



# **St Albans Local Plan**

## **Submission**

### **Sustainability Appraisal Report Addendum**

**March 2019**



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# 1 Introduction

## 1.1 Background to Sustainability Appraisal/Strategic Environmental Assessment

This Sustainability Appraisal Report Addendum has been prepared to report on the sustainability appraisal activities that have been undertaken from the representation on the Publication Local Plan in September/October 2018, up to the Submission of the Local Plan and associated documents to the Secretary of State. The report covers four main areas:

- Analysis and responses to the representations made during the consultation on the Publication Local Plan and its accompanying sustainability appraisal;
- Assessment of proposed Minor Modifications to the Local Plan;
- Assessment of the proposed Strategic Rail Freight Interchange and
- Updates to the information in the SA Report (September 2018).

This report does not repeat information provided in the Publication SA Report (September 2018) and should therefore be read alongside that earlier report. Both this SA Report Addendum and the Publication SA Report will form part of the portfolio of Local Plan Submission Documents.

## 1.2 Stages of SA/SEA

The key stages of the SA/SEA process are broadly presented in Table 1-1. For purposes of completeness this table includes all the work undertaken on the Core Strategy, Strategic Local Plan and new Local Plan. The stages and documents associated with the work on the new Local Plan are shown in **bold italic** text. The stages that will need to be completed prior to the adoption of the Local Plan are also shown.

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

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

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

<b>Local Plan</b>	<b>SA/SEA Stages</b>	<b>SA documents/outputs and Dates</b>
Begin document preparation	<p>Stage A: Setting the context, establishing the baseline and deciding on the scope.</p> <p>A1: Identify other relevant policies, plans and document programmes, and sustainability objectives.</p> <p>A2: Collecting baseline information.</p> <p>A3: Identifying sustainability issues.</p> <p>A4: Developing the SA framework.</p> <p>A5: Consulting on the scope of the SA (<b>Scoping Report</b>).</p>	<p>SA Scoping Report, prepared February 2006.</p> <p>Consultation on Scoping Report February 2006.</p> <p><b>Consultation on the scope of the SA/SEA April 2018</b></p>
<p>Consultation on Issues and Options (2006 &amp; 2007) and Emerging Core Strategy (2009)</p> <p>Develop Spatial Strategy Options and Consultation on the Strategy for Locating Future Development in the District (2010)</p> <p><b>Local Plan Issues and Options consultation January 2018</b></p>	<p>Stage B: Developing and refining options and assessing of effects.</p> <p>B1: Testing the Local Plan objectives against the SA framework.</p> <p>B2: Developing the Local Plan options including reasonable alternatives.</p> <p>B3: Evaluate the likely effects of the Local Plan and alternatives.</p> <p>B4: Considering ways of mitigating adverse effects and maximising beneficial effects.</p> <p>B5: Proposing measures to monitor the significant effects of implementing the Local Plan.</p>	<p>Issues &amp; Options SA Working Note Oct 2006.</p> <p>Consultation on further Issues and Options July 2007 with accompanying SA Working Paper.</p> <p>Consultation on the Emerging Core Strategy in August 2009 with accompanying SA Working Note (June 2009).</p> <p>Preparation of SA Working Note for Spatial Strategy Options (September 2010)</p> <p>Consultation on the Strategy for Locating Future Development in the District (December 2010) with accompanying SA Working Note.</p> <p><b>Preparation of SA Working Note for Issues and Options consultation (January 2018)</b></p> <p><b>Preparation of SA Working Note to assess alternatives for housing growth levels and broad locations (May 2018)</b></p> <p><b>Preparation of SA Working Note for Council (June 2018)</b></p>
Draft Pre-submission Document	<p>Stage C: Preparing the Sustainability Appraisal Report.</p> <p>C1: Preparing the <b>SA Report</b>.</p>	Preparation of SA Report for the Draft Pre-Submission Strategic Local Plan November 2012 (not published).
Strategic Local Plan (SLP) Options Consultation on Draft SLP (2014)	Further consideration of options (Stages B2-B4)	Preparation of SA Working Note for Development Strategy Options, Housing Requirement/Target Options; and Strategic Sub-Area Options (June 2014)
<p>Publication of Pre-submission Document for SLP (2015)</p> <p><b>Publication of Pre-submission Document for Local Plan (September 2018)</b></p> <p>Submission of Local Plan to Secretary of State</p>	<p>Stage C: Preparing the Sustainability Appraisal Report.</p> <p>C1: Preparing the <b>SA Report</b>.</p>	<p>Preparation of SA Report for the Publication Strategic Local Plan December 2015.</p> <p>SA Report Addendum (July 2016)</p> <p><b>Preparation of SA Report for the Publication Local Plan (this report) September 2018</b></p>
Examination	<p>Stage D: Seek representations on the SA Report from consultation bodies and the public</p>	<p>Consultation on the Publication SA Report for the SLP (2016)</p> <p><b>Consultation on the Publication SA Report for the Local Plan (2018)</b></p> <p><b>Preparation of SA Report Addendum for the Submission stage (this Addendum), March 2019.</b></p>
Adoption of the Local Plan	<p>Consultation on any major modifications arising from the Examination (if required)</p>	Update to the SA Report if required to assess and report on implications of any major modifications
	<p>Stage E: Post adoption reporting and monitoring</p> <p>E1: Prepare and publish <b>post-adoption statement</b></p> <p>E2: Monitor significant effects of implementing the Local Plan.</p> <p>E2: Responding to adverse effects.</p>	To be completed when the Local Plan is adopted.

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

## **2 Pre-Submission Representations**

### **2.1 Introduction**

Section 2.4 of the SA Report (September 2018) provides a summary of all the SA related consultation activities which were carried out prior to the Regulation 19 consultation in September 2018.

This section of the SA Report Addendum adds to that summary by providing information on the representations on the SA Report that were received during the consultation at the Regulation 19 stage, undertaken from 4<sup>th</sup> September to 17<sup>th</sup> October 2018.

Amongst the large number of representations received during the consultation some were directly or indirectly related to the Sustainability Appraisal. These SA related representations were made by statutory consultees and other public bodies; landowners/developers; community groups; and individual members of the public.

Details of the representations received and the responses to these representations are provided in Appendix A to this SA Report Addendum.

None of the representations have resulted in major changes being made to the information or findings that were included in the Publication SA Report (September 2018). However the representations have resulted in a few minor updates to the assessments for the some of the Broad Locations. These are detailed in Appendix D to this Addendum and summarised in Section 5.

## **3 Assessment of the proposed amendments to the Local Plan**

### **3.1 Introduction**

The Council have proposed a limited number of 'Minor Modifications' to the Local Plan which will be considered by the Inspector during the Examination. In addition there have been some minor corrections made to the text of the Local Plan. It is necessary to consider whether any of these changes could affect the findings of the original sustainability appraisal and therefore a screening assessment has been undertaken to fulfil this requirement. This process has also considered the implications for the Habitats Regulations Assessment.

### **3.2 Screening assessment findings**

Each of the proposed Minor Modifications and corrections has been assessed to determine whether their inclusion in the Local Plan would have any implications for the previous findings of the sustainability appraisal, as documented in the SA Report (September 2018), or the Habitats Regulations Assessment, as documented in the HRA Screening Update (September 2018). In particular, the assessment considered whether there would be any new significant effects, or changes to significant effects previously identified. The detailed results of this assessment are provided in Appendix B, with the main findings summarised below.

The screening identified that:

- The proposed minor modifications to policy L18 would have positive implications for the 'health' objective (SA12) but would not result in any changes to the original assessments.
- The proposed minor modifications to policy L19 would have positive implications for the 'air quality' objective (SA7) and 'health' objective (SA12) but would not result in any changes to the original assessments.
- The proposed minor modifications to policy L19 would have positive implications for the 'air quality' objective (SA7) but would not result in any changes to the original assessments.
- The proposed minor modifications to policy L28 would have positive implications for the 'health' objective (SA12) but would not result in any changes to the original assessments.
- The proposed minor modifications to policy L29 would have positive implications for the 'biodiversity' objective (SA1) and the 'flood risk' objective (SA3) but would not result in any changes to the original assessments.
- The proposed minor modifications to policy L30 would have positive implications for the 'historic environment' objective (SA10) but would not result in any changes to the original assessments.

Therefore none of the Minor Modifications or corrections would result in any changes to the findings documented in the SA Report (September 2018).



### **3.3 Implications for the Habitats Regulations Assessment**

None of the proposed Minor Modifications have any implications for the existing findings of the Habitats Regulations Assessment – as documented in the HRA Screening Update (September 2018). The conclusions of that report therefore remain unchanged, i.e. the conclusion of ‘no likely significant effects’ remains applicable.

## 4 Consideration of alternatives

During the process to develop the Local Plan there has been extensive and detailed consideration of options and reasonable alternatives. Whilst the SA has informed the process it is not the purpose of the SA to decide the alternative to be chosen for the Local Plan, nor is it the role of the SA to determine what is and what isn't a 'reasonable alternative' – those are both decisions to be made by the plan-making authority.

Representations made during the consultation on the Publication Local Plan questioned why the SA had not taken into consideration the fact that the site for the proposed Park Street Garden Village (PSGV) has an extant planning permission for use as a Strategic Rail Freight Interchange (SRFI).

The view of the Council is that the SRFI is not a 'reasonable alternative' for that site and therefore it was not assessed in the SA. However for purposes of completeness the principle of developing an SRFI on the same site as that allocated for PSGV has now been assessed as part of this SA Report Addendum.

The details of the assessment, along with the rationale and assumptions made for the assessment, are provided in Appendix C. The key differences in the assessment findings are summarised in Table 4-1.

**Table 4-1: Comparison of predicted effects for PSGV and SRFI**

SA Objective	Comparison of effects
1. Biodiversity	Both PSGV and SRFI will result in some habitat loss, but also some enhancements relating to proposed Country Parks.
2 Water quality/ quantity	No predicted effects for either PSGV or SRFI.
3. Flood risk	Both PSGV and SRFI will be able to avoid having built development in the flood risk zone.
4. Soils	Both PSGV and SRFI would result in soil sealing from new development.
5. Greenhouse gas emissions	<p><b>Significant positive effects</b> have been identified for PSGV due to the range of non-car based transport improvements that the development would be required to deliver.</p> <p><b>Significant positive effects</b> have been identified for SRFI as moving freight from road onto rail will result in an overall reduction in CO<sub>2</sub> emissions from freight operations.</p> <p>Minor adverse effects were identified for both PSGV and SRFI in relation to the increased vehicle activity that would result.</p>
6. Climate change proof	No predicted effects for either PSGV or SRFI.
7. Air quality	<p>Minor positive effects have been identified for PSGV due to the range of non-car based transport improvements that the development would be required to deliver.</p> <p>Minor positive effects have been identified for SRFI, as moving freight from road onto rail will result in an overall reduction in airborne emissions at a regional level.</p> <p>Minor adverse effects were identified for both PSGV and SRFI in relation to the increased vehicle activity that would result.</p>
8. Use of brownfield sites	The majority of the site area is not classified as previously developed land. Minor adverse effects have therefore been predicted for PSGV and SRFI.
9. Resource efficiency	Minor positive effects have been identified for both PSGV and SRFI in relation to their respective proposals for sustainable developments.

10. Historic environment	Both PSGV and SRFI have the potential to have minor adverse effects on the same set of heritage assets and have therefore been assessed to have the same effects.
11. Landscape & Townscape	Both PSGV and SRFI have the potential to have minor adverse effects on landscape at this open site and have therefore been assessed to have the same effects. However the creation of Country Parks has resulted in minor positive effects also being identified for both.
12. Health	Minor positive effects have been identified for both PSGV and SRFI due to their proposed Country Parks and increased opportunities for walking and cycling.  Uncertainty relating to noise has been identified for both sites, but for different reasons. For PSGV it relates to the potential effects on new residents from noise from the M25, whilst for SRFI it relates to the potential for noise being generated from the SRFI to have effects on nearby residents.
13. Sustainable locations	Minor positive effects have been predicted for PSGV and SRFI.
14. Equality & social inclusion	Minor positive effects have been predicted for PSGV.  No predicted effects for SRFI.
15. Good quality housing	<b>Significant positive effects</b> have been identified for PSGV as it could provide a minimum of 2,300 new homes.  No predicted effects for SRFI.
16. Community identity & participation	Minor positive effects have been predicted for PSGV.  No predicted effects for SRFI.
17. Crime and fear of crime	No predicted effects for either PSGV or SRFI.
18. Sustainable prosperity & growth	Minor positive effects for PSGV given the potential to contribute to the local economy.  <b>Significant positive effects</b> have been identified for SRFI as it would be likely to provide direct and indirect benefits for the wider local economy.
19. Fairer access to jobs & services	Minor positive effects have been predicted for PSGV as it would provide some new job opportunities.  <b>Significant positive effects</b> have been identified for SRFI as it would provide in the region of 3,400 new jobs.
20. Revitalise town centres	Minor positive effects have been predicted for PSGV.  No predicted effects for SRFI.

## **5 Update to SA Report information**

### **5.1 Introduction**

To take account of information provided in representations to the SA Report (September 2018), as well as take account of new evidence published since that SA Report was produced, it has been necessary to update some of the information that was included in the SA Report.

The details of these updates are provided in Appendix D, and summarised below.

### **5.2 Summary of SA Report updates**

The new and updated assessments and updates to the information provided in the SA Report are as follows:

Policy S6 iv) North Hemel Hempstead Broad Location - the SA has been updated to make reference of the nearby scheduled monument. No update to the assessment 'score' required.

Policy S6 vi) North St Albans Broad Location - the SA has been updated to make reference of the heritage assets in the area. The assessment has been updated to reflect the uncertainty relating to the potential effects on these heritage assets.

Policy S6 vii) North East Harpenden Broad Location - The SA has been updated to make reference of the nearby Listed Building and Conservation Area. The assessment has been updated to reflect the minor adverse effects on these heritage assets that could result.

Policy S6 viii) North West Harpenden Broad Location - The assessment has been updated to reflect the minor adverse effects on these heritage assets that could result.

Policy S6 ix) West of London Colney Broad Location - the SA has been updated to make reference of the nearby Listed Buildings. No update to the assessment 'score' required.

Policy S6 xi) Park Street Garden Village Broad Location - the assessment has been updated to reflect that the majority of the site area is not classified as previously developed land and minor adverse effects are therefore predicted. In addition the SA has been updated to make reference to a Listed Building and the assessment has been updated to reflect the minor adverse effects on heritage assets that could result.

Appendix A and Appendix B of the SA Report (September 2018) have been updated to make reference to the new Strategic Flood Risk Assessment which supersedes the previous SFRA from 2007.

Appendix F of the SA Report (September 2018) has been updated to include the amended assessments which are detailed in Appendix D to this Addendum and summarised above.

In addition a new element has been added to the SA Report information, this being an assessment of a potential SRFI at Park Street (see Section 4 and Appendix C to this Addendum).

### **5.3 Implications for the SA**

As described above the proposed Minor Modifications would have positive effects against several SA objectives, but would not result in any changes to the assessment 'scoring'.

No adverse effects or negative implications have been identified in the screening of the Minor Modifications.

Therefore the proposed changes would not result in any new significant effects, nor would they change significant effects previously reported. However they would contribute positively to the cumulative effects of the Local Plan which were reported by SA topic in Section 5.3 of the SA Report (September 2019).

## 6 Next Steps

This SA Report Addendum forms part of the SA Report documents that will be submitted to the Secretary of State for examination.

It may be necessary to undertake further additional SA to respond to any changes that are recommended by the Inspector, or put forward by the Council, during the Examination process. Any such additional SA will be documented in a further addendum to the SA Report.

When the Local Plan is adopted it will be accompanied by an SA Adoption Statement. In line with the SEA Regulations, the SA Adoption Statement will provide the following information:

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

## Appendix A: St Albans Publication Local Plan: SA/SEA Representations

### SA/SEA responses to issues raised in the representations

Representations requiring response or further action	SA/SEA response to representation
<b>Historic England</b>	
<p>Policy S6 i)</p> <p>We note that the SA refers to the three listed buildings at Wood End Farmhouse but makes no mention of the assets to the east centred on Gorhambury and considers that the effects of the allocation on the historic environment are uncertain. The SA will need to be reviewed to take into consideration the nearby heritage assets.</p>	<p>The assessment for Policy S6 i) states that “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>No update to SA required.</p>
<p>Policy S6 ii) We note that the SA makes reference to Breakspear house and states that the effects of development on this asset is uncertain. There is no mention however of the heritage assets centred on Gorhambury to the east of the site. The SA will need to be reviewed to take into consideration the nearby heritage assets.</p>	<p>The assessment for Policy S6 ii) states that “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>No update to SA required.</p>
<p>Policy S6 iii) We note that the SA mentions both the listed buildings on the site and nearby listed buildings but states that the effects of the proposed development on these assets is uncertain. Again however, no mention is made of the heritage assets centred on Gorhambury to the east of the site. The SA will need to be reviewed to take into consideration the nearby heritage assets.</p>	<p>The assessment for Policy S6 iii) states that “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>No update to SA required.</p>
<p>Policy S6 iv)</p> <p>We note that the SA makes reference to the listed buildings, again concluding uncertain effects, but it makes no reference of the nearby scheduled monument. Again the SA will need to be revisited to make reference to the scheduled monument.</p>	<p>The SA has been updated to make reference of the nearby scheduled monument. No update to the assessment ‘score’ required.</p>
<p>Policy S6 v)</p> <p>We note that the SA finds that the effects of the allocation on the historic environment are uncertain.</p>	<p>Noted</p>
<p>Policy S6 vi)</p> <p>The SA makes no reference of the heritage assets in the area. The SA will need to be reviewed to take into consideration the nearby heritage assets and their settings.</p>	<p>The SA has been updated to make reference to the heritage assets in the area. The assessment has been updated to reflect the uncertainty relating to the potential effects on these heritage assets.</p>
<p>Policy S6 vii)</p>	<p>The SA has been updated to make reference of the nearby</p>

<p>The SA makes no reference of the nearby designated heritage assets. The SA will need to be reviewed to take into consideration the nearby heritage assets. We consider that the impact is likely to be negative/adverse. The land forming this allocation site from part of the setting of the Farm and the NPPF is clear that the development within the setting of a heritage asset may lead to harm to the significance of that asset.</p>	<p>Listed Building and Conservation Area. The assessment has been updated to reflect the potential minor adverse effects on these heritage assets.</p>
<p>Policy S6 viii) We note that the SA mentions these assets [Cooters End Farm; The Old Bell Public House] but states that the impact on the historic environment is uncertain. We disagree. Without sufficient policy protection in place, and with development proposed on three sides of Cooters End Farm, we consider that the impact is likely to be negative/adverse. The land forming this allocation site from as part of the setting of the Farm and the NPPF is clear that the development within the setting of a heritage asset may lead to harm to the significance of that asset.</p>	<p>The SA has been updated to reflect the potential minor adverse effects on these heritage assets.</p>
<p>Policy S6 ix) The SA makes no mention of the listed buildings and structure to the south of the site. The SA identifies adverse effects on the historic environment. Given this conclusion, it is surprising to find neither further assessment of the impacts nor any mention within the Plan.</p>	<p>The SA has been updated to make reference of the nearby Listed Buildings. No update to the assessment 'score' required.</p>
<p>Policy S6 xi) We note that the SA mentions the nearby heritage assets (with the exception of the Turret) but states that the impact on the historic environment is uncertain. We disagree. Without sufficient policy protection in place, and with the development proposed we consider that the impact is likely to be negative/adverse.</p>	<p>The SA has been updated to make reference of the Allan-Williams Turret. The assessment has been updated to reflect the potential minor adverse effects on heritage assets.</p>
<p><b>Natural England</b></p>	
<p>The Regulation 19 response from Natural England stated that <i>"Natural England does not consider that this St Albans District Council Local Plan Publication 2018 poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation."</i></p> <p>Further correspondence with Natural England – March 2019</p> <p>Natural England agree with the conclusion of the Habitats Regulations Assessment (HRA) that there will be no likely significant effects on any European Site.</p>	<p>Noted</p>
<p><b>Environment Agency (ID1147557)</b></p>	
<p>The SA doesn't currently provide any explicit commentary on the process the Council undertook to apply the sequential test based on the latest SFRA, taking future climate change into account</p>	<p>The SA Report information has been updated to reflect the findings of the update to the SFRA, published in January 2019. This identifies the potential future flood risk taking climate change into account.</p> <p>The SA Report (September 2018) provided an assessment of Policy L29 'Green and Blue Infrastructure, Countryside,</p>



	Landscape and Trees' and found that the policy's requirement of 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 the 'flood risk' objective (SA3).
<b>Hertfordshire County Council (ID 837689)</b>	
Agree with the supporting statement in the SA with regards to flood risks but recommend the creation of an aim of new development that contributes to reducing existing flood risk (where applicable)	The SA Objective for flood risk (SA3) was updated in xxx to take account of comments from the Environment Agency. That updated objective was used in the assessments included in the SA Report (September 2018). It is not appropriate at this stage in the SA process to update the objective a further time, however the comment from HCC is noted and will be considered for inclusion in future SA work undertaken by the Council.
<b>Individual respondent (ID 334023)</b>	
The SA has not considered the impact of increasing the East Hemel South proposed dwellings development by 140%	The assessment of 'Policy S6 iii) - East Hemel Hempstead (South) Broad Location' identified the potential effects of building 2,400 new homes at this Broad Location. This included an identification of the environmental constraints associated with this area.
<b>Stackbourne Limited (ID1153646)</b>	
There is no compatibility between the Vision and Objectives listed within the Plan and the SA objectives	Table 3-2 in the SA Report provides an assessment of the compatibility between the Local Plan Vision and Objectives and the SA objectives.
<b>Department of Health &amp; Social Care and Bloor Homes (ID1156886)</b>	
<p>The SA is flawed as it does not consider alternatives for Park Street Garden Village</p> <p>The Plan is not considered to be deliverable, an objection is made to Policy S1 in particular the introduction of Park Street Garden Village in Category 2, there is no justification or evidence to support the inclusion of the Garden Village. The Plan in this respect is not justified or consistent with national policy as exceptional circumstances have not been demonstrated to support the inclusion of Park Street Garden Village. It is considered that not all reasonable alternatives have been considered and consequently the Sustainability Assessment is flawed and the Plan is therefore unsound.</p>	<p>During the process to develop the Local Plan there has been extensive and detailed consideration of options and reasonable alternatives. Whilst the SA has informed the process it is not the purpose of the SA to decide the alternative to be chosen for the Local Plan, nor is it the role of the SA to determine what is and what isn't a 'reasonable alternative' – those are both decisions to be made by the plan-making authority.</p> <p>The SA has assessed all the options which the Council has</p>

	considered to be reasonable alternatives. Section 4 of the SA Report provides information on the various stages at which different sites have been considered in the SA process.
The Plan and the accompanying SA rely on much of the previous work undertaken to support the Strategic Local Plan (SLP) and draft Detailed Local Plan (DLP), the evidence base for which is out of date	The SA work on the SLP/DLP and now the new Local Plan have been part of the ongoing process to replace the 1994 Local Plan. SA is an iterative process and has been updated as appropriate when work moves forward. This has included taking into account updates to the evidence base, in terms of both other relevant policies, plans and programmes and baseline information.
<b>Helioslough Ltd (ID1182085)</b>	
The SA is misleading in its assessment of PSGV. It includes ambiguous statements, does not consider site constraints which could hinder development proposals, and ignores the loss of benefits resulting from not providing the SRFI.	The comment relating to ambiguous statements and constraints is addressed below for the various SA topic related comments.  The assessment for PSGV was undertaken using the baseline as being the site in its current status and was not a comparison between the PSGV and the SRFI. It did not consider benefits lost or benefits gained between one proposed use and another potential use.
The biodiversity score for the SA of PSGV should be downgraded to 'very unsustainable'	This comment is made on the premise that PSGV should be assessed against an 'SRFI baseline' and not a 'current status baseline'. As described above that has not been the case.
The SA for PSGV fails to mention that flood risk zone 3 is a relatively wide band (approximately 140m) which runs along the eastern boundary of the Park Street urban area in the vicinity of the station, thereby creating a gap in development. This does not affect the flood risk score but it is related to subsequent objectives.	The SA has recognised that the area of flood risk zone would not be suitable for new built development.
The greenhouse gas emissions score for the SA of PSGV should be graded as 'unsustainable'.  Significant benefits are claimed due to the range of planned facilities. This is agreed with reference to facilities such as schools and local shops, however there is no significant other employment proposed and there are only a very limited number of existing employment areas within an acceptable walking or cycling distance.  The site and specifically the developable area is not next to a train station as claimed. Equally it is claimed that the P&Ra is a benefit which, for the reasons set out above, may encourage more cars to access the car park.  In contrast, as the SRFI will enable freight to be transferred from road to rail, it is forecast that the SRFI will result in a significant reduction in greenhouse gases.  For these reasons the PSGV assessment can certainly not be marked as 'Very Sustainable'. Indeed, when compared to the	As described above the assessment has been made against the 'current status baseline' and not an 'SRFI baseline'.  The policy requirement for the development to deliver transport network (including walking and cycling links) and public transport services upgrades/improvements, including a new park and rail facility and increased rail services were considered in the assessment to warrant a score of 'significant positive'. This view still stands.  The site is next to the rail station but it is acknowledged that without any new access the walk to the station is further and

consented scheme which is currently being progressed and is forecast to reduce greenhouse gas emissions then the PSGV should be scored as 'Unsustainable'	due to the size of the site some of the PSGV will be some distance. However the whole site is still relatively close to a station, particularly as it is a relatively level walk/cycle.
Air Quality – This is scored twice on the basis of local facilities and location with respect to St Albans. The first score of 'Sustainable' is on the same basis as greenhouse emissions hence for similar reasons it should be neutral at best. The poor relationship to St Albans is correct and hence this is correct as 'Unsustainable'.	See comments above relating to greenhouse gas emissions.
Sustainable Locations – The appraisal admits that the location with respect to St Albans is not good. It then seeks to justify a sustainable score due to the limited local facilities and possible rail improvements which could be used by local residents. For the reasons noted in this report, the rail opportunities are limited in terms of facilities and proximity, and the local facilities would only account for a small number of car trips. The score for location should therefore be 'Unsustainable'.	The appraisal identified that <i>"This site is located some distance from the city/town centres"</i> .  Whilst the site is some distance from St Albans it is planned as a sustainable community supported by the necessary infrastructure and facilities and therefore the level of facilities that will be provided make the development more sustainable, as identified in the assessment.
Given the points above the PSGV should be scored less for three objectives.	See comments above for each of these three objectives
SA incorrect to refer to site as previously developed land - land developed for minerals extraction excluded by paragraph 70 of NPPF. Therefore, the PSGV site is not considered to be a previously developed site and should be rated as 'unsustainable'.	The SA identified that <u>part</u> of the site is PDL, not the whole of the site. However the assessment has been updated from 'uncertainty of effects' to 'minor adverse effects' as the majority of the site is not classified as being previously developed land.
In considering the wider strategic implications of not providing the SRFI, the PSGV rating for resource efficiency should be downgraded to 'unsustainable'.	See previous comments regarding the approach taken to the assessment with regard to the baseline assumptions.
SA incorrect that prior gravel extraction will have destroyed any archaeological remains if they existed as some of the site has not been quarried. Therefore, the PSGV development has potential to have an adverse impact on below ground archaeological features. Due to the uncertainty of whether the unquarried section of the site contains below ground archaeology, the sustainability rating is correct as 'uncertain'.	Noted
The approved SRFI proposals include a 334ha Country Park which includes substantial benefits considered to exceed the requirements of policy S6 xi for the PSGV. When factoring in the loss of the landscape and biodiversity benefits proposed by the SRFI, the 'sustainable' score should be reduced to at least 'Neutral'.	See previous comments regarding the approach taken to the assessment with regard to the baseline assumptions.
The recreational opportunities set out by policy S6 xi would undoubtedly be beneficial for local residents of the PSGV, however there are conflicts with existing infrastructure that need to be given further consideration. These proposals also need to be considered in light of the substantial Country Park offered by the SRFI proposals not being delivered. The scale of the SRFI Country Park has the potential to offer health benefits to not only the lifestyles of local residents but the lifestyles of those living in the wider district and county. It is for these reasons that the PSGV health score should be downgraded to 'neutral'.	See previous comments regarding the approach taken to the assessment with regard to the baseline assumptions.
Whilst the local centre and new schools are likely to reduce some trips by car, PSGV residents will have to travel to the	The SA identified 'minor positive' effects against the SA

<p>surrounding city/town centres for goods and services beyond the daily essentials. Furthermore, as discussed in the greenhouse gas emissions paragraphs above, the PSGV does not appear to provide any substantial sources of employment beyond the new schools and shops. In comparison, the SRFI scheme would create significant additional employment opportunities of approximately 3,400 full time jobs and a further 500 jobs related to the scheme.</p>	<p>objectives relating to the economy. This assessment still stands.</p> <p>See previous comments regarding the approach taken to the assessment with regard to the baseline assumptions.</p>
<p>In terms of rail improvements, the requirements of policy S6 xi has various limitations which relate to the Abbey Line. Firstly, the policy states that there should be services every 15-20 minutes at peak times, with no mention of off peak timetabling. Secondly, the St Albans Abbey train station is not located centrally and would require additional travel to access the centre. Thirdly, the Park Street station is not best positioned for the PSGV, being located on the western side of the railway. Finally, the developable area is not located next to a rail station as suggested, located 900m from the nearest house, which may encourage more cars to park in the park and rail facility. All of these points are discussed in more detail in the TTM at Appendix B. The sustainable location score should be 'unsustainable'</p>	<p>See comment above relating to the distance of the site from Park Street Station</p>
<p>The SA gives the PSGV a 'sustainable' rating based on the new local centre and the potential for new employment opportunities. Whilst the new local centre is likely to provide daily essentials for residents of the PSGV, services and facilities beyond this will be sought from surrounding town/city centres.</p> <p>As discussed in the greenhouse gas emissions paragraphs above, the PSGV does not appear to provide any substantial sources of employment beyond the new schools and shops. In comparison, the SRFI scheme would create significant additional employment opportunities of approximately 3,400 full time jobs and a further 500 jobs related to the scheme.</p> <p>The sustainability rating should be reduced to 'neutral' for the reasons set out above.</p>	<p>The SA identified 'minor positive' effects against the SA objectives relating to the economy. This reflected the potential for PSGV to support the local economy and to provide some additional employment opportunities. This assessment still stands.</p> <p>See previous comments regarding the approach taken to the assessment with regard to the baseline assumptions.</p>
<p>SA and the Plan are not considered to be consistent with national policy as they don't aim to deliver sustainable development</p>	<p>The SA helps to guide the development of the Local Plan, including providing an assessment of the reasonable alternatives considered. It cannot in itself 'deliver' sustainable development.</p>
<p><b>Helioslough Ltd (ID1182085) Department of Health &amp; Social Care and Bloor Homes (ID1156886)</b></p>	
<p>The Plan and SA have not been positively prepared as they disregard the planning permission that exists for the SRFI.</p>	<p>The view of the Council is that the SRFI is not a 'reasonable alternative' for that site and therefore it was not assessed in the SA. However for purposes of completeness the principle of developing an SRFI on the same site as that allocated for PSGV has now been assessed as part of this SA Report Addendum (see Section 4 and Appendix C).</p>
<p><b>Taylor Wimpey Strategic Land (ID1187472), Martin Grant Homes and Kearns Land (ID975683), ERLP 1 Sarl (ID1123561), M Scott Properties (ID1185993), Individual respondent (ID1153268), Department of Health &amp; Social Care and Bloor Homes (ID1156886), Owner Pound Farm &amp; East of Sandridge (ID1187227), Helioslough Ltd (ID1182085)</b></p>	
<p>The SA/SEA does not consider other/all specific sites that have been put forward and fails to provide an assessment for them, explaining why they have been rejected</p>	<p>The SA/SEA has provided an assessment of all the sites considered by the Council to be reasonable alternatives. Section 4 of the SA Report provides information on the</p>

	various stages at which different sites have been considered in the SA process.
<b>ERLP 1 Sarl (ID1123561)</b>	
No reasonable alternatives to the 12 Broad Locations have been assessed. The SA is flawed and outdated.	The SA/SEA has provided an assessment of all the sites considered by the Council to be reasonable alternatives. Section 4 of the SA Report provides information on the various stages at which different sites have been considered in the SA process.
<b>Owner Pound Farm &amp; East of Sandridge (ID1187227)</b>	
The council hasn't consulted on the SA	The Council consulted on the SA at the Regulation 18 Issues and Options Stage (January 2018) and at the Regulation 19 Publication Stage (September 2018). Section 2.4 of the SA Report provides a summary of the consultation that has been undertaken.
<b>Individual respondent (ID1153741)</b>	
The SA should contain a fuller assessment and development scoping exercise must be carried out on the East Hemel Hempstead (North) development to ensure that the area maintains an appropriate landscaping and character, sympathetic to the nearby settlement.	The SA has provided a 'high level' assessment of Policy S6 i) East Hemel Hempstead (North) Broad Location. More detailed consideration of landscaping and character will be given at the Masterplanning and detailed planning application stages.
<b>The Dak (ID 1186131) and multiple individuals/groups/companies making the same representation</b>	
<p>The audit trail of where and when the decision was made to solely focus on strategic sites is almost impossible to follow. It is not set out clearly within the Sustainability Appraisal report and seems to have been a decision arrived at through discussions at various Planning Policy Committee meetings.</p> <p>The Sustainability Appraisal report is required by European law to detail the likely significant environmental effects of the Local Plan and of the reasonable alternatives. It is also a soundness test for the Local Plan to be considered against reasonable alternatives.</p> <p>It is not clear where or how the Council has assessed the option of focusing solely on strategic sites and compared it with the reasonable alternative of allocating a larger number of smaller sites. There are advantages and disadvantages with strategic sites. For example, it is accepted that larger sites are often better able to provide on-site infrastructure. However, they take longer to deliver and are more prone to delays than smaller sites. This is an important consideration given the historic under-delivery of housing and the affordability issues that have been created. There does not appear to be any like-for-like comparison to enable respondents to understand how the decision has been taken and how different factors have been</p>	<p>During the process to develop the Local Plan there has been extensive and detailed consideration of options and reasonable alternatives. Whilst the SA has informed the process it is not the purpose of the SA to decide the alternative to be chosen for the Local Plan, nor is it the role of the SA to determine what is and what isn't a 'reasonable alternative' – those are both decisions to be made by the plan-making authority.</p> <p>The SA has assessed all the options which the Council has considered to be reasonable alternatives. Section 4 of the SA Report provides information on the various stages at which different sites have been considered in the SA process.</p> <p>As reiterated in the SA Working Note (January 2018), which</p>

<p>weighed.</p> <p>The housing issue is particularly important because of the strong influence on delivery rates that arises from the strategic-sites-only approach. Despite a five-year period that begins in 2020 and despite ignoring any historic shortfall, the Council is still unable to demonstrate a five-year land supply because of the lack of small- and medium-size sites. The “stepped” housing trajectory employed by the Council is only necessary because of the focus on strategic sites. The negative consequences of this should have been recorded in the Sustainability Appraisal and explicitly considered in the Council’s decision-making.</p>	<p>was produced at the Regulation 18 stage, the Council considered a series of options for the development strategy (see Section 4.4.1. of the SA Report (September 2018)). The Council’s preferred approach was based on Option 1a (Mixed Location / Scale Development) which relied on larger strategic sites to deliver the levels of development to meet local needs. As a result it was only strategic sites which were subsequently considered for inclusion in the Local Plan.</p> <p>However, whilst 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 of the Publication Local Plan did recognise that in addition to the larger sites, smaller sites do play an important role in delivering the housing requirement.</p> <p>In the assessment of Policy S4 Housing Strategy and Housing Requirement/Target the SA identifies positive effects against SA13 (Sustainable locations) in relation to the policy’s recognition 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.</p>
<p>Sustainability implications of the spatial strategy have not been properly assessed</p>	<p>The assessments of Policy S1 Spatial Strategy and Settlement Hierarchy, as well as Policy S2 Development Strategy, identify the implications of using the approach to the spatial strategy that is included in the Publication Local Plan.</p>
<p><b>M Scott Properties (ID 1185913 and ID 1185991)</b></p>	
<p>Flawed assessment of Park Street Garden Village. No acknowledgement of the planning permission for the SRFI on the site of the proposed Park Street Garden Village</p>	<p>See response above to similar comments made in the representation by Helioslough.</p>
<p>SA methodology excludes small to medium sites in sustainable locations with facilities beneficial for any development</p>	<p>See the comments above made in response to the representation by The Dak.</p>
<p>SA is inconsistent with the proposed 2020 commencement date for the emerging Local Plan.</p> <p>The SAR contains no justification for the 2020 start date of the ELP. This is inconsistent with national policy, particularly the NPPF 2018 which states at paragraph 11 that: “11. Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that: a) Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.”</p>	<p>It is not the role of the SA to justify the start date for a Local Plan.</p>

It is not considered that the ELP meets development needs nor is sufficiently flexible to adapt to rapid change given it does not cover the period to 2020.	
The SA should provide an objective-led approach whereby the potential impacts of a development plan, its allocations and all reasonable alternatives are appraised to the same level of detail in order to identify their contribution to sustainable development	At each separate stage of the SA process the policies/sites have been assessed at the same level of detail.
Support the SA statement that not all villages are suitable for accommodating growth	Noted
The SA does not consider financial implications of providing infrastructure	The Sustainability Appraisal process is not required to, or designed to, take such financial considerations into account.
<b>Martin Grant Homes and Kearn Properties (ID975683)</b>	
SA does not make it clear why Land East of Redbourn was rejected	Section 4.4.2. of the SA Report provides an explanation of why the Land East of Redbourn was not included as an allocation in the Publication Local Plan.
<b>Individual respondent (ID1185630)</b>	
The SA demonstrates full compliance with the Plan's requirement to consider social, economic and environmental factors	Noted
<b>Redbourn Parish Council (ID759908)</b>	
The SA fails to address the negative consequences of housing provision on large strategic sites and the impacts this has on supply	The assessments for the strategic sites did identify adverse effects against some of the SA objectives.  In relation to the comment on supply, see the response to The Dak above.
No consultation was undertaken for North East Redbourn site at the Issues and Options stage. Unclear how the site (as well as other 'omission sites') was explored as an alternative in the Sustainability Appraisal (SA)	The Issues and Options Regulation 18 consultation stage in January 2018 considered potential approaches for providing new development to meet the needs of the local population but did not include Broad Locations. Section 4.3.3.3. of the SA Working Note (January 2018) states "... 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."  Subsequently, the North East Redbourn site was considered as a 'reasonable alternative' alongside assessments of 11 other broad locations in the SA Working Note prepared for

	<p>the Planning Policy Committee in May 2018. Section 4.4.2 of the SA Report (September 2018)) provides a summary of the findings, including the reasons behind North East of Redbourn not being taken forward into the Publication Local Plan, whilst the full SA Working Note is included as Appendix E12 to the SA Report. The opportunity for consultation on the SA Report was provided at the Regulation 19 stage.</p>
<p><b>Batford Community Action Group (ID 1185696)</b></p>	
<p>SA will not be finished until March 2019. No chance to respond.</p>	<p>The SA Report was prepared in September 2018 and was part of the consultation at the Local Plan Regulation 19 stage. This is the statutory requirement for the publication of the SA Report.</p> <p>This SA Report Addendum provides some additional details to support the SA Report, but as the Local Plan has not been subject to any Major Changes between the Regulation 19 consultation and Submission there is no requirement for additional consultation to be undertaken.</p>
<p><b>Leverstock Green Village Association</b></p>	
<p>The allocation of East Hemel Hempstead (South) does not appear to be evidence based, with the allocation of the broad location reaching far beyond the Green Belt Review's recommendations for release. The Sustainability Appraisal conclusions for this policy also do not seem to differ greatly for the previous conclusions for a site which was allocated for fewer dwellings.</p>	<p>The SA has highlighted the main opportunities and constraints for the Broad Location, both for the site identified in the Strategic Local Plan and for the larger area allocated in the Local Plan. Where additional constraints have been identified for the larger site these have been identified. However the larger site does not include any additional significant constraints and therefore the original assessments have not been substantially changed.</p>
<p>5. Habitats Regulations Assessment</p> <p>5.1 Annex 1 of the SA (2018) of the St Albans Local Plan includes a copy of the HRA Screening update (originally prepared in 2008). This considers the impact of the recent EU Court Judgment of the 'People Over Wind' case and determines that the findings of the 2008 HRA Screening remain valid and that the current version of the Plan will not have likely significant effects on the Chilterns Beechwoods SAC.</p> <p>5.2 The Screening is reliant on assessment of earlier work including, for example, potential growth sites included in the 2006 Issues and Options Paper: Growth at Hemel Hempstead. Although it is acknowledged that this did consider a wide range of growth options the document is dated and must be considered in combination with growth that has taken place since then and potential impacts on the SAC.</p>	<p>The SA Screening Update reviewed the findings of the previous HRA and considered new evidence relating to the Chiltern Beechwoods SAC as well as other factors, including recreational disturbance and air quality effects, in order to confirm whether the findings still stood.</p> <p>Natural England agree with the conclusion of the Habitats Regulations Assessment (HRA) that there will be no likely significant effects on any European Site.</p>



<p>5.3 The Screening also suggests that because the remainder of the 2008 HRA Screening (i.e. that beyond issues associated with out-commuting for employment) concluded that there was no need for mitigation measures to conclude 'no likely significant effects', the 'People Over Wind' ruling does not have any implications for this update and, as such, an Appropriate Assessment is not required.</p> <p>5.4 Natural England is being consulted on the HRA Screening alongside consultation on the Local Plan and so, as yet, their response is unknown. We suggest that it is inappropriate to rely on evidence and material prepared more than a decade ago and that all up-to-date and current evidence must be considered before a conclusion can be satisfactorily made.</p>	
<p>8. East Hemel Hempstead (South) Broad Location (Site Specific Matters)</p> <p>...</p> <p>Sustainability Appraisal Findings</p> <p>8.26 The site was previously allocated in the 2016 Strategic Local Plan in Policy SLP13 a), which required the development to deliver a minimum of 1,000 dwellings.</p> <p>8.27 Given that the dwelling allocation has significantly increased by 1,400 dwellings to 2,400 dwellings, it is expected that there would be significant changes in the assessment of impacts in the Sustainability Appraisal.</p> <p>8.28 However, the Sustainability Appraisal does not conclude that there are significant differences between the allocation of fewer dwellings in the 2016 SLP and the 2018 Local Plan as shown in Figures 8.3 and 8.4 below.</p> <p>8.29 For two objectives, the 2018 SA assesses that the larger development would be marginally more sustainable than the smaller development assessed in the 2016 Sustainability Appraisal. Differences are shown for the 'Soils' objective where the 2016 SA assesses 'significant adverse effects' and the 2018 SA assesses the soils objective as 'unsustainable'. The assessments for the landscape &amp; townscape objective also differ between 2016 and 2018, with the assessment of the effect on landscape changing from 'significant adverse effects' to 'unsustainable'. This is curious given that the site is situated on the same area.</p> <p>8.30 There are only three objectives where the 2018 SA predicts marginally more unsustainable effects for the significantly larger development (revising the assessment from 'very sustainable' to 'sustainable'): 'equality/social inclusion', 'sustainable prosperity and growth' and 'fairer access to services'.</p> <p>8.31 The LGVA therefore do not consider that the Sustainability Appraisal has fully considered the impact of increasing the dwellings by 140%.</p>	<p>The assessment for the soils objective (SA4) was updated from "significant adverse" in 2016 to 'minor adverse' in 2018 in order to reflect the new information produced by Natural England in 2017 relating to agricultural land quality. The latest evidence indicated that approximately 19% of the site contains Best and Most Versatile (BMV) agricultural land.</p> <p>The 2016 assessment used a methodology whereby the presence of any amount of BMV resulted in a 'significant adverse' score, whereas in 2018 a more robust methodology was used which only allocated such a score if more than 25% of the site is classified as BMV land.</p> <p>The assessment for the landscape and townscape objective (SA11) was updated from "significant adverse" in 2016 to 'minor adverse' in 2018 as the later assessment took account of the fact that none of the area is designated as a Landscape Character Area in the St Albans Local Plan, nor is it covered by any other designation.</p>

## Appendix B: Screening of proposed minor modifications to the Publication Local Plan

The table below lists the proposed minor amendments and corrections to the Publication Local Plan and identifies whether the proposed changes have any implications for the findings of the sustainability appraisal that were included in the SA Report (September 2018).

<b>Policy/Para</b>	<b>Proposed Change</b>	<b>Implications for the sustainability appraisal and HRA</b>
1.10	<b>Amend</b> to refer to Scheduled Ancient Monument,	No implications for SA or HRA
1.10	Add "HCC Minerals and Waste Plans – inc. Mineral Safeguarding Areas" to list of 'Other GIS Sources'	No implications for SA or HRA
2.8	Add Mineral Safeguarding Areas to list of 'Other GIS Sources'	No implications for SA or HRA
S2	Add 'If detailed local evidence supports a Neighbourhood Plan that justifies development at a neighbourhood scale on land currently designated as Green Belt, that is supported in principle.' to end of policy	No implications for SA or HRA
S3 para2	Amend to <del>existing</del> <u>existing</u>	No implications for SA or HRA
S4	Swap 'C2' and 'C3' in paragraph 2	No implications for SA or HRA
S6 i)	Amend point 12 to 'An 8FE secondary school, with flexibility to be expanded to a 10FE, to serve the new and existing communities.'	No implications for SA or HRA
S6 v)	Amend point 9 to 'A 2fe A site for, and appropriate contributions towards, a 3FE primary school, including Early years provision, to serve the new community.'	No implications for SA or HRA
S6 vii	Delete full stop under requirement 6	No implications for SA or HRA
S6 viii	Delete full stop under requirement 6	No implications for SA or HRA
S6 ix)	Delete full stop under requirement 6	No implications for SA or HRA
S6 x)	Delete full stop under requirement 6	No implications for SA or HRA
S6 xi)	Delete full stop under requirement 6	No implications for SA or HRA
L2	Third sentence should be a new paragraph	No implications for SA or HRA
L12	Last sentence of 'Town Centre Approach' section should refer to Appendix 7	No implications for SA or HRA
L14	Amend para 1 to ' <u>...and can help deliver support and contribute towards</u> sustainable communities'	No implications for SA or HRA

L15	Add 'horse riding and carriage driving' to footnote 16.	No implications for SA or HRA
L18	Amend para 1 of ' <u>Walking, Cycling and Horse Riding</u> ' to 'Proposals and promotions to increase the proportion of <del>utility and leisure</del> trips made through walking, cycling and horse-riding are supported'.	Minor positive implications for SA12 (Health) - but no change to original assessment is needed. No implications for HRA
L18	Amend bullet point 3 of ' <u>Overall Approach</u> ' to 'Provision of appropriate amenities and community facilities easily accessible on foot <u>and cycle</u> to major new development sites'.	Minor positive implications for SA12 (Health) - but no change to original assessment is needed. No implications for HRA
L18	Amend bullet point 8 of ' <u>Overall Approach</u> ' to ' <u>secure</u> cycle parking in new developments and key journey destinations (stations, major employers, town and local centres).'	Minor positive implications for SA12 (Health) - but no change to original assessment is needed. No implications for HRA
L19	Delete ' <del>This should include an assessment of all alternative options and their costs</del> ' from ii) Road hierarchy section.	No implications for SA or HRA
L19	Amend para 4 to 'New and improved connections to local Rights of Ways, local foot/cycle paths <u>and local amenities such as shops and schools</u> should be provided to increase walking, cycling and to facilitate access for disabled and other disadvantaged people.'	Minor positive implications for SA12 (Health) - but no change to original assessment is needed. No implications for HRA
L19	Amend para 2 to reflect the NPPF 2018 to ' <del>A Travel and Traffic</del> <u>Transport Assessment and an Air Quality Assessment</u> will be required for major developments.'	Minor positive implications for SA7 (Air quality) - but no change to original assessment is needed. No implications for HRA
L23 iii)	Amend to '...design and layout with <del>and</del> appropriate..'	No implications for SA or HRA
L23 viii)	add comma after '(including contemporary styles)'	No implications for SA or HRA
L23	Amend second para of ' <u>Detailed design and layout</u> ' section to ' ...and source documents) <u>e.g. Hertfordshire's Health and Wellbeing Planning Guidance</u> '.	Minor positive implications for SA12 (Health) - but no change to original assessment is needed. No implications for HRA
L23 h)	Amend to 'Actual and potential and adverse cumulative effects will be taken into account will be refused.'	No implications for SA or HRA

L23	Amend third sentence of <u>Detailed design and layout c) Drainage</u> to 'Sustainable <del>Urban</del> Drainage Systems (SuDS) principles...'. Urban	No implications for SA or HRA
L27	Amend criterion i) to 'An assessment has been undertaken which has shown the open space, buildings or land to be surplus to recreational, sporting, amenity or biodiversity requirements, or, if i) does not apply, suitable replacement land and facilities of <u>equivalent or better provision in terms of quantity and quality</u> can be provided elsewhere (if replacement sports facilities are to be provided, they must be laid out and playable before the existing site is lost);'	No implications for SA or HRA
L27	Amend to reflect specific NPPF wording that 'suitable replacement land and facilities of equivalent or better provision in terms of quantity and quality can be provided elsewhere'	No implications for SA or HRA
L28	Add 'Sport England Design Guidance <a href="http://www.sportengland.org/facilities-planning/design-and-cost-guidance/">http://www.sportengland.org/facilities-planning/design-and-cost-guidance/</a> ' to footnote 23	Minor positive implications for SA12 (Health) - but no change to original assessment is needed. No implications for HRA
L29	Amend ' <u>Watercourses and flood risk</u> ' section to 'The Council will seek to avoid (incompatible / unsuitable) development in areas at risk from flooding (fluvial, and ground water) in accordance with national policy and ensure that water management and flood risk issues ( <u>from all sources of flooding</u> ) are fully addressed by new development. Sustainable ( <del>Urban</del> ) Drainage Systems (SuDS) approaches should be taken for all new development schemes.'	Minor positive implications for SA3 (Flood risk) - but no change to original assessment is needed. No implications for HRA
L29	Amend footnote to correct link: <a href="https://www.hertsmere.gov.uk/Documents/09-Planning--Building-Control/Planning-Policy/Planning-Publications/SPG---Watling-Chase.pdf">https://www.hertsmere.gov.uk/Documents/09-Planning--Building-Control/Planning-Policy/Planning-Publications/SPG---Watling-Chase.pdf</a>	No implications for SA or HRA
L29	Amend second bullet point of ' <u>Green and Blue Infrastructure</u> ' section to 'Continued implementation of Heartwood Forest <u>and linking Heartwood Forest with the Green Corridor within Welwyn &amp; Hatfield</u> '	Minor positive implications for SA1 (Biodiversity) - but no change to original assessment is needed. No implications for HRA
L29	Under 'Protection of existing woodland. Trees and Landscape features' section, delete '(Policy 29)' from first paragraph	No implications for SA or HRA
L29	Under 'New landscaping and tree planting' section split the last paragraph into two	No implications for SA or HRA
L30	Amend paragraph 3 to "Known heritage assets are recorded on Local Information Service (Public GIS) <u>and Hertfordshire County Council's Historic Environment Record.</u> "	No implications for SA or HRA
L30	Add ' <u>heritage at risk</u> ' to list in paragraph 2.	Minor positive implications for SA10 (Historic environment) - but no change to original

		assessment is needed. No implications for HRA
L30	Add to 'Archaeology' section ' <u>where the impact of a development proposal on important archaeological remains is unclear, or relative importance of such remains is uncertain, the council will require developers to provide further information in the form of an appropriate archaeological assessment or evaluation.</u> '	Minor positive implications for SA10 (Historic environment) - but no change to original assessment is needed. No implications for HRA
L30	Replace the term 'un-designated heritage assets' with ' <u>non-designated heritage assets</u> ' in paragraph 2, ' <u>Heritage assets</u> ' section, and 'g) <u>Historic Landscapes</u> ' section	No implications for SA or HRA
L30	Amend para 5 to ' <u>Other</u> heritage assets <del>worthy of conservation</del> include...'	No implications for SA or HRA
L30	Re-word final sentence of paragraph 6 to read ' <u>the significance of the heritage asset</u> ' ' <del>on the heritage assets significance</del> '	No implications for SA or HRA
L30	Replace 'planning benefits' with ' <u>public benefits</u> ' in 'b) <u>Demolition</u> ' section	No implications for SA or HRA
L30	Add ' <u>and setting.</u> ' to the end of e) ' <u>Locally Listed Buildings</u> ' section	Minor positive implications for SA10 (Historic environment) - but no change to original assessment is needed. No implications for HRA
L30	Amend 'd) <u>Conservation Areas</u> ' section at paragraph to read and local distinctiveness of the Conservation Area <u>and its setting.</u> '	Minor positive implications for SA10 (Historic environment) - but no change to original assessment is needed. No implications for HRA
L30	Delete comma in para 2 between 'Parks and. Gardens'	No implications for SA or HRA
L30	Delete 2 <sup>nd</sup> repetition of 'Parks and Gardens'	No implications for SA or HRA
Policies Map	Minor amendment to Marshalswick District Centre boundary to include petrol station building as well as forecourt.	No implications for SA or HRA
Policies map	Show Highfield Local Centre	No implications for SA or HRA

## Appendix C: Assessment of Strategic Rail Freight Interchange

This Appendix provides an assessment of the proposed Strategic Rail Freight Interchange (SRFI) alongside the existing assessment for Park Street Garden Village (PSGV).

Assessments for Park Street Garden Village (PSGV) are shown in black text. These are based on the assessments included in the SA Report (September 2018), with changes to those assessments being shown in underline and ~~striketrough~~ text. These changes are the same as those described in Appendix D to this SA Addendum and have been made independent to the assessment of the SRFI to reflect representations made by Historic England (see Appendix A) and to include new information on flood risk.

Assessments for the Strategic Rail Freight Interchange (SRFI) are shown in **blue text**. The assessments have been informed by information in the Sustainability Statement for the SRFI (CgMs Ltd, March 2009), the Environmental Statement for the SRFI (ES) (Various Consultancies, March 2009) and the Sustainability Appraisal undertaken for the Draft National Policy Statement for National Networks (Ramboll, December 2013)

### Assumption for the assessment

The assessments for PSGV and SRFI have both been undertaken using the baseline as being the site in its current status. It does not consider benefits lost or benefits gained between one proposed use and another.

**Policy S6 xi) Park Street Garden Village Broad Location**  
**and**  
**Strategic Rail Freight Interchange**

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	<b>PSGV:</b> 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.	<b>P</b>	<b>L</b>	<b>x</b>	<b>x</b>	<b>x</b>
		<b>PSGV:</b> 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.	<b>P</b>	<b>N</b>	✓	✓	✓
		<b>SRFI:</b> 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.	<b>P</b>	<b>L</b>	<b>x</b>	<b>x</b>	<b>x</b>
		<b>SRFI:</b> The SRFI would deliver biodiversity gains associated with the proposed Country Park.	<b>P</b>	<b>N</b>	✓	✓	✓
2	Water quality/ quantity	<b>PSGV:</b> The development would be required to deliver excellence in water management. No site specific predicted effects.	-	-	-	-	-
		<b>SRFI:</b> The Sustainability Statement identifies that water conservation will be led through good design measures. No site specific predicted effects.	-	-	-	-	-

3	Flood risk	<p><b>PSGV:</b> 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>The 2018 SFRA considers the implications of climate change:</p> <ul style="list-style-type: none"> <li>• <u>It shows that none of the site lies in 'Flood Zone 3 + 70%CC'.</u></li> <li>• <u>It identifies that some parts of the site are classified as 'RoFSW<sup>1</sup> + CC (1 in 100-year + 40% CC)'. These will need to be taken into account in future masterplanning and detailed design.</u></li> </ul>	P	L	*	*	*
		<p><b>SRFI:</b> Flood risk is the same as reported for PSGV above. The ES identifies that there would be no built development in the area of the site which is at risk of fluvial flooding.</p>	P	L	*	*	*
4	Soils	<p><b>PSGV:</b> Site is mainly greenfield and therefore soil sealing would result from new development.</p>	P	L	*	*	*
		<p><b>PSGV:</b> 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 (&gt;60% area bmv)<sup>2</sup>. 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>	-	-	?	?	?
		<p><b>PSGV:</b> Development could provide the potential to remediate any contaminated land associated with the site's former use as an aerodrome.</p>					
		<p><b>SRFI:</b> Site is mainly greenfield and therefore soil sealing would result from new development.</p>	P	L	*	*	*

<sup>1</sup> Risk of Flooding from Surface Water

<sup>2</sup> <http://publications.naturalengland.org.uk/publication/6205542189498368?category=5208993007403008>



		<p><b>SRFI:</b> 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 (&gt;60% area bmv)'<sup>3</sup>. 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> <p>Development could provide the potential to remediate any contaminated land associated with the site's former use as an aerodrome.</p>	-	-	?	?	?
5	Greenhouse gas emissions	<p><b>PSGV:</b> 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 &amp; 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	✓✓	✓✓	✓✓
		<p><b>PSGV:</b> 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>	P	N	x	x	x
		<p><b>SRFI:</b> moving freight from road onto rail will result in an overall reduction in CO<sub>2</sub> emissions from freight operations.</p>	P	N	✓✓	✓✓	✓✓
		<p><b>SRFI:</b> This site is located some distance from the main population centres which will result in increased car use for employees of the SRFI and lead to growth in the level of greenhouse gas emissions.</p> <p>The SRFI will also generate increased HGV movements associated with delivery and/or collection from the facility.</p>	P	N	x	x	x
6	Climate change proof	<p><b>PSGV:</b> No predicted effects.</p>	-	-	-	-	-
		<p><b>SRFI:</b> No predicted effects.</p>	-	-	-	-	-

<sup>3</sup> <http://publications.naturalengland.org.uk/publication/6205542189498368?category=5208993007403008>

7	Air quality	<p><b>PSGV:</b> 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 &amp; 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><u>The requirement to deliver a local bypass route for Park Street is likely to reduce traffic levels in Park Street and Frogmore, with associated benefits for local air quality.</u></p>	P	L	✓	✓	✓	
		<p><b>PSGV:</b> 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.</p> <p>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>	P	L	x	x	x	
		<p><b>SRFI:</b> Development of an SRFI would result in an overall reduction of HGV road miles which would have benefits for local air quality at a regional level.</p> <p>At a local level the Sustainability Statement identifies that delivery of the Park Street Relief Road as part of the development would reduce traffic levels in Park Street and Frogmore, with associated benefits for local air quality.</p>	P	L/R	✓	✓	✓	
		<p><b>SRFI:</b> This site is located some distance from the city/town centres (St Albans and Watford) which will result in additional vehicle trips from employees of the SRFI, with associated airborne emissions. In addition it would result in an increased number of HGVs in the local area with an associated increase in associated airborne emissions.</p> <p>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>	P	L	x	x	x	
8	Use of brownfield sites	<p><del><b>PSGV:</b> Part of the site is previously developed land. The majority of the site area is not classified as previously developed land. Minor adverse effects have therefore been predicted.</del></p>	-	-	?	x	?	x
		<p><b>SRFI:</b> The majority of the site area is not classified as previously developed land. Minor adverse effects have therefore been predicted.</p>	-	-	x	x	x	

9	Resource efficiency	<p><b>PSGV:</b> 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 but the scale of development provides opportunities for renewable energy production to be incorporated. The site is located within a Wind Opportunity Area.</p> <p>The site is located on a sand and gravel belt – but minerals have already been extracted at this location.</p>	P	L	✓	✓	✓
		<p><b>SRFI:</b> The Sustainability Statement identifies that the development would be designed to high levels of energy efficiency and incorporate other sustainable design measures.</p>	P	L	✓	✓	✓
10	Historic environment	<p><b>PSGV:</b> 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. In the north of the site there is also the Grade II listed Allan-Williams Turret. The settings of these heritage assets may be affected by any new development, although the topography and existing screening should minimise any adverse effects.</p> <p>The prior gravel extraction on the site will already have destroyed any archaeological remains – if they existed.</p> <p>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 on the other side of the railway to this site.</p> <p>Given the heritage assets, and their settings, which could be affected by the development of PSGV, minor adverse effects are predicted.</p>	-	-	? x	? x	? x
		<p><b>SRFI:</b> see PSGV above for a summary of the heritage assets associated with this site.</p> <p>Given the heritage assets, and their settings, which could be affected by the development of SRFI, minor adverse effects are predicted.</p>	-	-	x	x	x
11	Landscape & Townscape	<p><b>PSGV:</b> 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>	P	L	x	x	x

		<p><b>PSGV:</b> 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>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	L	✓	✓	✓
		<p><b>SRFI:</b> 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>	P	L	✗	✗	✗
		<p><b>SRFI:</b> The development would provide recreation space and countryside access links, including a large new Country Park.</p> <p>The Sustainability Statement identifies that the development would include mitigation measures to minimise the effects and impact of the scheme.</p>	P	L	✓	✓	✓
12	Health	<p><b>PSGV:</b> The development is required to provide <u>a new Country Park</u>, 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.</p> <p>In addition, the level nature of the site and its surrounding area make walking and cycling viable options.</p>	P	L	✓	✓	✓
		<p>An oil pipeline crosses the northern section of the site and would need to be taken into consideration in planning the layout of development.</p> <p>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><b>SRFI:</b> The development would provide recreation space and countryside access links, including a large new Country Park. These will provide the opportunity for local residents to live active lifestyles.</p> <p>In addition, the level nature of the site and its surrounding area make walking and cycling viable options.</p>	P	L	✓	✓	✓
		<p><b>SRFI:</b> Operation of the SRFI, with associated increase in HGV and rail movements could result in noise issues for local residents – dependent on mitigation. The SA for the Draft National Policy Statement for National Networks identifies a 'small negative' for noise impacts associated with the operation of SRFIs.</p>	-	-	?	?	?

13	Sustainable locations	<b>PSGV:</b> 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.	<b>P</b>	<b>L</b>	✓	✓	✓
		<b>SRFI:</b> This site is located some distance from the local population centres which means that employees are likely to be reliant on car use to access the site. However the Sustainability Statement identifies that additional public transport services will be provided to mitigate the need for car use.	<b>P</b>	<b>L</b>	✓	✓	✓
14	Equality & social inclusion	<b>PSGV:</b> 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.	<b>P</b>	<b>L</b>	✓	✓	✓
		<b>SRFI:</b> No predicted effects	-	-	-	-	-
15	Good quality housing	<b>PSGV:</b> 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.	<b>P</b>	<b>L</b>	✓✓	✓✓	✓✓
		<b>SRFI:</b> No predicted effects	-	-	-	-	-
16	Community identity & participation	<b>PSGV:</b> 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.	<b>P</b>	<b>L</b>	✓	✓	✓
		<b>SRFI:</b> No predicted effects	-	-	-	-	-
17	Crime and fear of crime	<b>PSGV:</b> No predicted effects.	-	-	-	-	-
		<b>SRFI:</b> No predicted effects	-	-	-	-	-
18	Sustainable prosperity & growth	<b>PSGV:</b> 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.	<b>P</b>	<b>L</b>	✓	✓	✓

		<b>SRFI:</b> Development of a SRFI would result in the provision of approximately 3,400 new jobs which would help to support the local economy and is likely to result in economic benefits relating to the supply chain and income/spending effects in the local area.	<b>P</b>	<b>L</b>	✓✓	✓✓	✓✓
19	Fairer access to jobs & services	<b>PSGV:</b> 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.	<b>P</b>	<b>L</b>	✓	✓	✓
		<b>SRFI:</b> The Sustainability Statement identifies that development of the SRFI would result in the provision of approximately 3,400 new jobs, as well as providing the potential for indirect/induced employment opportunities for the local area.	<b>P</b>	<b>L</b>	✓✓	✓✓	✓✓
20	Revitalise town centres	<b>PSGV:</b> 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.	<b>P</b>	<b>L</b>	✓	✓	✓
		<b>SRFI:</b> No predicted effects	-	-	-	-	-

## Appendix D: Updates to the SA Report (September 2018)

This appendix provides updates to the information provided in the SA Report (September 2018) that was prepared for Local Plan Publication stage. These updates have been necessary to take account of representations received during the consultation on the Local Plan and SA Report, as well as to reflect new evidence. The updates are provided on a SA Report 'section by section' and/or 'policy by policy' basis. The relevant parts of the SA Report, including its appendices and Non-Technical Summary, are identified, along with the change(s) required. The changes use underline text to show additions and ~~strikethrough text~~ to identify deletions.

### SA Report

Amend the relevant rows in the table in Section 5.2.2 of the SA Report and Table 2 of the Non-Technical Summary as follows:

Amended cells are shown with red outline

Option	SA Objectives																			
	1. Biodiversity	2. Water resources	3. Flood risk	4. Soils	5. GHG Emissions	6. Climate Change Proof	7. Air Quality	8. Previously developed land	9. Resource Efficiency	10. Historic environment	11. Landscape/ Townscape	12. Health	13. Sustainable Locations	14. Equality/ Social Inclusion	15. Good Quality Housing	16. Community Identity	17. Crime and Fear of Crime	18. Sustainable Prosperity and Growth	19. Fairer Access to Services	20. Revitalise Town Centres
Policy S6 vi) North St Albans	x	-	-	xx	✓	-	✓	x	✓	<del>✓</del>	x	✓	✓	✓	✓	-	-	✓	✓	✓
Policy S6 vii) North East Harpenden	x	-	?	x	✓	-	✓	x	✓	<del>✓</del>	x	✓	✓	✓	✓	-	-	✓	-	✓
Policy S6 viii) North West Harpenden	x	-	-	x	✓	-	✓	x	✓	<del>✓</del>	x	✓	✓	✓	✓	-	-	✓	-	✓
Policy S6 xi) Park Street Garden Village	x	-	x	x	✓	-	✓	<del>✓</del>	✓	<del>✓</del>	x	✓	✓	✓	✓	✓	-	✓	✓	✓

Amend the following sub-sections of Section 5.2.2. of the SA Report:

**5.2.2.9. Policy S6 vi) North St Albans “...**

There is uncertainty as to the effects against the ‘historic environment’ objective, given the heritage assets and their settings which are located near to this Broad Location.

...”

**5.2.2.10. Policy S6 vii) North East Harpenden “...**

Minor adverse effects have been predicted against the ‘historic environment’ objective, given the heritage assets and their settings which are located near to this Broad Location.

...”

**5.2.2.11. Policy S6 viii) North West Harpenden “...**

~~There is uncertainty in relation to the~~ Minor adverse effects on the ‘historic environment’ are predicted 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.

...”

**5.2.2.14. Policy S6 xi) Park Street Garden Village “...**

As ~~part of the majority of the site is not classified as~~ previously developed land ~~uncertain~~ minor adverse effects have ~~also~~ been identified for the ‘use of brownfield sites’ objective.

...

~~There is uncertainty as to the~~ Minor adverse effects on the ‘historic environment’ objective have been predicted 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.

...”

Amend Section 5.2.2 of the SA Report and the equivalent Section 5.3.7 of the Non-Technical Summary as follows:

“...

Minor adverse effects were identified for the Broad Locations at North East Harpenden (Policy S6 vii); North West Harpenden (Policy S6 viii); West of London Colney Broad Location (Policy S6 ix); and Park Street Garden Village (Policy S6 xi), given the specific constraints in proximity to ~~that location~~ these locations.”



## SA Report Appendix A – PPP Review

### 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

- 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.

### South West Hertfordshire Level 1 Strategic Flood Risk Assessment (October 2018)

This Strategic Flood Risk Assessment (SFRA) covers the local authority areas of Dacorum Borough, St Albans District, Three Rivers District and Watford Borough. The purpose of this study is to provide a comprehensive and robust evidence base to support the production of Local Plans for the four Councils.

#### Objectives, Targets, Indicators

The key objectives of the Level 1 Strategic Flood Risk Assessment are:

1. To replace the Councils' existing Level 1 Strategic Flood Risk Assessment, taking into account most recent policy and legislation in the National Planning Policy Framework.
2. To collate and analyse the latest available information and data for current and future (i.e. climate change) flood risk from all sources and how these may be mitigated.
3. To inform decisions on the emerging Local Plan including the selection of development sites and planning policies.
4. To provide supporting evidence to support the Councils with the preparation of their Local Plans, allowing the application of the Sequential Test in the allocation of new development sites.
5. To provide a comprehensive set of maps presenting flood risk from all sources that can be used as an evidence base for use in the emerging Local Plans.
6. To provide advice for applicants carrying out site-specific flood risk assessments and outline specific measures or objectives that are required to manage flood risk to the appropriate standard.

## **SA Report Appendix B – Baseline Review**

"...

### 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 2007. 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.~~

A Strategic Flood Risk Assessment (SFRA) covering St Albans and three neighbouring authorities was undertaken in 2018<sup>4</sup>. Appendix C of the SFRA identifies that the sources of fluvial flood risk in St Albans are "*the River Lee in the north of the district, The Rivers Colne and Ver, and two tributaries of the Colne to the east, the Ellen and Butterwick Brooks.*" Surface water flood risk is "*largely confined within the valleys of the Main Rivers and ordinary watercourses of St. Albans District, particularly within the rural areas*". Groundwater flood risk is "*concentrated in the floodplains of the Rivers Lee, Ver and Colne, as well as Butterwick and Ellen Brooks. Here, the chalk geology and gravel surface deposits can result in heightened groundwater levels at or just below the ground surface. The settlements identified as at highest risk of groundwater flooding are southern St. Albans, Marshalswick (St. Albans), Redbourn, Batford and Wheathampstead.*"

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<sup>4</sup> South West Hertfordshire Level 1 Strategic Flood Risk Assessment, Final Report, October 2018. JBA Consulting.

## Flood History

The SFRA states that "There are many recorded flood incidents in the district. With the exception of groundwater flooding recorded in the city itself, the majority of incidents are concentrated in the surrounding settlements. In particular, relatively regular fluvial and surface water flooding has been recorded in Wheathampstead, Colney Heath, London Colney and Batford".

Flood incidents have been recorded in several settlements, including Colney Heath (most recently in 2007), Batford (1998), Wheathampstead (2007), London Colney (2014), Redbourn (2014), Sandridge and Marshalswick (2001), St Albans (2016) and Harpenden (2015).

The risk of flooding is expected to increase with climate change. Therefore, it is important that appropriate planning control and management is achieved in the wider river basin districts in order to help reduce this risk.

..."

## **SA Report Appendix F**

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

3	Flood risk	Site is not in a flood risk zone. No predicted effects. <u>The 2018 SFRA considers the implications of climate change:</u> <ul style="list-style-type: none"><li><u>It shows that none of the site lies in 'Flood Zone 3 + 70%CC'.</u></li><li><u>It identifies that some small parts of the site are classified as 'RoFSW<sup>5</sup> + CC (1 in 100-year + 40% CC). These will need to be taken into account in future masterplanning and detailed design.</u></li></ul>	-	-	-	-	-
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<sup>5</sup> Risk of Flooding from Surface Water

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

3	Flood risk	<p>Site is not in a flood risk zone. No predicted effects.</p> <p><u>The 2018 SFRA considers the implications of climate change:</u></p> <ul style="list-style-type: none"> <li>• <u>It shows that none of the site lies in 'Flood Zone 3 + 70%CC'.</u></li> <li>• <u>It identifies that some small parts of the site are classified as 'RoFSW + CC (1 in 100-year + 40% CC). These will need to be taken into account in future masterplanning and detailed design.</u></li> </ul>	-	-	-	-	-
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**Policy S6 iii) East Hemel Hempstead (South) Broad Location**

3	Flood risk	<p>Site is not in a flood risk zone. No predicted effects.</p> <p><u>The 2018 SFRA considers the implications of climate change:</u></p> <ul style="list-style-type: none"> <li>• <u>It shows that none of the site lies in 'Flood Zone 3 + 70%CC'.</u></li> <li>• <u>It identifies that some parts of the site are classified as 'RoFSW + CC (1 in 100-year + 40% CC). These will need to be taken into account in future masterplanning and detailed design.</u></li> </ul>	-	-	-	-	-
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**Policy S6 iv) – North Hemel Hempstead Broad Location**

3	Flood risk	<p>Site is not in a flood risk zone. No predicted effects.</p> <p><u>The 2018 SFRA considers the implications of climate change:</u></p> <ul style="list-style-type: none"> <li>• <u>It shows that none of the site lies in 'Flood Zone 3 + 70%CC'.</u></li> <li>• <u>It identifies that some parts of the site are classified as 'RoFSW + CC (1 in 100-year + 40% CC). These will need to be taken into account in future masterplanning and detailed design.</u></li> </ul>	-	-	-	-	-
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10	Historic environment	<p>The site is not subject to any significant heritage or archaeological constraint.</p> <p><u>A Scheduled Monument, The Aubreys (fort/camp), is located approximately 0.75km to the north east of the site.</u></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>	-	-	-	?	?
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Update to the Assessment Summary

"...

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

..."

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

3	Flood risk	<p>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><u>The 2018 SFRA considers the implications of climate change:</u></p> <ul style="list-style-type: none"> <li><u>It shows that none of the site lies in 'Flood Zone 3 + 70%CC'.</u></li> <li><u>It identifies that some parts of the site are classified as 'RoFSW + CC (1 in 100-year + 40% CC). These will need to be taken into account in future masterplanning and detailed design.</u></li> </ul>	-	-	?	?	?
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**Policy S6 vi) North St Albans Broad Location**

3	Flood risk	<p>Site is not in a flood risk zone. No predicted effects.</p> <p><u>The 2018 SFRA considers the implications of climate change:</u></p> <ul style="list-style-type: none"> <li><u>It shows that none of the site lies in 'Flood Zone 3 + 70%CC'.</u></li> <li><u>It identifies that some parts of the site are classified as 'RoFSW + CC (1 in 100-year + 40% CC). These will need to be taken into account in future masterplanning and detailed design.</u></li> </ul>	-	-	-	-	-
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10	Historic environment	<p>The site is not subject to any significant heritage or archaeological constraint. <u>The Childwickbury Conservation Area is approximately 400m to the north west of the site; the 'Beech Bottom entrenchment' Scheduled Monument is approx. 250m to the south of the site; and the 'Moated Manorial site' Scheduled Monument is approx. 800m to</u></p>	-	-	-?	-?	-?
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		<p>the west of the site. In addition the Sandridge Conservation Area (and associated listed buildings) is approx. 1km to the north east of the site.</p> <p><del>No predicted effects.</del> <u>Effects are uncertain.</u></p>						
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Update to the Assessment Summary

"...

There is uncertainty as to the effects against the 'historic environment' objective, given the heritage assets and their settings which are located near to this Broad Location.

..."

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

3	Flood risk	<p>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.</p> <p><u>The 2018 SFRA considers the implications of climate change:</u></p> <ul style="list-style-type: none"> <li>• <u>It shows that the same very small area of the site lies in 'Flood Zone 3 + 70%CC'.</u></li> <li>• <u>It identifies that some small parts of the site are classified as 'RoFSW + CC (1 in 100-year + 40% CC)<sup>6</sup>'. These will need to be taken into account in future masterplanning and detailed design.</u></li> </ul>	-	-	?	?	?
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10	Historic environment	<p>The site is not subject to any significant heritage or archaeological constraint.</p> <p><u>The Red Cow PH Grade II Listed Building is in close proximity to the site. The Mackerye End Conservation Area (with associated listed buildings, including Grade I Mackerye End) is approx. 500m to the east of the site.</u></p> <p><del>No predicted effects.</del> <u>Minor adverse effects are predicted.</u></p>	-	-	- *	- *	- *
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<sup>6</sup> Risk of Flooding from Surface Water

Update to the Assessment Summary

“...

Minor adverse effects have been predicted against the ‘historic environment’ objective, given the heritage assets and their settings which are located near to this Broad Location.

...”

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

3	Flood risk	<p>Site is not in a flood risk zone. No predicted effects.</p> <p><u>The 2018 SFRA considers the implications of climate change:</u></p> <ul style="list-style-type: none"> <li><u>It shows that none of the site lies in ‘Flood Zone 3 + 70%CC’.</u></li> <li><u>It identifies that some very small parts of the site are classified as ‘RoFSW + CC (1 in 100-year + 40% CC). These will need to be taken into account in future masterplanning and detailed design.</u></li> </ul>	-	-	-	-	-
10	Historic environment	<p>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. Minor adverse effects are therefore predicted.</p>	-	-	? x	? x	? x

Update to the Assessment Summary

“...

There is uncertainty in relation to the Minor adverse effects on the ‘historic environment’ are predicted 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.

...”

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

3	Flood risk	<p>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.</p> <p><u>The 2018 SFRA considers the implications of climate change:</u></p> <ul style="list-style-type: none"> <li>• <u>It shows that none of the site lies in 'Flood Zone 3 + 70%CC'.</u></li> <li>• <u>It identifies that some parts of the site are classified as 'RoFSW + CC (1 in 100-year + 40% CC). These will need to be taken into account in future masterplanning and detailed design.</u></li> </ul>	-	-	?	?	?
10	Historic environment	<p>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.</p> <p>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. The <u>Grade II* Listed Building 'All Saints Pastoral Centre and Chapel'</u> and the <u>Grade II Listed Buildings 'London Coal Duty Marker on E side of Broad Colney Bridge', 'Voluntary Mission Movement' and 'Farm Cottage &amp; adjoining garden walls at All Saints Pastoral Centre'</u> are also situated to the south of the site and could have their settings affected.</p>	P	L	x	x	x

Update to the Assessment Summary

"...

Further adverse effects were identified for the 'historic environment' objective as development at this location could affect the setting of Napsbury Park which is designated as a Registered Historic Park and Garden and a Conservation Area and which is situated adjacent to the north of the area identified for housing and partly within the area identified as an education site. In addition, the 'Colne Chapel moated site' Scheduled Ancient Monument is situated to the south of the site and development could affect its setting.

..."



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

3	Flood risk	<p>Area is not in a flood risk zone. No predicted effects.</p> <p><u>The 2018 SFRA considers the implications of climate change:</u></p> <ul style="list-style-type: none"> <li><u>It shows that none of the site lies in 'Flood Zone 3 + 70%CC'.</u></li> <li><u>It identifies that none of the site is classified as 'RoFSW + CC (1 in 100-year + 40% CC).</u></li> </ul>	-	-	-	-	-
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**Policy S6 xi) Park Street Garden Village Broad Location**

3	Flood risk	<p>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><u>The 2018 SFRA considers the implications of climate change:</u></p> <ul style="list-style-type: none"> <li><u>It shows that the area of site which lies in 'Flood Zone 3 + 70%CC' is the same as that which is currently in flood risk zone 3.</u></li> <li><u>It identifies that some additional parts of the site are classified as 'RoFSW + CC (1 in 100-year + 40% CC). These will need to be taken into account in future masterplanning and detailed design.</u></li> </ul>	<b>P</b>	<b>L</b>	<b>x</b>	<b>x</b>	<b>x</b>
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7	Air quality	<p><b>PSGV:</b> 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 &amp; 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><u>The requirement to deliver a local bypass route for Park Street is likely to reduce traffic levels in Park Street and Frogmore, with associated benefits for local air quality.</u></p>	P	L	✓	✓	✓
		<p><b>PSGV:</b> 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.</p> <p>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>	P	L	x	x	x
8	Use of brownfield sites	<p><del>Part of the site is previously developed land. The majority of the site area is not classified as previously developed land. Minor adverse effects have therefore been predicted.</del></p>	-	-	? x	? x	? x
10	Historic environment	<p>The site is not subject to any significant heritage or archaeological constraint.</p> <p>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. In the north of the site there is also the Grade II listed Allan-Williams Turret. The settings of these heritage assets may be affected by any new development, although the topography and existing screening should minimise any adverse effects.</p> <p>The prior gravel extraction on the site will already have destroyed any archaeological remains – if they existed.</p> <p>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 on the other side of the railway to this site.</p> <p><u>Given the heritage assets, and their settings, which could be affected by the development of PSGV, minor adverse effects are predicted.</u></p>	-	-	? x	? x	? x

12	Health	<p><b>PSGV:</b> The development is required to provide <u>a new Country Park</u>, 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.</p> <p>In addition, the level nature of the site and its surrounding area make walking and cycling viable options.</p>	P	L	✓	✓	✓
		<p>An oil pipeline crosses the northern section of the site and would need to be taken into consideration in planning the layout of development.</p> <p>The southern part of the site is close to the M25 motorway and there could therefore be noise disturbance for the new residents.</p>	-	-	?	?	?

Update to the Assessment Summary

"...

As ~~part of the majority of the~~ site is not classified as previously developed land ~~uncertain~~ minor adverse effects have ~~also~~ been identified for the 'use of brownfield sites' objective.

...

~~There is uncertainty as to the~~ Minor adverse effects on the 'historic environment' objective have been predicted 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.

..."