



St Albans Local Plan

Publication

Sustainability Appraisal Report

Non-Technical Summary

September 2018

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Non-Technical Summary

1 Background

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

Government regulations require that both a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA) are carried out on the plan during its development. In line with guidance¹, these two requirements have been combined into a single process that has been undertaken by independent consultants (TRL) and integrated into the plan making activities since 2006. For simplicity of terminology this process is referred to as Sustainability Appraisal (SA).

The main purpose of SA is to improve the environmental and sustainability performance of a plan by assessing whether it is likely to result in any significant effects (positive or negative) on topics related to environmental, social and economic sustainability. The SA process does not however just provide an assessment of the plan at a particular point in time, but should also influence what is in the plan by making recommendations as to how adverse effects can be avoided, offset or reduced, as well as how improvements can be made. A programme to monitor significant effects is then required in order to check whether the SA has been accurate in its predictions.

This document is the Non-Technical Summary of the Sustainability Appraisal Report (SA Report) that has been prepared to accompany the publication of the Draft Local Plan. It provides a summary in non-technical language of the Sustainability Appraisal (SA) undertaken to date during the preparation of the Local Plan.

The SA Report documents the findings of the assessment of the Draft Local Plan in order to give stakeholders and the public an opportunity to comment on the findings, at the same time as making any comments on the plan itself.

2 The Local Plan

When it is adopted by the Council, the Local Plan will set out the Council's long term spatial planning strategy for delivering development and infrastructure from 2020 to 2036. The Plan will replace the 1994 Local Plan on which planning policy is currently based.

¹ Plan Making Manual: <http://www.pas.gov.uk/pas/core/page.do?pageId=109798>

Development of the Plan has involved a number of previous stages of plan making and consultation as summarised in Figure 1. This includes all the planning for the earlier Strategic Local Plan (formerly Core Strategy) and Detailed Local Plan – these documents having not been finalised to adoption - and the Local Plan is therefore in effect a continuation of the same strategic planning process to replace the 1994 Local Plan, rather than being a completely 'new plan'.

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

Figure 1: Stages of the Local Plan process

The Local Plan includes a Vision as follows:

Vision

The vision for the District is of:

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

The Vision is supported by the following five objectives:

Objectives

To deliver the Vision through:

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

The Local Plan includes a series of under the following headings: Development Strategy and Metropolitan Green Belt; Homes, Affordable Homes and Workplaces; Retail, Leisure and Commercial Uses and Development; Infrastructure and Community Facilities; and Design, Conservation and Enhancement of the natural, built and historic environment.

3 The SA Process

The SA has guided the development of the plan from the beginning of the Local Plan process (previously Core Strategy, Strategic Local Plan and Detailed Local Plan). The assessment process is briefly described below and summarised in Figure 2.

The stages and documents associated with the work on the new Local Plan are shown in **bold italic** text.

The SEA Regulations require that the effects of the Plan on the following topics are investigated: Air; Biodiversity; Climatic factors; Cultural heritage; Human health; Landscape; Material assets; Population; Soil; Water; and the interrelationship between these factors. The Sustainability Appraisal element of the process widens this to include consideration of additional social and economic issues.

Stage A - After documenting the baseline sustainability characteristics of the area, and identifying any trends (i.e. is the situation getting better or worse?), the wider policy context of the Local Plan was reviewed. From the outputs of these two initial tasks the key environmental issues and opportunities that exist in the District were identified, on which the assessment should focus. A series of SA/SEA Objectives were developed to concentrate the subsequent assessment process on these key issues.

Stage B - This stage involves predicting the effects that would result if the Local Plan were implemented and then assessing whether any of these effects would be significant. Where potential adverse effects against the SA/SEA Objectives are identified measures to mitigate these effects are proposed. During the development of the Local Plan there have been several points during which 'Stage B' activities have been undertaken to take account of the different options that have been considered.

Stage C - The Sustainability Appraisal Report pulls together the results of all the assessment activities that have been undertaken by consultants TRL and identifies monitoring activities that will check the accuracy of the assessment once the Local Plan is adopted.

Stage D – This stage involves consultation on the SA Report with environmental bodies, key stakeholders and the public. The SA will then assess any significant changes to the Local Plan that are made after the consultation.

At plan adoption, an SA Adoption Statement will be published which explains how the SA has influenced the plan making process and which finalises the monitoring arrangements.

Stage E – This stage will take place after the Local Plan is adopted and covers the monitoring of the predicted effects.

Local Plan	SA/SEA Stages	SA documents/outputs and Dates
Begin document preparation	<p>Stage A: Setting the context, establishing the baseline and deciding on the scope.</p> <p>A1: Identify other relevant policies, plans and document programmes, and sustainability objectives.</p> <p>A2: Collecting baseline information.</p> <p>A3: Identifying sustainability issues and problems.</p> <p>A4: Developing the SA framework.</p> <p>A5: Consulting on the scope of the SA (Scoping Report).</p>	<p>SA Scoping Report, prepared February 2006.</p> <p>Consultation on Scoping Report February 2006.</p> <p>Consultation on the scope of the SA/SEA April 2018</p>
<p>Consultation on Issues and Options (2006 & 2007) and Emerging Core Strategy (2009)</p> <p>Develop Spatial Strategy Options and Consultation on the Strategy for Locating Future Development in the District (2010)</p> <p>Local Plan Issues and Options consultation January 2018</p>	<p>Stage B: Developing and refining options and assessing of effects.</p> <p>B1: Testing the Local Plan objectives against the SA framework.</p> <p>B2: Developing the Local Plan options including reasonable alternatives.</p> <p>B3: Evaluate the likely effects of the Local Plan and alternatives.</p> <p>B4: Considering ways of mitigating adverse effects and maximising beneficial effects.</p> <p>B5: Proposing measures to monitor the significant effects of implementing the Local Plan.</p>	<p>Issues & Options (I&O) SA Working Note October 2006.</p> <p>Consultation on further Issues and Options July 2007 with accompanying SA Working Paper.</p> <p>Consultation on the Emerging Core Strategy in August 2009 with accompanying SA Working Note (June 2009).</p> <p>Preparation of SA Working Note for Spatial Strategy Options (September 2010)</p> <p>Consultation on the Strategy for Locating Future Development in the District (December 2010) with accompanying SA Working Note.</p> <p>Preparation of SA Working Note for Issues and Options consultation (January 2018)</p> <p>Preparation of SA Working Note to assess alternatives for housing growth levels and broad locations (May 2018)</p> <p>Preparation of SA Working Note for Council (June 2018)</p>
Draft Pre-submission Document	<p>Stage C: Preparing the Sustainability Appraisal Report.</p> <p>C1: Preparing the SA Report.</p>	Preparation of SA Report for the Draft Pre-Submission Strategic Local Plan November 2012 (not published).
<p>Strategic Local Plan Options</p> <p>Consultation on Draft Strategic Local Plan (2014)</p>	Further consideration of options (Stages B2-B4)	Preparation of SA Working Note for Development Strategy Options, Housing Requirement/Target Options; and Strategic Sub-Area Options (June 2014)
<p>Publication of Pre-submission Document for SLP (2015)</p> <p>Publication of Pre-submission Document for Local Plan (September 2018)</p> <p>Submission of Local plan to Secretary of State</p> <p>Examination</p>	<p>Stage C: Preparing the Sustainability Appraisal Report.</p> <p>C1: Preparing the SA Report.</p>	<p>Preparation of SA Report for the Publication Strategic Local Plan December 2015.</p> <p>SA Report Addendum (July 2016)</p> <p>Preparation of SA Report for the Publication Local Plan (this report) September 2018¹.</p>
	<p>Stage D: Seek representations on the SA Report from consultation bodies and the public</p>	<p>Consultation on the Publication SA Report for the SLP (2016)</p> <p>Consultation on the Publication SA Report for the Local Plan (2018)</p>
	<p>Consultation on any major modifications arising from the Examination (if required)</p>	Update to the SA Report if required to assess and report on implications of any major modifications
Adoption of the Local Plan	<p>Stage E: Post adoption reporting and monitoring</p> <p>E1: Prepare and publish post-adoption statement</p> <p>E2: Monitor significant effects of implementing the Local Plan.</p> <p>E2: Responding to adverse effects.</p>	To be completed when the Local Plan is adopted.

Figure 2: Summary of the SA Process

3.1 Sustainability Issues and Objectives

The first stage of the SA/SEA focused on the identification of the sustainability issues in the District. Issues identified include:

- Whilst the condition and management of both national and local sites designated for biodiversity in the District has generally been improving more could still be done to improve the quality of these sites
- The CO₂ per capita emissions for St Albans have shown an overall decline since 2005 but are higher than the average figures for Hertfordshire and the East of England.
- In 2014 transport contributed around 56% of CO₂ emissions within the District.
- The main source of air pollution within St Albans District is generated from vehicle emissions.
- Whilst levels of nitrogen oxides (NO_x), nitrogen dioxide (NO₂) and particulates (PM₁₀) have fallen over the last decade, there remain areas in the District where air pollution levels exceed the limits set in the UK Air Quality Strategy. These are generally associated with road traffic.
- Three Air Quality Management Areas have formally been declared within the District in relation to the annual mean air quality objective for nitrogen dioxide.
- Light pollution is increasingly an issue, as is the decreasing amount of tranquillity.
- A large proportion of the District lies in the Metropolitan Green Belt. The need to protect the Green Belt is a very important issue to residents.
- The District contains many heritage assets, and there are three scheduled monuments within St Albans that are on the 2017 Heritage at Risk Register.
- Waste production and disposal is a growing problem. Production of waste and disposal of this waste is becoming increasingly difficult, with diminishing numbers of suitable sites for landfill disposal. There is however, an increasing move towards Energy Recovery Facilities (ERF) facilities rather than landfill.
- Waste water treatment works may be near capacity thresholds by the 2030's.
- Previously developed land is a finite source that is being depleted over time. This will put greater pressure to build on greenfield sites and to increase housing densities on these sites.
- The District includes areas classified as the Best and Most Versatile Agricultural Land.

- There are some issues with river water quality in St Albans, with the status of a number its rivers considered to be 'moderate' or 'poor'.
- Over abstraction of water resources is an issue in the county and region.
- Water consumption per capita in the county is above the national average.
- Whilst there is generally a low flood risk, parts of the District are at risk from flooding, which may expand with climate change.
- The population is forecast to increase from 147,000 in 2014 to 165,000 in 2041.
- An ageing population means that there are fewer economically active people to support an increasing number of people coming up to retirement age.
- The District has a high proportion of residents who are highly skilled and educated, but there are also pockets of deprivation and exclusion.
- Whilst the general health and fitness of St Albans' residents is better than the national average there are health inequalities within St Albans which should be reduced and there are also issues with childhood and adult obesity and inactivity.
- Whilst the number of noise complaints being made to the Council is showing a general decline, there are issues with noise relating to Luton airport.
- There is a wide variation in the audit scores of the District's parks and gardens and the Green Spaces Strategy suggests a need to enhance a number of these spaces.
- In St Albans District, the forecast growth is from 57,000 households in 2012 to 73,000 households in 2037.
- House prices are high and there is a high demand for more affordable housing, particularly for those on low incomes and first time buyers.
- Demand for housing is going to increase as the number of households is forecast to growth.
- The need for specialist housing for older people is expected to increase along with an ageing population.
- There is high car usage in the District and as a result traffic congestion is an issue.
- Pressures due to population growth which leads to increasing levels of traffic, which in turn exacerbates congestion, particularly during peak times.

- All the key roads in south-west Hertfordshire are under pressure from heavy levels of traffic, and associated congestion, which has adverse effects on air quality, quality of life and the local economy.
- Expansion of Luton Airport could put increased pressure on M1, motorway junctions and wider road network.
- About 40% of the resident workforce commutes out of the District for work
- The District's cycling network needs to be improved.
- The District has very little employment development land and its existing employment areas are coming under pressure for other uses.
- Whilst employment rates in the region remain high, with the professional scientific and technical sectors accounting for the largest proportion of businesses some pockets of deprivation and exclusion exist in relation to income and employment.
- There is forecast to be a shortfall in secondary school places from 2019/20.

Further detail on the issues can be found in the main SA Report and its accompanying appendices.

Government guidance² on how to undertake SA recommends that objectives are developed that relate to the key issues, so that the assessment can use these objectives to focus on the prediction and assessment of the effects that are most important in an area.

These objectives were developed as part of the Scoping Report (2006) and updated following consultation on that report, and also at later stages, in order to take account of consultation comments. The broad objectives that have been used in this SA/SEA are listed in **Error! Reference source not found.** These broad objectives are supported by a more detailed series of assessment criteria – see the main SA Report for details.

² A Practical Guide to the Strategic Environmental Assessment Directive (ODPM, 2005)

Table 1: Framework of SA/SEA Objectives

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

4 Development of the Local Plan

4.1 Introduction

The consideration and appraisal of alternative options is an integral part of the plan making and SA processes. The SA needs to consider reasonable alternatives for delivering the objectives of a plan and provide information to the plan makers to be used in the decision making process when selecting the preferred alternatives. It is not the purpose of the SA to decide the alternative to be chosen for the plan. Sustainability

Appraisal is a decision aiding tool rather than a decision making one and the contents of this report should therefore be considered in this light.

During the development the former Strategic Local Plan and Core Strategy a wide range of both strategic and more detailed options were considered and assessed through the sustainability appraisal process. That work has been used to inform the development of the new Local Plan and therefore the options considered in these earlier stages of planning have been included in this section.

In developing the Local Plan further options have been considered. The SA Report provides detailed information on the various stages at which options have been considered, but for the purposes of this Non-Technical Summary a short summary of the stages is provided.

4.2 Strategic Local Plan and Detailed Local Plan Options

4.2.1 Issues and Options – May 2006

The St Albans Joint Issues and Options Consultation Document, *“Your Views on its Future”* included Issues and Options relating to three of the Development Plan Documents (DPDs) in the Local Development Framework (LDF), namely the Core Strategy, Site Allocations & Proposals DPD; and Development Control Policies DPD.

4.2.2 Supplemental Issues and Options - November 2006

An additional round of Issues and Options consultation considered how the potential expansion of Hemel Hempstead, as recommended by the independent panel report on the draft East of England Plan, could be delivered. As there was the possibility that some of the potential expansion of Hemel Hempstead could take place in St Albans District, this consultation paper was prepared jointly by Dacorum Borough Council and St Albans City and District Council to inform both of their emerging Core Strategies.

4.2.3 Core Strategy Issues and Options – July 2007

Taking on board comments received from the Government Office for the East of England (Go-East) regarding the need to better define the scope and content of each DPD, the Council decided to carry out a second round of consultation on Issues and Options specifically relating to the Core Strategy DPD. This second stage of consultation on Core Strategy Issues and Options was undertaken in summer 2007.

4.2.4 Emerging Core Strategy – July 2009

Community and stakeholder consultation on the Emerging Core Strategy took place in August and September 2009. A Sustainability Appraisal Working Note was produced to accompany this consultation.

The Emerging Core Strategy was based around two separate visions, one for the city of St Albans (City vision) and the other referred to as the Rural Vision, with these visions being supported by a series of objectives. Building on the vision and objectives, the Emerging Core Strategy set out the Council's suggested approach to the location of development and associated infrastructure requirements. The document also provided commentary and information on the likely content of core policies which were seen as essential for delivering the development needs of the District.

4.2.5 Spatial Strategy Options – September 2010

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

4.2.6 Core Strategy: Consultation on the Strategy for Locating Future Development in the District - December 2010

"*The Core Strategy: Consultation on the Strategy for Locating Future Development in the District - December 2010*" provided the Council's preferred option for housing growth of 250 dwellings per annum, and included strategic sites proposed to help towards delivering this level of growth. In addition, a wide range of infrastructure and non-residential development proposals were also considered in this consultation.

4.2.7 Publication of the Strategic Local Plan – November 2012

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

4.2.8 Assessment of Strategic Local Plan Options – June 2014

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

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

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

4.2.9 Strategic Local Plan Publication – January 2016

Based on the work undertaken on the options in summer 2014 and taking into account the consultation on the Draft Strategic Local Plan in late 2015 the preferred options were included in the Publication Strategic Local Plan. The consultation on the Publication Strategic Local Plan in early 2016 was accompanied by a full SA Report which provided an assessment of the SLP strategies, policies and broad locations for development. The SA Report also provided, in Section 4, a summary of how alternatives had been taken into account during the development of the SLP and the preceding Core Strategy.

At this stage in the SA there was no new consideration/comparison of options.

4.2.10 Strategic Local Plan Submission – July 2016

The SA Report for the SLP Publication was later supplemented by an SA Report Addendum (July 2016) which was prepared to accompany the Submission SLP. Like the SA Report it did not include any new consideration/comparison of options.

4.2.11 Detailed Local Plan (Regulation 18 stage) – November 2016

Following the submission of the Strategic Local Plan (SLP) for Examination, work was undertaken to develop a Detailed Local Plan (DLP) to complement the SLP by providing a Policies Map showing geographically where various policies will apply and detailing policies related to development management issues that arise from the SLP. An SA Working Note was prepared to accompany the draft DLP during its consultation under Regulation 18. It included a preliminary overview assessment of the policies and allocations in the DLP.

4.3 New Local Plan options

In developing the new Local Plan there has been additional consideration of options, as summarised below.

4.3.1 Regulation 18 – January 2018

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

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

4.3.2 Options for Housing Number and Broad Locations SA Working Note – May 2018

Following on from the Regulation 18 stage a second SA Working note (May 2018) was prepared to report the findings of the assessment of options that were being considered for Broad Locations and in addition to consider the implications of a new potential reasonable alternative of 1,200 dwellings per annum. This is in order to provide consideration of either choosing to prioritise even higher levels of housing delivery and/or potentially helping neighbouring or nearby authorities to meet any unmet need in their area.

4.4 Summary of the consideration of alternatives

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

It should be noted however that the reasons for taking forward some options and rejecting others are not restricted to the findings of the sustainability appraisal but also cover wider planning issues such as deliverability, views of the local community and

infrastructure availability/constraints. The findings of the technical studies undertaken by SADC on the potential Broad Locations are an example of such an influencing factor for selecting preferred options and rejecting others.

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

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

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

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

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

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

5 Assessment of the Publication Local Plan

A Publication Local Plan has now been prepared taking into consideration all the iterations to the emerging options. Based on the methodology used in the early rounds of the SA, the assessment has used the following scoring system:

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

5.1 Identification of Significant Effects

The assessment of the Publication Strategic Local Plan generally found that the policies are likely to have overall positive effects across the range of sustainability topics, with a number of significant positive effects having been identified, as follows:

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

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

Some significant negative effects have also been identified in the assessment as follows:

	Reference Term	SA Objective	Significant effects identified
4	Soils	Minimise development of land with high quality soils and minimise the degradation/loss of soils due to new developments	✗✗ in relation to Broad Locations at: S6 i) East Hemel Hempstead (North); S6 ii) East Hemel Hempstead (Central); and S6 vi) North St Albans.

5.2 Identification of other effects

In addition to the significant effects described above the assessment identified a wide range of minor positive and minor negative effects.

In general, adverse effects have been identified against the environmental objectives in relation to the 'development enabling' policies (such as Policy S4 Housing Strategy / Housing Requirement/Target; Policy S5 Economic Development Strategy and Employment Land Provision; and the Broad Locations included in Policy S6), whilst positive effects have been identified for those policies against the social and economic objectives.

For the 'development controlling' policies (such as Policy L23 Urban Design and Layout of New Development; Policy L29 Green and Blue Infrastructure, Countryside, Landscape and Trees; and Policy L30 Historic Environment) the assessments are generally positive against the SA objectives related to that policy, with there being no predicted effects against the non-related objectives.

In addition to the positive and negative effects that were identified, there were areas where there is uncertainty as to how some SA objectives would be influenced by the Local Plan policies. For example, where development is proposed but without specific sites being identified, the effects will be dependent on the individual characteristics of the area affected and therefore remain uncertain at this stage of the planning process.

The full results of this assessment can be seen in Table 2 . The table is split into sub-tables which are based on the Local Plan chapters.

**Table 2: Summary of assessment
Development Strategy and Metropolitan Green Belt**

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

Homes, Affordable Homes and Workplaces

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

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

Retail, Leisure and Commercial Uses and Development

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

Infrastructure and Community Facilities Thriving Economy

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

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

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

5.3 Assessment of Cumulative Effects

In addition to identifying the potential effects associated with the individual policies, or specific locations for development, it is important to develop an understanding of the overall effects of the plan as a whole. Consideration has therefore been given to how the policies within the plan interact with each other and the potential cumulative effects that could result from these interactions. Summaries of the assessments against the various SA topic areas are provided below. This includes the consideration of cumulative, synergistic and secondary effects.

5.3.1 Biodiversity (SA Objective 1)

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

To deliver the level of housing growth included in the Local Plan there will inevitably be the need for development of greenfield land which could have adverse impacts on habitats and species due to landtake, habitat fragmentation and urban pollution issues – again the nature and magnitude of these effects will be dependent on a development site's individual characteristics. In relation to the 11 broad locations (Policies S6 i) to xi)) there are some potential site specific adverse effects identified but these are not considered to be significant. The mitigation of any adverse effects will need to be undertaken at a location by location level, informed by other policies in the Local Plan, in particular *Policy L29 Green and Blue Infrastructure, Countryside, Landscape and Trees*. Through development at the broad locations, particularly the larger ones, there are opportunities for biodiversity gains from integrating green infrastructure into the new developments.

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

To counter these potential adverse effects, significant positive effects against the biodiversity objective have been forecast in relation to *Policy L29 Green and Blue Infrastructure, Countryside, Landscape and Trees* which seeks to actively support the

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

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

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

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

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

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

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

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

5.3.3 Greenhouse gas emissions (SA Objective 5)

The new development proposed in the Local Plan will inevitably result in an increase in greenhouse gas emissions from energy used in new developments and associated activities including increases in traffic and therefore negative effects have been

identified. However new employment development could help to offset this to a certain extent if it results in lower levels of out-commuting.

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

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

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

5.3.4 Climate change adaptation (SA Objective 6)

Policy S3 Metropolitan Green Belt seeks to proactively manage the Green Belt in relation to climate change adaptation, whilst the *Policy L23 Urban Design and Layout of New Development*, makes reference to the Hertfordshire Building Futures Guide which provides guidance on climate change adaptation in new developments. In addition *Policy L25 Energy and Environmental Performance of New Development* requires the use of

water efficiency measures which could help new developments to cope with drier summers, whilst *Policy L29 Green and Blue Infrastructure, Countryside, Landscape and Trees* aims to create new wildlife routes which should help progress this objective by helping biodiversity adapt to the changing climate. In addition, the promotion of green infrastructure and encouraging greening of the urban environment (through tree planting, green roofs and green walls) will help with adaptation to climate change through urban cooling and the attenuation of flooding.

5.3.5 Air quality (SA Objective 7)

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

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

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

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

Significant positive effects have been identified against the resource efficiency objective for *Policy L25 Energy and Environmental Performance of New Development* as the policy supports the provision of renewable energy proposals, both stand-alone and also those associated with large new developments. In addition, the policy includes requirements related to minimisation of waste and the re-use and recycling of materials. Furthermore the Hertfordshire Building Futures Guide provides guidance on the sustainable use of

materials as well as on waste. A significant positive effect has also been identified for the East Hemel Hempstead Broad Location (Policy S6 ii)) as in accordance with the aims and status of the Hertfordshire Enviro-Tech Enterprise Zone the development would be required to deliver environmentally friendly buildings and in addition the development would be required to deliver a Combined Heat & Power system and large scale solar power generation.

5.3.7 Historic environment (SA Objectives 10)

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

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

However across many of the other the Local Plan policies there is some uncertainty over the effects of the policies on this objective. Some of these relate to specific Broad Locations where there are some heritage related constraints which could be affected, whilst other uncertainties are related to the fact that effects will be dependent on the sites taken forward for development (e.g. new school sites or infrastructure) and whether those sites have heritage related constraints.

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

5.3.8 Landscape & Townscape (SA Objective 11)

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

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

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

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

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

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

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

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

5.3.9 Health and wellbeing (SA Objective 12)

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

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

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

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

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

5.3.10 Sustainable locations (SA Objective 13)

The assessment mainly identified positive effects in relation to SA13 as the Local Plan aims to provide development in the most sustainable locations and to improve the sustainability of those locations currently not well served by public transport. Significant positive effects have been identified for the three Broad Locations at East Hemel Hempstead (Policy S6 i), ii) and iii)) as the developments provide opportunities to reduce the need to travel through closer integration of housing, jobs and services. The sustainability of the location will also be improved by the requirement to deliver a multi-modal transport interchange. Positive effects were also identified for *Policy S4 Housing Strategy and Housing Requirement/Target* as the policy recognises that smaller sites, including those of half a hectare or less, have been and will continue to be an important source of housing land supply, with the bulk being in highly sustainable urban locations.

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

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

In general positive effects have been forecast in relation to these social objectives from across the full range of Local Plan policies, although there is some uncertainty arising from whether the planned levels of growth would put additional strain on existing

services and facilities. The provision of, amongst others, new housing to meet the needs of all sections of the population, new and enhanced education, community and recreational facilities, improvements to the public realm and natural environment, and sustainable transport measures will all help to meet the needs of the community in general. No adverse effects were identified against these three SA objectives.

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

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

5.3.12 Housing (SA Objective 15)

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

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

The Local Plan is forecast to have a positive cumulative effect on economic factors, including 'sustainable prosperity' (SA18), 'fairer access to services' (SA19) and 'revitalising town centres' (SA20). Providing for economic growth in the District should help to develop the local economy, through the provision of employment opportunities close to the major residential areas in the District and should contribute to improving the

viability and vitality of the City/town centres. Significant positive effects have been forecast for SA18 and SA19 in relation to *Policy S5 Economic Development Strategy and Employment Land Provision*, supported by other policies including, but not limited to, *Policy L9 Primarily Business Use Areas*, *Policy L10 Strategic Office Locations*, *Policy L11 Special Employment Locations in the Green Belt* and *Policy L16 Mixed Use Opportunity Areas*. Significant positive effects against SA18 and SA19 have also been identified in relation to the East Hemel Hempstead (Central) Broad Locations (Policies S6 ii)) as development of this site would result in a significant amount of high quality economic growth in line with the aims of Hertfordshire's Strategic Economic Plan (March 2014) and the Hertfordshire Enviro-Tech Enterprise Zone, and should provide approximately 10,000 new jobs over time, including a mix of employment types.

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

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

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

5.4 Cross Boundary Effects

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

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

In addition to the potential for the implementation of St Albans Local Plan resulting in effects being felt in neighbouring areas, so the reverse is also the case, with development in neighbouring areas having the potential to have effects on St Albans District. Some such effects have been considered in this SA Report as part of the consideration of cumulative effects (see Section **Error! Reference source not found.**).

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

6 Mitigation and Recommendations

A key role of the SA is to provide recommendations as to how the sustainability performance of the plan can be improved. While undertaking the SA a range of recommendations were identified as to how the Local Plan could maximise its performance against the range of sustainability topics. Some of the recommendations sought to mitigate potential adverse effects, whilst others looked to build on some of the opportunities presented within the District. The majority of these recommendations were taken on board as the Local Plan developed into its current form.

Recommendations covered topics such as providing greater emphasis to climate change adaptation within the plan and issues including: development in the Green Belt and on greenfield sites; road improvement and building schemes; location of key services and amenities; economy and employment; and integrating sustainability considerations into new developments.

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

6.1 Monitoring

The requirement in the SEA Regulations relating to monitoring focuses specifically on significant environmental effects of the implementation of plans and programmes, with a view to identify unforeseen adverse effects at an early stage and be able to undertake appropriate remedial action.

Once the Local Plan is adopted, its effects against a range of sustainability areas are to be monitored to allow action to be taken to reduce and/or offset any significant effects. This monitoring will make use of existing arrangements, particularly those being developed to monitor the performance of the St Albans Local Plan. Reporting of Local Plan and SA monitoring will be produced annually in the Authority's Monitoring Report (AMR).

The SA monitoring framework focuses only on monitoring those effects that are significant or uncertain. The monitoring framework may need to be updated if changes are made to the plan, either prior to submission or during the examination process, which affect the findings of the assessment on the Publication plan.

The final SA monitoring programme will be included in the SA adoption statement (once the plan is adopted) and this will reflect any changes made at Public Examination and prior to adoption.

7 Next Steps

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