13	Sustainable locations	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.	P	L	✓	✓	✓
14	Equality & social inclusion	No predicted effects.	-	-	-	-	-
15	Good quality housing	No predicted effects.	-	-	-	-	-
16	Community identity & participation	No predicted effects.	-	-	-	-	-
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-
18	Sustainable prosperity & growth	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. Development would result in 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.	P	L	✓	✓	✓
19	Fairer access to jobs & services	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.	P	L	✓	✓	✓
20	Revitalise town centres	The site is within close proximity of the town centre and therefore development of this site supports this objective.	P	L	✓	✓	✓
Summary of		Positive effects have been forecast against the economic objectives. Rothamsted is an important local business and					

assessment	<p>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'.</p> <p>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.</p> <p>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.</p>
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Retail, Leisure and Commercial Uses and Development

Policy L12 Centres for Retail, Services and Leisure

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	No predicted effects.	-	-	-	-	-
2	Water quality/ quantity	No predicted effects.	-	-	-	-	-
3	Flood risk	No predicted effects.	-	-	-	-	-
4	Soils	No predicted effects.	-	-	-	-	-
5	Greenhouse gas emissions	Maintaining the retail hierarchy should progress this objective as town centre shopping centres are likely to be more accessible by sustainable modes of transport thereby reducing the growth in greenhouse gas emissions. In addition, the local and district centres will help to meet day to day needs and thereby reduce the need to travel.	P	N	✓	✓	✓
6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	Maintaining the retail hierarchy should progress this objective as town centre shopping centres are likely to be more accessible by sustainable modes of transport thereby reducing the growth in airborne emissions. In addition, the local and district centres will help to meet day to day needs and thereby reduce the need to travel.	P	L	✓	✓	✓
8	Use of brownfield sites	Focusing retail development in the town centres should have a positive effect on this objective as it favours development on previously developed land.	P	L	✓	✓	✓
9	Resource efficiency	No predicted effects.	-	-	-	-	-
10	Historic environment	No predicted effects.	-	-	-	-	-
11	Landscape & Townscape	No predicted effects.	-	-	-	-	-

12	Health	The policy includes the consideration of amenity and noise/smells when determining applications for hot food takeaways. This 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.	P	L	✓	✓	✓
13	Sustainable locations	Maintaining the retail hierarchy should progress this objective by ensuring a provision of retail facilities close to main areas of population.	P	L	✓	✓	✓
14	Equality & social inclusion	Including a policy relating to protecting and enhancing the vitality and viability of the town, district and local centres should have a positive effect on this objective by maintaining access to shops for local people.	P	L	✓	✓	✓
15	Good quality housing	No predicted effects.	-	-	-	-	-
16	Community identity & participation	Maintaining retail opportunities across the District should make the urban areas attractive places to live, work and visit. In addition, provision of facilities in the smaller centres will help to maintain community identity.	P	L	✓	✓	✓
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-
18	Sustainable prosperity & growth	Protecting and enhancing the vitality and viability of the retail centres across the District will help to support the economy, particularly if more people stay in the District when meeting their shopping needs. The policy also prevents the loss of ground floor business/commercial units to residential uses which will help to support this objective.	P	L	✓	✓	✓
19	Fairer access to jobs & services	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.	P	L	✓	✓	✓
		Including a policy with regard to protecting the vitality and viability of the town, district and local centres should have a positive effect on this objective by maintaining access to shops for day to day needs. The policy also prevents the loss of ground floor business/commercial units to residential uses which will help to support this objective by retaining employment opportunities.					
20	Revitalise town centres	Including a policy with regard to protecting and enhancing the vitality and viability of the town district, and local centres directly supports this objective and therefore a significant positive effect has been identified.	P	L	✓✓	✓✓	✓✓
Summary of assessment		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					

	<p>across the District should also make the urban areas attractive places to live, work and visit, with positive effects on 'community identity & participation'.</p> <p>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.</p> <p>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.</p>
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Policy L13 Attractive and vibrant cultural and civic areas

SA Objective		Assessment of Effect						
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects			
					In the short term	In the medium term	In the long term	
1	Biodiversity	No predicted effects.	-	-	-	-	-	
2	Water quality/ quantity	No predicted effects.	-	-	-	-	-	
3	Flood risk	No predicted effects.	-	-	-	-	-	
4	Soils	No predicted effects.	-	-	-	-	-	
5	Greenhouse gas emissions	Provision of new cultural and leisure facilities may reduce greenhouse gas emissions by reducing the need for residents to travel outside the District to access such facilities. Conversely, 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 on this objective 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.	-	-	?	?	?	
6	Climate change proof	No predicted effects.	-	-	-	-	-	
7	Air quality	Provision of new cultural and leisure facilities may reduce airborne emissions by reducing the need for residents to travel outside the District to access such facilities. Conversely, 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 on this objective by inducing more car trips. The effect will be dependent on type, scale and location of the development.	-	-	?	?	?	
8	Use of brownfield sites	No predicted effects.	-	-	-	-	-	
9	Resource efficiency	No predicted effects.	-	-	-	-	-	

10	Historic environment	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. Significant positive effects have therefore been identified for this objective.	P	L	✓✓	✓✓	✓✓
11	Landscape & Townscape	Environmental enhancements, including landscaping and public realm improvements, and the enhancement of the Cathedral Quarter should have a positive effect on townscape. Enhancing the public realm, greenspaces and setting of the Abbey, as well as more effectively integrating the Cathedral with the City centre, will have a positive effect on townscape.	P	L	✓	✓	✓
12	Health	Improving the attractiveness of civic areas, through for example public realm improvements and landscaping should help to improve community well-being, thereby having a positive effect on this SA objective.	P	L	✓	✓	✓
13	Sustainable locations	Providing accessible cultural and entertainment facilities should help to progress this objective.	P	L	✓	✓	✓
14	Equality & social inclusion	Creating and improving cultural and entertainment facilities should progress this objective. Through the provision of enhanced facilities for community activities this policy should progress this SA objective.	P	L	✓	✓	✓
15	Good quality housing	No predicted effects.	-	-	-	-	-
16	Community identity & participation	Encouraging cultural activities, which celebrate the District's culture, community and history, supports this SA objective. In addition, creating vibrant centres should help to improve the quality of life for residents by making the City a more attractive place in which to live and work. The Cathedral is considered to be integral to the identity of the City and therefore this policy which aims to make improvements to the area in which it is located should have a positive effect on this objective.	P	L	✓	✓	✓
17	Crime and fear of crime	Improvements to the public realm should have a positive effect on this SA objective.	P	L	✓	✓	✓
18	Sustainable prosperity & growth	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.	P	L	✓	✓	✓
19	Fairer access to jobs & services	Provision of new cultural and entertainment facilities and additional and improved hotel provision will provide additional employment opportunities.	P	L	✓	✓	✓

20	Revitalise town centres	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.	P	L	✓✓	✓✓	✓✓
Summary of assessment		<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>					

Policy L14 Location of Non-residential uses serving residential areas

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	No predicted effects.	-	-	-	-	-
2	Water quality/ quantity	No predicted effects.	-	-	-	-	-
3	Flood risk	No predicted effects.	-	-	-	-	-
4	Soils	No predicted effects.	-	-	-	-	-
5	Greenhouse gas emissions	No predicted effects.	-	-	-	-	-
6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	No predicted effects.	-	-	-	-	-
8	Use of brownfield sites	No predicted effects.	-	-	-	-	-
9	Resource efficiency	No predicted effects.	-	-	-	-	-
10	Historic environment	No predicted effects.	-	-	-	-	-
11	Landscape & Townscape	No predicted effects.	-	-	-	-	-
12	Health	The policy includes the consideration of health and wellbeing when determining applications for non-residential uses serving residential areas. This should help to avoid adverse effects on wellbeing of local residents.	P	L	✓	✓	✓
13	Sustainable locations	The policy enables small scale services and facilities to serve residential areas. This will promote a closer integration between housing and services and improve access to these facilities.	P	L	✓	✓	✓
14	Equality & social inclusion	The policy enables small scale services and facilities to serve residential areas. This will ensure facilities and services are accessible for those without access to a private car.	P	L	✓	✓	✓

15	Good quality housing	No predicted effects.	-	-	-	-	-
16	Community identity & participation	The policy enables small scale services and facilities to serve residential areas. This should help to enhance community interaction.	P	L	✓	✓	✓
17	Crime and fear of crime	The policy includes the consideration of safety and security when determining applications for non-residential uses serving residential areas. This should help to reduce adverse effects on local residents.	P	L	✓	✓	✓
18	Sustainable prosperity & growth	No predicted effects.	-	-	-	-	-
19	Fairer access to jobs & services	No predicted effects.	-	-	-	-	-
20	Revitalise town centres	No predicted effects.	-	-	-	-	-
Summary of assessment		<p>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.</p> <p>There are no predicted effects against the environmental or economic objectives.</p>					

Policy L15 Leisure Uses

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	No predicted effects.	-	-	-	-	-
2	Water quality/ quantity	No predicted effects.	-	-	-	-	-
3	Flood risk	No predicted effects.	-	-	-	-	-
4	Soils	No predicted effects.	-	-	-	-	-
5	Greenhouse gas emissions	No predicted effects.	-	-	-	-	-
6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	No predicted effects.	-	-	-	-	-
8	Use of brownfield sites	No predicted effects.	-	-	-	-	-
9	Resource efficiency	No predicted effects.	-	-	-	-	-
10	Historic environment	No predicted effects.	-	-	-	-	-
11	Landscape & Townscape	The policy requires that landscaping and land restoration proposals for all leisure uses should enhance their setting. The policy also limits the types of development that would be allowed in the open countryside. Both support this objective.	P	L	✓	✓	✓
12	Health	The policy would allow the development of leisure uses, where appropriate for the particular type of location, which would provide opportunities for healthy lifestyles.	P	L	✓	✓	✓
13	Sustainable locations	No predicted effects.	-	-	-	-	-
14	Equality & social inclusion	No predicted effects.	-	-	-	-	-
15	Good quality housing	No predicted effects.	-	-	-	-	-

16	Community identity & participation	No predicted effects.	-	-	-	-	-
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-
18	Sustainable prosperity & growth	No predicted effects.	-	-	-	-	-
19	Fairer access to jobs & services	No predicted effects.	-	-	-	-	-
20	Revitalise town centres	No predicted effects.	-	-	-	-	-
Summary of assessment		<p>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.</p> <p>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.</p> <p>There are no predicted effects against the other SA objectives.</p>					

Policy L16 Mixed Use Opportunity Areas

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	The presence of tree preservation orders on the Colney Fields site in London Colney could have implications for biodiversity	-	-	?	?	?
2	Water quality/ quantity	No predicted effects.	-	-	-	-	-
3	Flood risk	No predicted effects.	-	-	-	-	-
4	Soils	Redevelopment of the site at Griffiths Way in St Albans could enable any existing contaminated land related to the old gas works to be remediated.	P	L	✓	✓	✓
5	Greenhouse gas emissions	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 GHG emissions. The Griffiths Way site is also in a relatively sustainable location, with good access using sustainable modes of transport.	P	N	✓	✓	✓
		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 GHG emissions.	P	N	✗	✗	✗
6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	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 airborne emissions. The Griffiths Way site is also in a relatively sustainable location, with good access using sustainable modes of transport.	P	L	✓	✓	✓
		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 airborne emissions.	P	L	✗	✗	✗

8	Use of brownfield sites	Focusing mixed-use development on the previously developed sites included in the policy would support this objective.	P	L	✓	✓	✓
9	Resource efficiency	No predicted effects.	-	-	-	-	-
10	Historic environment	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.	-	-	?	?	?
11	Landscape & Townscape	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.	P	L	✓	✓	✓
12	Health	No predicted effects.	-	-	-	-	-
13	Sustainable locations	The policy supports mixed use development which would reduce the need to travel through closer integration of housing, jobs and services. The Civic Centre Opportunity Site is a sustainable location for the provision of retail and depending on the final configuration of the development should help to meet the needs of the District's population thereby reducing the need to travel to other centres for shops. Although on the edge of the City centre, the site at Griffiths Way is relatively accessible.	P	L	✓	✓	✓
		The site at Colney Fields would be part of an out-of-town development and is most easily accessed by car, although the site is accessible by public transport.	P	L	x	x	x
14	Equality & social inclusion	Providing enhanced and additional retail opportunities in the District should improve access to these services.	P	L	✓	✓	✓
15	Good quality housing	The policy supports mixed use development which would provide some new residential development.	P	L	✓	✓	✓
16	Community identity & participation	Enhancing retail opportunities in the District could make the urban areas more attractive places to live, work and visit. Enhancing the public realm at the Civic Centre Opportunity Site should help to improve community vitality and participation.	P	L	✓	✓	✓
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-

18	Sustainable prosperity & growth	<p>The policy supports the principle of major mixed use development. This would support the local economy.</p> <p>Redevelopment at the Civic Centre Opportunity Site in St Albans supports this objective as it would provide additional economic growth in the retail and service sectors and by improving the retail offer of the City could have wider benefits for other retailers, restaurants, service providers etc. as more people come to the City to shop.</p> <p>Mixed-use development at Griffiths Way, St Albans and Colney Fields, in London Colney support this objective as it would provide additional economic growth in the retail and service sectors.</p>	P	L	✓	✓	✓
19	Fairer access to jobs & services	<p>The policy supports the principle of major mixed use development. This would support the provision of new employment opportunities.</p> <p>Redevelopment at the Civic Centre Opportunity Site in St Albans supports this objective as it would provide additional employment opportunities in the retail and service sectors and by improving the retail offer of the City could have wider benefits for other retailers, restaurants, service providers etc. as more people come to the City to shop.</p> <p>Mixed-use development at Griffiths Way, St Albans and Colney Fields, in London Colney support this objective as it would provide additional employment opportunities in the retail and service sectors.</p>	P	L	✓	✓	✓
20	Revitalise town centres	<p>The policy requires that through any major mixed use development in St Albans city there must overall be an enhancement of the city's central area vitality and viability.</p> <p>Mixed-used development proposed at the Civic Centre Opportunity Site in the centre of St Albans further supports this objective.</p>	P	L	✓	✓	✓
		<p>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 this objective.</p>	P	L	x	x	x
Summary of assessment		<p>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.</p> <p>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</p>					

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.

Infrastructure and Community Facilities

Policy L17 Infrastructure

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	Effects on biodiversity will depend on the type and scale of the new infrastructure and the biodiversity characteristics of the specific locations where the infrastructure is provided.	-	-	?	?	?
		Any provision of new green infrastructure could result in some biodiversity gain.	P	L	✓	✓	✓
2	Water quality/ quantity	By requiring the provision of new physical infrastructure, water quality should be protected by avoidance of overloading of waste water treatment works.	P	L	✓	✓	✓
3	Flood risk	No predicted effects.	-	-	-	-	-
4	Soils	No predicted effects.	-	-	-	-	-
5	Greenhouse gas emissions	No predicted effects.	-	-	-	-	-
6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	No predicted effects.	-	-	-	-	-
8	Use of brownfield sites	No predicted effects.	-	-	-	-	-
9	Resource efficiency	New physical infrastructure to meet the needs of new development and to address the infrastructure deficit is supported through this policy.	P	L	✓	✓	✓
10	Historic environment	Effects on the historic environment will depend on the type and scale of the new infrastructure and the particular characteristics of the specific locations where the infrastructure is provided.	-	-	?	?	?
11	Landscape & Townscape	Effects on landscapes & townscapes will depend on the type and scale of the new infrastructure and the particular features/settings of the specific locations where the infrastructure is provided.	-	-	?	?	?

12	Health	Provision of new green and social infrastructure should help to encourage healthy lifestyles and provision of healthcare facilities.	P	L	✓	✓	✓
13	Sustainable locations	Provision of new social infrastructure should help to reduce the need to travel through closer integration of services with housing and jobs.	P	L	✓	✓	✓
14	Equality & social inclusion	No predicted effects.	-	-	-	-	-
15	Good quality housing	No predicted effects.	-	-	-	-	-
16	Community identity & participation	Delivery of new social infrastructure should improve the provision of community facilities.	P	L	✓	✓	✓
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-
18	Sustainable prosperity & growth	The provision of infrastructure, including utilities and improved broadband, should help to support the local economy.	P	L	✓	✓	✓
19	Fairer access to jobs & services	No predicted effects.	-	-	-	-	-
20	Revitalise town centres	No predicted effects.	-	-	-	-	-
Summary of assessment		<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>					

Policy L18 Transport Strategy

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	Effects on biodiversity will depend on the type and scale of any new transport infrastructure and the biodiversity characteristics of the specific locations where the infrastructure is provided or enhanced. The effects of any significant highway improvements, for example at the M1/A414 interchange identified in the Policies Map, would be dependent on the route/land take.	-	-	?	?	?
2	Water quality/ quantity	No predicted effects.	-	-	-	-	-
3	Flood risk	No predicted effects.	-	-	-	-	-
4	Soils	The effects on soils would be dependent on the level of 'land-take' required and the characteristics of the soils in the affected areas.	-	-	?	?	?
5	Greenhouse gas emissions	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 this objective by reducing growth in greenhouse gas emissions from transport.	P	N	✓	✓	✓
		The wide range of measures outlined in the policy to encourage sustainable travel, by public transport, walking and cycling (through proposals and promotions) and reduce traffic congestion (as a result of HGVs) should have a positive effect on this objective by reducing growth in greenhouse gas emissions from transport. Improvements to the Abbey line will also help towards this objective. Requiring all major developments (where appropriate) to produce travel plans which will set out measures to encourage alternative modes of travel to single occupancy car should have a positive effect on this SA objective.	P	N	✓	✓	✓
		The effects of any significant highway improvements are uncertain on this objective as it could result in an increase in overall traffic levels – through induced traffic.	P	L	?	?	?
6	Climate change proof	No predicted effects.	-	-	-	-	-

7	Air quality	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 this objective by reducing airborne emissions from transport.	P	L	✓	✓	✓
		The wide range of measures outlined in the policy to encourage sustainable travel, by public transport, walking and cycling (through proposals and promotions) should have a positive effect on this objective by reducing airborne emissions from transport. Improvements to the Abbey line will also help towards this objective.					
		Requiring all major developments (where appropriate) to produce travel plans which will set out measures to encourage alternative modes of travel to single occupancy car should have a positive effect on this SA objective. In addition the policy requires that planning for major development must include an assessment of air quality impacts from traffic (both from the development and on occupants of the development). Development design and the transport measures associated with the development must include proposals to limit and mitigate impacts, particularly if there is an effect on a designated Air Quality Management Area (AQMA).					
		Reducing traffic congestion across the District in both towns and rural areas through encouraging HGVs to use the primary road network would reduce airborne emissions from transport.					
		The potential for significant highway improvements has been predicted as having uncertain effects on this objective as it could result in an increase in overall traffic levels – through induced traffic.					
8	Use of brownfield sites	New transport infrastructure could result in the loss of some greenfield land and soil sealing.	-	-	?	?	?
9	Resource efficiency	No predicted effects.	-	-	-	-	-
10	Historic environment	Reducing traffic congestion and associated air pollutants (particularly from HGVs) in the City centre should have a positive effect on this objective by helping to protect and maintain the City's historic environment.	P	L	✓	✓	✓
		Effects on the historic environment will depend on the type and scale of any new transport infrastructure and the characteristics of the specific locations where the infrastructure is provided or enhanced. The effects of any significant highway improvements would be dependent on the route/land take.	-	-	?	?	?
11	Landscape & Townscape	Reducing traffic congestion (as a result of HGVs) in towns should enhance the townscape character.	P	L	✓	✓	✓
		The proposed delivery of any significant highway improvements for example at the M1/A414 interchange identified in the Policies Map, could have negative implications on local landscape depending on the route/land take.	P	L	?	?	?

12	Health	The wide range of 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. The level of the effect will however depend on the level of behavioural change that will be required to make use of the active travel modes enabled by this policy. Reducing traffic congestion (as a result of HGVs) in the City centre may reduce vehicular emissions. Therefore leading to improved air quality and associated health benefits for the local community.	P	L	✓	✓	✓
13	Sustainable locations	The requirement that new development should be concentrated in accessible locations supports this objective.	P	L	✓	✓	✓
14	Equality & social inclusion	The wide range of measures to increase use of public transport, walking and cycling, including requiring new development to be concentrated in accessible locations, could improve access to services and facilities whilst promoting more sustainable modes of transport could encourage more active travel.	P	L	✓	✓	✓
15	Good quality housing	No predicted effects.	-	-	-	-	-
16	Community identity & participation	Reducing traffic congestion caused by HGVs and the wide range of measures to encourage the use of sustainable transport should improve the quality of the urban environment, making it a more attractive place in which to live, work and visit.	P	L	✓	✓	✓
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-
18	Sustainable prosperity & growth	Reducing traffic congestion caused by HGVs and measures to encourage the use of sustainable transport should improve the quality of the urban environment thereby supporting the local economy. Reducing congestion should also be beneficial for local businesses as deliveries, customers and employees are less likely to become caught in traffic.	P	L	✓	✓	✓
19	Fairer access to jobs & services	The wide range of measures to increase use of public transport, walking and cycling could improve access to employment opportunities.	P	L	✓	✓	✓
20	Revitalise town centres	Reduced traffic congestion in the town centre caused by HGVs should improve the quality of the urban environment.	P	L	✓	✓	✓
Summary of assessment		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					

	<p>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.</p> <p>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.</p> <p>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'.</p> <p>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.</p>
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Policy L19 Highways / Access Considerations for New development

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	No predicted effects.	-	-	-	-	-
2	Water quality/ quantity	No predicted effects.	-	-	-	-	-
3	Flood risk	No predicted effects.	-	-	-	-	-
4	Soils	No predicted effects.	-	-	-	-	-
5	Greenhouse gas emissions	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 and reduce the growth in GHG.	P	L	✓	✓	✓
6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	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 and reduce the growth in airborne emissions.	P	L	✓	✓	✓
8	Use of brownfield sites	No predicted effects.	-	-	-	-	-
9	Resource efficiency	No predicted effects.	-	-	-	-	-
10	Historic environment	No predicted effects.	-	-	-	-	-
11	Landscape & Townscape	No predicted effects.	-	-	-	-	-

12	Health	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 active travel modes and improve health and wellbeing, for both new and existing residents. The policy also requires the facilitation of access to disabled and other disadvantaged groups, which will improve their health and wellbeing. In addition the policy also considers road safety aspects relating to roads associated with, or affected by, new developments.	P	L	✓	✓	✓
13	Sustainable locations	No predicted effects.	-	-	-	-	-
14	Equality & social inclusion	No predicted effects.	-	-	-	-	-
15	Good quality housing	No predicted effects.	-	-	-	-	-
16	Community identity & participation	No predicted effects.	-	-	-	-	-
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-
18	Sustainable prosperity & growth	No predicted effects.	-	-	-	-	-
19	Fairer access to jobs & services	No predicted effects.	-	-	-	-	-
20	Revitalise town centres	No predicted effects.	-	-	-	-	-
Summary of assessment		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.					

Policy L20 New Development Parking Guidance and Standards

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	No predicted effects.	-	-	-	-	-
2	Water quality/ quantity	No predicted effects.	-	-	-	-	-
3	Flood risk	No predicted effects.	-	-	-	-	-
4	Soils	No predicted effects.	-	-	-	-	-
5	Greenhouse gas emissions	The policy requires that the provision of electric vehicle charging points in new communal parking areas be considered. Effects on GHG would be dependent on the levels of provision and whether they are sufficient to encourage people to use electric vehicles.	-	-	?	?	?
6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	No predicted effects.	-	-	-	-	-
8	Use of brownfield sites	No predicted effects.	-	-	-	-	-
9	Resource efficiency	No predicted effects.	-	-	-	-	-
10	Historic environment	Requiring developments to provide on-site parking should help to minimise adverse effects on the historic environment that could result from increased levels of on-street parking that might arise if on-site parking were not to be provided.	P	L	✓	✓	✓
11	Landscape & Townscape	Requiring developments to provide on-site parking should help to minimise adverse effects on townscapes by that could result from increased levels of on-street parking that might arise if on-site parking were not to be provided.	P	L	✓	✓	✓
12	Health	No predicted effects.	-	-	-	-	-
13	Sustainable locations	No predicted effects.	-	-	-	-	-
14	Equality & social inclusion	No predicted effects.	-	-	-	-	-

15	Good quality housing	No predicted effects.	-	-	-	-	-
16	Community identity & participation	No predicted effects.	-	-	-	-	-
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-
18	Sustainable prosperity & growth	No predicted effects.	-	-	-	-	-
19	Fairer access to jobs & services	No predicted effects.	-	-	-	-	-
20	Revitalise town centres	No predicted effects.	-	-	-	-	-
Summary of assessment		<p>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.</p> <p>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.</p> <p>There are no predicted effects against the other SA objectives.</p>					

Policy L21 Education

NB: the Policies Map identifies five Education sites in the Green Belt. Four of these are associated with Broad Locations (Policy S6 i) East Hemel Hempstead (North); Policy S6 v) East St Albans; Policy S6 viii) North West Harpenden; and Policy S6 ix) West of London Colney) and the assessment of those sites are incorporated into the assessments for the respective Broad Location.

One Education site (London Road, St Albans) is not associated with a Broad Location and so the assessment for that site is incorporated into the assessment for Policy L21.

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	Development of new or expanded schools could have an adverse effect on biodiversity, depending on the biodiversity value of the development sites. The policy does however require the consideration of any impact on ecology. The London Road site is greenfield and contains mature trees, some of which may be lost through the development of the school.	-	-	?	?	?
2	Water quality/ quantity	No predicted effects.	-	-	-	-	-
3	Flood risk	No predicted effects.	-	-	-	-	-
4	Soils	Development of new or expanded schools could have an adverse effect on soils, depending on the amount of land-take and the soil characteristics of the areas affected.	-	-	?	?	?
5	Greenhouse gas emissions	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 reduce growth in GHG emissions.	-	-	-	-	-
6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	No predicted effects.	-	-	-	-	-

8	Use of brownfield sites	The potential provision of new schools in the greenfield Broad Locations does not support this objective. However, allowing expansion of existing schools in the Green Belt could make best use of brownfield sites. Effects will be site specific.	-	-	?	?	?
9	Resource efficiency	No predicted effects.	-	-	-	-	-
10	Historic environment	Development of new schools could have adverse effects on known or undiscovered heritage assets. Effects against this objective will be dependent on the location of the new schools. The London Road site is adjacent to the St Albans Conservation Area, however the impact on the setting on the Conservation Area is likely to be limited given the existing perimeter tree screening and the location of the London Road Business Park adjacent to the site.	-	-	?	?	?
11	Landscape & Townscape	Development of new or expanded schools could have an adverse effect on local landscapes. Effects against this objective will be dependent on the location of the new or expanded schools. The policy does however require the consideration of landscape impact and design and external appearance. No specific effects identified for the London Road site.	-	-	?	?	?
12	Health	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.	P	L	✓	✓	✓
13	Sustainable locations	No predicted effects. The London Road site is in a relatively sustainable, edge of City location.	-	-	-	-	-
14	Equality & social inclusion	The provision of new or expanded educational facilities should have a positive effect on this objective. New or expanded schools will provide facilities that can be used by the wider community.	P	L	✓	✓	✓
15	Good quality housing	No predicted effects.	-	-	-	-	-
16	Community identity & participation	No predicted effects.	-	-	-	-	-
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-
18	Sustainable prosperity & growth	No predicted effects.	-	-	-	-	-
19	Fairer access to jobs & services	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.	P	L	✓✓	✓✓	✓✓

20	Revitalise town centres	No predicted effects.	-	-	-	-	-
Summary of assessment		<p>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.</p> <p>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.</p> <p>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.</p>					

Policy L22 Community, Leisure and Sports Facilities

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	The policy encourages new and enhanced community, leisure and sports facilities. The nature and significance of any effects will be dependent on the biodiversity value of the actual locations taken forward. No effects are predicted in relation to the expansion of the cemetery at London Road, St Albans.	-	-	?	?	?
2	Water quality/ quantity	No predicted effects.	-	-	-	-	-
3	Flood risk	No predicted effects.	-	-	-	-	-
4	Soils	The policy encourages new and enhanced community, leisure and sports facilities. If the locations taken forward for development are greenfield sites development could have adverse effects on soils. The expansion of the cemetery at London Road, St Albans will result in the loss of some agricultural land.	-	-	?	?	?
5	Greenhouse gas emissions	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. In addition, new sport and recreation facilities will be concentrated in sustainable and accessible locations reducing the need for car journeys and this would therefore help to reduce growth in GHG emissions.	P	N	✓	✓	✓
6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	New facilities will be concentrated in sustainable and accessible locations reducing the need for car journeys and therefore should help to reduce airborne emissions by enabling the use of more sustainable modes of transport.	P	L	✓	✓	✓

8	Use of brownfield sites	The effects will be dependent on whether new developments are located on previously developed land or on greenfield sites. The expansion of the cemetery at London Road, St Albans will result in the loss of some greenfield land.	-	-	?	?	?
9	Resource efficiency	No predicted effects.	-	-	-	-	-
10	Historic environment	Development of new and enhanced community, leisure and sports facilities could have adverse effects on known or undiscovered historic and cultural heritage. Effects against this objective will be dependent on the location of the facilities. No effects are predicted in relation to the expansion of the cemetery at London Road, St Albans.	-	-	?	?	?
11	Landscape & Townscape	The policy encourages new and enhanced community, leisure and sports facilities. The nature and significance of any effects on landscapes and townscapes will be dependent on the type, scale and location of the new facilities. No effects are predicted in relation to the expansion of the cemetery at London Road, St Albans.	P	L	?	?	?
12	Health	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.	P	L	✓✓	✓✓	✓✓
13	Sustainable locations	The policy requires that new sport and recreation facilities will be concentrated in sustainable and accessible locations	P	L	✓	✓	✓
14	Equality & social inclusion	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.	P	L	✓	✓	✓
15	Good quality housing	No predicted effects.	-	-	-	-	-
16	Community identity & participation	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. 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.	P	L	✓	✓	✓

17	Crime and fear of crime	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.	-	-	?	?	?
18	Sustainable prosperity & growth	No predicted effects.	-	-	-	-	-
19	Fairer access to jobs & services	The provision of new community, leisure and sports facilities will provide some local employment opportunities.	P	L	✓	✓	✓
20	Revitalise town centres	The provision of new community, leisure and sports facilities in sustainable locations should help promote the role of local centres as centres for sustainable development.	P	L	✓	✓	✓
Summary of assessment		<p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>					

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.

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

Policy L23 Urban Design and Layout of New Development

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	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.	P	L	✓	✓	✓
2	Water quality/ quantity	The policy requires that all applications for 'major development' must include a detailed drainage, surface water management and flooding assessment / strategy. This 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.	P	L	✓	✓	✓
3	Flood risk	The policy requires that all applications for 'major development' must include a detailed drainage, surface water management and flooding assessment / strategy. This will help to avoid adverse effects relating to flood risk. The Hertfordshire Building Futures Guide provides guidance on minimising water consumption, managing surface water drainage and climate change adaptation. Positive effects have therefore been identified against this objective.	P	L	✓	✓	✓
4	Soils	No predicted effects.	-	-	-	-	-
5	Greenhouse gas emissions	Elements of the policy seek to enable permeable developments that will enable walking and cycling to be a realistic alternative to car-use. The energy efficiency measures and use of sustainable construction methods that are covered by the Hertfordshire Building Futures Guide will also help to reduce GHG emissions from new development.	P	N	✓	✓	✓
6	Climate change proof	The Hertfordshire Building Futures Guide provides guidance on climate change adaptation in new developments.	P	L	✓	✓	✓

7	Air quality	Elements of the policy seek to enable permeable developments that will enable walking and cycling to be a realistic alternative to car-use. This could help to improve local air quality.	P	L	✓	✓	✓
8	Use of brownfield sites	No predicted effects.	-	-	-	-	-
9	Resource efficiency	The Hertfordshire Building Futures Guide provides guidance on the sustainable use of materials as well as on waste. Positive effects against this objective have therefore been identified.	P	L	✓	✓	✓
10	Historic environment	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.	P	L	✓	✓	✓
11	Landscape & Townscape	The design principles and wide range of detailed design requirements that are included in the policy will contribute towards improvements to townscapes. 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. Significant positive effects are therefore identified for this objective.	P	L	✓✓	✓✓	✓✓
12	Health	By seeking to create attractive places, including through the creation of safe and accessible environments, there should be overall positive effects on general wellbeing of those living in and around new developments.	P	L	✓	✓	✓
13	Sustainable locations	No predicted effects.	-	-	-	-	-
14	Equality & social inclusion	No predicted effects.	-	-	-	-	-
15	Good quality housing	The policy requires all new development to be designed to create attractive places where people enjoy living and working and this should ensure the provision of high quality housing.	P	L	✓	✓	✓
16	Community identity & participation	The policy requires all new development to promote social cohesion which supports this objective. Encouraging good design and public realm improvements also supports this objective.	P	L	✓	✓	✓
17	Crime and fear of crime	The policy supports the creation of safe environments which address physical aspects of crime prevention directly supports this objective.	P	L	✓✓	✓✓	✓✓

18	Sustainable prosperity & growth	Requiring all new development to be designed to create attractive places where people enjoy living and working should support the local economy.	P	L	✓	✓	✓
19	Fairer access to jobs & services	Requiring all new development to be laid out, orientated and designed to create attractive places where people enjoy living and working and ensuring that new development integrates with existing development and is easily navigable could result in improved access to employment locations, particularly for those without access to a private car.	P	L	✓	✓	✓
20	Revitalise town centres	Requiring all new development to be laid out, orientated and designed to create attractive places where people enjoy living and working supports this objective.	P	L	✓	✓	✓
Summary of assessment		<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>					

	<p>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.</p> <p>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.</p> <p>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.</p>
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Policy L24 Development Amenity Standards

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	No predicted effects.	-	-	-	-	-
2	Water quality/ quantity	No predicted effects.	-	-	-	-	-
3	Flood risk	No predicted effects.	-	-	-	-	-
4	Soils	No predicted effects.	-	-	-	-	-
5	Greenhouse gas emissions	No predicted effects.	-	-	-	-	-
6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	No predicted effects.	-	-	-	-	-
8	Use of brownfield sites	No predicted effects.	-	-	-	-	-
9	Resource efficiency	No predicted effects.	-	-	-	-	-
10	Historic environment	No predicted effects.	-	-	-	-	-
11	Landscape & Townscape	The policy requires the consideration of landscape quality which will help to support this objective.	P	L	✓	✓	✓
12	Health	The development amenity standards should help to maintain the general wellbeing of residents in neighbouring properties.	P	L	✓	✓	✓
13	Sustainable locations	No predicted effects.	-	-	-	-	-
14	Equality & social inclusion	No predicted effects.	-	-	-	-	-
15	Good quality housing	No predicted effects.	-	-	-	-	-

16	Community identity & participation	No predicted effects.	-	-	-	-	-
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-
18	Sustainable prosperity & growth	No predicted effects.	-	-	-	-	-
19	Fairer access to jobs & services	No predicted effects.	-	-	-	-	-
20	Revitalise town centres	No predicted effects.	-	-	-	-	-
Summary of assessment		<p>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.</p> <p>There are no predicted effects against the other objectives.</p>					

Policy L25 Energy and Environmental Performance of New Development

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	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.	-	-	?	?	?
2	Water quality/ quantity	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. 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.	P	L	✓✓	✓✓	✓✓
3	Flood risk	The Hertfordshire Building Futures Guide provides guidance on SUDS and climate change adaptation in new developments. This should help to reduce flood risk.	P	L	✓	✓	✓
4	Soils	No predicted effects.	-	-	-	-	-
5	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. Significant positive effects have therefore been identified for this objective.	P	N	✓✓	✓✓	✓✓
6	Climate change proof	The Hertfordshire Building Futures Guide provides guidance on climate change adaptation in new developments. The policy requires the use of water efficiency measures which could help new developments to cope with drier summers.	P	L	✓	✓	✓

7	Air quality	No predicted effects.	-	-	-	-	-
8	Use of brownfield sites	No predicted effects.	-	-	-	-	-
9	Resource efficiency	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. Significant positive effects have therefore been identified for this objective.	P	N	✓✓	✓✓	✓✓
10	Historic environment	Depending 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, there may be adverse effects on this objective.	-	-	?	?	?
11	Landscape & Townscape	Depending on the types, design and location of decentralised renewable or low carbon energy supply used in developments and the characteristics/constraints of the specific locations, there may be adverse effects on landscape and townscape.	-	-	?	?	?
		The Hertfordshire Building Futures Guide provides guidance on design and also landscape. Positive effects have been identified for this objective.	P	L	✓	✓	✓
12	Health	The Hertfordshire Building Futures Guide provides guidance on reducing noise when constructing and living in new developments. This should have positive effects on general wellbeing.	P	L	✓	✓	✓
13	Sustainable locations	No predicted effects.	-	-	-	-	-
14	Equality & social inclusion	No predicted effects.	-	-	-	-	-
15	Good quality housing	The policy should help towards achieving this objective through provision of high quality housing.	P	L	✓	✓	✓
16	Community identity & participation	No predicted effects.	-	-	-	-	-
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-
18	Sustainable prosperity & growth	No predicted effects.	-	-	-	-	-
19	Fairer access to jobs & services	No predicted effects.	-	-	-	-	-
20	Revitalise town centres	No predicted effects.	-	-	-	-	-
Summary of assessment		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.

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

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	The retention of existing and development of new green spaces would help to maintain the biodiversity associated with these areas.	P	L	✓	✓	✓
2	Water quality/ quantity	No predicted effects.	-	-	-	-	-
3	Flood risk	The retention of existing and development of new green spaces may help to reduce flood risk by increasing levels of infiltration into soils, reducing runoff and increasing levels of evapotranspiration, thereby reducing the potential for fluvial and pluvial flooding.	P	L	✓	✓	✓
4	Soils	The retention of existing and development of new green spaces would help to avoid soil being lost to new development.	P	L	✓	✓	✓
5	Greenhouse gas emissions	The retention of existing and development of new green spaces would help with carbon sequestration.	P	L	✓	✓	✓
6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	The retention of existing and development of new green spaces may help to improve local air quality in urban and heavily trafficked areas.	P	L	✓	✓	✓
8	Use of brownfield sites	No predicted effects.	-	-	-	-	-
9	Resource efficiency	No predicted effects.	-	-	-	-	-
10	Historic environment	No predicted effects.	-	-	-	-	-

11	Landscape & Townscape	The retention of existing and development of new green spaces will help to maintain the quality of local landscapes and townscapes.	P	L	✓	✓	✓
12	Health	Policies L26 and L27 prevent the loss of designated Local Green Spaces and some other valued green spaces to other uses or development. 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.	P	L	✓	✓	✓
13	Sustainable locations	The policies require the retention and provision of green spaces in sustainable locations.	P	L	✓	✓	✓
14	Equality & social inclusion	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.	P	L	✓	✓	✓
15	Good quality housing	No predicted effects.	-	-	-	-	-
16	Community identity & participation	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. This will help to maintain community cohesion.	P	L	✓	✓	✓
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-
18	Sustainable prosperity & growth	No predicted effects.	-	-	-	-	-
19	Fairer access to jobs & services	No predicted effects.	-	-	-	-	-
20	Revitalise town centres	The retention and provision of green spaces in local centres and town centres will help to support this objective.	P	L	✓	✓	✓
Summary of assessment		<p>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'.</p> <p>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.</p> <p>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.</p>					

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

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	The policy directly supports this SA 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.	P	L	✓✓	✓✓	✓✓
2	Water quality/ quantity	Conserving watercourses and their settings for their biodiversity value and improving water quality to meet standards set out in River Basin Management Plans will have a significant positive effect on this objective. In addition, encouraging river restoration, such as naturalisation and the removal of culverts, should also progress this objective. Indirect positive effects on water quality are also predicted to result through the conservation and enhancement of green infrastructure. In addition, requiring SUDS to be incorporated into new developments should progress this objective. SUDS treat run-off water to remove pollutants before allowing it to return to the natural system. This could reduce pollution and help to improve water quality.	P	L	✓✓	✓✓	✓✓

3	Flood risk	<p>Seeking to avoid development in areas at risk from flooding and ensuring that water and flood risk are fully addressed by new development should have a positive effect on this objective.</p> <p>Requiring SUDS, including flood storage areas, to be incorporated into new developments should progress this objective. In addition, supporting the creation and enhancement of green infrastructure could have a positive effect on this objective by providing for flood alleviation.</p>	P	R	✓	✓	✓
4	Soils	<p>(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.</p> <p>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. In addition, protecting greenspaces and recreational land from development should prevent soil sealing in these areas.</p>	P	L	✓	✓	✓
5	Greenhouse gas emissions	<p>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.</p> <p>The provision of a green infrastructure network should also help to encourage use of sustainable modes of transport thereby reducing GHG 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 this objective.</p>	P	L	✓	✓	✓
6	Climate change proof	<p>Requiring SUDS, including flood storage areas, to be incorporated into new developments should progress this objective.</p> <p>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.</p>	P	L	✓	✓	✓
7	Air quality	<p>The provision of a green infrastructure network should help to encourage use of sustainable modes of transport thereby reducing air pollution from motorised transport. The St Albans Green Ring which aims to make the City centre more accessible, encourage park and walk schemes, and cycling should also progress this objective. Green infrastructure can also help to reduce air pollution.</p>	P	L	✓	✓	✓
8	Use of brownfield sites	No predicted effects.	-	-	-	-	-
9	Resource efficiency	No predicted effects.	-	-	-	-	-

10	Historic environment	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. Encouraging the enhancement of Verulamium Park in accordance with the approved Conservation Management Plan should also have a positive effect on this objective.	P	L	✓	✓	✓
11	Landscape & Townscape	The policy directly supports this SA objective by aiming to conserve, manage and where appropriate enhance the District's landscapes. The character of local areas will also be considered when considering applications to develop on residential garden land. 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.	P	L	✓✓	✓✓	✓✓
12	Health	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. It is increasingly recognised that a favourable environment can encourage people to exercise, providing psychological and social benefits that may also increase the motivation to exercise ²¹ . 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. This directly supports the SA sub-objective ' <i>To identify, protect and enhance open spaces ... and the links between them, for the benefit of people and wildlife</i> '. 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.	P	L	✓✓	✓✓	✓✓
13	Sustainable locations	No predicted effects.	-	-	-	-	-
14	Equality & social inclusion	Encouraging the creation, enhancement and conservation of and access to green infrastructure should have a positive effect on this SA objective by improving access to recreation areas.	P	L	✓	✓	✓
15	Good quality housing	No predicted effects.	-	-	-	-	-

²¹ Bird, W (2004) Natural Fit: Can Green Space and Biodiversity Increase Levels of Physical Activity? RSPB. UK.

16	Community identity & participation	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.	P	L	✓	✓	✓
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-
18	Sustainable prosperity & growth	No predicted effects.	-	-	-	-	-
19	Fairer access to jobs & services	No predicted effects.	-	-	-	-	-
20	Revitalise town centres	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.	P	L	✓	✓	✓
Summary of assessment		<p>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.</p> <p>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.</p> <p>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</p>					

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

	<p>objective.</p> <p>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.</p> <p>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.</p>
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Policy L30 Historic Environment and Townscape Character

SA Objective		Assessment of Effect					
		Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	Significance of Effects		
					In the short term	In the medium term	In the long term
1	Biodiversity	No predicted effects.	-	-	-	-	-
2	Water quality/ quantity	No predicted effects.	-	-	-	-	-
3	Flood risk	No predicted effects.	-	-	-	-	-
4	Soils	No predicted effects.	-	-	-	-	-
5	Greenhouse gas emissions	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 GHG emissions reductions that are achievable.	-	-	?	?	?
6	Climate change proof	No predicted effects.	-	-	-	-	-
7	Air quality	No predicted effects.	-	-	-	-	-
8	Use of brownfield sites	No predicted effects.	-	-	-	-	-
9	Resource efficiency	No predicted effects.	-	-	-	-	-
10	Historic environment	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.	P	L	✓✓	✓✓	✓✓
11	Landscape & Townscape	The policy directly supports this SA objective as it will help to protect and enhance townscape character.	P	L	✓✓	✓✓	✓✓
12	Health	No predicted effects.	-	-	-	-	-
13	Sustainable locations	No predicted effects.	-	-	-	-	-
14	Equality & social inclusion	No predicted effects.	-	-	-	-	-

15	Good quality housing	No predicted effects.	-	-	-	-	-
16	Community identity & participation	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.	P	L	✓	✓	✓
17	Crime and fear of crime	No predicted effects.	-	-	-	-	-
18	Sustainable prosperity & growth	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.	P	L	✓	✓	✓
19	Fairer access to jobs & services	No predicted effects.	-	-	-	-	-
20	Revitalise town centres	Improving the historic environment and townscape character will help to create and maintain viable and attractive town centres.	P	L	✓	✓	✓
Summary of assessment		<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>					



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

**Annex 1
Habitats Regulations Assessment Screening Update**

September 2018

Table of Contents

1	Introduction	1
1.1	Background.....	1
1.2	Previous HRA Screening	1
1.3	HRA Screening for the Local Plan	3
1.3.1	Potential effects to be considered.....	4
2	Chiltern Beechwoods SAC – Evidence Review	4
2.1	Introduction.....	4
2.2	Qualifying habitats and species.....	5
2.3	Conservation objectives	5
2.4	Natura 2000 – Standard Data Form	5
2.5	Site Improvement Plan.....	6
2.5.1	Threat: ‘Public access/disturbance’ in relation to stag beetle	6
2.5.2	Threat: ‘Air pollution – atmospheric nitrogen deposition’ (for all features).....	6
2.6	Condition of relevant SSSI Units.....	6
2.7	Implications for the HRA Screening	6
3	Screening Update.....	7
3.1	Introduction.....	7
3.2	New factors to consider	7
3.2.1	Recreational disturbance	7
3.2.2	Recent caselaw - ‘People Over Wind’ (Sweetman)	9
3.3	Air quality effects	10
3.3.1	Distance criterion.....	10
3.3.2	Traffic level increase criterion	10
3.3.3	Potential for effects on Chiltern Beechwoods SAC.....	11
3.4	Implications for St Albans Local Plan HRA Screening.....	11
3.4.1	Recreational disturbance	11
3.4.2	Air quality effects	11
3.4.3	Implications of recent caselaw	11
4	Conclusion of Screening Update	12

1 Introduction

1.1 Background

St Albans District Council (SADC) is developing a new Local Plan that will replace the current St Albans District Local Plan Review 1994. It sets out the planning policies and proposals for the future development of the City and District of St Albans and 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) and must comply with legal requirements. One of these requirements is to comply with the Conservation of Habitats and Species Regulations 2017¹ by undertaking a Habitats Regulations Assessment (HRA). The first stage of the HRA involves undertaking a screening process to determine whether the Local Plan is likely to have a significant effect on a European site² (either alone or in combination with other plans or projects). Where these likely significant effects (LSE) cannot be excluded, they would then need to be assessed in detail through Appropriate Assessment (AA) to ascertain whether there would be an adverse effect on the integrity of the European site.

The new Local Plan is a continuation of the same on-going strategic planning process to replace St Albans District Local Plan Review 1994 as that for the Strategic Local Plan (formerly Core Strategy) and Detailed Local Plan, which were not adopted, rather than being a new planning process.

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.

This report forms the HRA Screening Update for the Publication Local Plan 2018.

1.2 Previous HRA Screening

In previous stages of SADC strategic planning an HRA Screening was undertaken. In agreement with Natural England, the statutory consultee for Screening and Appropriate Assessment, it was determined that the Chilterns Beechwoods Special Area of Conservation (SAC) was the only European site of relevance.

An HRA Screening Report³ that was prepared in 2008 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, were not considered to be significant. As a result there was no requirement to undertake Appropriate Assessment.

¹ Statutory Instrument 2017 No. 1012

² European sites are those designated under the EU Habitats Directive and the Wild Birds Directive.

³ http://www.stalbans.gov.uk/Images/SP_SLP_ENV004HabitatRegulationAssessment2008_tcm15-54904.pdf

The 2008 HRA Screening Report identified one St Albans related element⁴ of the Issues and Options document that might lead to a conclusion of likely significant effects on the Chilterns Beechwoods SAC and for which mitigation was considered in order to avoid any such effects. That element was '*Option 21(c): Seeking to increase net out-commuting, by meeting the need for new employment land outside the district*', the associated likely significant effect being related to air pollution from increased traffic.

The mitigation proposed in 2008 was as follows: "*Option 21(c) is only pursued if: a) Employment sites outside the district were located close to the district boundary (e.g. Hemel Hempstead, Hatfield). b) Roads that pass near to Chilterns Beechwoods SAC (i.e. A41, A4251, A4146) do not undergo any significant increase in traffic as a result of siting of new employment land. c) Sustainable transport requirements such as improved public transport, improved cycle routes and Green Travel Plans were met*".

The HRA Screening Report also considered mitigation measures relating to possible 'recreational impacts' and 'water resource impacts'. However these were precautionary, to lessen the possibility of any adverse effects (significant or otherwise) from the Plan, rather than being included as mitigation required in order to arrive at a conclusion of 'no likely significant effects'.

In relation to the requirement for HRA, Section 6.3 of the 2008 report states:

"It is therefore considered unnecessary to undertake a full Appropriate Assessment on the St Albans CSLOPs. It is also considered that this AA screening report will suffice for any future Site Allocations produced by St Albans City and District Council, providing the Allocations are within the spatial boundaries set by the St Albans Core Strategy. This AA screening report should suffice for all future policies and site allocations produced by St Albans City and District Council provided they are in the boundaries set by the Core Strategies (including Dacorum's Core Strategy). Any future plans that are likely to cause an increase in key impacts (i.e. recreation, air pollution) or other impacts that might adversely affect the conservation objectives of the SAC (for example, significant impacts within 5km of the SAC) may need to be examined as either an addendum to this screening report or as part of a full Appropriate Assessment."

As the strategic planning process progressed further to the stage of the submission of the Strategic Local Plan (SLP), the findings of the 2008 HRA Screening Report were revisited at each additional stage to ascertain whether the assessment and conclusions still stood or whether they needed to be updated.

Following a review of the updates to the SLP after the original Issues and Options stage, the findings of the 2008 HRA Screening Report were confirmed as still being applicable to the level of new development and the broad locations that were proposed in the Publication Strategic Local Plan (2016). Therefore the conclusion of 'no likely significant effects' remained applicable.

This finding was documented in Section 2.6 of the SA Report that was consulted on alongside the Publication Strategic Local Plan in spring 2016. Natural England's response in relation to the SA Report was as follows: "*Natural England does not wish to make any specific comments in relation to the Sustainability Appraisal*".

⁴ The development location as Pouchen End was also included in Table 1 of the 2008 HRA, but that is Dacorum Borough and not in St Albans District

1.3 HRA Screening for the Local Plan

As mentioned in Section 1.1, there is a requirement for SADC to consider whether the Local Plan would be likely to have a significant effect on a European site (either alone or in combination with other plans or projects), this being the first step in the process to ensure that the Local Plan will not have an adverse effect on the integrity of the European site.

It is considered that it remains the case that the only European site that might be affected by the Local Plan is the Chilterns Beechwoods SAC which is a multi-site designation, the closest constituent part of which is situated just over 7km to the west of the District (see Figure 1). NB: the figure is copied from a 2008 report and the element relating to the 'Indicative route of Hemel Hempstead Northern Bypass' is no longer relevant.

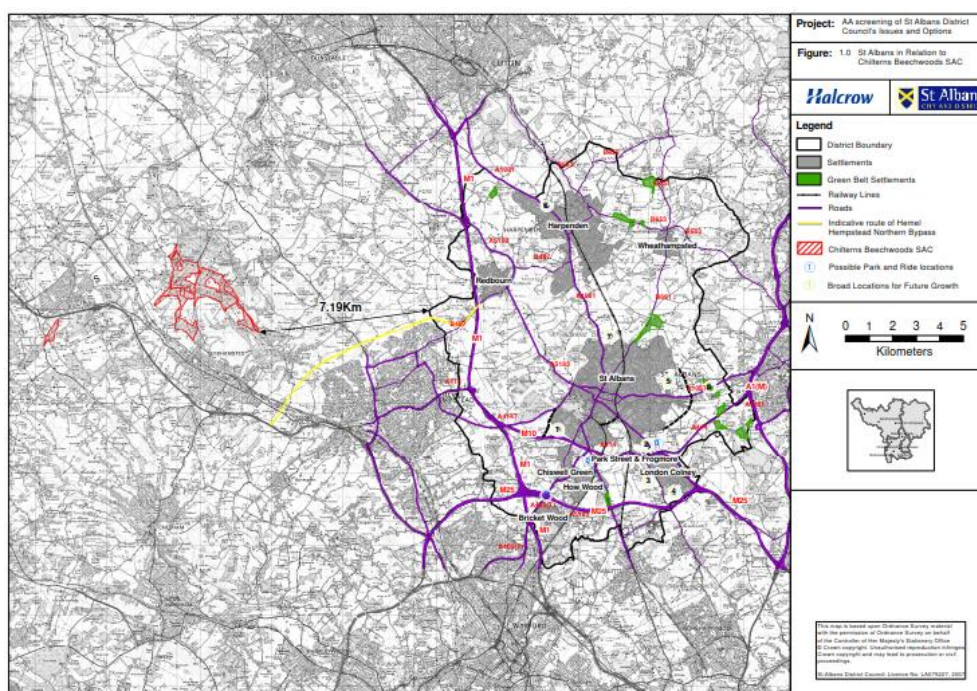


Figure 1: St Albans in relation to Chilterns Beechwoods SAC⁵

The policies in the Publication Local Plan cover the same topics as the policies in the Strategic Local Plan but provide more ‘development control’ type elements, as were included in the Regulation 18 draft Detailed Local Plan. The Publication Local Plan makes provisions for the delivery of 14,608 new dwellings and new allocations for employment development (55Ha at east Hemel Hempstead) in the period 2020 – 2036 and allocates 11 Broad Locations across the District for Green Belt release in order to deliver this quantum of development. Three of the Broad Locations for housing are located to the east of Hemel Hempstead, which is the area of the District located closest to the Chilterns Beechwoods SAC. One of these Broad Locations (North Hemel Hempstead), the closest to the SAC, is planned to only be partly built out (approx.35%) during the Local Plan period.

Given that the previous HRA screening (April 2008) covered the assessment of the Issues and Options for Hemel Hempstead growth⁶ which included 17 options for strategic sites around Hemel Hempstead (see Figure 2), this earlier HRA screening therefore remains

⁵ Study to Inform Appropriate Assessment (Screening Report) 2008, Halcrow.

⁶ Core Strategies Supplementary Issues and Options Paper Growth at Hemel Hempstead (November 2006).

relevant for the HRA screening of the Local Plan. For that reason the previous HRA screening report needs to be considered alongside this screening update.

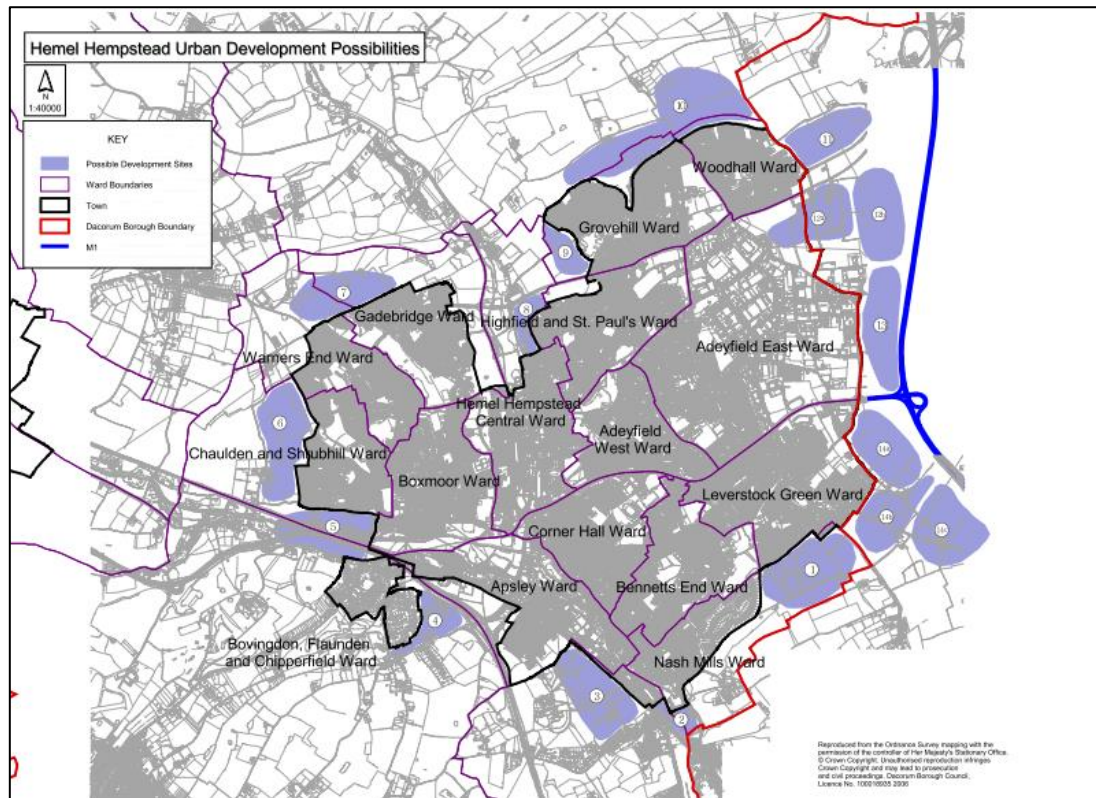


Figure 2: Possible Development Sites included in the 2006 Issues and Options Paper ‘Growth at Hemel Hempstead’⁷

However it is important to consider whether there are any new factors of relevance or any new evidence that would change the previous screening decision. This HRA Screening Update therefore builds on the previous work to take new information into account and to specifically consider the effects of the Publication Local Plan.

1.3.1 Potential effects to be considered

The previous HRA screening identified two potential effects which were then considered in more detail in the screening exercise. These were ‘recreational disturbance’ and ‘air pollution’. It is considered that this remains the case and that they are the only two effects that need to be investigated in relation to the potential for the St Albans Local Plan to have effects on the Chilterns Beechwoods SAC.

2 Chiltern Beechwoods SAC – Evidence Review

2.1 Introduction

The Chilterns Beechwoods SAC is a multi-site designation with areas in Berkshire (6.71%), Buckinghamshire (43.19%), Hertfordshire (35.07%) and Oxfordshire (15.03%). The closest component site to St Albans District is at Ashridge.

⁷ <http://www.stalbans.gov.uk/Images/I%26OHemelHempstead.pdf>

2.2 Qualifying habitats and species

The qualifying habitats and species of the SAC are as follows:

- Beech forests on neutral to rich soils
- Dry grasslands and scrublands on chalk or limestone
- Stag beetle

2.3 Conservation objectives

The Conservation Objectives for the SAC are as follows:

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- *The extent and distribution of qualifying natural habitats and habitats of qualifying species*
- *The structure and function (including typical species) of qualifying natural habitats*
- *The structure and function of the habitats of qualifying species*
- *The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely*
- *The populations of qualifying species, and,*
- *The distribution of qualifying species within the site.*

2.4 Natura 2000 – Standard Data Form

The Natura 2000 – Standard Data Form⁸ generated in January 2016 identifies the most important threats, pressures and activities with impacts on the site. Four negative impacts are listed, all ranked as 'High'. These are as follows:

- Threats and pressures code B02 (Forest and Plantation management & use) - Inside the site;
- Threats and pressures code I02 (Problematic native species) – Both inside and outside the site;
- Threats and pressures code I01 (Invasive non-native species) – Both inside and outside the site; and
- Threats and pressures code K04 (Interspecific floral relations) - Inside the site.

⁸ <http://jncc.defra.gov.uk/protectedsites/sacselection/n2kforms/UK0012724.pdf>

2.5 Site Improvement Plan

The Site Improvement Plan prepared in 2014 identifies seven potential pressures/threats to the SAC. These are as follows:

1. Forestry and woodland management (Pressure/Threat). Feature(s) affected 'H9130 Beech forests on neutral to rich soils'
2. Deer (Pressure/Threat). Feature(s) affected 'H9130 Beech forests on neutral to rich soils'
3. Changes in species distributions (Threat). Feature(s) affected 'S1083 Stag beetle'
4. Invasive species (Pressure/Threat). Feature(s) affected 'H9130 Beech forests on neutral to rich soils'
5. Disease (Threat). Feature(s) affected 'H9130 Beech forests on neutral to rich soils'
6. Public access/disturbance (Threat). Feature(s) affected 'S1083 Stag beetle'
7. Air pollution – impact of atmospheric nitrogen deposition (Pressure). Feature(s) affected 'H6210 Dry grasslands and scrublands on chalk or limestone (important orchid sites)'; 'H9130 Beech forests on neutral to rich soils'; and 'S1083 Stag beetle'.

Two of these potential pressures/threats (#6 and #7) are considered to be of relevance to the HRA of the Local Plan and these are detailed below, along with the proposed actions to tackle the threats.

2.5.1 *Threat: 'Public access/disturbance' in relation to stag beetle*

Proposed measures to address the issue: 'Reduce visitor impact on dead wood'

Delivery Bodies: Forestry Commission, National Trust, Natural England, Landowner(s), National Nature Reserve (NNR), Chilterns Woodland Project, Chilterns Conservation Board

2.5.2 *Threat: 'Air pollution – atmospheric nitrogen deposition' (for all features).*

Proposed measures to address the issue: 'Establish a site nitrogen action plan'.

Delivery Body: Natural England

2.6 Condition of relevant SSSI Units

The SSSI Unit which is closest to St Albans District is Unit 1 of the Ashridge Commons and Woods SSSI.

The most recent assessment of the condition of that unit was undertaken on 13-June-2014. The condition of the unit was found to be 'Favourable'.

2.7 Implications for the HRA Screening

The information provided in Sections 2.4 to 2.6, which was not available to inform the 2008 Screening, confirms that recreational impacts and air quality impacts remain as the two issues that need to be taken into consideration in this Screening Update.

3 Screening Update

3.1 Introduction

This section provides an update to the HRA Screening at the stage of the Publication of the Local Plan in September 2018. It considers the findings of the 2008 HRA Screening in the context of new evidence and case law developments.

3.2 New factors to consider

Since the previous HRA Screening Report (April 2008) was prepared there have been some new developments in the HRA process and context which need to be taken into consideration for the HRA screening of the St Albans Local Plan. These include the development of the Thames Basin Heaths Delivery Framework, which addresses recreational disturbance on ground nesting birds, and a recent ruling by the Court of Justice of the European Union (CJEU) that has resulted in a change to how and when mitigation can be taken into consideration in the HRA process. These are discussed in the following sub-sections.

3.2.1 *Recreational disturbance*

3.2.1.1 *Natural England Public Access and Disturbance Theme Plan*

As part of their 'Improvement Programme for England's Natura 2000 Sites – Planning for the Future' Natural England have issued a 'Public Access and Disturbance Theme Plan'. The document identifies that housing development near to Natura 2000 sites has in some cases been a driver for increased use of these sites by recreational users. However it also points out that the data from Natural England's MENE⁹ suggests a possible decrease in the frequency of visits to the countryside (with most visits being taken in parks in towns and cities). There is no specific information provided in this plan to inform this Screening Update and the reference to the document is provided here for the background purposes only.

3.2.1.2 *Thames Basin Heaths SPA Delivery Framework*

This Framework was prepared in order to provide local authorities with recommendations on measures to enable the delivery of dwellings in the vicinity of the SPA - without having a significant effect on the SPA as a whole. It focuses on avoiding the impact of recreation and urbanisation on the SPA habitat and interest features. Whilst this relates to effects on ground-nesting birds, and so is not of direct relevance to potential effects on the Chilterns Beechwoods SAC, it nevertheless provides one of the few examples of concrete guidance relating to distance based criteria for determining the potential for new housing development to result in likely significant effects on a Natura 2000 site.

The Delivery Framework states that: "*The avoidance measures recommended in the Delivery Framework should be applied within a 'Zone of Influence' - defined as the area from 400m from the perimeter of the SPA (measured as the crow flies to nearest part of the curtilage of*

⁹ Monitor of Engagement with the Natural Environment, Natural England 2015

the dwelling) to 5km from the perimeter of the SPA, (measured as the crow flies from the primary point of access to the curtilage of the dwelling). The South East Plan Technical Assessor ('the Assessor') recommended that a zone of influence should be defined on the basis of travel distance. A travel distance approach was trialled by LAs, however this approach led to increased confusion and uncertainty. The JSPB therefore recommends that in the interests of certainty and clarity the Zone of Influence of the Delivery Framework approach to provision of avoidance measures is based on a 5km linear distance.

Applications for large scale development proposals beyond the zone of influence should be assessed on an individual basis. Where appropriate a full appropriate assessment may be required to ascertain whether the proposal could have an adverse effect on the SPA. This is in line with the general requirements of the Habitats Regulations and reflects the approach proposed by the Assessor, who recommended that between 5 and 7km from the edge of the SPA residential developments of over 50 houses should be assessed and may be required to provide appropriate mitigation. It is recommended that such cases be considered on a case by case basis."

The avoidance and mitigation measures referred to above relate to the provision of SANG (Suitable Alternative Natural Greenspace) and Access Management.

Generally, HRA screening and AA now uses this delivery framework as a general model. For example the HRA undertaken for the Aylesbury Vale Local Plan¹⁰ makes reference to the Thames Basin Heaths Delivery Framework as follows: "... *These distances have been based on various research commissioned by Natural England which investigated people's recreational movements, behaviour and distance travelled to woodland and heathland sites. Importantly, the research indicates that beyond 7 km, the effect of recreational pressures on a heathland and woodland site are likely to be minimal*". However it is not made clear as to which Natural England research to which this refers.

3.2.1.3 Solent recreation mitigation strategy

Along similar lines to the Thames Basin Heaths SPA Delivery Framework the Solent Recreation Mitigation Strategy aims to prevent bird disturbance from recreational activities, in this case in relation to the SPA. This strategy requires the provision of 'developer contributions' for new homes built within 5.6 kilometres of the SPAs. (This 5.6 kilometre zone is where the majority of coastal visitors live.) Some developments may require additional mitigation due to their size or proximity to a SPA. Other studies and reports on recreational disturbance.

3.2.1.4 Burnham Beeches Visitor Survey

In the absence of a visitor survey for the Chilterns Beechwoods SAC, a survey¹¹ undertaken by Footprint Ecology in 2013 for the nearby Burnham Beeches SAC could be considered to act as a proxy survey for the Chilterns Beechwoods SAC. That survey found that "*Extrapolation of visitor data indicates that around 16% of visitors currently come from postcodes within 0.5km of the SAC boundary and 5% come from postcodes within 1km. Visit*

¹⁰ Aylesbury Vale DC Local Plan HRA report, Land Use Consultants (April 2017)

¹¹ Liley, D., Floyd, L. and Fearnley, H. (2014) Burnham Beeches Visitor Survey Footprint Ecology. Unpublished report for Corporation of London.

rates per household decline sharply with distance away from the SAC. Within a 5km radius there is a marked change with distance. A development of 100 dwellings at 5km is estimated to have the same impact (in terms of access to Burnham Beeches SAC) as 1.3 dwellings within 500m". Section 6 of the report provides a detailed analysis of visitor origins and home postcodes, including understanding impacts of new development. The report concludes in paragraph 9.9 that "... In terms of spatial planning and impacts to Burnham Beeches SAC, these results would suggest that consideration needs to focus on all development in areas directly adjacent to the SAC, and that large developments within 5km are also of relevance".

3.2.1.5 Other Habitats Regulations Assessments

A review of Habitats Regulations Screening Reports and Appropriate Assessments for other plans and projects has identified some other references and evidence relating to distance based recreation effects.

The HRA for the City of Bradford District Core Strategy undertaken by Urban Edge (UE) Environmental Consulting makes reference to visitor surveys undertaken by UE and their partners relating to Ashdown Forest SPA¹² and for a new Whitehill & Bordon Ecotown¹³. For the Ashdown Forest SPA 76% of visitors travel 5km or less to access the heathland sites. The survey undertaken for Whitehill & Bordon in relation to Shortheath Common SAC indicated that the recreational catchment for the Common is relatively restricted, with the median travel distance being less than 5km.

3.2.2 Recent caselaw - 'People Over Wind' (Sweetman)

A ruling by the Court of Justice of the European Union (CJEU) in April 2018¹⁴ has resulted in a change to how and when mitigation can be taken into consideration in the HRA process, as described in the extract from PINS Note 05/2018¹⁵ below:

"... on 12 April 2018, the Court of Justice of the European Union (CJEU) issued a judgment which ruled that Article 6(3) of the Habitats Directive must be interpreted as meaning that mitigation measures (referred to in the judgment as measures which are intended to avoid or reduce effects) should be assessed within the framework of an appropriate assessment (AA) and that it is not permissible to take account of measures intended to avoid or reduce the harmful effects of the plan or project on a European site at the screening stage.

Prior to this judgment, case law in England and Wales had established that avoidance or reduction measures that form part of a proposal could be taken into account when

¹² Pincombe NEJ and Smallbone K (2009a): Visitor Access Patterns on Ashdown Forest. UE Associates Ltd and University of Brighton Report for Mid Sussex and Wealden District Councils.

¹³ Pincombe NEJ and Smallbone K (2009b): Visitor Access Patterns on European Sites surrounding Whitehill and Bordon, East Hampshire. UE Associates Ltd and University of Brighton Report for the Whitehill Bordon Eco-town and East Hampshire District Council. As reported in the HRA for the East Hampshire Joint Core Strategy (URS 2013)

¹⁴

<http://curia.europa.eu/juris/document/document.jsf?jsessionid=9ea7d2dc30dd4a0be052f3b04c09819ffb09262871e7.e34KaxiLc3qMb40Rch0SaxyNbxn0?text=&docid=200970&pageIndex=0&doclang=EN&mode=req&dir=&occ=first&part=1&cid=636343>

¹⁵ Planning Inspectorate (May 2018) Consideration of avoidance and reduction measures in Habitats Regulations Assessment: People over Wind, Peter Sweetman v Coillte Teoranta

considering whether the plan or project would be likely to have a significant effect on a European site. If the risk of a significant effect could be excluded on the basis of objective information, there was no need to undertake an AA.”

This ruling needs to be taken into account in the context of this Screening Update and future HRAs.

3.3 Air quality effects

The 2008 HRA Screening identified the potential for air quality effects. This was in relation to Option 21c which was never taken forward, but nevertheless is an effect that needs to be considered in the context of this HRA Screening update.

Natural England Guidance published in June 2018¹⁶ has been prepared to assist Natural England staff when giving advice relating to the assessment of the potential impacts from road traffic emissions on the qualifying features of European Sites. This has been made available to the public and so has been used to inform this Screening Update.

3.3.1 Distance criterion

In relation to the requirement for assessing impacts that road projects may have on air quality the Design Manual for Roads and Bridges (DMRB) Volume 11 Section 3, Part 1 – Air Quality identifies that “Only properties and Designated Sites within 200 m of roads affected by the project need be considered”.

The Natural England 2018 guidance confirms that only those European sites present within 200m of the edge of a road on which a plan or project will generate traffic will need to be considered when checking for the likelihood of significant effects from road traffic emissions - although where (unusually) there is a credible risk that air quality impacts might extend beyond 200 metres from a road, Natural England may advise that additional sites should also be scoped into the HRA screening and potentially the assessment.

3.3.2 Traffic level increase criterion

DMRB Volume 11 Section 3, Part 1 – Air Quality also identifies a screening threshold above which the predicted change resulting from the plan or project is likely to be significant. This threshold is based on a predicted change of daily traffic flows of 1,000 Annual Average Daily Traffic Flow (AADT) used as a proxy for emissions. Where the AADT, in combination with other plans or projects, is less than 1,000 the plan or project can be screened out from requiring Appropriate Assessment.

DMRB also contains other thresholds, but which are not considered relevant for the St Albans Local Plan HRA. These are: road alignment will change by 5 m or more; Heavy Duty Vehicle (HDV) flows will change by 200 AADT or more; daily average speed will change by 10 km/hr or more; and peak hour speed will change by 20 km/hr or more.

¹⁶ Natural England’s approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (June 2018)

3.3.3 Potential for effects on Chiltern Beechwoods SAC

Based on the criteria in Sections 3.3.1 and 3.3.2, the only element of the Chilterns Beechwoods SAC which lies with 200m of an A or B road and which could therefore have the potential to be affected by > 1,000 AADT is the section to the west of the A41 west of Tring, this being the Tring Woodlands SSSI component of the SAC.

3.4 Implications for St Albans Local Plan HRA Screening

This section considers the implications of the new evidence/guidance and caselaw provided in Sections 3.2.1 and 3.2.2 on the HRA Screening for St Albans Local Plan.

3.4.1 Recreational disturbance

The closest point of St Albans District is 7.19 km from the Chilterns Beechwoods SAC as the crow flies (Figure 1). That point of the District is also the area for one of the 11 Broad Locations allocated in the Local Plan (Policy S6 iv) North Hemel Hempstead). By road, the distance from this Broad Location (considered to be at the junction between Cherry Tree Lane and Redbourn Road) to the Ashridge Estate visitor centre in the SAC via Little Gaddesdon is 15.8km (9.8 miles).

Given that this distance is over 7km, based on the evidence in Section 3.2.1 it can be concluded that the finding of the 2008 Screening remains unchanged, i.e. that development in the St Albans Local Plan would not have any likely significant recreation based effects on the Chilterns Beechwoods SAC, either alone or in-combination with other plans or projects.

3.4.2 Air quality effects

The distance of the planned developments included in the St Albans Publication Draft Local Plan from Tring is substantial and in addition the A41 is not a route directly associated with the District. Given the very low level of new residents (or businesses) in the development areas planned that would be anticipated to commute on the A41 near Tring, it is considered that in relation to air quality, development in the St Albans Local Plan would not have likely significant effects on the Chilterns Beechwoods SAC. This applies either alone or in-combination with other plans or projects.

3.4.3 Implications of recent caselaw

The previous HRA screening did take mitigation into consideration during the screening stage before arriving at the conclusion of 'no likely significant effects'. However that was only in relation to '*Option 21(c): Seeking to increase net out-commuting, by meeting the need for new employment land outside the district*'. Following the consultation on the Issues and Options in 2006 that option (option 21c) has never been further considered for inclusion in the strategic planning process and as a result the likely significant effects identified and the mitigation proposed in relation to that option (see Section 1.2) are no longer of relevance to the HRA Screening for the Local Plan.

In light of the fact that the 'remainder' of the conclusions of the 2008 HRA Screening did not rely on mitigation measures in order to conclude 'no likely significant effects', the 'People over Wind' ruling does not have any implications for this HRA Screening Update and the

findings of the 2008 HRA Screening remain valid. An Appropriate Assessment in order to comply with the new ruling is therefore not required.

4 Conclusion of Screening Update

Based on the information provided in Sections 1 to 3, it is considered that it remains the case that the findings of the 2008 HRA Screening Report 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. As a result it is considered that Appropriate Assessment will not be required.

The information, findings and conclusions of this screening update will be subject to consultation with Natural England as part of the Regulation 19 stage for the St Albans Local Plan.