

# Sustainability Appraisal (SA) of the St Albans Local Plan

SA Report

Non-technical Summary

September 2024



# Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging St Albans Local Plan.

Once in place, the Local Plan will set a strategy for growth and change for the period to 2041, allocate sites to deliver the strategy and establish the policies against which planning applications will be determined.

SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. Local Plans must be subject to SA.

Central to the SA process is preparation of an SA Report for publication alongside the draft plan that presents an appraisal of “the plan and reasonable alternatives”.

At the current time, the SA report is published alongside the ‘proposed submission’ version of the Local Plan, under Regulation 19 of the Local Planning Regulations (with an Interim SA Report previously having been published alongside an early draft plan in 2023).

This is the Non-technical Summary (NTS) of the SA Report.

## Structure of the SA Report / this NTS

SA reporting essentially involves answering the following questions in turn:

1) What has plan-making / SA involved **up to this point**?

- including in relation to ‘reasonable alternatives’.

2) What are the SA findings **at this stage**?

- i.e. in relation to the draft plan.

3) What happens **next**?

Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by answering the question: *What’s the scope of the SA?*

## What’s the scope of the SA?

The scope of the SA is reflected in a list of topics and objectives. Taken together, this list provides a methodological ‘framework’ for appraisal.

The following topics comprise the core of the SA framework:

- Accessibility (to community infrastructure)
- Air and wider environmental quality
- Biodiversity
- Climate change adaptation
- Climate change mitigation
- Communities and health
- Economy and employment
- Historic environment
- Homes
- Landscape
- Soils and other resources
- Transport
- Water

## Plan-making / SA up to this point

Key steps in the required SA process are: A) appraising ‘reasonable alternatives’ in time to inform development of the draft plan; and then B) publishing information on reasonable alternatives as part of the draft plan consultation.

As such, Part 1 of the SA Report explains work undertaken in 2024 to develop and appraise a reasonable range of “growth scenarios”, essentially in the form of alternative key diagrams, i.e. alternative approaches to development where each is ‘reasonable’ in terms of providing for development needs and delivering on wider plan objectives.

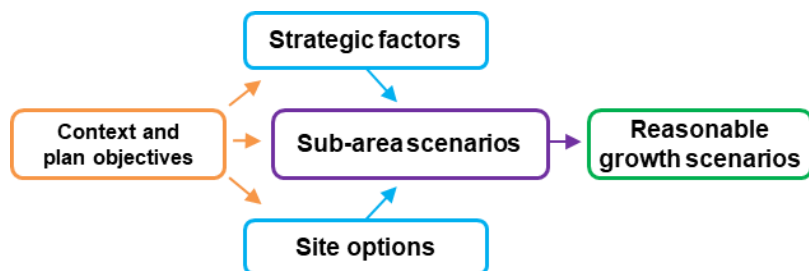
A focus on growth scenarios ensures a focus on the choice at the very heart of the plan. Furthermore, it ensures a focus on alternatives that are meaningfully different in terms of ‘significant effects’ (it being a requirement for SA to focus on significant effects).

In short, the process of exploring growth scenarios involved: **1)** defining growth scenarios; **2)** appraising growth scenarios; and then **3)** feeding-back to inform the draft plan.

## Defining growth scenarios

Section 5 of the main report explains the process of defining reasonable alternative (RA) growth scenarios for appraisal and consultation. Figure A provides an overview.

**Figure A: Process overview**



### Context and plan objectives

Plan-making has been underway for a number of years, but a key milestone was reached in 2023, namely the Draft Local Plan consultation stage. All work from 2023, and all evidence gathered through consultation, fed into work to define growth scenarios in 2024.

Further context comes from two failed attempts to prepare a new local plan to replace the adopted plan, which dates from 1994. There is now an urgent need to adopt a local plan to avoid and remedy issues caused by an existing plan that will soon be the oldest in England, and in the context of the National Planning Policy Framework (NPPF) requiring that local plans are updated every five years. This includes issues as a result of developments coming forward in a piecemeal fashion as opposed to coming forward in line with a clear strategy and under an agreed policy framework.

Simply achieving an up-to-date local plan is key, but there are also a range of other objectives in place to guide plan-making and, in turn, work to define growth scenarios. These cover Council priorities including net zero, nature recovery and affordable housing.

### Strategic factors

Section 5.2 of the main report gives consideration to:

- **Quantum** (*how much?*) – there is a clear case for providing for housing and wider development needs in full, as opposed to generating unmet need that would then need to be provided for elsewhere in a constrained sub-region. However, there are also certain arguments for remaining open to higher and lower growth scenarios.

Focusing on local housing need (LHN), on the basis of the Government's standard method this is 885 dwellings per annum (dpa), or 14,603 homes over the plan period.

- **Broad spatial strategy** (*where?*) – there are a wide range of broad spatial strategy factors including: A) maximising supply from urban areas and previously developed land (PDL) before looking to the Green Belt; B) aligning with the findings of the Green Belt Review (2023); C) balancing supply geographically (broadly in line with the settlement hierarchy); D) balancing supply from strategic sites (able to deliver infrastructure) versus smaller sites (important for 'delivery'); and E) coordinating development in line with an understanding of infrastructures issues and opportunities.

There is also the key context of the Hemel Garden Communities (HGC) programme, which is being taken forward by St Albans District, Dacorum Borough and other partner organisations. HGC was a core component of the Draft Local Plan (2023) and there is a clear strategic case for continuing to support HGC through the Proposed Submission Local Plan. The intention is for HGC overall to deliver 11,000 homes and 10,000 jobs by 2050, with roughly half of the HGC area falling within St Albans District (and with many of the key elements within St Albans District, including the strategic employment area, secondary school sites and roads linking to the M1 and A414).

### Site options

Section 5.2 of the main report explains how a key 'bottom up' starting point for work to define growth scenarios was the Housing and Employment Land Availability Assessment (HELAA), which identifies a long-list of sites that are available, achievable and potentially suitable for allocation. Also, key evidence on the merits of site options comes from the Green Belt Review (2023). Finally, Section 5.2 explains how, as a minor step in the overall process, all site options were subject to GIS analysis (e.g. distance to a school).

### Sub-area scenarios

This is a key section within the main report (Section 5.4), which aims to draw together the 'top down' and 'bottom up' understanding generated from the preceding two sections.

Nine sub-areas are defined, and for each the aim is to: A) discuss strategic factors; B) consider site options (in isolation and in combination); and then C) conclude on sub-area scenarios to take forward, i.e. alternative combinations of site allocations.

It is important to be clear that numerous options are ruled-out at this stage in the process, i.e. they are discussed in Section 5.4 but not taken forward. In this way, the analysis in Section 5.4 can be considered a key step in the local plan 'site selection' process.

### Reasonable growth scenarios

The final task (Section 5.5 of the main report) is to combine sub-area scenarios to form growth scenarios for the District as a whole – see Table A. Taking each of the rows in turn:

- Completions and permissions – 2,176 homes have already delivered since 2021 or are set to come forward at sites with planning permission (includes an 8% lapse rate).
- Windfall – it can be assumed that 2,103 homes will come forward at sites not allocated within the Local Plan but in line with policy (typically small sites within urban areas).
- Urban supply – 57 homes from Harpenden Neighbourhood Plan allocations; plus 43 homes from HELAA sites; plus 860 homes from Urban Capacity Study sites.
- Hemel Garden Communities (HGC) – 4,315 homes in St Albans District in the plan period (with further homes to 2050). Whilst HGC was a ‘variable’ across the growth scenarios in 2023, at this stage the decision is taken (on balance) to hold it ‘constant’.
- St Albans – eight Green Belt allocations are held constant across the growth scenarios, comprising two strategic sites (North St Albans and Glinwell), four non-strategic sites and two PDL sites (located close to St Albans). Also, East St Albans is an emerging proposed allocation but is explored as a variable. Finally, two omission sites – SE St Albans and ‘Expanded North St Albans’ – are explored as a variable.

In summary, therefore, five scenarios are explored for the St Albans sub-area.

- Harpenden – all ten Green Belt (GB) allocations are held constant across the growth scenarios, which includes two strategic sites (including one held constant on balance) and eight non-strategic sites. There are also two modest employment allocations.
- London Colney – one strategic GB site held constant.
- Redbourn – one strategic GB site held constant and one non-strategic variable site, such that two scenarios are explored for the Redbourn sub-area.
- Other villages – the emerging proposed approach involves a total of ten non-strategic GB allocations, but it is also appropriate to test the option of not allocating these sites, i.e. the option of a strategy more focused on strategic sites and higher tier settlements.

In summary, therefore, two scenarios are explored for each of these villages.

- Edge of Radlett – one strategic GB site held constant (on balance).
- Total homes – the emerging preferred option (PO) is Scenario 3, which involves 14,989 homes supply over the plan period in order to provide for LHN (14,603 homes).

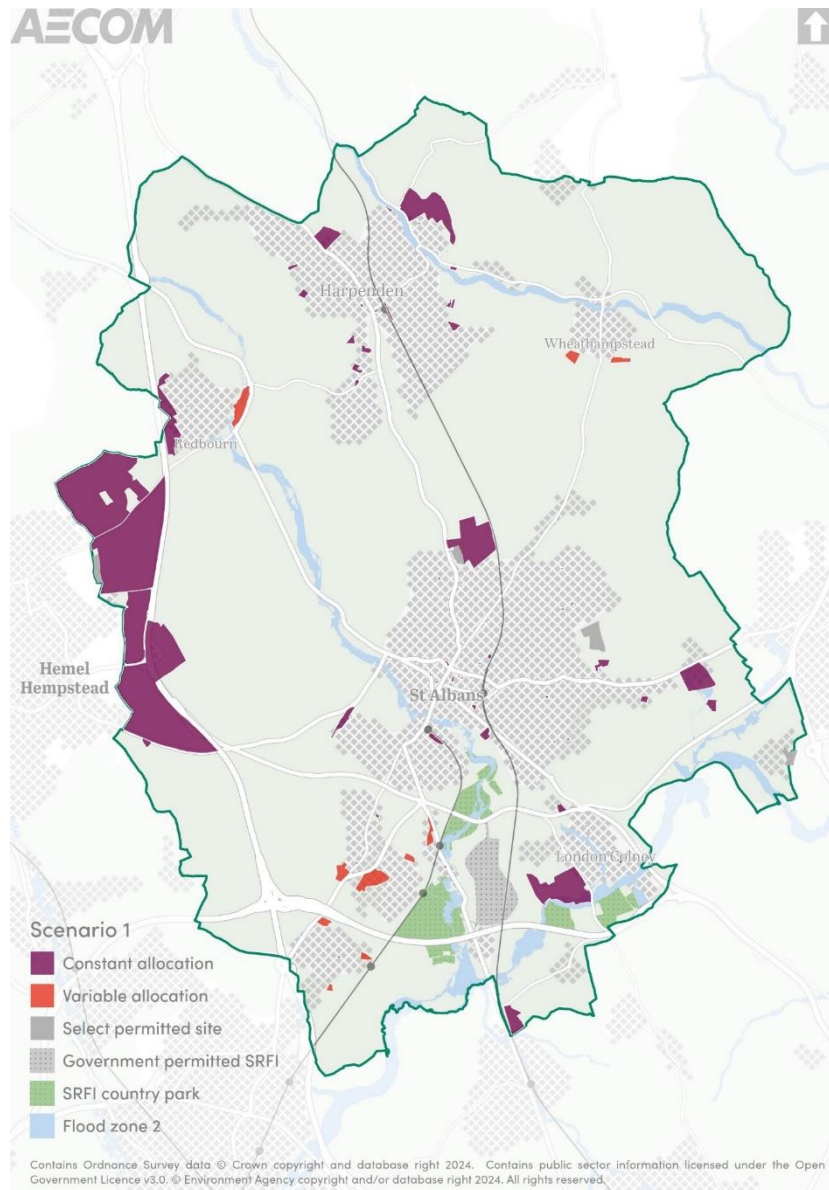
However, the housing requirement would need to be ‘stepped’, meaning it is set below LHN (885 dpa) in the early years of the plan period and then commensurately above LHN in the latter years (when strategic sites including HGC are delivering at pace).

The lowest growth scenarios would generate unmet need, whilst the highest growth scenarios would allow for: A) a generous ‘supply buffer’ as a contingency for delivery issues; and/or B) flexibility to consider a housing requirement modestly above LHN.

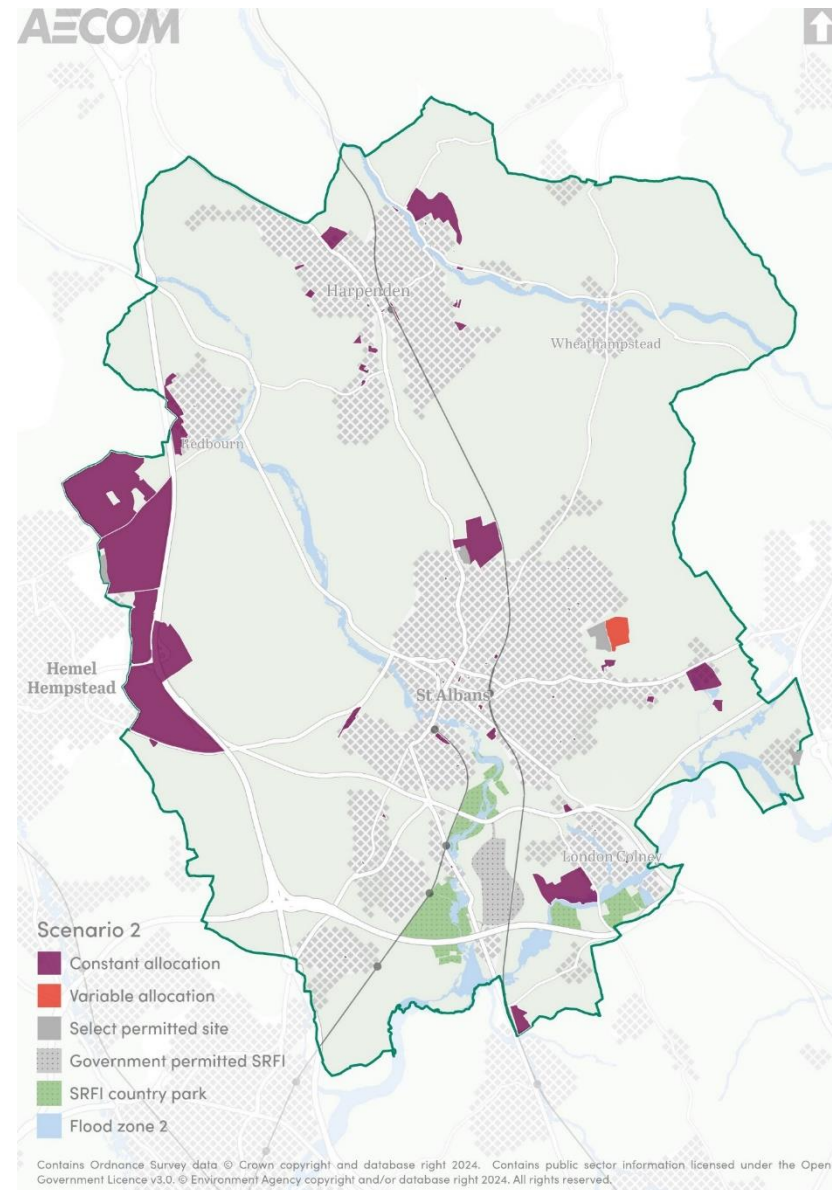
**Table A: The reasonable alternative growth scenarios**

Supply components		1	2	3 (PO)	4	5	6	7	8		
Completions and permissions		2,176	2,176	2,176	2,176	2,176	2,176	2,176	2,176		
Windfall		2,103	2,103	2,103	2,103	2,103	2,103	2,103	2,103		
Allocations	Urban supply	960	960	960	960	960	960	960	960		
	Green Belt release	HGC	4,315	4,315	4,315	4,315	4,315	4,315	4,315	4,315	
		St Albans	Constants	1,775	1,775	1,775	1,775	1,775	1,775	1,775	1,775
			East	0	472	472	472	472	472	472	472
			SE	0	0	0	800		800	800	
			Expanded North	0	0	0		1,400	1,400		1,400
	Harpenden	1,270	1,270	1,270	1,270	1,270	1,270	1,270	1,270		
	London Colney	324	324	324	324	324	324	324	324		
	Redbourn	612	545	612	545	545	545	612	612		
	Wheathampstead	145	0	145	0	0	0	145	145		
	Bricket Wood	127	0	127	0	0	0	127	127		
	CG, HW, PS/F' more	436	0	436	0	0	0	436	436		
	Edge of Radlett	274	274	274	274	274	274	274	274		
<b>Total homes</b>		<b>14,517</b>	<b>14,213</b>	<b>14,989</b>	<b>15,013</b>	<b>15,613</b>	<b>16,413</b>	<b>15,789</b>	<b>16,389</b>		
<b>% above/below LHN</b>		<b>-1%</b>	<b>-3%</b>	<b>3%</b>	<b>3%</b>	<b>7%</b>	<b>12%</b>	<b>8%</b>	<b>12%</b>		

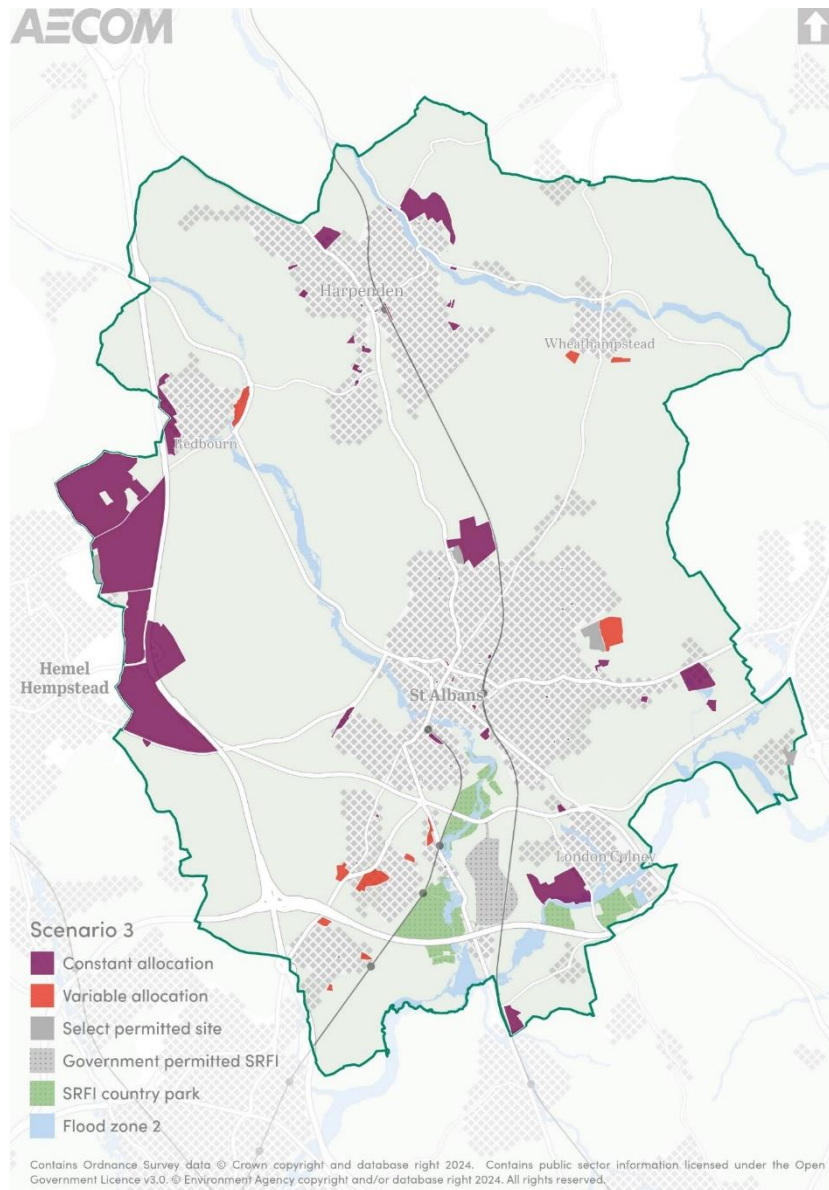
**Scenario 1: The preferred option (PO) minus East St Albans**



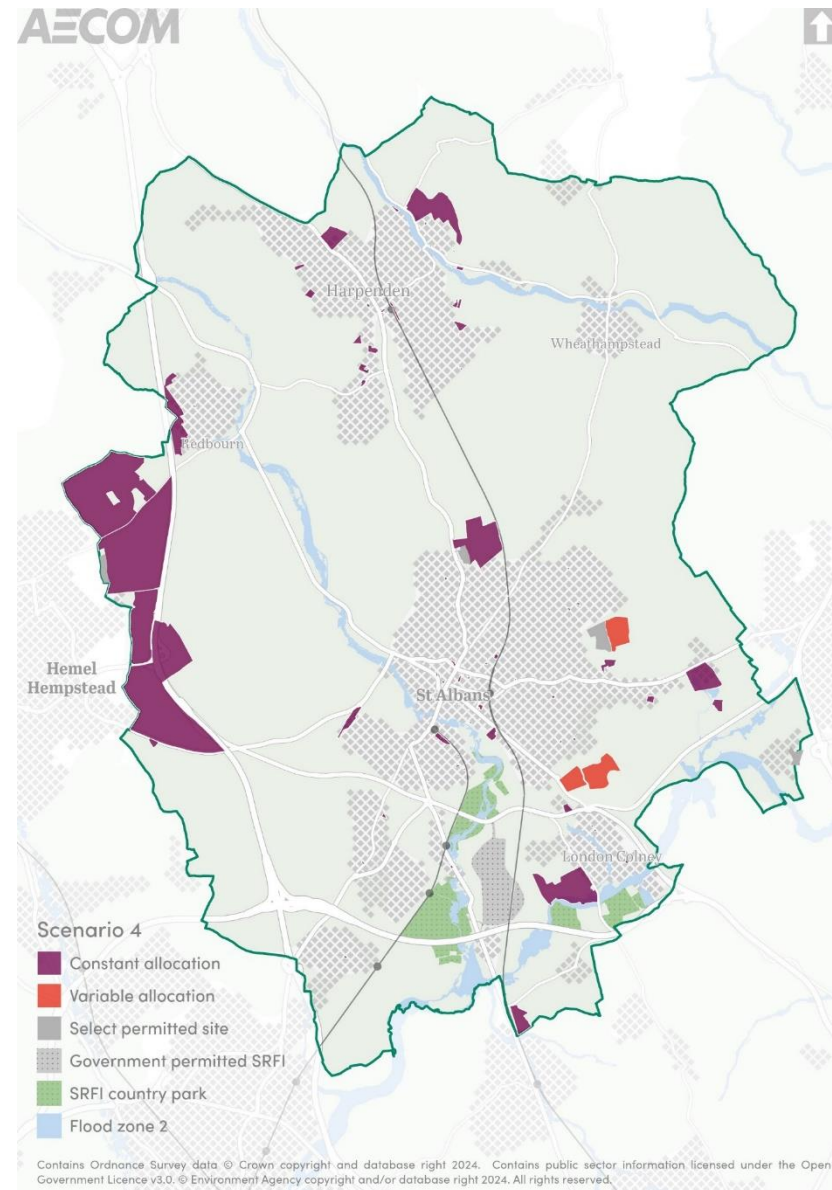
**Scenario 2: PO minus small sites**



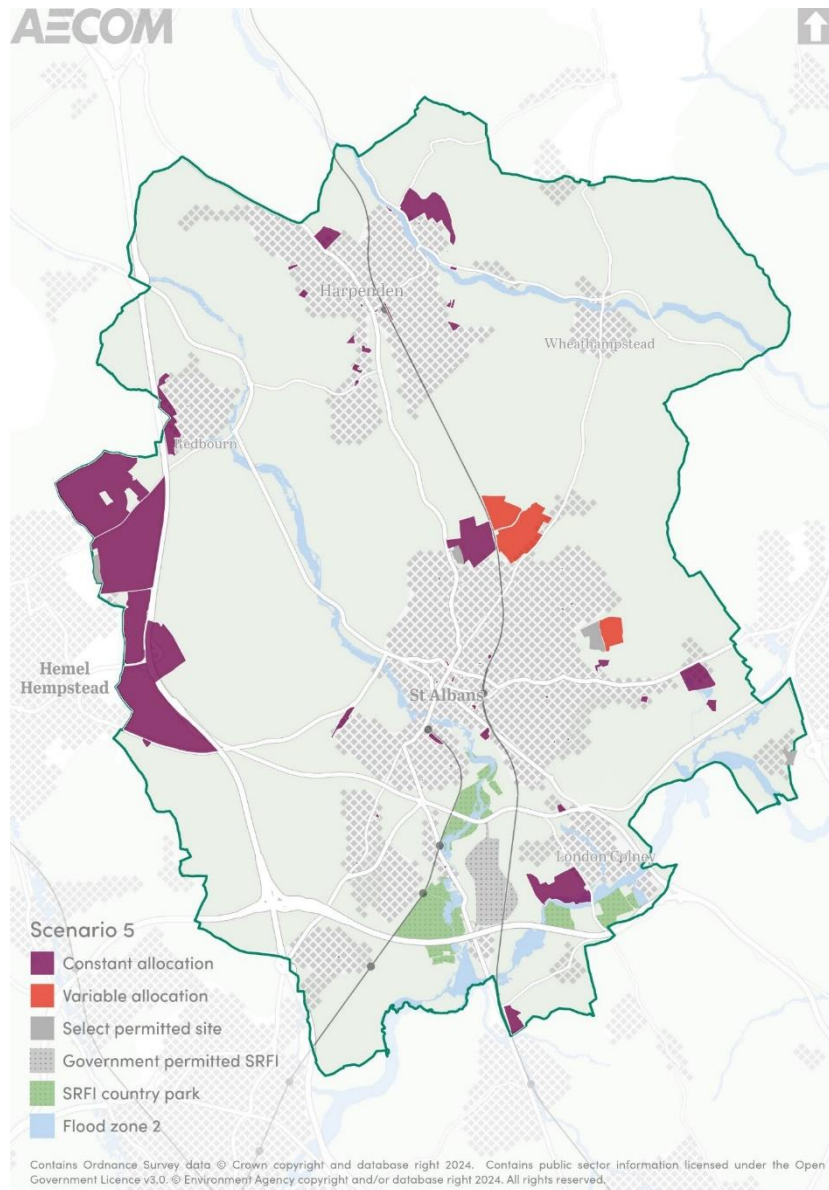
**Scenario 3: The preferred option**



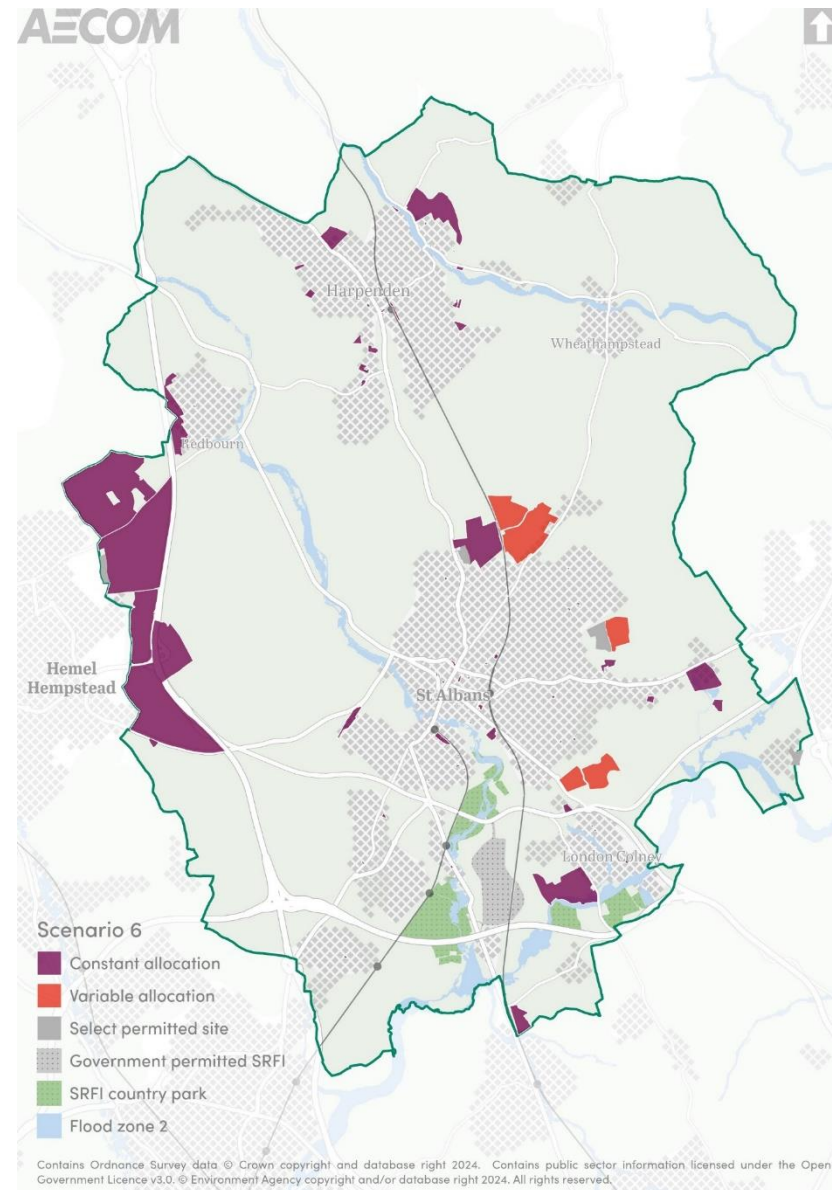
**Scenario 4: PO minus small sites; plus SE St Albans**



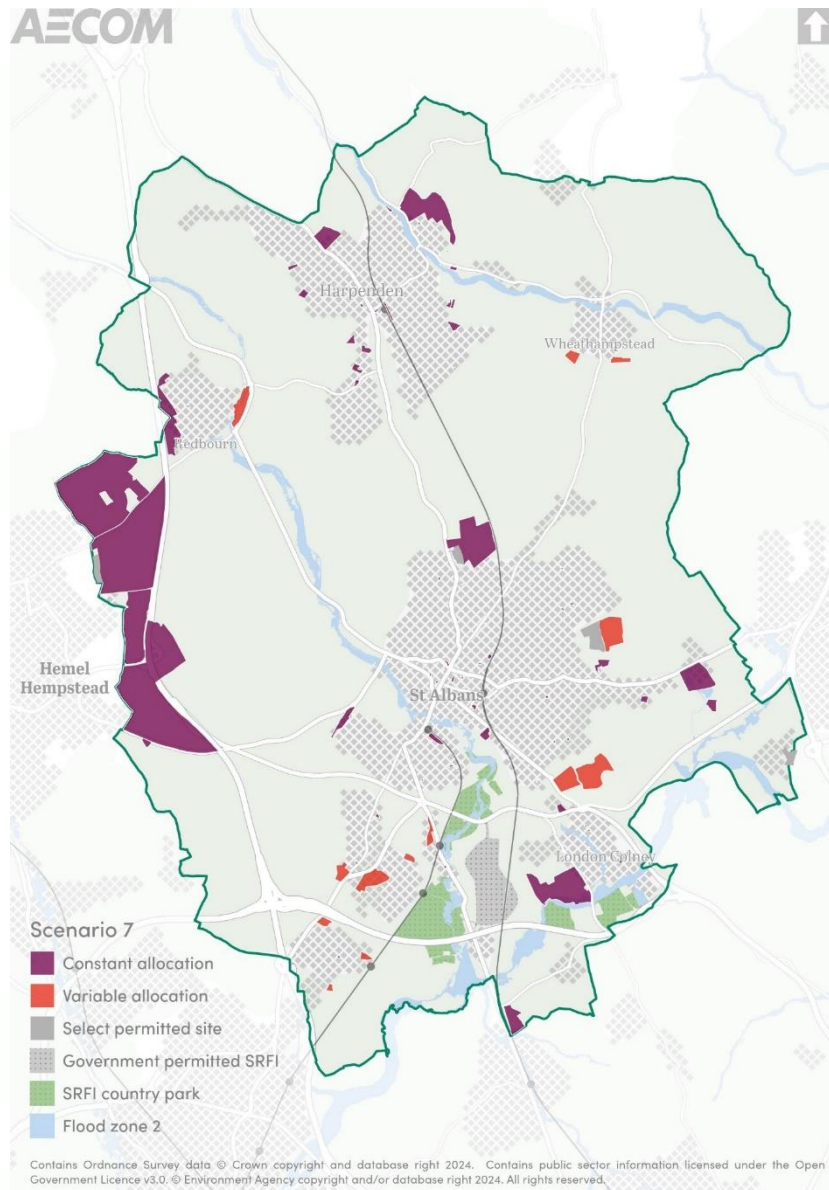
**Scenario 5: PO minus small sites; plus expanded North St Albans**



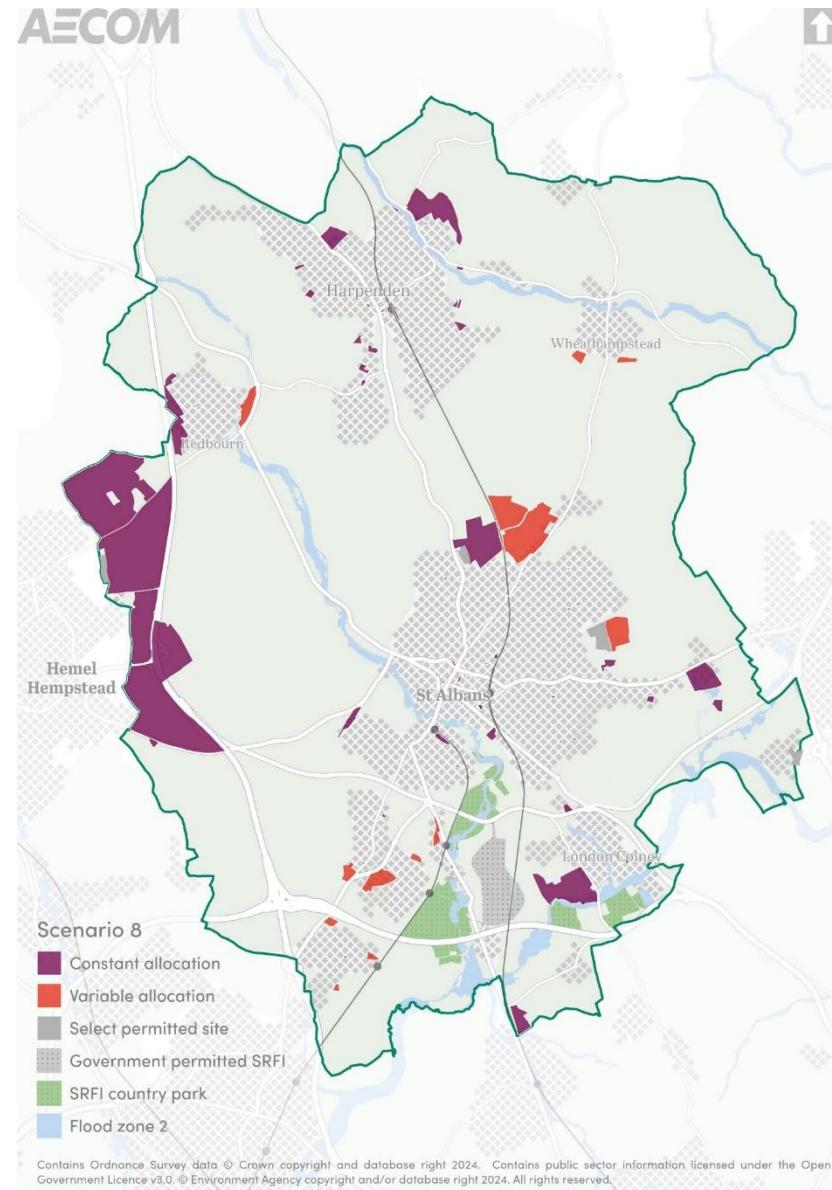
**Scenario 6: PO minus small sites; plus both omission sites**



**Scenario 7: PO plus SE St Albans**



**Scenario 8: PO plus expanded North St Albans**





## Growth scenarios appraisal

### Introduction

The table below ('matrix') presents a summary appraisal of reasonable growth scenarios presented above. To recap, Scenario 3 is the emerging preferred option (PO) and the other scenarios involving either removing sites (minus sign) or adding sites (plus sign).

The table includes a row for each component of the SA framework (introduced above), and within each row, the aim is to **1**) rank the scenarios in order of performance (with a star indicating best performing and "=" used where it is not possible to differentiate with confidence); and then **2**) categorise performance in terms of 'significant effects' using red / amber / light green / green.<sup>1</sup> It is important to note that the topics should not be assumed to have importance (or 'weight'), such that the intention is not for the appraisal matrix below to be used to arrive at a total performance score for each of the growth scenarios.

### Summary discussion (continued overleaf)

The appraisal matrix below shows a very **mixed picture**, serving to suggest that the choice between the reasonable alternative growth scenarios is finely balanced. This is a strong indication of their 'reasonableness', in that all or most could arguably deliver on key objectives and their performance varies 'at the margins'.

The first point to note is that **Scenario 1** stands out as performing quite poorly. However, it is difficult to categorically reach a conclusion that it is the worst performing scenario. This is because the appraisal is undertaken without any assumptions made regarding the 'weight' that should be attributed to each of the sustainability topics. Under two topic headings there are scenarios that perform worse than Scenario 1, and the Council, as decision-makers, might choose to give particular weight to one or more of these topics.

Maintaining a focus on Scenario 1, its poor performance partly reflects the absence of East St Albans (although there are some tensions/challenges in respect of comprehensive planning for the sector of land to the east of St Albans) but also the fact that this is the lower growth scenario (relative to the emerging preferred approach, which is Scenario 3). One of the assumptions underpinning the appraisal is that lower growth could create challenges in respect of progressing the Local Plan (with knock-on implications for sustainability objectives, as it would likely mean ongoing planning by appeal) and/or would risk unmet housing need being generated that then has to be provided for elsewhere within a constrained sub-region.

**Table B:** Summary appraisal of the reasonable growth scenarios

Topic	1	2	3	4	5	6	7	8
	(-) E SA	(-) Smalls	PO	(-) Smalls (+) SE SA	(-) Smalls (+) Ex NSA	(-) Smalls (+) SE SA (+) Ex NSA	(+) SE SA	(+) Ex NSA
Accessibility	3	★	★	★	★	2	★	★
Air and wider env quality	2	★	★	★	★	2	★	★
Biodiversity	3	★	2	★	★	★	2	2
Climate adaptation	3	★	2	★	★	★	2	2
Climate mitigation	4	3	3	2	2	★	★	★
Communities & health	3	2	★	★	2	2	2	2
Economy & employment	2	★	★	★	★	★	★	★
Historic environment	2	2	★	2	2	3	2	2
Homes	4	4	2	3	3	2	★	★
Land, soils, resources	=	=	=	=	=	=	=	=
Landscape	2	3	★	2	2	3	2	2
Transport	4	3	2	★	3	4	2	2
Water	2	2	★	★	★	3	3	3

<sup>1</sup> Red = significant negative effect; amber = negative effect of limited or uncertain significance; light green = positive effect of limited or uncertain significance; green = significant positive effect; no colour = neutral effect.

The appraisal serves to highlight **Scenario 2** as potentially a preferable lower growth scenario, which sees removal of non-strategic Green Belt allocations from lower tier settlements. A number of these sites are subject to a degree of constraint (with limited potential to avoid/mitigate impacts through masterplanning, relative to strategic sites); however, some are unconstrained, quite well located in transport terms (including close to an Abbey Line station), will deliver benefits (notably at Bricket Wood and Redbourn) and/or will help to meet locally arising housing needs (notably Wheathampstead).

A clear drawback to Scenario 2 is the risk or likelihood of generating unmet housing need, and there is a case for suggesting that it should be ranked lower under some topics on this basis, for example under 'Biodiversity' because St Albans does not stand out as biodiversity-constrained in the sub-regional context. However, in practice there would be the potential to adjust Scenario 2 by allocating certain better performing variable sites.

The next scenario for consideration is **Scenario 6**, which has the greatest number of predicted negative effects and also performs best or equal best only under four topic headings. The appraisal serves to suggest that the strategy here could amount to an over-concentration of growth at St Albans. However, there is a degree of uncertainty / the conclusion reached under several topic headings reflects a precautionary approach.

Differentiating between the remaining five scenarios in terms of overall performance is then very challenging. Two key points to note are: **Scenarios 4 and 5** – could involve a problematic housing land supply trajectory, i.e. an overreliance on strategic sites could result in low housing delivery in the crucially important early years of the plan period; whilst **Scenarios 7 and 8** – are higher growth scenarios which gives rise to a notable (but uncertain) degree of concern in respect of water-related objectives.

These points potentially serve to highlight **Scenario 3** (the emerging preferred approach) as a scenario that strikes a good balance across competing sustainability objectives. It can be noted that Scenario 4 is found to perform better under more topic headings than Scenario 3 (8 versus 7), however, and to reiterate, the topic headings should not be assumed to have equal weight. Also, and in any case, Scenario 3 is predicted one additional positive effect and one fewer negative effect relative to Scenario 4.

Having made the above overarching comments, the following bullet points summarise appraisal findings under each of the sustainability topic headings in turn:

- **Accessibility (to community infrastructure)** – a clear focus of the strategy is directing growth broadly in line with the settlement hierarchy and in response to community infrastructure capacity issues / opportunities, most notably by supporting delivery of new schools, including to address existing issues. However, opportunities

could be missed under Scenario 1, and under Scenario 6 there would be a need for further work to consider long term secondary school capacity in St Albans itself.

- **Air quality** – there is a transport and, in turn, air quality argument against the lower growth scenarios, recognising that the District does not stand-out as notably constrained in the sub-regional context. Having said this, there is an air quality management area (AQMA) in the centre of St Albans, hence a concern with Scenario 6 (albeit growth would be in the long term, and air quality is improving nationally).
- **Biodiversity** – there is not support for removing East St Albans, as this is a notably unconstrained site in biodiversity terms, but there is support for adjusting the emerging proposed approach in respect of small site allocations, as a number of the sites in question are subject to notable constraint.
- **Climate change adaptation** – there is not support for removing East St Albans, as this is a notably unconstrained site in flood risk terms, but there is support for adjusting the emerging proposed approach in respect of small site allocations, as a number of the sites in question are subject to notable constraint.
- **Climate change mitigation** – focusing on built environment decarbonisation, it is fair to flag support for higher growth, because of strong development viability locally (supportive of delivering net zero development to an exacting standard, including with net zero achieved onsite) and because there would be added support for strategic sites, which can represent a particular opportunity. With regards to significant effects, the conclusion reflects the stretching nature of decarbonisation targets. It is not possible to conclude built environment decarbonisation has been a primary 'driver' of strategy and site selection (but transport decarbonisation has, as discussed below).
- **Communities and health** – it is difficult to draw conclusions given many competing factors. However, on balance it is considered appropriate to flag: A) support for the emerging preferred approach, which aims to balance wide ranging factors; B) a degree of support for removing small sites, particularly those in the Chiswell Green, How Wood and Park Street / Frogmore area; and C) support for adding SE St Albans as it could feasibly deliver Gypsy and Traveller pitches, which is a key issue/opportunity.
- **Economy and employment** – the approach to allocating land for new employment floorspace – both industrial/logistics and R+D – is highly proactive under all scenarios. However, Scenario 1 is flagged as a lower growth scenario and one that could lead to issues in respect of secondary school capacity at St Albans. This is in the context of a need to support housing growth in the District to ensure a local workforce suited to the local employment opportunities, including in growth sectors linked to Hertfordshire Innovation Quarter Employment site located in East Hemel (Herts IQ).

- **Historic environment** – concerns are overall fairly limited across the sites that are a variable across the growth scenarios, with the exception of expanded North St Albans, which is subject to notable constraint (albeit there is good potential to mitigate impacts through masterplanning). With regards to sites that are a ‘constant’, there are a range of issues (see Section 9), but overall limited concern.
- **Homes** – there is a need to factor-in not only total growth quantum, but also the mix of sites, particularly so as to minimise the need for a stepped housing requirement. Ensuring a good supply of smaller sites is key from a housing perspective, and there is also a case to be made for the higher growth scenarios that could potentially (subject to consideration of an appropriate supply buffer) allow for the requirement to be set modestly above local housing need as a response to levels of affordable housing need locally and/or in order to make modest provision for unmet need from elsewhere.
- **Land and soils** – the District is not associated with particularly high agricultural land quality in the sub-regional context, and it is difficult to differentiate between the variable site options with any confidence.
- **Landscape** – there is not support for removing either East St Albans or the package of small sites at lower tier settlements, from a landscape perspective. With regards to the two emerging strategic omission sites, both are subject to a degree of landscape constraint, and this appears to be particularly the case for expanded North St Albans (but SE St Albans is also sensitive given the need for a landscape gap to London Colney). However, the primary concern is recorded as allocating both sites, as it can be envisaged that there would be in combination effect resulting from strategic expansion of St Albans to the north, east and southeast (albeit the most sensitive landscape, to the west, would be protected).
- **Transport** – key factors are: A) there is not support for lower growth, nor for high growth at St Albans; B) there is modest support for removing smaller allocations at lower tier settlements; and C) there is a preference for SE St Albans over expanded North St Albans. With regards to significant effects, the Interim SA Report (2023) concluded a ‘moderate or uncertain positive effect’ for the preferred approach at that time, and there is now greater confidence in this conclusion in light of consultation responses received and ongoing work to explore transport issues and opportunities, including transport modelling work and detailed work to explore the potential for growth to deliver targeted enhancements to the District’s active travel network. However, it is not possible to predict ‘significant’ positive effects given ongoing work and because inherent challenges remain locally, given the densely populated nature of the south of the District (also noting recent sites unexpectedly gaining permission at appeal) and given inherent transport challenges at Harpenden (including noting Luton Airport).

- **Water** – there is limited available evidence, but it is appropriate to flag a concern with higher growth in light of the Environment Agency’s 2023 consultation response.

## The preferred growth scenario

The following statement is SADC officers’ response to the appraisal:

“The preferred scenario is **Scenario 3**, which the appraisal shows to perform reasonably well relative to the alternatives, supporting a conclusion that it is an appropriate strategy.

With regards to St Albans itself, the Council is working with Oaklands College in respect of comprehensive planning for housing here alongside land for a secondary school, hence there is clear support for East St Albans.

The next question is then whether to support a higher growth scenario involving an additional strategic urban extension. Were there to be a strategic case for this, then both of the shortlisted options (SE St Albans and expanded North St Albans) would warrant consideration. However, there is very limited strategic case to be made, given the potential to provide for LHN in full without an additional strategic urban extension at St Albans, and also noting that neither site is associated with a clear case in respect of delivering on strategic transport or community infrastructure objectives.

A package of non-strategic allocations at lower tier settlements is then the other variable across the reasonable alternative growth scenarios. The appraisal does serve to highlight that several of these sites warrant ongoing consideration in terms of addressing onsite constraints and also in terms of achieving access and delivering on transport objectives more widely. However, the appraisal also serves to highlight a clear strategic argument against reducing supply from small sites in the sense that the effect of doing so would be to worsen the housing land supply situation in the important early years of the plan period. Also, a diverse mix of smaller sites is important in terms of ensuring a robust housing supply trajectory (i.e. a situation whereby there is confidence that the housing requirement can be delivered year-on-year).

In conclusion, Scenario 3 is considered to be justified, in that it is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence (NPPF paragraph 35). It is noted that Scenario 3 gives rise to a degree of tension with certain sustainability objectives, as is inevitable in the context of a local plan, and it is recognised that there are certain arguments in favour of supporting an alternative approach, but Scenario 3 is judged to represent sustainable development on balance.”

# SA findings at this stage

Part 2 of the SA Report presents an appraisal of the Local Plan as a whole.

## Appraisal of the Proposed Submission Local Plan

The appraisal seeks to build upon the appraisal of Growth Scenario 3, as presented above. The appraisal predicts a **positive effect** under five topics (Accessibility, Communities, Economy/employment, Homes and Transport), and in two cases (Accessibility and Economy / employment) it is possible to conclude that positive effect will be 'significant'.

Under the remaining topic headings the appraisal predicts a **neutral effect**, but that is not to say that the appraisal does not flag a range of specific issues and tensions with sustainability objectives under these headings. In particular, the overall conclusion of a neutral effect is marginal under the climate change mitigation and water headings. It is important to be clear that the appraisal is undertaken accounting for a baseline situation / no plan scenario which is assumed to involve considerable growth coming forward in a relatively unplanned manner under the presumption in favour of development.

There will be the potential to make improvements to the plan through the forthcoming examination in public. Improvements to the plan might seek to further bolster positive effects identified through this appraisal, and there will certainly be the potential to further explore tensions with sustainability objectives. As part of this, it may be possible to adjust the balance that has been struck in respect of development management policy requirements in the context of development viability, e.g. feasibly compromising on one objective in order to set more stringent policy requirements in support of another objective.

A small number of recommendations are made; however, it is inherently difficult to confidently make recommendations because actioning them will have implications that are difficult to foresee and account for here. For example, whilst it would be easy to recommend further policy stringency in respect of net zero development, this would have cost/viability implications such that there could be a need to accept trade-offs in respect of one or more wider objectives (e.g. affordable housing). Equally, whilst it would be easy to recommend further site-specific policy, there is always a risk of being overly prescriptive, such that there is reduced flexibility at the development management stage, potentially resulting in site delivery being delayed or site not coming forward at all.

Finally, it should be noted that the current version of the Local Plan was prepared taking account of the appraisal presented within Section 9 of the Interim SA Report (2023). There is no requirement for SA to be iterative in this way, but it adds to plan robustness.

## Cumulative effects

The [Regulations](#) that underpin the SA process indicate that stand-alone consideration should be given to 'cumulative effects', i.e. effects of the Local Plan in combination with other plans, programmes and projects that can be reasonably foreseen. In practice, this is an opportunity to discuss potential long term and 'larger than local' effects. The following bullet points cover some key considerations:

- **Housing needs** – progressing the St Albans Local Plan and providing for LHN in full is strongly supported from a 'larger-than-local' perspective. Support for HGC is likely to be of crucial importance for the Dacorum Local Plan, and if the St Albans and Dacorum Local Plans are able to progress then the South West Herts JSP will be well placed to make progress and plan for longer term needs (alongside infrastructure). There is also a need to account for the emerging Hertsmere Local Plan, which includes a proposed new settlement at Bowmans Cross. Certainty in respect of the St Albans Local Plan could assist with progressing the Hertsmere Local Plan.
- **The economy** – the proposed strategic employment allocation to the east of Hemel Hempstead is very strongly supported from a perspective of meeting employment land needs / realising economic growth and productivity objectives across SW Herts.
- **Transport corridors** – several strategic transport corridors pass through the area, but of particular note is the A414 corridor. The growth strategy should support aspirations for transformational change, with major enhancements supporting objectives for settlements / growth areas between Hemel Hempstead / Watford and Harlow (where there is a committed Garden Town). There is also a clear need to consider the M1 and, in this respect, National Highways are a key partner organisation.
- **Internationally important biodiversity sites** – the key consideration is the Ashridge Woods and Commons SSSI component of the Chilterns Beechwoods SAC. Were HGC not to progress then it would likely prove very difficult for Dacorum to provide for housing needs alongside sufficient SANG.
- **The Chilterns National Landscape** – HGC is in proximity, but this has been a focus of detailed work and concerns are overall limited, as discussed. Again, were HGC not to progress then there could be increased pressure on the National Landscape through the Dacorum Local Plan. There is also a need to note the Chilterns NL boundary review, which is likely to see the National Landscape extended into St Albans District.
- **Landscape scale nature recovery** – a Hertfordshire Local Nature Recovery Strategy (LNRS) is emerging but is not at a stage whereby it can inform the Local Plan. Key cross-border growth-related opportunities might be found in:

- the east of the District, i.e. the sensitive landscape gap between St Albans and Hatfield, albeit recognising that the emerging Welwyn Hatfield Local Plan proposes little growth in this area;
  - the south / southeast of the District, mindful of the proposed series of new country parks set to be delivered alongside the Government permitted SRFI; and
  - the Bricket Wood area, given Bricket Wood Common SSSI and the River Colne corridor, and recognising close links to Watford.
- **Agricultural land** – self-sufficiency of food production is increasingly a key national consideration. Overall, it is not clear that St Albans is particularly constrained in the national context, hence there is support for providing for housing needs in full. Other nearby areas are overall more constrained.
  - **Water resources** – this is a key larger-than-local issue, including given the very large catchment draining to Maple Lodge Sewage Treatment Works (STW). There is a need for coordination of growth across the catchment and with a long term perspective, working with Thames Water.
  - **Hertsmere cross-border issues** – the St Albans / Hertsmere boundary area is quite densely populated, such that growth must be carefully managed, for example in terms of road traffic, maintaining settlement (Green Belt) gaps and strategic planning for green / blue infrastructure. London Colney abuts the boundary and is a higher order settlement in St Albans, such that it must naturally be considered as a location for significant growth through the Local Plan, including potentially with a view to delivering a secondary school that would also serve the north of Hertsmere. With regards to Hertsmere, a Duty to Cooperate meeting in 2021 discussed three potential strategic growth locations close to St Albans, most notably Bowmans Cross, which was then progressed to the Draft Hertsmere Local Plan. However, there is a clear need for further work in respect of avoiding/addressing cross-border issues and realising opportunities. One obvious consideration is the in combination impacts of growth on levels of traffic through London Colney and along Harper Lane. However, there are many other considerations, including realising strategic road, public transport and walking/cycling infrastructure opportunities.
  - **The London Green Belt** – at the current time there is a considerable national debate regarding the future of Green Belt as a long-established designation (there are 14 Green Belts nationally, of which the London ('Metropolitan') Green Belt is by far the largest). Regardless of how this debate progresses, there is a need to ensure a long term strategic perspective in respect of protecting landscapes between settlements.

This will mean a targeted approach that recognises that not all settlement gaps are as important as each other, having accounted for settlement character, landscape character and wide ranging other objectives (e.g. maintaining ecosystem services such as flood risk mitigation). It will be important not to 'sleep walk' into a situation whereby there is piecemeal loss of settlement gaps to the point where South West Hertfordshire becomes part of greater London. A graduated approach might be taken that accounts for defining features such as the Greater London / Hertfordshire boundary, the M25 and the A414, plus other key features such as the River Colne corridor. Looking 50 years hence there is a clear argument against allowing the north west London suburbs to stretch as far as St Albans.

## Next Steps

### Submission, examination, adoption and monitoring

Once the period for representations on the Local Plan / SA Report has finished the intention is to submit the plan for examination in public alongside a summary of the main issues raised through the Regulation 19 publication period. Once found to be sound following examination the Local Plan will be adopted, at which time an SA 'Statement' will present prescribed information including "measures decided concerning monitoring".

Section 11 of the main report suggests a number of indicators, for example:

- Biodiversity – there will be a need to establish a regime for ensuring that decision making in respect of biodiversity net gain as part of planning applications is undertaken under a strategic spatial framework (linked to LNRS) and then monitor effectiveness.
- Climate change mitigation – monitoring should focus on clarity. This can be a confusing policy area, but it is very important that the interested public can engage.
- Economy and employment – the nature of need/demand for office floorspace and industrial/logistics floorspace changes very quickly. Regular monitoring of delivery would assist with future assessments.
- Homes – this topic is already a focus of the monitoring, but additional indicators could be explored, for example with figures broken down further by settlement and by housing type and tenure. Also, there is an increasing focus on tenure split for affordable housing, which might feed into monitoring. A focus on Gypsy and Traveller accommodation could also serve to inform future needs assessments.