

Sustainability Appraisal (SA) of the St Albans Local Plan

Interim SA Report Non-technical Summary

July 2023



Quality information:

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1 Introduction

1.1 Background

- 1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging St Albans City and District Local Plan (the “St Albans Local Plan”).
- 1.1.2 Once adopted, the Local Plan will set a strategy for growth and change for the District up to 2041, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.
- 1.1.3 SA is a process for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives.
- 1.1.4 A central requirement of the SA process is publication of an SA Report for consultation alongside the draft plan that presents an appraisal of “the plan and reasonable alternatives” in order to inform the consultation.
- 1.1.5 The Council is currently consulting on a Draft Plan under Regulation 18 of the Local Planning Regulations.
- 1.1.6 An ‘Interim’ SA Report is published alongside, and this report is the Non-Technical Summary (NTS).

1.2 Structure of the Interim SA Report / this NTS

- 1.2.1 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**?

- 1.2.2 Each of these questions is answered in turn below.
- 1.2.3 Firstly there is a need to answer the question: *What's the scope of the SA?*

1.3 What's the scope of the SA?

- 1.3.1 The scope of the SA is reflected in a list of topics and objectives that sets parameters and a methodological framework for appraisal. The following topics are at the core of the framework:

- Accessibility (to community infrastructure)
- Air / environmental quality
- Biodiversity
- Climate change adaptation
- Climate change mitigation
- Communities
- Economy and employment
- Historic environment
- Homes
- Land, soils and resources
- Landscape
- Transport
- Water

2 Plan-making / SA up to this point

2.1 Introduction

2.1.1 Part 1 of the report explains work undertaken over late 2022 to summer 2023 to develop and appraise 'reasonable alternative' approaches to the allocation of land for development, or '**growth scenarios**'.

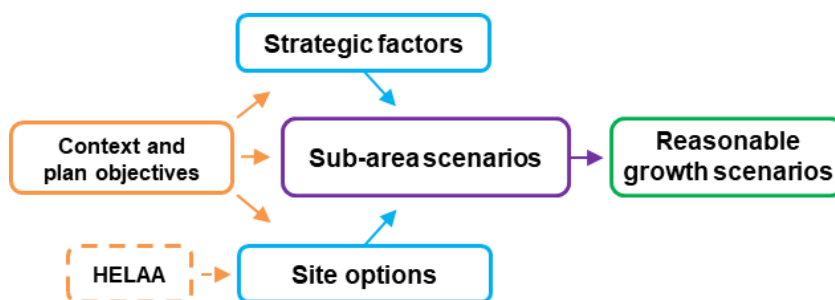
2.1.2 Specifically, Part 1 of the report –

- Explains the process of **defining** the growth scenarios
- Presents the outcomes of **appraising** the growth scenarios
- Explains reasons for **selecting** the preferred scenario, in light of the appraisal

2.2 Defining growth scenarios

2.2.1 **Section 5** of the report explains a lengthy *process* summarised in the figure below.

Figure A: Defining growth scenarios



2.2.2 Section 5.2 of the report gives consideration to **strategic factors**, with two sub-sections:

- **Development quantum** – the District's Local Housing Need (LHN) is 888 dwellings per annum (dpa), or 15,096 homes in total over the 17-year plan period. It is the role of the Local Plan to determine a housing requirement, and whilst there are clear arguments for setting the requirement at LHN, there are also arguments for lower and higher growth. Whatever the housing requirement, there is a need to ensure a supply of deliverable sites sufficient to ensure that the requirement is delivered in practice.¹

Specific considerations include:

- High level arguments for a housing requirement *at* LHN – this is the approach typically taken, and arguably the default approach, but it is not 'mandatory'. Across a sub-region, confidence that authorities will at least provide for LHN supports effective planning for strategic infrastructure.
- High level arguments for a housing requirement *below* LHN – the primary consideration is the London Metropolitan Green Belt, which constrains greenfield land across the entire District, and is a key constraint to growth listed within NPPF footnote 7. The Draft NPPF (2022) seemingly gives increased weight to Green Belt as a constraint, but it is not entirely clear, and the proposals remain only in draft.
- High level arguments for a housing requirement *above* LHN – the LHN figure is 'capped', meaning that step three in the (three step) standard methodology applies, with the uncapped figure significantly higher, and the Government's Planning Practice Guidance (PPG) is clear that consideration should be given to closing the gap to the uncapped LHN figure. However, the cap is there to ensure a realistic housing requirement from a delivery perspective, mindful of penalties for under-delivery, and this is a relevant consideration in the St Albans context and given the national economic context.² The housing requirement must not be set at a level that risks being undeliverable in practice.

¹ The housing requirement is the figure that the Council commits to delivering, mindful of penalties for under delivery, namely the presumption in favour of sustainable development (NPPF paragraph 11 including footnote 8). The Housing Delivery Test is used to measure the Council's performance in this respect. Also, the Council must maintain a rolling supply of 'deliverable' sites sufficient to meet the housing requirement for a five year period (i.e. a 'five year housing land supply', or '5YHLS').

² A report on housing delivery was presented to the Local Plan Advisory Group (LPAG) in March 2022. Average delivery since 1994 has been 397 dpa, but higher over the past five years (455 dpa). However, 2021/22 saw just 314 homes delivered.

Affordable housing need is also very high locally, and the Government's Planning Practice Guidance (PPG) states: *"An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes."* The SW Herts Local Housing Needs Assessment (LHNA, 2020) identifies a need for 443 affordable homes to rent per annum plus a need for 385 per annum affordable home ownership. The combined figure is very high in comparison to LHN, mindful that market-led schemes typically deliver affordable housing at a rate of up to ~40%. Furthermore, there is also a need to consider the recent rates of affordable housing delivery, as understood from the past five [Authority Monitoring Reports](#) (AMRs), which is 19.4%, with a breakdown by tenure as follows: social rent – 23%; affordable rent – 57%; affordable ownership – 21%. It is not clear that this fully aligns with the LHNA recommendation that *"[s]uch is the scale of affordable housing need... should seek to deliver as much affordable housing to rent as viability allows"*.

Finally, there is a need to consider unmet need from elsewhere, with the NPPF (2021; also draft 2022) clear that: *"Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period"* [emphasis added]. A detailed review is presented in the main report, with the conclusion reached that, whilst there is little in the way of clear evidence to suggest that St Albans is or might be well-suited to providing for unmet need from elsewhere, there is a clear risk of significant unmet need arising from the wider sub-region.

- Quantum of supply – given the number of homes in question it is inevitable that there will be unforeseen delays to delivering allocated sites (e.g. due to issues that arise through the planning application process), and some types of site are more at risk of delay than others, notably large strategic sites and complex urban / brownfield sites. The implication is a need to: A) identify a supply of land with a theoretical capacity in excess of what is needed to provide for the housing requirement as a contingency against delivery issues (a 'supply buffer'); and B) ensure a good mix of sites in terms of size, type, location and delivery timetable. In respect of (B), it is important to note that the Inspector examining a previous version of the St Albans Local Plan (withdrawn in 2020) was critical of focusing overly on large-strategic sites, stating that *"a range of sites including smaller sites could also provide benefits. For example, they could be delivered more quickly without requiring additional infrastructure, provide choice and flexibility in the housing market and secure affordable housing more immediately."*
- Employment land – the South West Herts Economic Study Update (2019; N.B. an update is in progress) considers a series of scenarios for future demand in respect of both office space and industrial land, ultimately supporting the highest growth scenarios for office space and (in particular) industrial land. For industrial land it states: *"Although this is a considerable change we believe it is justified by the consistently strong levels of demand for industrial space in South West Herts, which could have been even higher if the market was not undersupplied. The continued growth of online shopping is also likely to mean this strong demand is sustained."* The study then considers supply, before predicting an: over-supply across the sub-region in respect of office space; and a large undersupply in respect of industrial land, but with an oversupply within St Albans.
- **Broad distribution** – key messages from the review of issues/opportunities include:
 - Hemel Garden Communities (HGC) – is strongly supported in wide-ranging respects, but there are also a range of issues and sensitivities. Detailed discussion is presented below and in the main report.
 - Strategic sites – there is a clear argument for ensuring a strong focus on strategic sites, i.e. sites delivering at least several hundred homes that are suited to comprehensive masterplanning and tend to support a mix of uses onsite and delivery of new / upgraded infrastructure.
 - Smaller sites – as discussed, a key lesson learned from the experience of the previous (withdrawn) local plan is that there is a need for a good mix of sites, to include smaller sites. A good mix of sites is important from a perspective of seeking to minimise delivery risk, but there are also wider merits to smaller sites, notably: the NPPF supports smaller sites because they can allow for *"opportunities for villages to grow and thrive, especially where this will support local services"*; smaller sites are suited to delivery by SME housebuilders; and small Green Belt sites can sometimes be developed with limited impact on the wider Green Belt. There can also be a traffic argument for dispersing growth across smaller sites; however, on the other hand, focusing growth (at strategic sites or along transport corridors) can support early and effective transport planning, including for strategic upgrades.
 - Transport connectivity – is a key issue locally, with implications for wide-ranging sustainability objectives, including climate change mitigation. The option of focusing growth along transport corridors was found to perform strongly through the recent SW Herts South West Herts Joint Strategic

Plan (JSP) consultation, and the option of ‘growing the best-connected places’ also performed well. Growing the best-connected places could mean an overwhelming focus on Hemel Hempstead, St Albans and Harpenden or, alternatively, distributing growth in accordance with the settlement hierarchy. Also, there is a need to recognise that settlements function in clusters. This is recognised in the NPPF (para 79) and applies quite strongly in both the north and the south of St Albans District.

- A414 and Mass Rapid Transit (MRT) – discussion of strategic opportunities / options for the A414 corridor, including a possible Hertfordshire Essex Mass Rapid Transport (HERT) has been ongoing for several years. There was then a presentation to LPAG in [September 2021](#), which emphasised the links between HERT and the wider A414 strategy, as well as complexities and challenges associated with realising scheme objectives. The project then hit a milestone in late 2021, when there was an initial consultation; however, no significant progress has been reported since that time. The initial consultation covered: need and benefits of the HERT; principles including the vision and potential key features; current travel behaviours and the possible trips that could be made using the HERT; and towns and interchanges the HERT could serve, between Hemel Hempstead / Watford and Harlow.
- Other transport priorities – there is clearly a need to support accessibility to the two mainline train stations, and the Abbey Line also provides important connectivity to Watford, with a need to support patronage. There are also key bus services to account for as part of spatial strategy and site selection, including with a view to supporting and potentially enhancing services; this includes key north / south and east / west routes through St Albans. There is also a good network of cycle infrastructure locally, including two offroad routes along former railways, with significant opportunities to deliver enhancement. Finally, an important transport consideration is the need to account for increased HGV movements in the south of the District as a result of the Government-permitted SRFI.
- Education – a review of Duty to Cooperate (DtC) meetings serves to highlight discussions with Dacorum Borough regarding the need for a secondary school to serve Hemel Hempstead to come forward within St Albans part of HGC. Also, there is also a need for new secondary school capacity at St Albans and at London Colney, and this is also important from a transport/traffic perspective.
- Green and blue infrastructure – is another key issue, in light of the recent SW Herts JSP consultation. Reasonable growth scenarios must be defined mindful of both strategic constraints and opportunities. A series of new country parks is set to come forward alongside the Government-permitted SRFI, and other opportunities of similar significance might be explored, including around enhancing river corridors and improving access to woodlands. Bricket Wood Common is a key sensitivity in the south.
- Urban capacity – it almost goes without saying that there is a need to maximise urban capacity, in order to minimise pressure on the Green Belt. In some urban areas there can be a strategic choice, in terms of development clusters and density (including building heights), but it is not clear that there is any such strategic choice in the St Albans context. There is also a need to be mindful that identified urban housing land supply can be associated with high delivery risk in comparison to greenfield.

2.2.3 Section 5.3 of the main report then gives consideration to the pool of **site options** available and hence in contention for allocation. The starting point was the Council’s Housing and Economic Land Availability Assessment (HELAA, 2022), Green Belt Review (2023) and Urban Capacity Study (2022). With regards to the Green Belt review, it is important to note that a key outcome is a list of land parcels that are “recommended for further consideration” in terms of their potential for development.

2.2.4 Further detailed work to examine site options in isolation was primarily led by Officers, and an initial draft assessment has been prepared for a lengthy shortlist of reasonable site options. AECOM also took a supplementary GIS analysis exercise (Appendix V of the main report). At this stage it should also be noted that there are not considered to be any realistic new settlement options within the District.

2.2.5 Section 5.4 of the report then draws upon the preceding two stages of work to give consideration to **growth scenarios for sub-areas** (individual settlements and one settlement cluster). This is a key stage within the process (see Figure A), with there being a need to: A) place site options in a sequential order of preference (as far as possible); and then B) identify reasonable alternative ways that sites might be allocated in combination, mindful of in-combination issues / opportunities and the quantum of homes that is broadly, or arguably, appropriate for the sub-area in question. Whilst most of the sub-areas are associated with many feasible scenarios there is a pragmatic need to keep the number to a minimum, and also to apply a degree of methodological consistency across sub-areas.

2.2.6 Table A presents a summary of the sub-area scenarios. In summary: two scenarios for six sub-areas; three scenarios for two sub-areas; and four scenarios for one sub-area.

2.2.7 Final points to note, on the sub-area scenarios, are as follows:

- The table shows new supply via Green Belt (GB) release. Additional housing supply comes from planning permissions, urban areas and windfall (see discussion in Appendix VI of the main report).³
- The option of nil Green Belt release is progressed for all sub-areas other than: Northeast Hemel Hempstead (it is considered reasonable to assume that land 'recommended' by the GB Review would be allocated under all scenarios); and St Albans (two previously developed / brownfield sites).
- It can be seen that there is a considerable range for all sub-areas, which is not ideal. At the next stage it will be important to establish a narrower range of scenarios, including ruling out nil GB release where appropriate. At this current stage it is considered safer to test nil GB release for most sub-areas.

Table A: Summary of sub-area scenarios

Sub area	Scenarios for new homes via Green Belt release
Northeast of Hemel Hempstead	Two scenarios: 740 or 4,750 homes
St Albans (inc. Colney Heath)	Four scenarios: 144, 809, 2,326 or 5,677 homes
Harpenden	Three scenarios: 0, 963 or 1,561 homes
London Colney	Three scenarios: 0, 405 or 885 homes
Redbourn	Two scenarios: 0 or 661 homes
Wheathampstead (inc. Gustard Wood)	Two scenarios: 0 or 213 homes
Bricket Wood	Two scenarios: 0 or 132 homes
Chiswell Green, How Wood and Park Street / Frogmore	Two scenarios: 0 or 538 homes
Edge of Radlett (N.B. Radlett is within Hertsmere)	Two scenarios: 0 or 274 homes

N.B. in summary, this table shows the sub-area growth scenarios (housing supply from Green Belt release) defined on the basis of the analysis in Appendix VI, as summarised in Section 5.4 of the main report (and informed by the analysis presented in Sections 5.2 and 5.3). Having defined sub-area growth scenarios, the next step is to combine them to form a single set of reasonable growth scenarios for the District / Local Plan as a whole.

2.2.8 Section 5.5 of the report then considers how to combine the sub-area scenarios in order to form **reasonable growth scenarios** for the Local Plan / plan-area as a whole. There are many feasible scenarios, but there is a pragmatic need to limit scenarios to a manageable number.

2.2.9 The conclusion is that there are four reasonable growth scenarios at the current time:

- **Scenario 1** – Low growth without HGC
Lowest growth scenario for two sub-areas (NE Hemel Hempstead and London Colney) combined with the second-lowest growth scenario for the other seven sub-areas.
- **Scenario 2** – Low growth with HGC
High growth scenario for NE Hemel Hempstead (i.e. HGC in full) along with the lowest growth elsewhere.
- **Scenario 3** – Provide for LHN without HGC
Highest growth scenarios for all sub-areas other than NE Hemel Hempstead
- **Scenario 4** – Provide for LHN with HGC
In comparison to Scenario 3, this scenario brings in HGC, therefore allowing for reduced supply at St Albans and London Colney. Specifically, it allows for the second highest scenario for these settlements.

³ Urban supply breaks down as: four Harpenden Neighbourhood Plan allocations; two brownfield HELAA sites; two greenfield HELAA sites (at London Colney); and additional supply identified through the Urban Capacity Study. Windfall is assumed supply from sites that can be expected to come forward outside of local plan allocations. Appendix VI presents information by sub area.

2.2.10 The four scenarios are presented below across two separate tables (reflecting two different approaches to categorising Green Belt supply) and a series of maps. **Final points to note** are as follows:

- Windfall and urban supply – these terms are defined above (footnote 3). With regards to urban supply, it is important to emphasise that this is inherently associated with some delivery risk, e.g. given uses / land values, complex land ownership and unforeseen development costs. The question of potential reasonable alternative growth scenarios for urban areas will be revisited prior to plan finalisation.
- ‘Recommended’ Green Belt (GB) sites – feature in the majority of scenarios, namely in Scenarios 1, 3 and 4. These are site options comprising land recommended for further consideration by the Green Belt Review. Most are smaller sites, but there are also four strategic sites (NW Harpenden, West of Redbourn, Glinwells (east of St Albans) and Harper Lane (north of Radlett). Also, the central section of HGC falls into this category, as does the eastern section of the NE Harpenden strategic site option (Scenarios 3 and 4). The great majority of land parcels ‘recommended’ by the GB Review feature in Scenarios 1, 3 and 4, i.e. few were screened out through the process of defining growth scenarios.
- Other strategic site options – there are four strategic site options judged to perform relatively well despite comprising or including land not recommended for further consideration by the Green Belt Review, such that they feature in Scenarios 3 and 4. These four sites are:
 - North East Harpenden
 - North St Albans
 - East St Albans
 - West London Colney
- Fallback strategic site options – are strategic site options judged to perform poorly relative to the strategic site options listed above, but which might need to come into consideration under a scenario whereby the housing requirement is set at LHN and HGC is not taken forward in full, i.e. Scenario 3.

Three fallback strategic site options are progressed to the reasonable growth scenarios on balance, but this was quite a marginal decision, with several other potential sites given close consideration as part of the discussion of sub-area scenarios (Section 5.4 and Appendix VI of the main report) but ultimately ruled out. The three sites were selected particularly mindful of the settlement hierarchy, transport connectivity and support for growth at scale (particularly in the absence of HGC). Sites ruled out might have merit when viewed in isolation, but when viewed in combination with sequentially preferable sites their allocation would lead to an unreasonably high quantum of growth for the settlement in question.

The three fallback strategic site options are:

- Expanded North St Albans – the assumption is that a cluster of four HELAA sites would be supported to the east of the railway line with a total area of 90 ha, such that the assumed capacity is 2,170 homes. However, in practice capacity could be lower, including due to problematic transport connectivity, and/or there could be some additional capacity to the west of the railway line, i.e. the sequentially preferable North St Albans strategic site option could feasibly be extended further to the north.
- South East St Albans – the assumption is 880 homes across a 47 ha site between the A1081 London Road and Highfield Lane, leaving a landscape / Green Belt gap to the A414 of at least 400m.
- North East London Colney – the assumption is 480 homes. The site is notably adjacent to the District’s boundary with Hertsmere Borough, plus there is a need to consider the proximity of a major new settlement option that is being closely considered through the Hertsmere Local Plan, namely Bowmans Cross. Road and active travel accessibility is a clear challenge, but there is currently a junction onto the A414, which could feasibly be upgraded. In this respect, there could feasibly be some benefit to bringing forward development here in-combination with ‘South East St Albans’.
- Employment – the approach taken to meeting employment land needs is held constant across the growth scenarios. Specifically, under all scenarios the assumption is that there would be delivery of 55 ha of employment land at East Hemel Hempstead (Central), in addition to 33.16 ha of employment land as part of the Government permitted SRFI. The effect would be an over-supply of employment land locally, as measured against the established need figure (discussed above). However, this is appropriate, given the challenges faced by other South West Herts local authorities in respect of meeting their need. East of Hemel Hempstead performs very strongly as a location for strategic employment growth and there is no reason to test scenarios without delivery of the Government permitted SRFI.
- Maps – please note that the four maps of growth scenarios show only proposed Green Belt allocations.

Table B: The RA growth scenarios (with Green Belt supply broken down by sub-area)

Supply components		Scenario 1: Low growth No HGC	Scenario 2: Low growth With HGC	Scenario 3: LHN No HGC	Scenario 4: LHN With HGC	
Commitments		1,378	1,378	1,378	1,378	
Windfall		2,880	2,880	2,880	2,880	
Allocations	Urban supply	920	920	920	920	
	Green Belt release	Northeast Hemel Hempstead	740	4,750	740	4,750
		St Albans	809	144	5,377	2,326
		Harpenden	963	-	1,561	1,561
		London Colney	-	-	885	405
		Redbourn	661	-	661	661
		Wheathampstead	213	-	213	213
		Bricket Wood	132	-	132	132
		Chiswell Green + HW + PS / Frogmore	438	-	438	438
		Edge of Radlett	274	-	274	274
		Total homes		9,407	10,072	15,459
% above/below LHN (15,096)*		-38	-33	2	6	
Housing requirement**		~9,000	~9,000	LHN?	LHN	
Unmet need		~6,000	~6,000	0?	0	

* 15,096 is local housing need (LHN) for the plan period (888 dpa x 17 years)

** The housing requirement is the number of homes the Local Plan commits to delivering, for monitoring purposes, and mindful that failing to deliver the housing requirement can render a local plan out-of-date.

Table C: The RA growth scenarios (with Green Belt supply broken down by category of site)

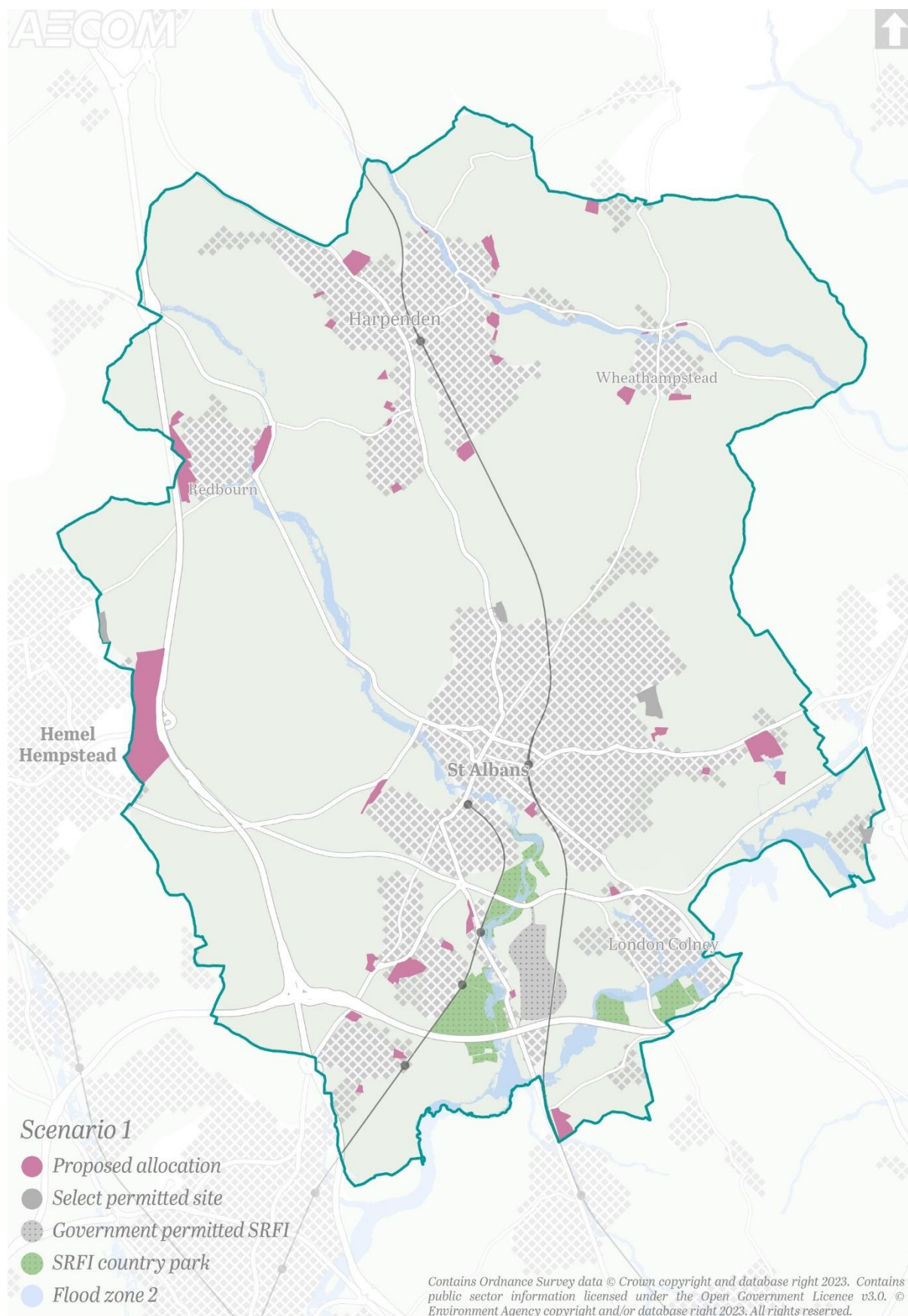
Supply components		Scenario 1: Low growth No HGC	Scenario 2: Low growth With HGC	Scenario 3: LHN No HGC	Scenario 4: LHN With HGC	
Commitments		1,378	1,378	1,378	1,378	
Windfall		2,880	2,880	2,880	2,880	
Allocations	Urban supply	920	920	920	920	
	Green Belt release	Green Belt PDL	144	144	144	144
		Hemel Garden Communities (HGC)	740	4,750	740	4,750
		'Recommended' GB (non-HGC)*	3345	-	3182	3182
		North St Albans	-	-	996	996
		North East Harpenden	-	-	762	762
		East St Albans	-	-	522	522
		West London Colney	-	-	405	405
		Expanded North St Albans	-	-	2170	-
		South East St Albans	-	-	880	-
		North East London Colney	-	-	480	-
		Total homes		9,407	10,072	15,459
% above/below LHN (15,096)**		-38	-33	2	6	
Housing requirement***		~9,000	~9,000	LHN?	LHN	
Unmet need		~6,000	~6,000	0?	0	

* Higher under Scenario 1 because it includes 164 homes within NE Harpenden

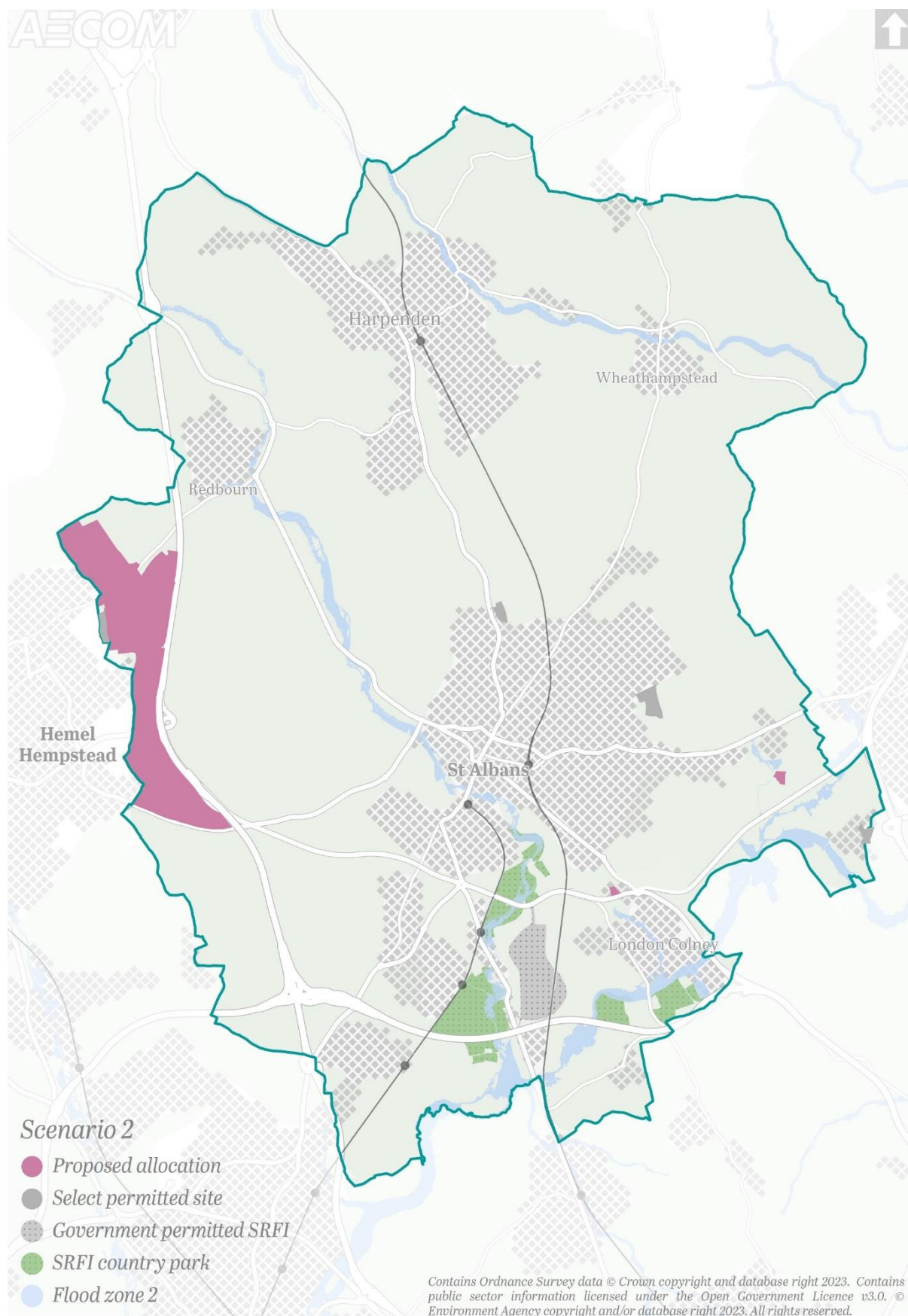
** 15,096 is local housing need (LHN) for the plan period (888 dpa x 17 years)

*** The housing requirement is the number of homes the Local Plan commits to delivering, for monitoring purposes, and mindful that failing to deliver the housing requirement can render a local plan out-of-date.

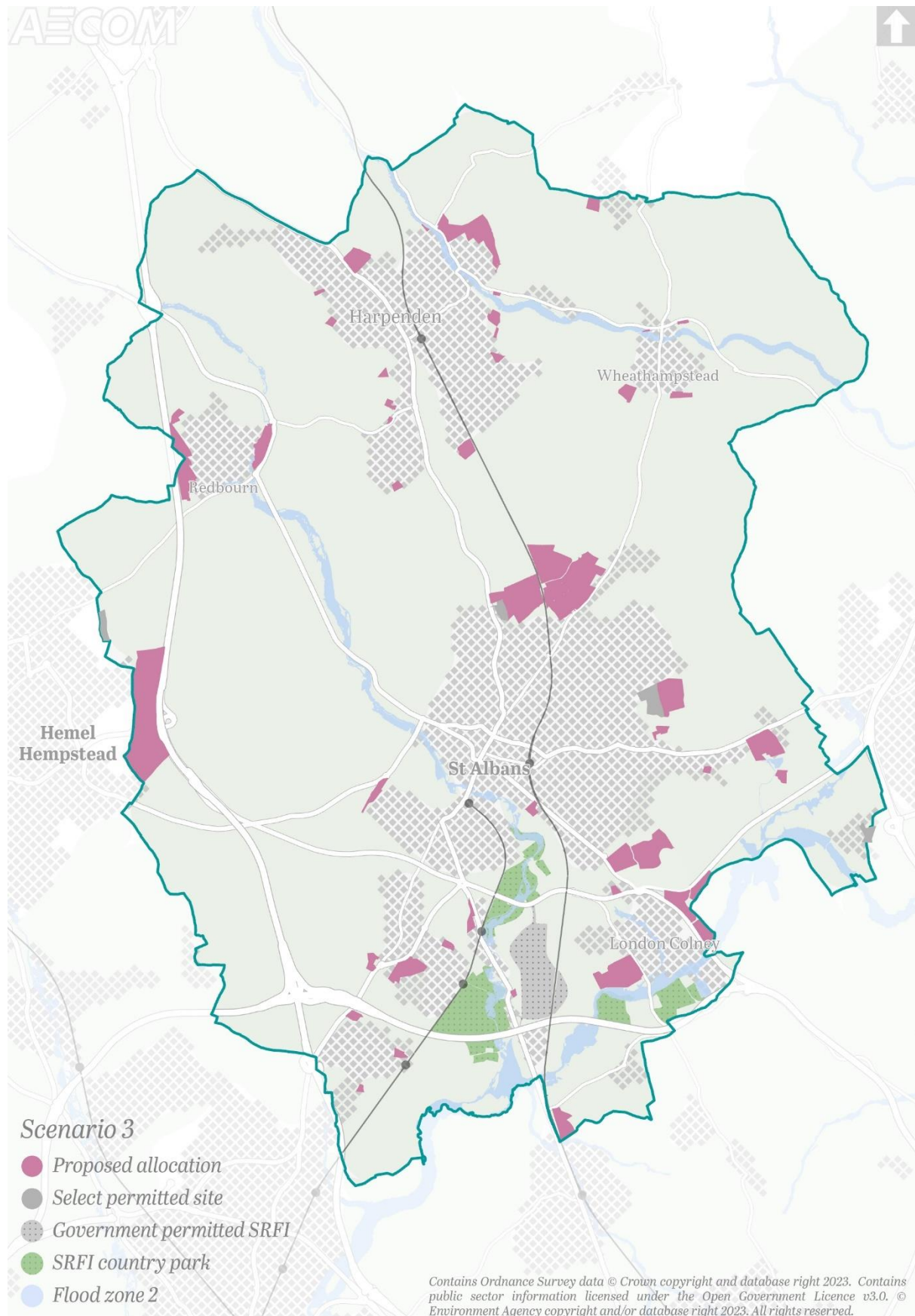
Reasonable growth scenario 1: Low growth; No HGC



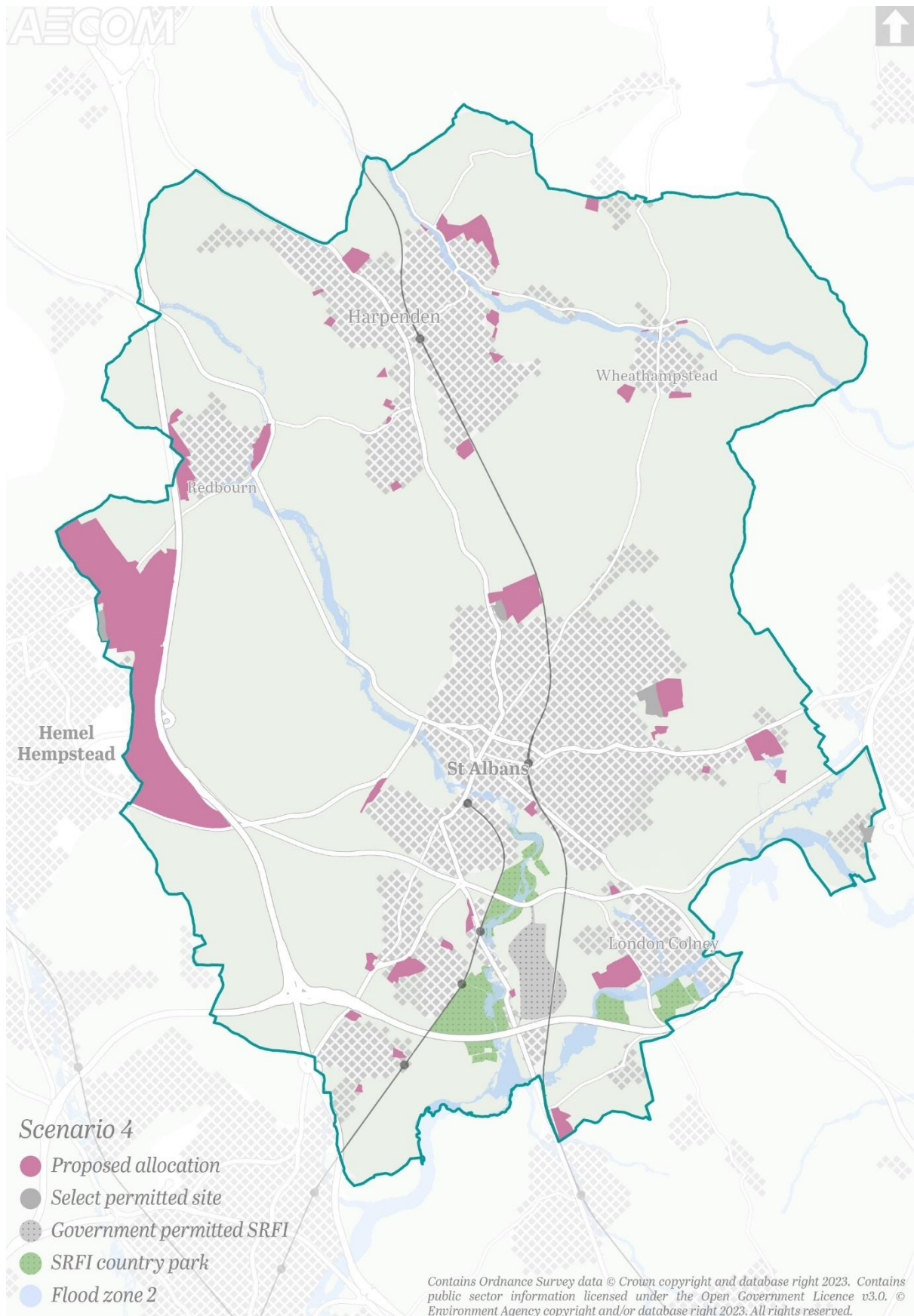
Reasonable growth scenario 2: Low growth; with HGC



Reasonable growth scenario 3: Provide for LHN; no HGC



Reasonable growth scenario 4: Provide for LHN; with HGC



2.3 Appraising growth scenarios

2.3.1 Section 6 of the report presents the appraisal of reasonable growth scenarios. Below is a summary.

2.3.2 Within each row of Table D (i.e. for each of the SA framework topics) the columns to the right hand side seek to: rank the scenarios by performance, where one is best performing (highlighted by a gold star); and then categorise the performance of each scenario in terms of 'significant effects', using **red** (significant negative effect), **amber** (moderate or uncertain negative effect), no colour (no significant effect), **light green** (moderate or uncertain positive effect) and **dark green** (significant positive effect). Also "=" is used where it is not possible to differentiate between the growth scenarios with sufficient confidence.

N.B. a key point to note is in respect of **growth quantum**. It is not considered appropriate to simply conclude a preference for lower growth from wide-ranging environmental perspectives, despite the fact that housing growth inevitably leads to environmental impacts. This reflects an assumption that unmet need would have to be provided for elsewhere within a constrained sub-region, and it is not always possible to conclude that St Albans is particularly constrained in the sub-regional context.

Table D: The reasonable growth scenarios – summary appraisal findings

	Scenario 1: Low growth No HGC	Scenario 2: Low growth With HGC	Scenario 3: LHN No HGC	Scenario 4: LHN With HGC
Topic	Rank of preference (number) and categorisation of effects (colour)			
Accessibility	2	2	2	★
Air & wider env quality	2	2	2	★
Biodiversity	2	★	★	★
Climate change adaptation	2	★	★	★
Climate change mitigation	3	2	2	★
Communities & health	★	★	2	★
Economy & employment	3	2	2	★
Historic environment	2	★	3	★
Homes	3	4	2	★
Land, soils & natural resources	★	★	2	★
Landscape	2	2	2	★
Transport	3	2	2	★
Water	=	=	=	=

2.3.3 The appraisal shows **Scenario 4** to perform well in terms of a wide range of sustainability objectives, relative to the other three scenarios appraised. However, it does not necessarily follow that Scenario 4 is best performing overall, or best represents sustainable development. This is for two reasons:

- For several topics (biodiversity, climate change adaptation, communities, historic environment and land) the appraisal is finely balanced, such that new evidence could quite easily serve to tip the balance of favour. Equally, further evidence might arise in respect of ‘water’ that is not supportive of Scenario 4.
- The appraisal is undertaken without any assumptions regarding the degree of importance that should be assigned to each of the SA topics. It is for the plan-makers to assign ‘weight’ to topics/objectives and *then* decide which scenario best represents sustainable development *on balance* (see below).

2.3.4 With regards to Scenarios 1, 2 and 3, matters are finely balanced. Key considerations include:

- The low growth scenarios (**Scenarios 1 and 2**) are supported in respect of some environmental topics, but not all, given an assumption that the resulting unmet need would have to be provided for elsewhere within a constrained sub-region. Equally, low growth is not supported from a transport perspective, because it is important to provide for housing need close to source and also provide for early certainty regarding broad distribution of growth sub-regionally in support of effective strategic transport planning. Finally, low growth is not supported from a decarbonisation perspective, including because development viability is high locally, leading to potential to exceed the emissions requirements of Building Regulations.
- **Scenario 1** performs poorly because of the unmet housing need that would be generated and because growth related opportunities would be missed (e.g. new secondary schools), both at Hemel Garden Communities (HGC) and at four other strategic growth locations that feature in Scenarios 3 and 4.
- **Scenario 2** performs particularly poorly in terms of ‘homes’ objectives, because the District’s housing supply would be overly reliant on a single site (HGC), leading to delivery risk, plus there would be very low supply early in the plan period (before HGC delivers) and very locally arising needs would go unmet.
- **Scenario 3** performs poorly in certain respects as HGC would be replaced by three strategic urban extensions that are subject to constraint (including in combination, particularly at the St Albans City-scale, e.g. in terms of traffic congestion) and would be a difficult ‘sell’ to the local community, as the growth related / planning gain opportunities are relatively limited in comparison to other strategic options.

2.3.5 Finally, taking each of the key ‘variables’ in turn:

- **Hemel Garden Communities** (Scenarios 2 and 4) – there are a range of issues and tensions with sustainability objectives, which is inevitable given the scale of HGC, and there are also a range of uncertainties at this stage in the local plan process, despite work having been ongoing for several years (potentially reflecting the fact that work has been undertaken in the context of policy uncertainty).

However, there is clear evidence to suggest that, for a wide range of sustainability objectives, St Albans Local Plan scenarios without HGC give rise to *greater concerns* than is the case for scenarios with HGC, whether that is a low growth scenario (Scenario 1) or a scenario whereby HGC is replaced by strategic urban extensions (Scenario 3). Furthermore, without St Albans support for HGC it may not be possible for Dacorum to take HGC forward, with implications for the Dacorum Local Plan and, in turn, wider knock-on effects. It is crucially important to consider the merits of HGC in this wider strategic context.

Scenarios including HGC perform well in terms of:

- Accessibility - there is a major opportunity to deliver community infrastructure alongside new homes, including secondary school capacity and including to the benefit of existing communities locally.
- Biodiversity - it is key to deliver new homes alongside Suitable Alternative Natural Greenspace (SANG) in western St Albans and Dacorum. Also, HGC is fairly unconstrained in wider biodiversity respects.
- Climate change adaptation (flood risk), historic environment, land (particularly best and most versatile agricultural land) and landscape – the St Albans HGC area is fairly unconstrained, again mindful of where/how this quantum of homes might alternatively be delivered. Proximity to the Chilterns AONB is noted, as is ongoing Chilterns AONB boundary review. Also, the land is mostly not “recommended for further consideration” by the Green Belt Review. However, landscape and Green Belt concerns can be mitigated, including via strategically located SANG and a new country park. Also, support for the St Albans components of HGC would serve to minimise pressure on the Gade valley in Dacorum.
- Climate change mitigation – large-scale strategic growth can lead an opportunity to minimise built environment emissions per head of population (‘per capita’), with transport emissions also key.

- Economy – Scenarios 1 and 3 assume that a strategic expansion of the Maylands Estate could be delivered without support for wider HGC, but this is uncertain, and would clearly be sub-optimal.
- Historic environment – although there will be impacts to a historic rural landscape including historic farmsteads, and proximity to the Gorhambury Estate (to the east) is noted.
- Homes – the scenarios assume that it could be possible to provide for LHN without HGC (Scenario 3), but this is uncertain (noting the drawbacks to Scenario 3).

A related key issue is providing for Gypsy and Traveller accommodation needs, with HGC likely very important. Latest understanding, following a legal case in 2022, is that local plans should consider ‘cultural’ need as opposed to only the needs of those who actively travel.

- Transport – growth at this scale leads to clear opportunities, around minimising the need to travel and supporting modal shift, and there are certain inherent locational opportunities (support for A414 corridor aspirations, including HERT; proximity to employment; and also the Nickey Line), however, it is recognised that new communities would be quite distant from a town centre and a train station.

Whilst the appraisal has given detailed consideration to ‘no HGC’ scenarios, in light of the appraisal there is an argument to suggest that such scenarios are unreasonable, and attention might more usefully focus on scenarios that vary less in respect of HGC and more in respect of urban extensions elsewhere.

- **Sites involving land ‘recommended’ by the GB review** (Scenarios 1, 3 and 4) – the strategic sites are all supported in wide-ranging respects, although there are a number of detailed issues that will require further consideration. The package of non-strategic sites includes a number of sites subject to constraint – e.g. biodiversity, historic environment, transport connectivity, safe and suitable access – which could result in a need to reduce housing yield or potentially consider the option of non-allocation. However, it is important to ensure a good supply of smaller sites from a housing delivery perspective.
- **Strategic sites involving land *not* ‘recommended’ by the GB Review** (Scenarios 3 and 4) – there is a distinction between A) East St Albans and West London Colney, which would deliver secondary schools; and B) North St Albans and NE Harpenden, which would deliver a primary school (and other significant infrastructure benefits, e.g. North St Albans should support significant enhancements to strategic cycle infrastructure). With regards to (A), there is strong support for these two sites, with the appraisal flagging few concerns, hence there is an argument to suggest that they should have been held constant across the RA growth scenarios, to enable a greater focus on other site / strategy options. Focusing on (B), NE Harpenden is slightly closer to its respective town centre and train station (~2km), and a secondary school (with capacity) is in very close proximity, but the site is not located on an A-road corridor. Both sites are associated with some landscape and heritage constraint.
- **Fallback strategic sites** (Scenario 3) – the three sites that replace HGC under Scenario 3 all give rise to significant concerns, most notably the option of an extended North St Albans strategic scheme. A South East St Albans urban extension has some merit, particularly in transport terms, and could feasibly be considered alongside strategic growth at North East London Colney (where there is also a need to consider the possibility of nearby growth in Hertsmere, as well as the Government permitted SRFI).

- 2.3.6 Finally, with regards to ‘water’, the appraisal conclusion reflects somewhat limited available evidence at the current time, particularly in terms of capacity / issues at sewage treatment works. The water companies and the Environment Agency will provide key evidence through the consultation.

2.4 The preferred growth scenario

- 2.4.1 The following text was provided to AECOM by Officers:

“The preferred scenario is Scenario 4, which the appraisal shows to perform very well relative to the alternatives. Scenario 4 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 4 is judged to represent sustainable development on balance. There is good potential to address the identified tensions through policy (see the Draft Plan appraisal below), and adjustments can also be made to the spatial strategy subsequent to the current Regulation 18 consultation, drawing upon the latest evidence including consultation responses received.”

3 SA findings at this stage

3.1.1 Part 2 of the Interim SA Report presents an appraisal of the Draft Local Plan as a whole. The appraisal takes the form of 13 narrative discussions – one for each of the topic headings that together comprise the SA framework. In practice, the appraisal builds upon the appraisal of Growth Scenario 4.

3.1.2 With regards to methodology, there are three key points to make:

- The requirement is to predict ‘significant effects’ taking into account the available evidence and also mindful of wide-ranging effect characteristics, e.g. effects can be short or long term, direct or indirect.
- An effect is a predicted change to the baseline situation, which is not simply a snap shot of the current situation, but also a projection of the current situation in the absence of the Local Plan. As part of this, there is a need to recognise that housing growth locally would continue in the absence of the Local Plan, under the presumption in favour of sustainable development and potentially Government intervention. Also, neighbouring local authorities would have to consider providing for St Albans’ unmet housing need.
- The significance of any given effect is judged taking into account not only the magnitude of the predicted change to the baseline situation but also established objectives and targets (e.g. the District has a 2030 net zero target date, such that there is a need to achieve a rapid decarbonisation trajectory).

3.1.3 The appraisal predicts **significant positive effects** in terms of:

- **Accessibility (to community infrastructure)** – growth is distributed in line with the settlement hierarchy, and there is a good focus on directing growth so as to secure new and upgraded infrastructure alongside new homes, to the benefit of new and existing communities. However, there is a need for further work to understand more precisely what can be achieved, for example two of the proposed strategic sites may or may not provide for a primary school. Focusing on HGC, the land within St Albans will not only deliver and secondary school but also two 3-form entry primary schools, i.e. large primary schools in contrast to the more typical 2-form entry.

N.B. significant positive effects are predicted mindful that the baseline situation would likely involve piecemeal housing growth coming forward (likely to include ‘planning by appeal’) without strategic consideration being given to infrastructure issues / opportunities. With regards to ‘planning by appeal’, there is in the order of 3,500 homes at the current time currently being proposed at Green Belt sites where the proposal is at the pre-application, application or appeal stage, and indications are that more proposals will be forthcoming. This is unprecedented.

- **Economy and employment** – there would be an oversupply of employment land locally, as measured against the requirement assigned to St Albans by the South West Herts Economic Update (2019; N.B. an update is forthcoming). However, this is appropriate given the potential for unmet need from elsewhere in South West Herts, and because East of Hemel Hempstead is a suitable location for new strategic employment land, given transport connectivity and Enterprise Zone designation. East of Hemel will support Herts IQ as a business location (described as “ideal for businesses in agri-tech, sustainable construction and clean tech”) and, in turn, support a regionally important cluster alongside Rothamsted Research to the north and Building Research Establishment (BRE) to the south. Also, it is important to recognise that a key aim of HGC is to support regeneration of Hemel Hempstead town centre and to support new jobs within the Hemel Hempstead urban area, i.e. outside of the HGC area.

3.1.4 The appraisal predicts **moderate or uncertain positive effects** in terms of:

- **Communities and health** – whilst there are concerns amongst the local community regarding the negative impacts of housing growth, there is little reason to suggest particular issues constraining St Albans relative to potential growth locations in the sub-region. There is clear support for HGC, as a garden community and a scheme with a focus on achieving wide-ranging objectives for Hemel Hempstead, and the HGC programme is progressing relatively well outside of the St Albans Local Plan process. With regards to other Green Belt allocations, several give rise to ‘communities’ related issues, including both of the proposed allocations comprising previously developed land.

A final key consideration is simply the need to adopt a local plan in order to avoid development coming forward in a less well-planned manner, whether that is under the presumption in favour of sustainable development or otherwise in a manner that is to some extent outside of local control (St Albans is at risk of Government intervention).

- **Homes** – there is clear support for setting the housing requirement at LHN (15,096) for the plan period as whole, and with a sufficient supply buffer, such that there is confidence in the ability to meet the housing requirement / provide for LHN in practice. This represents a considerable step-change in respect of response to the housing crisis, with wide ranging benefits such as for health and wellbeing, communities and the local economy (and, in turn, reducing out-commuting). With the local plan in place it will be possible to require higher density developments comprising smaller homes than would otherwise be delivered by the market, suited to first time buyers, young families and downsizers. Also, there will be a step-change in affordable housing delivery, with several hundred delivered every year (with a tenure mix in line with policy) as opposed to fewer than 100, which is the typical rate of delivery.

However, it is important to note that the proposal is for the requirement to be ‘stepped’, such that it is below the average for the plan period (888 dpa) in the early years (710 dpa) and then higher in the latter years (as high as 1,200 dpa when HGC is delivering at pace). This is not supported from a pure ‘housing’ perspective, because housing needs are an immediate priority (e.g. given an affordability ratio of 18.4% and affordable housing needs arguably in excess of 800 homes per annum). However, it is recognised that it is likely justified given reliance on HGC and limited realistic small site options, particularly on the basis of the evidence provided by the HELAA, Green Belt Review and the Urban Capacity Study.

Aside from growth quantum and trajectory, there is also a need to consider the mix of proposed supply. Overall there is considered to be a good mix - in terms of site size, type, location and timetable for development - which is supported from a perspective of minimising delivery risk, and it is also noted that quite detailed work has been completed regarding setting out the anticipated supply trajectory. However, there are numerous sites where further work is needed to confirm deliverability, delivery timescales, yield and viability (with implications for affordable housing delivery). This is naturally the case for HGC, where the number of homes anticipated to come forward in the plan period is inherently subject to some change due to its scale, but there are also a number of non-strategic site options (i.e. sites ‘recommended’ by the GB Review) where the potential to achieve suitable and safe access is currently unclear and/or there is a need for further work to explore how to address constraints, which could potentially result in the need to reduce the assumed housing yield. There will also be a need for further scrutiny of the anticipated yield from sites identified through the Urban Capacity Study, mindful that the proposed supply (775 homes) is so much higher than the supply of homes identified at brownfield urban sites through the [call for sites](#) / [HELAA](#) process (15 homes). It will likely be the case that numerous of the sites identified through the Urban Capacity Study are associated with issues that create some challenges to bringing forward a planning application, such as complex land ownership, existing leases / high existing use value and dependencies with other sites (e.g. due to a need to relocate an existing use, such as parking).

It is crucially important (from a wide-ranging sustainability perspective, as opposed to solely from a housing perspective) that the local plan supply is sufficient to meet the housing requirement in practice over the course of the plan period, accounting for wide-ranging delivery risks and mindful that the proposed housing requirement is a step-change from recent housing delivery rates.

- **Transport** – objectives are of key importance. Directing growth within the District and sub-regionally so as to align with transport objectives is crucially important in terms of climate change mitigation and wide-ranging other sustainability objectives. Transport is also a key priority amongst local residents, with the option of focusing growth along transport corridors found to perform strongly through the recent SW Herts JSP consultation, and the option of ‘growing the best-connected places’ also performing well.

In transport terms there is broad support for:

- Providing for LHN in full - albeit there are transport challenges affecting the District, particularly road traffic, with considerable variability in terms of connectivity to the strategic road network.
- Distributing growth broadly in accordance with the settlement hierarchy - with 33% of growth over the plan period set to occur at St Albans, 31% at Hemel Hempstead, 14% at Harpenden and 20% at lower order settlements (with no one settlement set to receive more than 5% of growth).
- Hemel Garden Communities - particularly because of the opportunities afforded by the scale of the scheme, although there are also certain locational opportunities, including around: supporting A414 upgrade aspirations; collocating new homes and employment growth; and extending the Nickey Line to Hemel Hempstead town centre (~4km) and train station (~5.5km).

The proposed strategic urban extensions also mostly perform quite well in transport terms, with certain sites well-linked to bus services and/or cycle infrastructure (e.g. notably North St Albans and Glinwell, east of St Albans, which is otherwise not ideally located in transport terms, being near equidistant between St Albans and Hatfield town centres / railway stations). There is a very good opportunity for

several of the strategic urban extensions to support upgrades to priority cycle routes, as set out within the recent Draft St Albans Local Cycling and Walking Implementation Plan (LCWIP). Perhaps most notably, there is an opportunity for growth to support upgrades to cycling infrastructure along the A1081 between St Albans and the north of Harpenden (cost up to £15m), and there is also potentially an opportunity to deliver a cycle route along the A4147 between St Albans and Hemel Hempstead. Another consideration is that support for a secondary school at London Colney (delivered alongside a 400 home urban extension, which is far fewer homes than might typically be expected) is strongly supported in terms of minimising peak time traffic congestion in the area.

With regards to the package of proposed non-strategic allocations, several present challenges in transport terms, e.g. sites at the southern extent of Harpenden and a site at Gustard Wood, which is a lower order settlement. Also, there is a need to consider in-combination / cumulative effects on traffic congestion, resulting from both strategic and non-strategic sites, and recognising traffic flows between settlements. Further work might be undertaken to ensure that growth is directed so as to best align with transport objectives, and it will be important to carefully consider the role of transport modelling (which can be a major undertaking with high costs and implications for the plan-making timetable).

3.1.5 The appraisal predicts **neutral effects** terms of:

- **Air quality** – there is little reason to suggest that the proposed growth strategy will conflict with air quality objectives within an air quality management area (AQMA). The only local AQMA is located in St Albans, but there are no specific concerns around traffic generation through the AQMA. Indeed, there is an argument for suggesting positive effects on the air quality baseline. However, on the other hand, benefits resulting from new infrastructure delivery will be felt in the long-term, and there is a need to consider that the baseline situation, in respect of air pollution / air quality nationally, which is improving over time.
- **Biodiversity** – there is a case for predicting positive effects, given biodiversity net gain requirements and certain site-specific opportunities. However, a number of the proposed non-strategic allocations are subject to significant onsite or adjacent constraint (primarily locally designated or non-designated priority habitat). The proposal is to require the national minimum 10% biodiversity net gain.
- **Climate change mitigation** – there is a good focus of growth at strategic sites, which may lead to a built environment decarbonisation opportunity. Furthermore, there is support for providing for LHN in full, both from a built environment and transport decarbonisation perspective. Whilst the Local Plan should lead to an improvement on the baseline situation (which is one whereby growth continues to come forward but in a less well-planned way), there is also a need to account for established objectives and targets, hence 'neutral effects' are predicted. There is a high bar to reach before predicting positive effects of any significance, given the urgency of the issue, including given a 2030 local net zero target.

Focusing on HGC, available scheme-specific information is high level, but there is a commitment to: “*A fabric first approach contributing towards the delivery of net zero homes.*” Also, a significant opportunity relates to delivering extensive rooftop solar PV (also potentially solar car ports) as part of the 55ha employment allocation. In general across the allocations, there is a need for further work, including by site promoters, to demonstrate the extent to which there is a site-specific decarbonisation opportunity.

- **Historic environment** – HGC appears to represent a good opportunity to deliver new homes whilst minimising pressure on the historic environment. However, a number of proposed allocations are subject to notable constraint, as discussed in Section 6 of the main report. Total growth quantum is also a consideration, as the District is overall subject to quite high constraint in the sub-regional context.
- **Land** – whilst development supported by the Local Plan will lead to significant loss of productive agricultural land, it seems likely that much, if not the majority, will be land that is *not* classed as best and most versatile (BMV). Also, it is important to recognise that best use is made of brownfield development opportunities, and that agricultural land quality locally does not stand-out as high in the regional context.
- **Landscape** – there is tentative support for HGC from a landscape perspective, albeit this is raised land in proximity to the Chilterns AONB. There is also support for providing for LHN in full, mindful of the Chilterns AONB constraining Dacorum Borough and also narrow Green Belt gaps between settlements constraining other neighbouring local authorities. A strong framework of development management policies is proposed with landscape and Green Belt sensitivities in mind (which is why neutral effects are predicted in respect of the Draft Plan as a whole, in contrast to the appraisal conclusion for Growth Scenario 4, above). However, the fact remains there are clear sensitivities. It will be important that plan-finalisation is informed by consultation responses received and further work, e.g. in respect of scheme layouts, including landscape / greenspace buffers and robust Green Belt boundaries.

- 3.1.6 The appraisal predicts **moderate or uncertain negative effects** in terms of:
- **Climate change adaptation** – several sites are subject to flood risk, but the overall proportion of allocated land subject to flood risk is not high, and there will be good potential to avoid and mitigate risk.
 - **Water** – there is theoretical support for setting the housing requirement at LHN, with a view to early and effective planning for water infrastructure and the wider water environment (as opposed to generating unmet need that will then need to be provided for at locations unknown within a constrained sub-region). However, it could potentially be the case that there are particular constraints affecting St Albans, in terms of water quality and/or water resources. In particular, whilst early indications from Thames Water are that wastewater treatment capacity is not a constraint to the emerging growth strategy, this is a matter to be examined in further detail (or, at least, there is a need for a watching brief). The majority of wastewater from the St Albans region is treated at the Maple Lodge STW, south of Rickmansworth, and the treatment works is already operating at close to capacity and can sometimes be overwhelmed and cause overflows (23 times for a total of 204 hours in 2022, as shown [here](#)). The Maple Lodge catchment is very large and covers multiple local authorities, so it is important that growth in St Albans is aligned with growth in the rest of the catchment area to avoid worsening capacity issues at the STW.
- 3.1.7 The appraisal does not predict **significant negative effects** under any sustainability topic heading.
- 3.1.8 Finally with regards to **cumulative effects** – i.e. effects of the Local Plan in combination with other plans, programmes and projects that can be reasonably foreseen – key considerations include:
- **Housing needs** – progressing the St Albans Local Plan and providing for local housing needs (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, with a previous version having proposed a new settlement to the southeast of London Colney. 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 the South West Herts sub-region.
 - **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). The M1 is another key consideration.
 - **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 AONB** – HGC is in proximity, but it is not clear that there are particular concerns (the Chilterns Conservation Board will comment further). Again, were HGC not to progress then there could be increased pressure on the AONB through the Dacorum Local Plan. There is also a need to note the Chilterns AONB boundary review, which could feasibly see the AONB extended into the District.
 - **Other considerations** – including Landscape scale nature recovery (a Hertfordshire Local Nature Recovery Strategy is emerging), agricultural land and water. See further discussion in the main report.

4 Next steps

- 4.1.1 Subsequent to the current consultation it is the intention to prepare and publish the proposed submission (or ‘publication’) version of the Local Plan under Regulation 19 of the Local Planning Regulations 2012. This will be a version that the Council believes is ‘sound’ and intends to submit for Examination. Preparation of the Proposed Submission (‘Publication’) Local Plan will be informed by the findings of this Interim SA Report, responses to the current consultation, further evidence gathering and further appraisal.
- 4.1.2 The formal SA Report will be published alongside the Publication Local Plan, essentially presenting an appraisal of “the plan and reasonable alternatives” (as per the current Interim SA Report). The next step is then for the Local Plan, SA Report and representations received to be submitted for Examination.