



St Albans Local Plan

Publication

Sustainability Appraisal Report

Appendix D: Consultation Comments

September 2018

Appendix D – Consultation Comments

As required by the SEA Directive, consultation has been undertaken at several stages of the process. The reports to date which have been consulted upon during the development of the Local Plan and previously the Strategic Local Plan and Detailed Local Plan include:

- The SA/SEA Scoping Report (February 2006)
- Issues and Options SA Working Note (July 2007)
- The Emerging Core Strategy SA Working Note (June 2009)
- The Core Strategy: Consultation on the Strategy for Locating Future Development in the District SA Working Note (December 2010)
- Draft Strategic Local Plan: Strategic Local Plan Options SA Working Note (June 2014)
- Publication Strategic Local Plan SA Report (December 2015)
- Detailed Local Plan SA Working Note (November 2016)
- Local Plan Regulation 18 SA Working Note (January 2018)
- Local Plan SA Scoping Letter (April 2018)

A summary of the consultation responses received and the actions taken in response are provided in the following tables.

1 Comments on SA/SEA Scoping Report (February 2006)

Summary of Comments	Reply to comments / how the comments have been taken on board
Countryside Agency/Landscape, Access and Recreation Division	
<p>We have read the draft Scoping Report with interest and in general, we are satisfied that the Sustainability Appraisal of the LDF is proceeding in a proper, logical and comprehensive manner.</p>	<p>No action required.</p>
<p>Baseline section on landscape Could be improved by reference to information from Countryside Quality Counts (CQC) on landscape change. Information regarding the presence of, and access to, open space and on the length and condition of Public Rights of Way is missing – the current and future green spaces strategies should provide a suitable up to date database. The Countryside Agency has published maps of Open Access Land under the CroW Act – a map for Hertfordshire can be accessed at: www.countrysideaccess.gov.uk/where_you_can_go.php; information on the Rights of Way network should also be available from the County Council’s work on the Rights of Way Improvement Plan. The Countryside Agency welcomes the recognition of issues and options around landscape character, pedestrian and cycle facilities and open space provision. No evidence is presented to justify the statement that there are some deficits in the availability of and access to sport and recreation facilities in St Albans – this evidence may be found in the Green Spaces Strategy and should be presented if available; if not the statement should be revised.</p>	<p>Information on landscape change has been incorporated into the baseline section on landscape. Information on public rights of way and access to green infrastructure is provided in the baseline sections on accessibility and recreation, sport and leisure.</p>
<p>SA/SEA Objectives The Countryside Agency would like to see the first criterion for Objective 11: Landscape improved - It should be changed to “To conserve and enhance the landscape character”. The Countryside Agency welcomes the criteria under Objective 12: To encourage healthy lifestyles.</p>	<p>The framework has been amended to incorporate this change.</p>
<p>Assessment and monitoring indicators The indicator of changes in landscape features will need to be related to the descriptions of the various local landscape character areas. The Countryside Agency is aware of the difficulty of setting targets and indicators of landscape change and is working to develop practice in this area through our Countryside Quality Counts initiative – the CA hopes to be in a position to issue guidance later this year. Under Objective 12: To encourage healthy lifestyles it would be helpful to monitor “Length and condition of cycle ways and footpaths”.</p>	<p>Changes have been incorporated in the revised appraisal framework.</p>
<p>Consultation As one of the statutory consultation bodies the Countryside Agency is happy to respond to all future consultations and assist in the appraisal process in anyway it can.</p>	<p>Noted.</p>
<p>Methodology You might like to consider the use of Quality of Life Assessment as a tool to assist in the identification of impacts for the appraisal.</p>	<p>Noted.</p>

English Nature	
<p>Natura 2000 sites</p> <p>There are no Natura 2000 sites within or close to St Albans District; therefore it is unlikely that the LDF might impact upon such sites.</p> <p>The only realistically viable mechanism for impact would to be in terms of increased demand for water associated with large scale new development, which could potentially affect the Lee Valley SPA and Ramsar site, although even this is unlikely.</p>	No action required.
<p>Main issues and opportunities</p> <p>These are likely to include: fragmentation of habitats, loss of infrastructure to support agriculture and the rural economy (e.g. closure of livestock markets and abattoirs), low flows in rivers during summer months, invasive non-native species, air and water pollution (surface and ground water), effects of climate change.</p>	Taken into account during the assessment.
<p>Assessment framework</p> <p>English Nature is of the opinion that the objectives do form a reasonable framework for the assessment of the likely significant effects of the DPDs.</p>	No action required.
<p>Indicators</p> <p>English Nature would like to draw the attention to the Hertfordshire Biological Records Centre which has drawn up a list of potential indicators for which data exists (contact person Martin Hicks).</p>	Indicators from the Hertfordshire Quality of Life Report 2004 have been incorporated in the revised assessment framework; these are partly based on HBRC data.
Environment Agency	
<p>Natura 2000 sites</p> <p>The Environment Agency confirms that St Albans does not contain any Natura 2000 sites.</p>	No action required.
<p>PPP review</p> <p>The following should be included:</p> <ul style="list-style-type: none"> • Draft PPS 3 Housing • Draft PPS 25 Development and Flood Risk • Draft Catchment Flood Management Plan (CFMP) for the Colne Catchment due to the implications for flood risk in the St Albans area 	The PPP review has been updated to include the National Planning Policy Framework (NPPF) (which replaces PPS3 and PPS25) and the Thames Region CFMP.
<p>The summary of PPS 1 Sustainable Development should be amended to reflect the need to promote all three aspects of sustainable development with a strong focus on environmental enhancements and promoting a greener more environmentally focussed community.</p>	Not applicable. The PPP review now refers to the NPPF which replaced PPPS1.
<p>Baseline section on biodiversity</p> <p>The overall tone of the section does not support biodiversity in a more general manner and needs to look more broadly at the biodiversity of St Albans and encourage enhancements throughout - This is particularly significant along river corridors such as the Rivers Colne, Ver and Lee.</p>	Baseline section on biodiversity amended.
<p>Baseline section on climatic factors</p> <p>This section needs to be cross referenced with the sections on water resources (including flood risk) in the relation to adaptation to</p>	Baseline section on climatic factors amended to refer to section 1.8.

climate change.	
<p>Baseline section on material assets</p> <p>Inclusion of indicators BV 216a and BV 216b is welcomed.</p>	No action required.
<p>Baseline section on water resources</p> <p>Draft PPS 25 also requires the achievement of ‘good ecological status of inland waters and should be noted in this section.</p> <p>‘The Environment Agency questions the statement that some areas of Hertfordshire suffer from over abstraction of water resources.</p> <p>A map regarding chemical and biological river quality has been provided which should be included in the Environmental Report.</p> <p>It is suggested to include a map illustrating the flood risk in the area; however a map was not provided.</p> <p>The Environment Agency recommends conducting a Strategic Flood Risk Assessment (SFRA) as required by PPG 25 (‘sequential test’) and draft PPS 25.</p> <p>The Environment Agency suggests including trend data for flood risk and water resources. More attention should be paid to the links between the provision of housing and water resources and flood risk issues.</p> <p>The Environment Agency recommends paying more attention to the interrelationship between Contaminated Land in St Albans and the issue of water quality.</p>	<p>PPS 25 is no longer applicable as it has been replaced by the NPPF.</p> <p>Baseline section amended. Maps of areas at risk from flooding have not however been provided.</p> <p>A Strategic Flood Risk Assessment has been undertaken to identify area that are at risk from flooding.</p>
<p>Environmental and sustainability issues, opportunities and priorities</p> <p>Opportunities for the enhancement of biodiversity in general should be encouraged.</p> <p>This section should also outline how the LDF could prevent the pollution of water courses.</p>	The SLP includes policy relating to protection of watercourses.
<p>Main issues in St Albans</p> <p>Water resources</p> <ul style="list-style-type: none"> • The river Ver suffers from low flow and is a designated BAP priority and chalk stream, as such the river must be treated sensitively. • The whole area is over abstracted, as it has been identified in the opportunities section, this ultimately has a knock-on effects on the ecology of rivers in the area. <p>Flood risk</p> <ul style="list-style-type: none"> • Draft Catchment Flood Management Plans have been produced for the rivers Lee and Ver – these should be used as baseline information. • There are opportunities to reduce flood risk along the river Colne at London Colney. <p>Source Protection Zones (SPZ)</p> <ul style="list-style-type: none"> • No high risk developments should be built in SPZ 1, therefore the use of SUDS should not be encouraged in these areas. • A Bromate plume is present in the area; however the source has been built upon, but you should be aware of its presence with regards to contaminated land, water quality and further developments in the area. 	Baseline amended.
<p>SA/SEA Objectives</p> <p>The Environment Agency recommends re-assessing the proposed assessment framework.</p>	The SA/SEA framework was revised as part of the SA/SEA scoping workshop, where the EA

<p>The Environment Agency recommends rewording the criteria regarding flood risk to reflect that developments should not take place in high risk areas.</p> <p>The Environment Agency recommends making reference to climate change adaptation in the water resources & flood objectives and criteria.</p>	<p>was present.</p> <p>Criteria for flood risk have been amended.</p> <p>Objectives/criteria for water resources/flood risk have been amended to highlight the need for climate change adaptation.</p>
<p>Consultation and next steps</p> <p>Stage B: Assessment of the effects of the LDF alternatives.</p> <p>With regards to point 8 'no net loss', it should be highlighted that the LDF should seek to enhance and improve biodiversity as stated in PPS 1 and PPS 9.</p>	<p>Noted.</p>
<p>Hertfordshire Gardens Trust</p>	
<p>The Trust is concerned by the absence of specific protection for historic designated landscapes in the St Albans District Local Plan and does not wish this omission to be replicated in the forthcoming development Plan Documents.</p> <p>The Trust would like to see the listing and protection of both registered and unregistered historic designed landscapes.</p>	<p>The SLP now includes policy text relating to the Historic Landscape Characterisation and Heritage Partnership Agreements.</p>
<p>Baseline</p> <p>The Trust is pleased to see that the historic environment is valued as an asset, but finds that the distinct contribution of historic designated landscapes appears not to be recognised and the Trust hopes that the report will demonstrate a clearer understanding.</p> <p>In particular the wording of the text concerning Cultural Heritage and Landscape is insufficient and requires further development.</p>	<p>The SA baseline includes information on the historic environment. Policy SLP26 in the SLP seeks to protect, manage and where appropriate enhance the district's landscapes.</p>
<p>Compatibility of objectives</p> <p>The Trust sees a potential conflict of interest between the desire to maximise the use of previously developed land and the protection and enhancement of historic heritage.</p> <p>Already much housing, leisure and infrastructural development is taking place within or very close to historic designed landscapes and as the pressure for development land grows, the historical integrity of individual sites could be lost forever.</p>	<p>This potential conflict has been taken into account during the assessment of SLP.</p>

2 Comments on Issues and Options SA Working Note (July 2007)

Summary of Comments	Reply to comments / how the comments have been taken on board
<p>Hertfordshire Constabulary (Letter dated 15th November 2007 following meeting with SADC on 13th November)</p>	
<p>Concerned that issues of crime and disorder, and community safety appeared not to have been robustly dealt with nor seen as integral to the sustainable communities' agenda. By way of example I referred to the Sustainability Appraisal and its approach to town centre issues, and the fact that when considering options for growth and their spatial distribution, the impact on policing appeared not to have been considered unlike education and health.</p> <p>There is a lot of information available on the spatial distribution of crime and anti-social behaviour in the District, including the draft Strategic Appraisal which is being carried out in relation to the new Community Safety Strategy which the Council's Community Safety</p>	<p>The issues raised in relation to crime have been considered as part of the assessment.</p>

<p>Officer is organising.</p> <p>The town centre is the crime hotspot for the District. It is important to note that through a number of measures, the number of incidents of violence in the town centre has dramatically reduced. However nevertheless town centre policies and the management of the town centre are vital to the target of reducing crime and disorder. This while supportive of proposals to regenerate and rejuvenate the town centre, consideration of policy options should take into account impacts they may have on crime and disorder.</p> <p>The distribution of housing growth could impact upon on the police as a key public service however the consultation paper appeared not to include this as a consideration. Response times are important. The Council's likely preferred option of concentrating development in and around St Albans, Harpenden and London Colney would not materially impact on policing. They would be well related to our existing facilities and would not require a redistribution of resources. The exception of this was the Smallford option which would require resources to be redistributed and would impact on response times. It is also considered that the option to spread housing around villages rather than towns would also impact on our distribution of resources and on our ability to meet responses time targets.</p>	
<p>The Community Safety Strategy has not been listed as a plan/strategy considered by the Sustainability Appraisal.</p>	<p>The most recent St Albans District Community Safety Partnership Strategy has been reviewed as part of the PPP.</p>

3 Comments on Emerging Core Strategy SA Working Note (June 2009)

Summary of Comments	Reply to comments / how the comments have been taken on board
Hertfordshire County Council Environment Department	
<p>It would be helpful if the technical appraisal of all areas of search considered and a clear picture of how decisions have been arrived to could be brought together as a single appraisal – perhaps formally within the sustainability appraisal/strategic environmental assessment process.</p>	<p>The SA Report provides details on the process of selecting preferred locations for development.</p>
Abbots Langley Parish Council	
<p>Concerned about the Building Research Establishment site being identified for 150 dwellings plus strategic employment site in the Green Belt. Consider such intensified use in the isolated location of the BRE site will be detrimental to the residential surroundings. Concerned about the impact of additional traffic that the proposal would generate in the parish, particularly along residential road of Bucknalls Lane. The accessibility/key services distance figures given in the Sustainability Appraisal for BRE are totally unrealistic in practice and do not contribute to fair evaluation of the sustainability of the site.</p>	<p>The approach was consistent with the evidence base provided in the Emerging Core Strategy Appendices.</p>
Welwyn Hatfield Borough Council	
<p>As St Albans City is identified as a Major Town Centre in the East of England Plan, the level of development proposed for the city is in line with the regional hierarchy and therefore acceptable. However, the Council is concerned about the out-of-town retail development at London Colney. Depending on scale, additional development at London Colney could have an impact on the vitality and viability of Welwyn Hatfield's town centres and could impact on proposals to regenerate Hatfield Town Centre. Locating retail development within St Albans District centres would be a far more sustainable approach. It is suggested that St Albans District Council strengthen the</p>	<p>This factor is reflected in the latest assessment.</p>

sustainability appraisal analysis as it does not even consider the impact of the development on the vitality of St Albans city centre.	
The Council has the same concerns with regard to access issues and the loss of green belt land as outlined in the response to Chapter 11. In addition, it is not clear why this option has not been assessed in the sustainability appraisal.	The sustainability appraisal provided an assessment of the proposed Employment Policies. This is documented in Appendix B of the SA Working Note.
Go East	
Assessment of options needs to be fully informed by the Sustainability Appraisal. The Sustainability Appraisal needs to assess all options, proposed and discounted.	Through the ongoing SA process all reasonable options have been assessed. The findings of these assessments are reported in the SA Report.
The Harpenden Green Belt Association and The Harpenden Society	
<p>Strong opposition of the identification of Area of Search No. 8 as a possible site for release from the Green Belt. Strongly disagree that the site is a sustainable location for housing and consider the initial SA of the site to be flawed in relation to its assessment of accessibility to key services.</p> <p>High out commuting will lead to traffic congestion. Almost all residents of north-west Harpenden drive into the town centre for shopping and leisure purposes. Walking 1km from the town centre would be strenuous due to the topography of the land.</p> <p>Development would lead to traffic, road congestion and parking issues. Should not be making decisions on sites without traffic modelling study.</p> <p>Schools including Roundwood Primary and Secondary Schools are over-subscribed.</p> <p>Development including possible growth to the south of Luton would also have an adverse effect on the open character of the countryside and would pose a threat to the important strategic gap which currently separates Harpenden and Luton.</p> <p>Impact on landscape, biodiversity and heritage noted.</p> <p>A flaw in the evidence base analysis is that the SA omits reference to the Chilterns Way running alongside Cooters End Lane in its discussion of adjacent rights of way.</p> <p>The council has provided no information to demonstrate that existing utilities (such as water and sewage) would have the capacity to cope with a further 300+ homes to the north of Harpenden. Drains from the Victorian era run beneath Luton Road.</p> <p>Deficiencies in local infrastructure – no real planning benefits to be gained from development.</p> <p>The Council has not sufficiently assessed the reasonable alternatives.</p>	Given that the area of search is located within walking distance of Harpenden town centre the SA found that this area of search was in a <u>relatively</u> sustainable location with good access to services and facilities.

4 Comments on Core Strategy: Consultation on the Strategy for Locating Future Development in the District SA Working Note (December 2010)

Summary of Comments	Reply to comments / how the comments have been taken on board
Tony Waite	
<p>Object to the sustainability appraisal of the Core Strategy. The strategy can only worsen the air quality in the Air Quality Management Area, as it exacerbates the need for cars as opposed to the other means of transport, and will not reduce, but rather increase greenhouse gas emissions.</p>	<p>The lower level of growth now being proposed in the SLP will result in fewer emissions than if the higher growth level options were taken forward.</p>
Entec on behalf of Crown Estates	
<p>Document states that the housing target has been reviewed and based on affordable housing delivery. There is no reference to any evidence to suggest how the housing target has been arrived at or what the review has involved.</p> <p>No explanation of how the target relates to population or household projections.</p> <p>Guidance PPS3 para 33 is applicable, it identifies evidence that LPAs should take into account when determining local housing provision, including:</p> <ul style="list-style-type: none"> • Evidence of the levels of demand for housing and affordability • Evidence of the availability of suitable land for housing using SHLAAs, National Land Use Database and the Register of Surplus Public Sector land • The Governments ambitions for affordability across the housing market; and • A sustainability appraisal of the environmental, social and economic implications of development including the most sustainable patten of housing. <p>Planning Officers' reports to PPAP in 2010 indicated that 500 units would be required per annum to meet the Governments population and household targets. New projections were published in November 2010 which indicates the number of households in St Albans will increase from 59,000 to 72,000, an increase of 22% or 650 households per annum for the next 20 years.</p> <p>St Albans housing target would be meeting less than half of this projected need for new households. This could lead to a reduction in the local employment workforce and an increase in the price of market housing, making housing less affordable for those on lower incomes. This will potentially increase pressure on affordable housing.</p> <p>Not meeting overall housing needs will have implications for surrounding authorities, putting additional pressure on their housing needs and on their services and infrastructure.</p> <p>Section 5 of the document sets out a range of factors which need to be considered in deciding the right amount of growth. It is not clear what the link is between these factors and the 250 housing target proposed.</p> <p>The Sustainability Appraisal Working Note considers and appraises three options (between 360 and 500), but not the 250. The consultation document does not consult on any other options therefore if the Inspector decides that this is not an appropriate level of growth, there will be no flexibility in the strategy and it will be found unsound. The SA gives more weight to environmental factors over</p>	<p>The Sustainability Appraisal produced to accompany the December 2010 consultation included an assessment of the 250 dpa – see Appendix A of the December 2010 SA Working Note.</p> <p>The SA provides an assessment against the 20 SA objectives that were developed at the Scoping Stage following wide consultation. The framework includes objectives that cover environmental, social and economic objectives. The same weight is provided to each objective.</p>

<p>social and economic factors. It makes assumptions that urban brownfield sites are always preferable for the environment rather than considering the most sustainable patterns of development.</p> <p>Consultation does not make reference to New Homes Bonus and the financial implications of different levels of housing growth including the potential financial benefits to the communities where development takes place.</p>	
<p>County Council Forward Planning Unit</p>	
<p>Housing growth levels – evidence base</p> <p>The proposed approach is not in conformity with the East of England Plan; however SADC quite rightly recognises Governments intention to abolish regional strategies and has taken a fresh approach within the spirit of Government’s localism agenda.</p> <p>PPS3 requires Local Development Documents to be informed by a robust, shared evidence base in particular of housing need and demand. The ongoing preparation of the core strategy process will therefore need to present as clear a view as possible about what can be considered to be reasonable assumptions about the likely level of future housing need and demand.</p> <p>One indication of potential future need is household projections, but the document does not present consultees with any intelligence about what there sources of readily available intelligence tell us. Though some information is contained in the SA it is lacking evidence relating to the latest set of national 2008 based household projections which were published after the SA working note was produced. A further existing source of evidence comes in the form of East of England Forecasting Model which generates an alternative view of potential future housing need however this is not referred to and does not appear in the evidence base.</p>	<p>The options assessments undertaken in September 2010 considered a high level of growth based on the 2008 housing projections. The assessment is presented in the September 2010 SA Working Note.</p>
<p>Housing growth levels – alternatives</p> <p>PPS12 is clear on the need for LPAs to demonstrate that the plan is the most appropriate when considered against reasonable alternatives and that the community is involved in considering the options for the strategy before the final document is produced.</p> <p>The SA considers three different growth levels. It is questionable whether the appraisal of options in the SA can genuinely be considered as satisfying the PPS12 requirements to consult on reasonable alternatives.</p> <p>The SA does not appear to assess the 250 dwellings per annum included in the consultation document. It also does not appear to assess an adequate range of reasonable alternatives, for example the growth matching the latest housing projections.</p>	
<p>Vincent Gorbing on behalf of Hertfordshire County Council: Hertfordshire Property</p>	
<p>The Consultation document does not set out the spatial strategy scenarios considered at a small limited number of community workshops in July 2010; and it fails to set out housing growth options which were considered by members of the PPAG Panel (September and October 2010).</p> <p>The views of the wider local community on the spatial strategy scenarios and the housing growth options are not being taken into account in the evidence base. The Core Strategy will not be justified on this account.</p> <p>The proposed new housing target of 250 dwellings per annum of which 100 dwellings will be affordable does not demonstrate effective links back to the evidence base in respect of demographic information (population growth and household formation) or affordable housing need (St Albans housing needs survey update 2006) and it does not demonstrate the extent to which the Council’s land supply will meet any shortfall on privately owned sites. The Plan fails to show how the choices reached are backed up by these facts and therefore it is not justified.</p> <p>The Consultation Document fails to identify sufficient land supply to meet the 250 dwellings per annum; fails to identify a clear strategy in the Consultation Document as to how the shortfall will be met; fails to indicate the extent of greenfield Green Belt sites; proposes</p>	<p>The SA Working Note was produced to report the assessment of the specific level of growth that had been included in the Consultation Document.</p> <p>Earlier sustainability appraisal in September 2010 had assessed other options for growth and the findings of these assessments were published on the SADC website.</p> <p>All the assessments have been incorporated into the SA Report to accompany the Pre-Submission Strategic Local Plan.</p>

<p>strategic housing sites (of which two may be undeliverable); fails to include sites that have been identified as suitable, available and deliverable (land to the north and south of Napsbury); and does not have a housing land trajectory to prove the deliverability of the housing target over the plan period. As such the plan is not deliverable, flexible and able to be monitored. It is therefore not effective.</p> <p>The Consultation Document has not presented all the alternatives and explained how the competing interests have been weighed; has not provided a robust audit trail of decision-making that explains the justification for the choice against the evidence base of the Core Strategy; and has not presented a direct comparative analysis of the options through Sustainability Appraisal.</p>	
<p>Countryside Properties</p>	
<p>No reasons have been given as to why these sites have been chosen ahead of others not identified in the document.</p> <p>There appears to be little transparency in the Council's decision making process. Sites have been chosen through Council meetings and committed to without properly engaging with the local community and consulting upon alternatives.</p> <p>There is a lack of sustainability appraisal of the alternative sites which is a key test of soundness. The SA does not compare sites chosen with alternative ones. The SA describes two sites chosen for the strategy as isolated and not in sustainable locations. All sites are remote with the exception of London Road/Alma Road. No reference linking growth to settlement hierarchy e.g. most development local within or on edge of main urban settlements in sequential manner. Therefore the SA is inadequate.</p>	<p>The SA Report produced to accompany the Pre-Submission SLP includes details on the assessment of options and the reasons for choosing broad locations ahead of others.</p>
<p>Hunston Properties Ltd</p>	
<p>Why, after the full extent of Area Search 7 was removed from the Emerging Core Strategy by the Cabinet in January 2010, does the Working Note include analysis of and comment upon the full extent of Area of Search 7? We believe that the negative comments relating to the larger Area of Search may, to the detriment of our proposal, be wrongly attributed to Sewell Park.</p>	<p>The SA Working Note provided assessments for three different levels of housing growth. In order to meet the highest level of growth there was an assumption that either 300 or 1,000 dwellings would need to be developed in Area of Search 7 whilst to meet the lower levels either 125 or 300 dwellings would be needed in this area.</p> <p>The assessment for the lower levels of growth was not based on a specific site within AoS7 (e.g. Sewell Park) but was based on a broad location.</p>
<p>The Sustainability Appraisal Working Note does not include a proper Landscape Assessment of the potential strategic housing locations. Has one been carried out on behalf of planning policy of the four sites currently before the PPAP? And if not, when will one be done? We enclose a draft copy of our Landscape Assessment for your files and would be interested to see how this compares with the other three potential strategic housing locations.</p>	<p>The sustainability appraisal uses the local authority's evidence base to inform the assessments. It is not the role of the sustainability appraisal itself to undertake detailed landscape assessments.</p>
<p>Sustainability</p> <p>Please explain the following conclusions relating to the four potential strategic housing locations:</p> <p>Nicholas Breakspear (distance from city centre = 3.5 km): "This is a relatively accessible and sustainable location for housing".</p> <p>Beaumont (distance from city centre = 2.7 km): "This is an accessible, sustainable location for housing".</p>	<p>The three sites to the east of St Albans City centre are relatively close to a range of local services, such as the supermarket on Hatfield Road. Area of Search 7 does not have the same range of services close by.</p>

<p>Oaklands (distance from city centre = 2.6 km): “This is a relatively accessible, sustainable location for housing”.</p> <p>Sewell Park (distance from city centre = 2.2 km): “The area is not in a very sustainable location, being some distance from the city centre”.</p>	
<p>Minerals</p> <p>Please explain why the Working Note does not mention that Beaumont and Nicholas Breakspear, like Oaklands, are on the Sand and Gravel Belt.</p>	<p>Approximately half of the District is in the minerals belt, but mineral sterilization is only likely to be a significant issue if about 1 million tonnes or more of mineral reserves are likely to be sterilized. At the time when the assessments in question were undertaken, this was only likely to be the case for potential development at Oaklands (900 homes scale) to meet the option for the highest level of housing growth.</p>
<p>Watling Chase Community Forest</p> <p>Please explain why the Working Note does not mention that Beaumont, Nicholas Breakspear and Oaklands are with the Watling Chase Community Forest. (The Working Note does refer to the Community Forest in relation to the Harperbury Hospital site.)</p>	<p>The assessment for Oaklands identified opportunities for green infrastructure improvements but did not make specific reference to the area’s location in the Watling Chase Community Forest. The updated assessment for this site now reflects this.</p>
<p>Green Infrastructure</p> <p>Please explain how it is that Oaklands “has been identified as having a high potential for delivering significant green infrastructure improvements”. Which methodology was used to assess green infrastructure and when? Who carried it out? Were similar assessments made of the three other potential strategic housing sites? If so, what were the results? If not, why not?</p>	<p>When the assessment was undertaken there was specific detail relating to green infrastructure available for this site.</p>
<p>Hertfordshire County Council</p>	
<p>The Council’s Sustainability Appraisal consultant produced a Sustainability Working Note on the three housing growth options. This is considered in the PPAG Panel (16 September). The note concludes that:</p> <p><i>“All three options provide a balanced distribution of housing growth across the District appropriate to deliver the planned levels of growth associated with each option. As a result most of the effects identified across the options are similar in type, but differ in scale.</i></p> <p><i>Option 1 (9,720 dwellings 2001-2028): would require 2,800-3,000 new homes to be developed on Greenfield sites in the Greenbelt which could have adverse effects on local landscapes and could erode gaps between settlements in some locations; would provide 144 affordable dwellings per annum but this option falls short of meeting the overall housing needs of the District which could result in insufficient provision of certain types of homes and lead to some people moving to other areas to access appropriate housing which would not support the Core Strategy for promoting mixed and balanced communities.</i></p> <p><i>Option 2 (8,950 dwellings 2001-2028): would require 2,030-2,230 new homes to be developed on Greenbelt land, the lower levels of growth under this option will minimise adverse effects compared to the other options; smaller developments are unlikely to be able to deliver the same levels of Green Infrastructure gain as the larger developments which are included in options 1 and 3; would provide 144 affordable dwellings per annum from 2011-2021 and 100 per annum from 2021-2028, however it is uncertain as to whether this level is achievable for this option, given that some developments may not deliver the full 40%, if they are delivering other infrastructure or are</i></p>	<p>The assessment of the 250 dpa housing growth is detailed in Appendix A of the December 2010 SA Working Note.</p> <p>This does identify that there are effects associated with the lower level of housing growth being proposed. These are against the SA objectives for:</p> <ul style="list-style-type: none"> • ‘equality and social exclusion’ – relating to fewer opportunities for new community facilities; • ‘good quality housing’ – relating to the proposed housing level not meeting the housing need; and • ‘fairer access to services’ – relating to the

located on small sites.

Option 3 (12,100 dwellings 2001-2028): would require 5,180 to 5,380 new homes on Greenbelt land with associated adverse effects on landscapes and increased potential for eroding the gaps between settlements; would result in unsustainable pressure being placed on District infrastructure, but would deliver in excess of the 100 affordable dwellings per annum helping to promote balanced and mixed communities across the district.

Option three which would provide the highest levels of growth has been forecast to have significant adverse effects in relation to the landscape SA objective ... The high levels of growth would also result in unsustainable pressure being placed on the District's already stretched infrastructure".

A further Sustainability Appraisal Working Note was prepared in December 2010 and issued alongside the Consultation Document. Section 3.3 of the Working Note does identify

"that lower levels of growth will mean that there will be a larger shortfall in terms of meeting the identified overall housing needs of the district which will have societal implications and potential associated well being issues. There could be an out migration of local people from the district to any neighbouring areas which do have available housing".

Even the proposed level of housing (4,250 dwellings) is practically significantly lower than that previously discussed, the Sustainability Working Note (December 2010) does not explicitly say that the proposed level of affordable housing at 100 units per annum would fall short of meeting the needs of the district with option one (providing 8270 dwellings) or option two (providing 8950 dwellings), as was stated in the earlier Sustainability Appraisal Working Note. Neither does it recognise that some developments may not deliver the full 40% affordable housing quota if there are other infrastructure pressures or that the reduced affordable housing quota could result in outward migration that would not meet the Core Strategy objective of balanced and mixed communities.

The Sustainability Appraisal Working Note (December 2010) falls short by not providing a comparative evaluation of the proposed approach in the Consultation Document with the conclusions reached above on all three of the above housing growth options. It does not reiterate concerns in the earlier Sustainability Appraisal Working Note (September 2010) in respect of affordable housing delivery and the maintenance of balanced and mixed communities. It does not indicate that these adverse impacts would be exacerbated by the current approach.

It is considered that there should be a comparative evaluation of the proposed approach alongside all three housing growth options. Currently the Sustainability Working Note does not provide sufficient comparative analysis of the alternative options.

lower number of new dwellings limiting the opportunities for people to stay living in the area.

5 Comments from the Consultation on the Draft Strategic Local Plan (October 2014)

Summary of Comments	Reply to comments / how the comments have been taken on board
Environment Agency	
No comments received relating to the Sustainability Appraisal	N/A
English Heritage (now Historic England)	
No comments received relating to the Sustainability Appraisal	N/A
Natural England	
No comments received relating to the Sustainability Appraisal	N/A
Environment Department – Hertfordshire County Council	
No comments received relating to the Sustainability Appraisal	N/A
Hertfordshire Ecology	
No comments received relating to the Sustainability Appraisal	N/A
Legal and General Property	
<p>Whilst the broad conclusions of the Sustainability Appraisal are supported, i.e. that Green Belt release is required and the North West of Harpenden Broad Location should be allocated for predominately residential development, we object to the analysis and scoring of the North West of Harpenden site, and contend that the site should have scored even more highly in sustainability terms than is set out in the SA.</p> <p>Please refer to more detailed representations submitted pursuant to the Sustainability Appraisal at the end of this document and those submitted pursuant to policy SLP 13c (para 6.75 objection) and the submitted LGP North West Harpenden Vision Document, LGP Initial Sustainability Appraisal and LGP Preliminary Landscape and Visual appraisal which forms part of these representations.</p>	<p>The assessment for the North West of Harpenden Broad Location is largely consistent with previous assessments for this area and for other similar sized areas.</p>
<p>There are some elements of the scores set out in the relevant document Sustainability Appraisal (incorporating Strategic Environmental Assessment) Working Note Appendix B: Strategic Sub-Areas that we would object to. These are set out below and are supported by the Interim Sustainability Appraisal which forms part of these representations.</p> <p>For both greenhouse gas emission and air quality an amber score is provided for North West Harpenden site S5 -with the following explanation:</p> <p>‘The site is located approximately 1km from the town centre, which while being walkable is also likely to generate additional car trips, with associated greenhouse gas emissions. However the potential for public transport service improvement would help to mitigate.’</p> <p>Given that the site is the closest to the town centre from all the candidate sites and is on an existing main bus route we believe the site should have scored higher in respect of this criterion. More detail is provided in the Interim Sustainability Appraisal and Preliminary Landscape and Visual Appraisal submitted as part of these representations.</p>	<p>The Sustainability Appraisal provides a split-assessment for the ‘greenhouse gas emissions’ and ‘air quality’ objectives and in addition to the amber score provides a minor positive assessment to reflect the fact that the site is in a relatively sustainable location.</p>

<p>For resource efficiency for North West Harpenden an amber score is provided for site S5 with the following explanation: ‘The site is not located in a District Heating Opportunity Area and its scale would not be sufficient to support district heating.’ Figure 15. of the Draft SLP (September 2014 Consultation Draft) confirms a St Albans Energy Opportunities Plan and identifies a ‘heat demand for district heating potential’ within the existing built area of Harpenden a short distance to the south and east of the site. In addition the wider North West Harpenden broad location is proposed to accommodate 500 houses plus potentially a primary school and community facility. Given these facts we do not agree that the site is too small to support district heating or that the opportunity for district heating combined with the wider area does not exist. In addition the Interim Sustainability Appraisal submitted as part of these representations which includes the following statements:</p> <ul style="list-style-type: none"> • The site has potential for other sustainable energy production opportunities – it benefits from a south-westerly orientation, with the topography providing a good opportunity for energy efficient design using both passive solar and - potentially - building integrated solar PV and solar thermal systems. <p>We therefore believe the site should have scored more highly in relation to this criterion.</p>	<p>The assessment remains unchanged in relation to this objective. The neutral score against this objective is consistent with previous assessments and the assessments for other similar sites.</p>
<p>For landscape and townscape an amber score is provided for North West Harpenden site S5 with the following explanation: The site is in an area designated as a Landscape Conservation Area within the SADC Local Plan Review 1994. Development may have some impact on the setting of Harpenden when approached from the north. Development of the part of the site to the north of Cooters End Lane would be more intrusive into countryside than that to the south. Development would have local visual impacts. Notable effects would be in relation to residents within the sub-area (e.g. Cooters End Farm, residents of properties on the opposite side of the valley and people travelling along the local road network) (SKM, 2014). Development would impact on views from rights of way, including the long-distance Chiltern Way which runs along the Luton Road to the south-west of the site and Cooters Lane to the north-west of the site. We strongly disagree with these statements. The draft SLP states at paragraph 10.5 that SADC intends to review the boundaries of the Landscape Conservation Area and the previous policy from 1994 is now significantly out of date. The above statements in the SA regarding land north of Cooters End Lane are simply incorrect. These representations include a Preliminary Landscape and Visual Appraisal which includes the following conclusions:</p> <ul style="list-style-type: none"> • Existing mature vegetation along the northern edge of the site and along and to the north of Ambrose Lane, together create a robust visual screen which prevents views of both the L&G site and the CEG land parcel (the two sub-components of the North West Harpenden Broad Location), from the plateau and wider landscapes located to the north While the site is currently partially open at its western side allowing views into it from Thrales End Lane, it otherwise has very little physical or visual connection to the wider area of land falling within the Central Bedfordshire Area of Great Landscape Value designation. • There are partial views into the LGP site and CEG land parcel from the A1081 Luton Road, through occasional gaps in the trees and shrubs alongside the road. However, land north/west of the lane benefits from a more robust belt of trees and shrubs along the south-western boundary on the approach to the Thrales End Road junction. • The dwelling at Cooters End Farm is generally well screened from the L&G site by vegetation surrounding the property. The principle elevation faces the CEG land. • The Chiltern Way National Trail follows Cooters End Lane into the countryside north of the site. While narrow in width, it is open on both sides at the southern end near the junction with Luton Road, allowing views across land to both sides. The lane is likely to require some modification at this southern end to enable access into the site. However, the overall integrity of the lane, and route of the public footpath could be maintained. 	<p>The assessment is consistent with the approach taken in all previous stages of the sustainability appraisal, where any new development on a greenfield site is scored with an adverse effect, as is the case for the biodiversity and soils objectives.</p> <p>To recognise that there are potential positive effects against this objective from the delivery of recreation space and public open space and the retention of existing landscape features a split assessment is now provided for this broad location, to now include positive effects alongside the adverse effect.</p>

<p>The Independent SKM Green Belt Sites and Boundaries Study Report, instructed by St Albans City and District Council and published in February 2014 also considers such matters. Para 7.6.5 confirms:</p> <ul style="list-style-type: none"> The location of the site avoids identified constraints and is well integrated with the urban area which adjoins the site on two edges. It is located within the area of lower landscape sensitivity within the sub-area however the potential visual connection with the wider landscape especially from elevated sections of the site is noted and is considered by the indicative layout. The site is therefore recommended suitable for residential-led development. <p>We therefore believe the site should have scored more highly in relation to this criterion.</p>	
<p>For sustainable locations a single tick is provided for North West Harpenden site S5 with the following explanation:</p> <p>The site is in a relatively sustainable location with good access to services and facilities and close to bus routes.</p> <p>Other sites have received two ticks, indicating a more sustainable location on the basis that they are close to employment and areas that are a focus for future growth and regeneration and could deliver community facilities. We consider that a fundamental criteria for a sustainable location is proximity to a town centre with a wide range of services and employment opportunities. As demonstrated by the Initial Sustainability Appraisal submitted with these representations the site is in a highly sustainable location with excellent access to services and facilities and adjacent to an existing bus route.</p> <p>We therefore believe the site should have scored more highly in relation to this criterion.</p>	<p>The assessment provided for this broad location is consistent with previous assessments for this area and with other similar areas. It remains unchanged.</p>
<p>For revitalising town centres a single tick is provided for North West Harpenden site S5 with the following explanation:</p> <p>The relative proximity of the site to Harpenden town centre means that development should help to support the vibrancy of the town centre and nearby local centres.</p> <p>As the only site within 1.5 km of a town centre we believe the site should have scored more highly in relation to this criterion.</p>	<p>The assessment provided for this broad location is consistent with previous assessments for this area and with other similar areas. It remains unchanged.</p>
<p>Overall, when the representations are taken into account, we believe that both table 4: Results of Sub Area Assessment using the SADC Evaluation Framework and table 7: Summary of assessments of sub-area options as set out in the St Albans Strategic Local Plan: Strategic Local Plan Options Sustainability Appraisal (incorporating Strategic Environmental Assessment) Working Note June 2014 would conclude that the North West Harpenden Site S5 would score and rank much more highly.</p>	<p>See comments above</p>
<p>Harpenden Green Belt Association and private individuals' responses relating to SA5 NW Harpenden</p>	
<p>New Sustainability Appraisal Working Note: The new Sustainability Appraisal Working Note Appendix B is inaccurate in several respects.</p> <p>-In assessing against the SA objectives "greenhouse gas emissions", "air quality", it uses the erroneous "as the crow flies" measurements of distance given by officers to justify its conclusions about NW Harpenden and NE Harpenden: the true walking distances are significantly longer.</p> <p>- In addition, in relation to NW Harpenden the Working Note is inconsistent with the 2012 statutory Sustainability Appraisal for Area of Search 8 as regards the SA objectives "historic and cultural assets", "health" and "equality and social exclusion", without good reason.</p> <p>The 2012 statutory Sustainability Appraisal for Area of Search 8 (SE part) – i.e. the southern part of the NW Harpenden site – graded the site as "unsustainable" for "historic and cultural assets" given the proximity of Cooters End Farm, a listed building. The NW Harpenden site now is not merely next to, but includes the site of, the listed building: the impact on this heritage asset is worse, not better. Despite that, the scoring in the Working Note against this SA objective is merely "uncertain".</p> <p>The 2012 Sustainability Appraisal graded Area of Search 8 (SE part) as "unsustainable" on health grounds because the topography could discourage walking and cycling. The topography of the land has not changed. Despite that, the Working Note grades NW Harpenden as</p>	<p>With regard to the distances that have been queried these have now been updated to the distances in the SLP Technical Report (October 2014)</p> <p>The differences between the 2012 and 2014 assessments are for the following reasons:</p> <ul style="list-style-type: none"> "historic and cultural assets": the change from a minor negative to an uncertain assessment reflected the fact that the incorporation of mitigation was considered in the 2014 version of the SLP and the assessment was updated accordingly.

<p>“sustainable” on health grounds.</p> <p>The 2012 Sustainability Appraisal graded Area of Search 8 (SE part) as “unsustainable” against “equality and social exclusion” because of the lack of places in local schools. The position has got worse since 2012, not better. Despite that, the Working Note grades the NW Harpenden site as “sustainable” against this objective on the grounds that “there may be some potential to create new small scale local community facilities and improved open space”. This is inconsistent with the scoring of 0 for strategic infrastructure in the evaluation.</p>	<ul style="list-style-type: none"> • “health”: the change from a minor negative to a positive assessment resulted from an approach that sought consistency of assessment between the eight sub-areas by considering the topography between the site and the town/local centre and not so much the ‘within-site’ gradients – which had been the cause of the adverse score for AoS8. • “equality and social exclusion”: the change from a negative to a positive assessment resulted from a change in context between 2012 and 2014 in terms of future school place provision, along with recognition in the SA of the potential benefits of new development – to be consistent with the assessments of the other sub-areas.
<p>The Sustainability Report 2014 says development in North Harpenden would ‘revitalise the town centre’, and in the Sustainability Report on sub areas it says ‘the relative proximity of the site to Harpenden town centre means that development should help to support the vibrancy of the town centre and nearby local centres’. This section of the sustainability report seems to be only ever taken as a positive or a ‘need’, but there is no need to ‘revitalise’ Harpenden, which is already a vibrant, busy, prosperous town. To have potentially 1000+ more homes would significantly worsen the quality of life and the character of Harpenden. Additional housing would lead to even more traffic in and out of the town centre, in which there is already inadequate parking, and would put even more pressure on the schools. School capacity is already a big issue in the area.</p>	<p>The assessment does not infer that Harpenden needs to be revitalised, but, as for the other sub-areas, provides the view that new development will help to support local businesses and services.</p>
<p>In the Sustainability Report – sub areas – in relation to the ‘sustainable locations’ objective, it says that the development site in North Harpenden ‘is in a sustainable location with good access to services and facilities and close to bus routes’. This is not true – if more housing was built in North Harpenden existing services, facilities and overall infrastructure would be overloaded and totally inadequate (it is already straining at rush hour and school drop off/pick up times).</p>	<p>Under this objective the assessment chiefly considers how close, and/or accessible by public transport, the sub-area is to services and facilities.</p> <p>The SLP Infrastructure Delivery Schedule considers the infrastructure required to support new development.</p>
<p>The Sustainability Appraisal Working Note Appendix B is inaccurate in several respects:</p> <p>In assessing against the SA objectives “greenhouse gas emissions”, “air quality”, it uses erroneous “as the crow flies” measurements of distance to justify its conclusions about NW Harpenden and NE Harpenden: the true walking distances are significantly longer.</p>	<p>The assessment has been updated to reflect the revised distances in the Strategic Local Plan Technical Report (October 2014). The updates do not however alter the findings of the 2014 SA working note.</p>
<p>The Council has not considered all reasonable alternatives</p>	<p>In developing the SLP the Council has considered a wide range of alternatives and</p>

	<p>these have been subject to Sustainability Appraisal. Details of the previous appraisals are provided in Section 4 of the SA Report and also in Appendix E of this report.</p> <p>Reasonable alternatives evaluated in further detail are those that can meet the objectives of the Plan, which in the case of the strategic locations for development that are to be included in the SLP are the broad areas that are related to the main settlements (as identified in Policy SLP1).</p> <p>Smaller scale greenfield Green Belt sites that are supported by communities will be considered through DLP or neighbourhood plan process. These are not reasonable alternatives in terms of the identification of strategic locations in the context of the SLP.</p>
<p>Oaklands College (VRG Planning Ltd)</p>	
<p>... we note that the 'Sustainability Appraisal' for the SLP refers to the benefits of allocating Site S3 under criteria 'Equality & social exclusion', 'Community identity & participation', 'Sustainable prosperity and growth' and 'Fairer access to services'. In each case, it awards a 'sustainable' rating, but not the superior 'very sustainable' rating. Given the substantial education / community benefits of the S3 allocation, a very sustainable rating would be more appropriate.</p> <p>... considers that the infrastructure implications for further and vocational education should be more explicitly taken into consideration in assessing the alternative site options.</p>	<p>The assessment of the broad location in June 2014 identified that new development at Site S3 – Sandpit Lane, St Albans [Broad Location East St Albans (Oaklands)] would enable significant improvements to Oaklands Further Education college. The assessment has been updated to reflect this and now identifies a significant positive effect for the 'equality & social exclusion objective'. The value of a better educated population towards supporting the local economy has also been recognised in the assessment against the 'sustainable prosperity and growth' objective.</p>
<p>Private individual's response relating to East St Albans (Oaklands) Broad Location</p>	
<p>I disagree with some C4S sustainability findings which show a lack of understanding of the local area as it operates now. For example, it indicates that supermarkets are within walking distance. Virtually no one in this area walks anywhere – everyone uses their cars because of lamentable public transport and time constraints. Residents from any new development in East St Albans would undoubtedly use their cars to get to a supermarket as they are not nearby – the 1 kilometre cited, if correct, is from the nearest possible corner of a very large site. C4S, whilst acknowledging the increase in traffic there could be, grossly underestimate the current detrimental effects of the weight of traffic flowing east/west on local people's social wellbeing, health and quality of life</p>	<p>The assessments for the 'greenhouse gas emissions' and 'air quality' recognise that there are potential issues relating to increased levels of traffic from a new development. There is however a requirement for the development to deliver transport network and public</p>

	transport services upgrades/improvements which will help to mitigate these issues.
Hunston Properties Limited	
We note the very many complaints that have been levelled against the inaccuracy, inconsistency and incompleteness of the evidence within the Sustainability Appraisal (“SA”). However, for the purpose of this consultation, we address the key issues that undermine the credibility of the Council’s SA exercise, and trust the factual evidence can be corrected when the SA is redone properly.	See responses to the specific SA comments below. Other points (Issues One, Four, Six and Seven) are made in the response, but they relate to the detailed site evaluations in the Plan rather than the SA.
<p>Issue Two – failure to assess “reasonable alternatives”: Contrary to the claims in section 1.6 of the Technical Report, the Council has not assessed all the “reasonable alternatives”, far from it. Paragraph 1.6. states:</p> <p>“The reasonable alternative sites are generated using the Green Belt Review.”</p> <p>However the Green Belt Review generated 16 sites that contributed least to the Green Belt, and the Council has chosen to consider only 8 of them. Furthermore, the Council failed to consider distinct “parts” of 7 of the 8 larger areas. To carry out an SA on just eight sites as the basis for a 20-year Local Plan appears insufficient. We submit that a further Sustainability Appraisal exercise is required to consider, as a minimum, the 8 Small Scale Sub Areas and “parts” of ALL of the larger sites.</p>	<p>During the development of the SLP a wide range of alternative locations for new development have been considered and subject to Sustainability Appraisal. Details of the previous appraisals are provided in Section 4 of the SA Report and also in Appendix E of this report.</p> <p>The eight sites taken forward from the Green Belt Review are the strategic locations that were considered as reasonable alternatives to deliver the objectives of the SLP.</p> <p>Smaller scale greenfield Green Belt sites that are supported by communities will be considered through DLP or neighbourhood plan process. These are not reasonable alternatives in terms of the identification of strategic locations in the context of the SLP.</p>
<p>Issue Three – the treatment of S5: Strategic Sub Area “S5 North West Harpenden” appears to have been treated entirely differently to other sites. Concerns include:</p> <p>Consideration of “part” of the site. Whilst the Council should have been prepared to consider “parts” of all 8 Strategic Sites, it did so in respect of S5 alone.</p> <p>Non-Strategic. The reduction of S5 to just c.12 hectares made it smaller than two of the 8 Small Scale Sub Areas that the Council simply refused to consider for the SLP because of size.</p> <p>Density. The draft SLP assumes a net density of 40 dwellings per hectare. At the reduced scale of c.12 hectares that equates to just 288 new homes. However, the Council continues to expect S5 to deliver 500 homes, equivalent to 70 dwellings per hectare: 40% higher density than any other site.</p> <p>Vehicular access and traffic impact. The Council awarded 9 out of 10 to S5 for access and traffic, the highest score for all 8 sites it looked at. In doing so, the Council omitted vital evidence including the fact that Herts County Council has identified this stretch of the A1081 as a “congestion hotspot”. In addition, there is no evidence to suggest that Herts Highways will conclude that “special circumstances” apply to</p>	<p>The assessment of S5 North West Harpenden that was included in the 2014 SA Working Note was based on the whole area shown in yellow in the Green Belt Review Stage 2. It was not based on a ‘part’ of that area.</p> <p>In relation to the relationship of the broad locations to the “M1/M25 Growth Area” of Hertfordshire LEP’s Strategic Economic Plan, the SA considered the economic implications of new housing development on the local area. This has no relationship to whether or not a broad location lies within the “M1/M25 Growth Area”.</p>

<p>exempt S5 from its normal policy of prohibiting new accesses onto main roads.</p> <p>Outside SEP 'Growth Area'. Whilst the sites at Hemel, St Albans, Chiswell Green and London Colney are all within the "M1/M25 Growth Area" of Hertfordshire LEP's Strategic Economic Plan, S5 (and S6, NE of Harpenden), sit outside of it. There is no recognition of this in the SA.</p>	
<p>Issue Five – lack of expert consultation. The scores awarded to sites for various issues have been arrived at without sufficient consultation with independent experts. For instance, we are unaware of any input from Herts Highways on the "vehicular access and traffic impact" element of the 2014 SA. As a result, we believe it is likely that un-trained Officers scoring this issue have missed potential opportunities and problems at each of the sites. We look forward to the Council engaging fully with Herts Highways, and others, when the SLP is revised.</p>	<p>This comment relates to the Strategic Local Plan Technical Report (October 2014) and not to the Sustainability Appraisal.</p> <p>The "vehicular access and traffic impact" criterion is part of the SLP Technical Report and is not a sustainability appraisal criterion.</p>
<p>Mr Brian Parker</p>	
<p>The Council only reviewed the sustainability credentials of 8 Strategic Sub Areas identified by SKM in the Green Belt Review. Despite being required by law to consider all reasonable alternatives, the Council failed to look at either the 8 Small Scale Sub Areas or distinct "parts" of the 8 larger areas. [In July 2014, Officers did consider the development of "part" of North West of Harpenden, limited to Cooters End Lane, but have subsequently denied doing this and have refused to consider "parts" of other sites.]</p> <p>A further Sustainability Appraisal exercise to consider the 8 Small Scale Sub Areas and "part" sites of the larger sites, is required to better inform a revised SLP.</p>	<p>See response above for the equivalent comment in Issue Two raised by Hunston Properties Limited.</p>
<p>St Albans and District Friends of the Earth</p>	
<p>Whilst the Sustainability Appraisal mentions the desirability of saving the best agricultural land, we do not feel that enough weight was given to this factor. Transport links can be created, local services can be provided and workspaces can be built, but new land for growing the food we depend on cannot be created once it has been destroyed.</p>	<p>The Sustainability Appraisal has identified significant adverse effects where development at broad locations would result in the loss of best and most versatile agricultural land.</p>

6 Comments from the Consultation on the Publication Strategic Local Plan SA Report (November 2015)

The table below provides details of the representations received during the Regulation 19 consultation on the Publication Strategic Local Plan, along with replies to the representations and details of how they were taken into account in the SA/SEA process. This repeats the information provided in Appendix A of the SA Report Addendum (July 2016) which was prepared to report on the sustainability appraisal activities that had been undertaken from the representation on the Publication Strategic Local Plan (SLP) in January 2016, up to the Submission of the SLP and associated documents to the Secretary of State.

Summary of Comments	Reply to comments / how the comments have been taken on board
<p>Historic England</p>	
<p>Historic England notes the point made at page 16, paragraph 6 (b) of the Sustainability Appraisal Report non-technical summary (identification of other effects), that 'For the 'development controlling' policies (such as SLP3-Historic Environment and Townscape</p>	<p>This representation is related more to the</p>

<p>Character, SLP4-Urban Design, and SLP26-Natural Environment etc.) the assessments are generally positive against the SA objectives related to that policy, with there being no predicted effects against the non-related objectives'. The sustainability appraisal (SA) continues that, where there is uncertainty as to how some SA objectives would be influenced by the SLP policies, there is some difficulty in identifying effects. This is because the individual characteristics of the area remain uncertain at this stage in the plan-making process, as exact site locations remain to be determined. When considering the Sustainability Appraisal Report's assessment of individual policies, Policy SL3 is assessed as very sustainable in the delivery of historic and cultural asset objectives. This level of assurance cannot be guaranteed for SLP 13 (a) (b) (c) and (d) and an uncertain outcome for SEA/SA purposes is recorded (at the SA assessment at its paragraph 5.2.3 and page 62). Historic England would recommend that such uncertainty points towards the need for necessary policy assurances in SLP (a) (b) (c) and (d), in addition to SLP 3, as we have identified in our submissions. In conclusion, this means that SEA/SA criterion requires additional policy text to support the inclusion of 'historic environment', as advocated against SLP (a) and (b) in particular. The sustainability appraisal report concludes (at its paragraph 5.3.7 on page 62, when assessing SA objectives 10 and 11) that: 'There is uncertainty over the effects of the development at the Broad Locations on the 'historic & cultural assets' objective. None of the Broad Locations have any significant constraints but all have some associated or nearby heritage assets that will need to be taken into consideration during the master-planning process.' Again Historic England would conclude that additional policy wording is required to avoid uncertainty and to reinforce the assessment of impacts upon the historic environment when producing effective master-planning and area action plans.</p>	<p>content of the Local Plan than the SA. The strategic approach to heritage assets is set out at policy SLP3.</p>
<p>Natural England</p>	
<p>Natural England does not wish to make any specific comments in relation to the Sustainability Appraisal.</p>	<p>Noted</p>
<p>Savills on behalf of Legal and General Property</p>	
<p>Savills provided a representation to Section 4 of the SA Report which reiterated their concerns provided in their consultation response to the Draft SLP (November 2014). It has therefore not been repeated here.</p>	<p>Section 5 of Appendix D to the SA Report (December 2015) provides a response to the 2014 representation.</p>
<p><u>Savills Response to Section 5 of the SA Report (December 2015)</u></p> <p>Given that there is an increasingly serious housing shortfall and housing accessibility problem emerging across the district and the wider south east, it is critical for future generations that the Council takes a proactive, enabling approach to delivering sufficient land for housing to meet local community and economic needs. Overall, we support SACDC's Strategic Local Plan and associated Sustainability Appraisal Report, particularly the identification of Broad Locations for growth for residential development, which will help address those challenges. Section 4: Development of the Strategic Local Plan provides a summary of the assessment of options undertaken during the various stages of the development of the SLP and where appropriate provides the reasons for selecting the options taken forward to the next stage of the planning process. In this regard the objections we previously submitted on behalf of LGP at the previous stages of the SLP remain valid as follows.</p> <p>Assessment of Strategic Local Plan Options- June 2014 We previously made representations in November 2014 to the Sustainability Appraisal published at the Regulation 18 consultation stage of the SLP. Those objections focussed on the housing requirement/target; the strategic sub-areas and the development strategy options undertaken in June 2014 and reported in the Sustainability Appraisal published for consultation in November 2014. Those stages are now reported in pages 46-55 of the latest SA Report. Our historic position was that the broad conclusions of the Sustainability Appraisal and SACDC officer assessments, i.e. that Green Belt release is required and the North West of Harpenden Broad Location should be allocated for predominately residential development is supported. However, we did have the following concerns on some of the detailed matters set out in these documents: - Housing requirement/target - there was a risk that</p>	<p>Broadly, the representation relates to what is considered by the respondent to be 'overly negative' assessments for some of the environmental objectives and 'not positive enough' assessments for some of the social and economic objectives.</p> <p>The respondent has challenged the assessments for SLP13c against several SA objectives. Reasons behind the assessment 'scores' attributed are provided below:</p> <ul style="list-style-type: none"> • Resource efficiency (SA9): the reasons for the finding of 'no predicted effects' were provided in Appendix F of the SA Report (page F50). The site was considered to not be of a size that could support district heating. The orientation of the site was

the housing requirement target had been set too low - Development strategy options – as a demonstrably highly sustainable site, the LGP site within the full extent of the North West Harpenden Broad Location should have been considered as an essential component to each of the development strategy options under consideration. - Strategic sub-areas - whilst the conclusions of the SACDC officer assessment (SLP Technical Report – Development Sites and Strategy Options Evaluation October 2014) of Site SA-S5 were supported, i.e. that the site is highly sustainable and should be allocated, there were some elements of the scores set out in the relevant document Sustainability Appraisal (incorporating Strategic Environmental Assessment) Working Note Appendix B: Strategic Sub-Areas that we objected to, with those objections supported by the submitted Savills/LGP Interim Sustainability Appraisal (which also forms part of these representations). Overall, once the revised scoring set out in our previous representations are taken into account, we contended that both table 4: Results of Sub Area Assessment using the SADC Evaluation Framework and table 7: Summary of assessments of sub-area options as set out in the St Albans Strategic Local Plan: Strategic Local Plan Options Sustainability Appraisal (incorporating Strategic Environmental Assessment) Working Note June 2014 and other related reports and assessments would conclude that the North West Harpenden Site S5 would score and rank much more highly. The detailed representations made in November 2014 to the SA appraisal matrix objective scoring are not repeated again here as the comments now made above in response to Section 5 of the SA (which provides an appraisal of the most recent publication draft SLP (December 2015)) represent the most recent position. Please refer to these. Nevertheless, our historic position on this early stage of the development SLP should be noted.

Whilst the broad and detailed conclusions of the sustainability appraisal and officer assessment are supported, we have some minor concerns regarding the application of the sustainability appraisal scoring matrices. We contend that the NW Harpenden site should have scored even more highly in sustainability terms than is set out in the SA. However we agree with the overall conclusions reached in the SA.

Given that there is an increasingly serious housing shortfall and housing accessibility problem emerging across the district and the wider south east, it is critical for future generations that the Council takes a proactive, enabling approach to delivering sufficient land for housing to meet local community and economic needs. Overall, we support SACDC's Strategic Local Plan and Sustainability Assessment, particularly the identification of Broad Locations for growth for residential development, which will help address those challenges. Whilst the broad conclusions of the Sustainability Appraisal are supported, i.e. that Green Belt release is required and the North West of Harpenden Broad Location should be allocated for predominately residential development we do object to some elements of the analysis and scoring of the North West of Harpenden site, and contend that the site should have scored even more highly in sustainability terms than is set out in the SA. We support the conclusion that no significant adverse effects arise in connection with policy SLP13c North West Harpenden, and that no further mitigation is required. Our concerns relate to the detailed matters set out in the sustainability appraisal scoring matrices for NW Harpenden (Policy SLP 13c) both in terms of page F49-F50 of appendix F: Policy Assessment and the related summary which appears at page 69 (para 5.2.3.11) of the SA. These objections are as follows:

1. No score for resource efficiency (objective 9) We object to the absence of a score for this criterion. The site has potential for sustainable energy production opportunities – it benefits from a south-westerly orientation, with the topography providing a good opportunity for energy efficient design using both passive solar and - potentially - building integrated solar PV and solar thermal systems.
2. Uncertainty for impact on historic and cultural assets (objective 10) and Negative score for landscape and townscape (objective 11) We object to the scoring against these criteria. The SLP states at paragraph 10.5 that SACDC intends to review the boundaries of the Landscape Conservation Area and the previous policy from 1994 is now significantly out of date. The statements in the SA regarding land north of Cooters End Lane being more intrusive into countryside than that to the south are simply incorrect. These representations include a previously submitted Preliminary Landscape and Visual Appraisal which includes the following conclusions: Existing mature vegetation along the northern edge of the site and along and to the north of Ambrose Lane, together create a robust visual screen which

not one of the criteria considered when undertaking the assessment.

- Historic and cultural assets (SA10): an uncertain score was provided due to the listed buildings within/adjacent to the Broad Location. It is uncertain as to whether these would be affected by any new development – this being dependent on mitigation.
- Landscape and townscape (SA11): the solely negative assessment that was provided in the September 2014 SA Working Note was updated in the 2015 assessment to also include a positive element to reflect the delivery of recreation space and public open space that would be required. Nevertheless the negative element of the assessment remained. This reflects the fact that development of approximately 500 houses within a high quality landscape will have inevitable adverse effects.
- Community identity and participation (SA16): this Broad Location has consistently been assessed as having 'no predicted effects' against this SA objective. Compared to larger Broad locations it is not of a scale that would provide new facilities that would serve the needs of the wider population.
- Sustainable location (SA13): this Broad Location has consistently been assessed as having 'minor positive' effects against this SA objective to reflect the location of the site.
- Equity and social exclusion (SA14): the 'minor positive' score reflects the relatively limited potential for the development to provide new facilities and open space.

<p>prevents views of both the L&G site and the CEG land parcel (the two sub-components of the North West Harpenden Broad Location), from the plateau and wider landscapes located to the north. While the site is currently partially open at its western side allowing views into it from Thrales End Lane, it otherwise has very little physical or visual connection to the wider area of land falling within the Central Bedfordshire Area of Great Landscape Value designation. There are partial views into the L&G site and CEG land parcel from the A1081 Luton Road, through occasional gaps in the trees and shrubs alongside the road. However, land north/west of the lane benefits from a more robust belt of trees and shrubs along the southwestern boundary on the approach to the Thrales End Road junction. The dwelling and listed building at Cooters End Farm is generally well screened from the L&G site by vegetation surrounding the property. The principle elevation faces Cooters End Lane. The Chiltern Way National Trail follows Cooters End Lane into the countryside north of the site. While narrow in width, it is open on both sides at the southern end near the junction with Luton Road, allowing views across land to both sides. The lane is likely to require some modification at this southern end to enable access into the site. However, the overall integrity of the lane, and route of the public footpath could be maintained. The Independent SKM Green Belt Sites and Boundaries Study Report, instructed by St Albans City and District Council and published in February 2014 also considers such matters. Para 7.6.5 confirms: The location of the site avoids identified constraints and is well integrated with the urban area which adjoins the site on two edges. It is located within the area of lower landscape sensitivity within the sub-area however the potential visual connection with the wider landscape especially from elevated sections of the site is noted and is considered by the indicative layout. The site is therefore recommended suitable for residential-led development. We therefore believe the site should have achieved a higher positive score in respect of these criteria.</p> <p>3. No score against the Community identity and participation (objective 16) There is no score entered for NW Harpenden in the 'community identity and participation objective', yet other broad locations have received positive scores on the basis of the 'potential to develop new facilities (education, health, community etc) that would be accessible to the new and nearby existing population'. It is considered that the NW Harpenden site should have a positive score against this criterion particularly as the SA matrix already identifies 'some potential to create new small scale local community facilities and improved open space' and the policy now also includes a requirement for primary school provision.</p> <p>4. Low positive scores against a number of objectives: It is noted that whilst some of the other broad locations have received 'double ticks' against certain criteria, NW Harpenden only receives a 'single tick', notably for the criteria of: sustainable location (objective 13); equity and social exclusion (objective 14); good quality housing (objective 15); sustainable prosperity and growth (objective 18); and, fairer access to jobs and services (objective 19). Given that the site is one of the closest broad locations to the town centre of one of the largest settlements in the District, and is on an existing main bus route, we believe the site should have scored higher in respect of the sustainable location criterion. In terms of the other criterion, the site seems to have been penalised for being of a smaller scale than the other broad locations. Whilst this can be a relevant factor, the site can still make a significant contribution and therefore potentially score more highly.</p> <p>Whilst the broad and detailed conclusions of the sustainability appraisal are supported, we have some minor concerns regarding the application of the sustainability appraisal scoring matrices. We contend that the North West Harpenden site should have scored even more highly in sustainability terms than is set out in the SA. However we agree with the overall conclusions reached in the SA.</p>	<ul style="list-style-type: none"> • Good quality housing (SA15): this Broad Location has consistently been assessed as having 'minor positive' effects against this SA objective. This 'score' reflects the level of housing that the site could deliver, when considered at the strategic level of the SLP. • Sustainable prosperity and growth (SA18): the findings of 'no predicted effects' against this objective in the 2014 assessment was amended to a minor positive score in 2015. This reflected the fact that the development could help the local economy and support local services. • Fairer access to jobs and services (SA19): the assessment of 'no predicted effects' against this objective is based on the development not providing new employment opportunities – beyond the construction phase. <p>Based on the explanations provided above the findings of the SA Report (December 2015) remain unchanged.</p>
Strutt & Parker LLP on behalf of Taylor Wimpey Strategic Land South East	
<p>Consideration of alternatives</p> <p>4.1. We have reviewed the St Albans Strategic Local Plan: Strategic Local Plan Options Sustainability Appraisal (incorporating Strategic Environmental Assessment) Working Note Appendix A: Housing Requirement / Target (June 2014). This and other working notes are cited</p>	<p>It is acknowledged that new development can bring with it some environmental benefits, such as biodiversity enhancements, and this has been</p>

<p>within the SEA/SA published alongside the Strategic Local Plan 2016, including in relation to the consideration of alternative housing figures and how the housing figure proposed in the Strategic Local Plan has been derived at.</p> <p>4.2. In respect of the SA Objective in relation to Biodiversity, the Working Note Appendix A assessment states that the larger the housing requirement the greater the need will be to develop on greenfield sites, which have an inherent value for biodiversity and will inevitably lead to some adverse effects on habitats and species. We question the validity of this assertion. It is not the case that greenfield sites are intrinsically biodiverse. Agricultural land, particularly that in use for monoculture, is often of limited ecological value, and its development can often afford opportunities for ecological enhancement. There is no evidence that the development of additional housing to that proposed will have an adverse impact on biodiversity that cannot be mitigated. Further, it should be noted that Land at Hill Dyke Road, Wheathampstead represents an example of a site whose development is not supported by the SLP, but which is of low ecological value and can be delivered for housing without undue ecological impact.</p> <p>4.3. The Working Note Appendix A assessment draws similar conclusions in respect of three other SA Objectives (Water quality / quantity; Flood risk; and Landscape & townscape). In relation to each of these three SA Objectives, the validity of stating that additional housing growth will intrinsically result in greater negative impacts is questioned.</p> <p>4.4. In the case of water quality / quantity the Council's Water Cycle Study (2010) does not support the conclusion that a higher level of growth will inevitably lead to harm. Rather, it identifies various levels of constraint to development in various different locations, and the extent to which infrastructure improvements and / or other mitigation will be required to enable development. It is also notable that this study identifies greater constraints to growth respect of wastewater treatment works, sewerage network capacity, flood risk and water environment in areas such as Hemel Hempstead (an area to which the Strategic Local Plan seeks to direct growth) than in Wheathampstead (a settlement that is not identified for any growth).</p> <p>4.5. Against the SA Objective on Flood Risk, the Working Note Appendix A states it should be possible to deliver all the levels of growth without having to build in Flood Risk Zones. It further states however that increased levels of development, and associated impermeable surfaces, would however increase the risk from pluvial flooding. Again, we question whether such an assertion can be substantiated. The relevant Lead Local Flood Authority – Hertfordshire County Council – has published a Sustainable Drainage System (SuDS) Policy Statement as an addendum to the Local Flood Risk Management Strategy. This requires proposals for SuDS to demonstrate how the frequency, rate and volume of runoff from development will be managed to achieve a greenfield rate. There is no evidence that there is a particular level of growth at which meeting this requirement will no longer be feasible. Again, Land at Hill Dyke Road, Wheathampstead represents an example of a site where there are no constraints to its development vis-à-vis flood risk or water, yet its development is not supported through the SLP.</p> <p>4.6. The Working Note Appendix A also suggests that greater levels of development will inevitably result in a greater negative impact on the SA Objective Landscape & townscape. It states that the larger the housing requirement the greater the need for developing on greenfield sites in the Green Belt, therefore requiring Green Belt release with associated adverse effects on local landscapes and the potential for eroding gaps between settlements. However, there is no evidence to suggest that there is a particular level of growth at which it will no longer be possible to accommodate development without undermining the strategic purposes of the Green Belt, including preventing neighbouring towns from merging into one another.</p> <p>4.7. Further, there is no evidence that there is a particular level of growth above which there will inevitably be undue harm to the District's landscape or townscape. In the case of Land at Hill Dyke Road, Wheathampstead, by way of example, whose development for housing is not supported by the SLP, development can be achieved without undermining the strategic purposes of including land within the Green Belt. As set out in our submissions on the 2014 draft SLP, a Landscape Visual Assessment and Green Belt Review carried out by CSa on behalf of Taylor Wimpey confirms the site could be released for development with minimal impact</p>	<p>recognised in the assessments for some of the broad locations, as well as in the assessments of those Spatial Strategy options (Options 1a and 3) that included the larger broad locations.</p> <p>Nevertheless the methodology used in the SA since the first assessment in 2006 has been to identify negative effects where greenfield land is to be lost to new development, in particular against SA Objectives 1 (Biodiversity), 4 (Soils), 8 (Use of brownfield sites) and 11 (Landscape).</p> <p>Similarly increased activity and housing numbers associated with new developments will inevitably lead to increased traffic, with associated increases in greenhouse gas emissions and potential reductions in air quality, as well as increased water consumption. With regard to the latter, St Albans is in an area classified as suffering from serious water stress, with the vast majority of the rivers and groundwater being over-abstracted. Any new housing development will exacerbate this situation, hence the identification of adverse effects against the water objective (SA2).</p> <p>The sustainability appraisal has only assessed the site and policy options that have been seen by the Council as being 'reasonable alternatives' at each particular stage of plan preparation. At each such stage all alternatives have been assessed at the same level of detail.</p> <p>Policy SLP 1 identifies four broad locations where development needs that cannot be accommodated within existing areas and other previously developed land will be met. The 'reasonable alternatives' considered for these broad locations constituted the eight strategic sub-areas identified in the SKM Green Belt Study. Four of these eight sub-areas were selected for inclusion in the SLP.</p> <p>The SKM Study also identified some small-scale</p>
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<p>4.8. Further, the Council’s own Green Belt Review Purposes Assessment (November 2013) confirms the lack of harm to the Green Belt that development of the site would entail. It considers land south of Wheathampstead (GB43A - land to south of Hill Dyke Road and enclosed by Dyke Lane to the east and settlement edge to the west) and conclude the following at paragraph 8.3.10: “Assessed in isolation this very small subarea makes a limited or no contribution towards checking sprawl, preventing merging, preserving setting or maintaining local gaps.”</p> <p>4.9. Considerable supporting information has been previously submitted to the Council to demonstrate development of the site can be suitably and sustainably accommodated. However, the reasons for its rejection remain unclear.</p> <p>4.10. We have been able to identify one document in which the Council purports to justify the rejection of potential alternatives for development, including Land at Hill Dyke Road, Wheathampstead. In June 2015 the Council published St Albans City and District Council Draft Strategic Local Plan Consultation Report of 2014. At page 169, our client’s site is considered and the following is stated: “This site should not be considered for inclusion in the SLP as it does not fall within the areas identified for possible Green Belt boundary change consideration in the Green Belt Review. However the site is potentially relatively small and is noted as a possible site for assessment as part of work on the DLP (small scale Green Belt boundary changes).”</p> <p>4.11. The above does not provide adequate justification for the failure of the plan to identify the site for development within the SLP , or at the very least to provide a strategic policy indicating that growth will be directed to this location.</p> <p>4.12. Having regard to the above, the process by which potential alternatives – particularly the alternative of a higher level of housing development, but also that of specific sites / locations for development – have been assessed and rejected is not considered to be robust. The decision for the Strategic Local Plan to not seek to deliver a greater number of homes is therefore not considered justified, and the plan is unsound.</p>	<p>sub-areas. These included Site SA-SS7 – Land south of Wheathampstead. However, due to their size these small-small scale sites were not considered by the Council to be ‘reasonable alternatives’ at a strategic level. They were not therefore considered for inclusion in the SLP, but will be considered, if appropriate, for inclusion in the Detailed Local Plan – as mentioned in the Council report to which the respondent makes reference, as well as being stated in Policy SLP 1.</p> <p>In relation to the respondent’s comment about the process by which potential alternatives have been assessed and rejected not being considered to be robust, at each stage of the planning process the SA has undertaken assessments to the same level of detail for each of the options that were considered as ‘reasonable alternatives’ at that particular stage. The options considered included strategic policies and strategic locations. The findings of these assessments have been provided in a series of SA Reports and SA Working Notes, with consultation having been undertaken on those documents, and have informed the plan making process.</p>
<p>London Colney Limited</p>	
<p>In response to the Sustainability Appraisal (December 2015), the 2015 Representations submitted to SADC (see Appendix A of the attached Representations Statement) are relevant and are summarised below. These Representations ultimately consider Land South of Alban Way, in the same manner that the sustainability assessment considers the Green Belt site options. In doing so it also takes into account the Planning Policy Committee (17 November 2015), and also considers the Evaluation Framework (SLP, Technical Report, October, 2014) and SLP Consultation (December 2014).</p> <p>The full assessment is set out at Appendix A (of the Representations Statement) and the updated sustainability appraisal which includes Land South of Alban Way is set out in Figure 1 – both set out in the attached Representations Statement.</p> <p>In summary, the assessment demonstrates that when assessed against the other strategic subareas (using the 20 criteria set out in the Sustainability Appraisal) the site can deliver a range of significant positive effects. These effects relate to social, economic and environmental factors and are at a level which is comparable with the four sites identified as broad locations for development / Green Belt release in the SLP. Overall the site represents a potential logical urban extension to the east of St Albans. In terms of location, the site is in close proximity to Alban Park, which represents a key employment location, so it is positive planning to locate housing nearby. In terms of the connectivity and accessibility the site is well-connected to existing routes including the Alban Way, which runs between St Albans and Hatfield, and highways access of Colney Heath Lane is possible. This means that the Site could be well-integrated into existing</p>	<p>This representation does not provide any comment on the SA Report (December 2015). Instead it provides an assessment of a site not considered for inclusion in the Strategic local Plan – and therefore not subject to sustainability appraisal.</p>

<p>urban areas, and help deliver a range of economic and social benefits to new residents and existing communities.</p>	
<p>JB Planning Associates on behalf of Hilton House Properties Ltd</p>	
<p>Sustainability Appraisal</p> <p>1.1 We consider that the sustainability appraisal is unduly negative in terms of housing provision. Examples are set out below:</p> <p>P.27 - Core Strategy Objective: "Mixed and balanced / sustainable communities"</p> <p>1.2 It is stated that this objective is potentially incompatible with a number of the SA objectives:</p> <ul style="list-style-type: none"> • <i>"The level of housing development required in the District will require development of greenfield land. Development of greenfield land is not compatible with biodiversity due to landtake, potential habitat fragmentation and urban pollution issues. Development on greenfield land would also result in soil sealing.</i> • <i>Providing new homes in the District will put direct pressure on water resources which are already identified as 'over-abstracted'.</i> • <i>Housing development will result in increases in greenhouse gas emissions from new housing and associated activities. It will also contribute to background emissions through an increase in the number of vehicles on the road thereby reducing air quality. The objective also has uncertain compatibilities with a number of the SA objectives:</i> • <i>Parts of the District lie within areas of flood risk and there is the potential for new housing sites to lie within these zones.</i> • <i>Housing development on greenfield sites is potentially incompatible with the SA objectives on historic & cultural assets, and landscape & townscape"</i> <p>1.3 The above objective ignores the fact that housing provision that takes place is capable of adding and improving biodiversity and green links. This is particularly true in respect of much agricultural land, which is lacking in existing biodiversity value.</p> <p>1.4 In terms of the both the economy and delivering infrastructure, it is apparent that the Sustainability Appraisal fails to properly balance the economic, social and environmental considerations. Instead, it overly focuses upon just the environmental aspects of development.</p> <p>P.27 - Core Strategy Objective: "A thriving economy"</p> <p><i>"This objective is incompatible with the SA objectives on greenhouse gas emissions and air quality as activities relating to the new employment sites, such as transport and travel, will result in increases in greenhouse gas emissions and other airborne emissions.</i></p> <p><i>The objective also has uncertain compatibilities with a number of other SA objectives. For example, developing employment sites on greenfield land will have uncertain effects on biodiversity, soils, historic & cultural assets and landscape & townscape depending on the exact location and type of employment to be provided"</i>.</p> <p>P.27 - Core Strategy Objective: "Delivering Infrastructure"</p> <p><i>"Through the provision of new infrastructure to enable there are potential incompatibilities with the SA objectives for biodiversity, soils, and historic & cultural assets and landscape & townscape as providing infrastructure, e.g. roads, utilities, services and community facilities, could lead to effects such as habitat fragmentation, soil sealing and adverse effects on the historic environment and landscapes, depending on the location and design of the infrastructure"</i>.</p> <p>P.30 - 4.2.1 Theme 1: Protection of the Green Belt</p> <p>1.5 A further example of this imbalance is highlighted below:</p> <p><i>"Two of the options contributed 'very sustainably' against one or more of the SA/SEA objectives. These were "no further greenbelt releases to meet further land use requirements" (against SA Obj.8 'Use of brownfield land', 11 'landscape', & 13 'sustainable locations') and</i></p>	<p>Whilst the representation identifies sections of the SA Report where the respondents consider the sustainability appraisal to be 'unduly negative in terms of housing provision' there are many other areas of the SA Report where housing provision is shown to be positive against a range of the SA objectives.</p> <p>Table 4 of the SA Report (Compatibility between SA/SEA Objectives and SLP Objectives) identifies several SA objectives for which compatibility with the SLP Objective 'Mixed and balanced / sustainable communities' have been identified. The report does not however then provide descriptions of why these compatibilities have been identified, as it does for the incompatibilities, which is perhaps why the respondent sees the SA as being unduly negative in terms of housing provision. This has not been the intention. The positive assessments against the social and economic SA objectives that have been identified for the SLP policies on housing back this up. In meeting the requirements of the SEA Regulations the SA framework includes more environmental objectives than social and economic ones, and as it is against the environmental objectives that new development in Green Belt greenfield locations has some inevitable negative effects, this means that there could be more negative scores than positive scores when assessing the scale or location of new development.</p> <p>However, the SA does not count up the positive and negative scores to arrive at a single score for a policy or site assessment.</p> <p>The SA Framework was developed in 2006 with extensive consultation and has been used for all</p>

<p><i>“retaining certain villages within the greenbelt and continuing to apply a strong presumption against development” (SA Obj. 13)”</i>.</p> <p>P.46 & 47 and Table 6 - Housing Requirement / Target Options</p> <p>1.6 The sustainability of 7 different options have been examined. These proposed rates of housing development between 200 – 900 dpa. Again, it is noteworthy that environmental considerations were given prominence over social and economic considerations.</p> <p>P.64 - 5.2.3.4 SLP8 Local Housing Requirement/Target and Provision</p> <p>1.7 It is stated that <i>“significant positive effects have been identified for the “good quality housing’ objective as the provision of an average of 450 net dwellings per annum will meet the Council’s Local Housing Requirement / Target, including the Council’s target for the provision of affordable homes as well as providing a mix of family homes”</i>. We would question where the precise evidence is to support this assertion. We consider that a far higher level of housing is required in order to increase the very poor level of affordable housing provision currently occurring in St Albans.</p> <p>1.8 We also note that the Sustainability Appraisal offers limited analysis of the relative benefits and drawbacks of the eight potential Broad Location sites.</p>	<p>the sustainability appraisal activities since that time. The make-up of the SA framework does not mean that environmental considerations are given prominence over social and economic considerations as the respondent contests.</p> <p>It is acknowledged that new development can bring with it some environmental benefits, such as biodiversity enhancements, and this has been recognised in the assessments for some of the broad locations.</p> <p>Nevertheless the methodology used in the SA since the first assessment in 2006 has been to identify negative effects where greenfield land is to be lost to new development, in particular against SA Objectives 1 (Biodiversity), 4 (Soils), 8 (Use of brownfield sites) and 11 (Landscape).</p> <p>Similarly increased activity and housing numbers associated with new developments will inevitably lead to increased traffic, with associated increases in greenhouse gas emissions and potential reductions in air quality, as well as increased water consumption.</p> <p>The representation also comments on the assessment of SLP 8 against the housing objective. The assessment undertaken against the ‘good quality housing’ objective (SA15) was based on the most up to date information available in terms of housing need. As the proposed level of housing (436 dpa) was arrived at to meet this need this was considered as contributing significantly towards meeting the SA objective a significant positive ‘score’ was attributed. Any level of housing above 436 dpa would have been given the same ‘score’ (i.e. significant positive).</p> <p>With regard to the respondent’s point that the SA offers limited analysis of the relative benefits and drawbacks of the broad locations, the SA provided the Council officers and Members with</p>
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	an assessment for each site in order to inform the decision making process. It did not seek to provide a ranking for the sites.
Clowes Developments (UK) Ltd	
<p>Sustainability Appraisal Clowes Developments (UK) Ltd object to the Sustainability Appraisal (SA) on the grounds that it has not been properly prepared, is not effective and in part does not comply with National Policy.</p> <p>The SA sets out the journey that the local plan has taken since 2006 when work commenced on the plan.</p> <p>It is clear that whilst the council acknowledged early in the process that a large proportion of the District lies in Green Belt and that the need to protect Green Belt is a very important issue with residents. Despite this acknowledgement the need to release land from the Green Belt was not really accepted by the District until 2012, when consideration was given to identifying broad locations for future development. Up until this point there was an expectation that all development could be accommodated on previously developed land outside of the Green Belt.</p> <p>At the heart of the local plan is an objective to direct future housing and mixed use development to four broad locations. Furthermore these locations need to be removed from the Green Belt.</p> <p>Clowes Developments (UK) Ltd object to the way that the Council has identified the four broad locations which essentially entailed two separate reports (one prepared by external consultants SKM who were commissioned by the Council and the second which was prepared by the local authority's officers) which arrived at almost diametrically opposed conclusions.</p> <p>Clowes Developments (UK) Ltd find it difficult to understand how the work undertaken on the second report has produced such significantly different conclusions. The absence of any tangible evidence suggests that the second report is for more subjective in its analysis than the first which appears to be more objectively assessed.</p> <p>Notwithstanding the above, Clowes Developments (UK) Ltd contend that the Council's officers and their consultants failed to give any due consideration to the company's landholding indicated on the attached plan, which is situated east of the M1 motorway, north of the M25 motorway and west of the northern orbital. This land lies near to the land referred to as "Chiswell Green".</p> <p>The council's failure to give consideration to this area which could be developed either independently or as part of a larger broad location, represents a flaw in the Council's plan preparations. As a result, the policies which have been put forward in the plan in so far as they apply to the broad locations for housing and mixed use development are considered to be unsound.</p>	The response does not raise any issues relating to the SA Report prepared by C4S.
Troy Planning & Design on behalf of Redbourn Parish Council	
<p>Sustainability Appraisal and Approach to the Strategy</p> <p>We also consider that St Albans City and District Council has failed to approach the plan-making process in a manner that has allowed all reasonable alternatives to be considered or in accordance with the latest national policy and guidance. The Sustainability Appraisal is deficient in failing to account for the possible contribution smaller sites may make to the main Development Strategy Options tested, despite relevant alternatives being identified in the Green Belt Study Phase 1.</p> <p>Equally, the Sustainability Appraisal fails to take account of the disproportionate burden of delivery placed on individual Broad Locations dependent on the housing requirement being applied; and overlooks that the proportion of development could be shared differently across larger strategic sites considered more suitable in Green Belt terms (and better-related to the main settlements of Harpenden and</p>	With regard to the consideration of smaller sites, these were not considered in the sustainability appraisal as they were not considered by the Council to be 'reasonable alternatives'. Only Strategic Sub Areas identified by SKM as least meeting the purposes of the GB were considered to be suitable for consideration in the Strategic Local Plan. Smaller sites will be considered for inclusion in the Detailed Local Plan or

<p>St Albans).</p> <p>The alternatives tested in the Sustainability Appraisal are based on the assumption that some of the land at the Broad Locations East of Hemel can be safeguarded and meet sub-regional housing needs. This is inconsistent with the proposed strategy requiring all recommended potential capacity at these locations being required to meet needs arising in St Albans, which represents a different basis for the spatial strategy and a different basis for the assessment of significant effects.</p> <p>Based on the above, it can also be stated that the test of exceptional circumstances has been misconstrued in terms of the planning judgments reached in respect of Land East of Hemel and the selection of sites is inconsistent with the overall settlement hierarchy to meet needs arising in St Albans or having full regard to the consequences for sustainable development.</p>	<p>Neighbourhood Plans, as stated in SLP1.</p> <p>In 2014 a series of Development Strategies for options for growth were considered and the findings of the sustainability appraisal were included in Appendix C of the SA Working Note (June 2014). The options considered different patterns of growth to deliver the same level of new development, ranging from concentrated development at a small number of broad locations, to reliance on smaller sized areas at all eight of the broad locations. A summary of the options considered and reasons for taking them forward, or not, are provided in Section Error! Reference source not found. of this Addendum.</p> <p>With regard to the comment relating to the basis and assumptions for assessing the alternatives at East Hemel Hempstead, the SA has assessed the type, scale and location of the proposed development in isolation of whether such development would be meeting District or sub-regional needs.</p> <p>The respondent's final comment relating to exceptional circumstances is not related to the SA Report.</p>
<p>Harpenden Green Belt Association</p>	
<p>The Sustainability Appraisal is not sound because there are inconsistencies between the treatment of the same objectives, as between different policies and over time. First, in relation to SLP2 at paragraph 5.2.2.1 of the SA, it is said " As the Green Belt is valued by the local community its protection will therefore have a positive effect on the "community identity and participation" objective. We welcome the recognition given to the value which the community places on the Green Belt, strongly and consistently expressed through consultation. The SA is right to say that the community having its voice heard in this respect is an important aspect of community identity and participation.</p> <p>However, it must follow that where there is loss of Green Belt and no countervailing benefit as regards "community identity and participation", there should be a negative assessment. In relation to NW Harpenden, the community has strongly and consistently voiced its opposition to loss of Green Belt and yet the community's views have gone unheeded and Green Belt release is being foisted on it. There are no countervailing benefits identified from development at this Broad Location in relation to "community identity and participation", in contrast to other Broad Locations.</p> <p>Yet, inconsistently with the position taken on SLP2, the assessment against this objective is shown as neutral rather than negative. This does not reflect the real anger felt by the community at their inability to effectively participate in decision-making which affects them.</p>	<p>With regard to the assessment against the SA Objective for community identity and participation (SA16), the assessment in November 2012 identified 'no predicted effects' related to Area of Search 8. That assessment remained unchanged for the assessment of the Broad Locations (SA Working Note September 2014) and for Policy SLP13c (SA Report December 2015). For the other three Broad Locations (Policies SLP13a, 13b and 13d) positive effects were identified against this objective, in relation to the provision of new community facilities, but due to the smaller scale of the NW Harpenden Broad Location such benefits were</p>

<p>Second, no adequate reason has been given from departures in the current Sustainability Appraisal from previous assessments made in the 2012 Sustainability Appraisal.</p> <p>The 2012 Sustainability Appraisal assessed an area of land referred to as “Area of Search 8 (SE part)”. This was part of the NW Harpenden Broad Location, but with the boundary at Cooters End Lane. It was therefore adjacent to two listed buildings, one at Cooters End Farm across Cooters End Lane, and the Area of Search itself was a pre-18th century enclosure. The assessment given against the “heritage and cultural assets” objective was negative.</p> <p>The 2015 Sustainability Appraisal assesses the NW Broad Location, which comprises both Area of Search 8 (SE part) and the field in which the listed building at Cooters End Farm stands. The listed building is not merely adjacent to, it is now within, the site under assessment. Clearly the risk of harm is worse, not better – yet the assessment given is merely “uncertain”.</p> <p>The response in this regard to a previous comment to the same effect by the Sustainability Appraisal consultants (at Appendix D-19) is inadequate. It is here suggested that the change from a minor negative to an uncertain assessment “reflected the fact that the incorporation of mitigation was considered in the 2014 version of the SLP and the assessment updated accordingly”.</p> <p>This makes no sense. In 2012, the listed building was to be retained and was across a road from the closest development. Now it is actually on the development site. Policy 13 SLPC does not prescribe any particular form of mitigation, it merely notes the listed building as a constraint. Furthermore, the consultants clearly do not have sufficient information available to them to suggest adequate protection of the setting of the listed building, or they would not have scored this as “uncertain”.</p> <p>The strong impression given is that the consultants perceive their role to be to support the Council as far as possible rather than to critically analyse the plans, and that “uncertain” has been substituted for “minor negative” to make the assessment more benign in relation to this objective.</p>	<p>not envisaged.</p> <p>The positive assessment provided against SA16 for Policy SLP2 – Metropolitan Green Belt in both the SA Reports from November 2012 and December 2015 provides a different approach than that considered at the site level, when this objective has been consistently used for providing an assessment based on the provision of community facilities. Previous representations on the SA have not identified any issue in respect to this approach.</p> <p>With regard to the assessment against the SA Objective for heritage and cultural assets (SA10), the indicative layout shows that the listed building at Cooters End Farm and its curtilage are excluded from the area of the Broad location (Policy SLP13c) that will be developed and is screened from the proposed area for development north of Cooters End Lane by mature hedgerow and trees. In addition there is also screening within the curtilage.</p> <p>The listed building itself is closer to the area of the Broad Location south of Cooters End Lane, against which the original finding of the SA (November 2012) had identified a minor adverse effect.</p> <p>The effect of new development on the listed building will therefore not necessarily be adverse, as had been identified in the November 2012 assessment, and therefore the ‘uncertain’ assessment provided in 2014 remains valid.</p>
<p>Mrs Joanne Whitehead</p>	
<p>I agree with and adopt the representations of the Harpenden Green Belt Association</p>	<p>See response to the Harpenden Green Belt Association representation above.</p>
<p>Mr Nigel Gale</p>	
<p>The consequences of the December 2015 St Albans full Council meeting resolution regarding Drovers Way and Aboyne Lodge School, has been overlooked by the Sustainability Appraisal Report (December 2015) section 5.2.4.5. The author of that report must reflect the</p>	<p>The assessment has been updated to reflect the changes made to Policy SLP19 Major Retail and</p>

voted decision of St Albans Council. The 4th and 7th paragraphs of 5.2.4.5 should therefore be revised.	Town Centre Development following December 2015 Full Council. The summary of the assessment provided in Section 5.2.4.5. of the SA Report has also been updated. These amendments can be found in Appendix C to this SA Report Addendum.
Gladman Developments Limited¹	
<p>Sustainability Appraisal/Strategic Environmental Assessment</p> <p>4.6 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.</p> <p>4.7 The Council should ensure that the results of the SA process clearly justify its policy choices.</p> <p>In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Council's decision making and scoring should be robust, justified and transparent.</p> <p>4.8 Gladman reminds the Council that there have now been a number of instances where the failure to undertake a satisfactory SA has resulted in Plans failing the test of legal compliance at Examination (South Somerset) or being subjected to later legal challenge (Heard vs Broadland DC).</p>	<p>Response noted.</p> <p>Section 4 and Appendix E of the SA Report (December 2015) provide information on the sustainability appraisal undertaken at eight stages prior to the final assessment as summarised in Section 5 of the SA Report.</p> <p>At each stage during the development of the SLP a range of options have been considered and assessed at the same level of detail.</p> <p>This SA Report Addendum clarifies the reasons for selecting and rejecting alternatives. It does not however provide any new assessment.</p>

7 Comments from the Regulation 18 Consultation on the Detailed Local Plan SA Working Note (November 2016)

The table below provides details of the representations received during the Regulation 18 consultation on the Detailed Local Plan, along with replies to the representations and details of how they were taken into account in the SA/SEA process.

Summary of Comments	Reply to comments / how the comments have been taken on board
Harpenden Green Belt Association	
<p>We consider that Appendix 1 of the SA Working Note significantly understates the negative impact in sustainability terms of Option B. For example:</p> <ul style="list-style-type: none"> - Under "biodiversity" and "landscape and townscape", Option B is scored as "uncertain", it being suggested that locating the school off-site could allow for more open space on the Broad Location. A similar comment is given for "health". But there is no basis for the 	<p>As the Detailed Local Plan did not provide different housing numbers for the two options, the assessment was undertaken using the assumption that both options would deliver</p>

¹ This representation was included in Gladman's general response document and not in a Response Form for the SA Report (i.e. to comment on specific paragraphs / pages in the SA Report).

<p>assumption that if Option B is adopted, there will be increased open space at the Broad Location in comparison with Option A. On the contrary, the Developers' presentation presented to PPC in November 2015 made clear the Developers' intention to build more housing if the school were located off site, as it would be in their financial interests to do. There is no policy requirement in the SLP or DLP to create a greater amount of open space within the Broad Location if Option B is adopted.</p> <p>The "landscape and townscape" assessment fails to have regard to the evidence from the Green Belt Review, referred to above, about the relative landscape and visual impacts of development of land to the east of Ambrose Lane.</p> <ul style="list-style-type: none"> - Under "soil", the SA Working Note suggests that there is "no difference in effects between the two options". This position cannot be maintained. If Option B is pursued a greater total area of land will be developed, in comparison with Option A. - Under "sustainable locations", we do not agree that there is no difference in effects between the two options. The traffic consequences of building a school on Ambrose Lane make this a significantly less sustainable location than if the school were built within the Broad Location. 	<p>the level of housing as specified in Strategic Local Plan Policy SLP 13c (i.e. circa. 500 dwellings). This would have meant the same level of hard development but with the housing on the main site being built to a lower density. There would therefore be similar levels of soil sealing from both options.</p> <p>The assessment for Policy S6 viii) now reflects the different landscape/visual sensitivity of the land to the east of Ambrose Lane.</p> <p>When undertaking the assessment it was anticipated that appropriate mitigation to transport issues would be required for both Options A&B.</p>
Redbourn Parish Council	
<p>1.8. The NPPG says the following in relation to the role for Sustainability Appraisal in the preparation of Local Plans:</p> <p>"Every Local Plan must be informed and accompanied by a Sustainability Appraisal. This allows the potential environmental, economic and social impacts of the proposals to be systematically taken into account, and should play a key role throughout the plan-making process. The Sustainability Appraisal plays an important part in demonstrating that the Local Plan reflects sustainability objectives and has considered reasonable alternatives. The Sustainability Appraisal should incorporate a Strategic Environmental Assessment to meet the statutory requirement for certain plans and programmes to be subject to a process of 'environmental assessment'. (ID:121016120140306)</p> <p>1.9. Preparation of the Detailed Local Plan is not yet informed by a full Sustainability Appraisal. Ultimately this would lead to further legal failures of plan preparation for the circumstances of the Land East of Hemel Hempstead. The Regulation 18 Consultation Draft DLP is supported by a "Sustainability Appraisal Working Note" (November 2016) which contains the following statement:</p> <p>For the Broad Locations at East Hemel Hempstead and East St Albans, the diagrams do not provide any further detail to that which had been the basis of the assessments undertaken for Policies SLP3a&b and SLP13d. There are therefore no new implications for the findings of those previous assessments. For the North West Harpenden Broad Location, Policy DLP 13 provides two diagrams (Option A and Option B). The assessment undertaken for these two options (see Appendix 1) found that there is the potential for different effects against the SA objectives for 'biodiversity', 'landscape and townscape' and 'health'. However no new significant effects have been identified.</p> <p>1.10. On one level, this extract simply highlights the limited contribution that the DLP makes towards providing the necessary policy framework for the East of Hemel Hempstead location. Furthermore, however, the statement is also wholly untrue given the facts and evidence surrounding emerging proposals. Based on the current information available from the site's promoters and the details of live planning applications on the western portion of the site (land West of Cherry Tree Lane) it is self evident that numerous options exist for the site. This especially includes the location of the required secondary school.</p>	<p>The SA Working Note was prepared in order to accompany the consultation on the Detailed Local Plan at the Regulation 18 stage. There is no requirement to have a 'full Sustainability Appraisal' at his early stage in the plan-making process. It is at the Regulation 19 stage that a full SA is required. This was outlined in Section 1.2 of the SA Working Note, as follows:</p> <p><i>"The Working Note does not constitute the formal SA Report for the DLP. That report will be produced alongside the publication of the DLP (currently scheduled for 2017) and will be informed by this Working Note."</i></p> <p>As the DLP did not progress beyond the Regulation 18 stage, that formal SA Report was never prepared.</p> <p>Instead, the SA of the new Local Plan now picks up the elements of the DLP that have been carried forward into the Draft Local Plan, including updated assessments of the Broad Locations at East Hemel Hempstead.</p>

1.11. These factors will all have a material impact on the scale of development achievable, the extent and location of infrastructure provision and the amount of land which may be removed from the Green Belt. These will subsequently influence the significant effects arising from any allocation and should be assessed in detail.

8 Comments from the Consultation on the Local Plan Regulation 18 SA Working Note (January 2018)

The table below provides details of the representations received during the Regulation 18 consultation on the new Local Plan, along with replies to the representations and details of how they have been taken into account in the SA/SEA process.

Summary of Comments	Reply to comments / how the comments have been taken on board
759908 Redbourn Parish Council	
<p>Within the current context for plan-making the significant reliance placed on the evidence base and supporting assessments undertaken as part of the abortive work to prepare the Strategic Local Plan is concerning. The Sustainability Appraisal 'Working Note' (January 2018) acknowledges that relevant objectives and scoping information to inform the framework for Sustainability Appraisal are unchanged from previous assessments. Although not fatal on its own this is coupled with recognition that substantial elements of the evidence base will be superseded and replaced as part of work to inform the publication draft. In relation to the majority of objectives set out in the current consultation, it has not been possible to undertake any specific assessment. The Working Note therefore simply acknowledges that there may be potential positive effects of any policy approach seeking to achieve these aims.</p> <p>This fails to satisfy the requirement to illustrate the testing of reasonable alternatives as part of developing the local plan options for how sustainable development may be achieved. As a result, the likely effects of the Local Plan and different alternatives have not been illustrated and there is no consideration of how adverse effects might be mitigated and benefits maximised. Fundamentally this illustrates a lack of wider consideration of the strategic priorities for plan-making that affect St Albans and its relationship with surrounding authorities. The work to-date provides little indication of how strategic policies might be focused to achieve quantitative development requirements alongside the effective and co-ordinated delivery of infrastructure and protection of key assets in the built and natural environment. The approach to addressing these requirements should provide meaningful alternatives for the proposed approach to be considered at this stage.</p> <p>The 'Working Note' devotes the greatest attention to assessing the objective of 'building homes in the right places' from the current consultation draft. However, this predominantly reiterates the assessment of options for distributing housing development considered as part of preparation of the Strategic Local Plan and considers similarities with the potential sources of supply contributing to housing provision outlined by this consultation. The 'Working Note' acknowledges that no spatial options are assigned under any of the potential sources. Based on the current information available it is considered inappropriate to draw these comparisons as an indication of support for any given approach. For example, the 'Working Note' repeats that "Options 1a and 3 [from assessment of options for the approach in the Strategic Local Plan, both of which included Land East of Hemel Hempstead] would locate the majority of new development of the edge of the main settlements which are the most sustainable locations in terms of reducing the need to travel to access services and facilities." In considering the approach in the emerging plan, the Working Note states that "as with previous SA work it will be recognised</p>	<p>Following the Regulation 18 stage a second SA Working Note (May 2018) was prepared which updated earlier assessments to include a higher level alternative for the housing requirement that those previously considered (1,200 dwellings per annum), as well as providing assessments of the 12 Broad Locations which were considered to be reasonable alternatives following the Council's Local Plan site selection process.</p> <p>The development of the new Local Plan is a continuation of the process to replace the St Albans District Local Plan Review 1994. As highlighted in the SA Working Note (January 2018), against which this representation was made, <i>"...though this is a new Local Plan, the work undertaken in developing the SLP has already undertaken assessment on a wide range of options, including those relating to housing numbers and the distribution of development – these being two topics which are covered in the new Regulation 18 consultation"</i> (Section 4.1). The previous consideration of options, in particular those relating to housing requirements, development strategy and broad locations has informed the work on the new Local Plan and the accompanying SA/SEA.</p> <p>Section 4 and Appendix E of the SA Report (September 2018) provide details of how options have been considered during the development of the Local Plan and the preceding Strategic Local Plan.</p>

<p>that the larger strategic sites provide the best opportunities for infrastructure provision and planning gain opportunities, including biodiversity enhancements, when compared to a larger number of smaller developments. The SA undertaken on the reasonable alternatives will inform the selection of sites to be included in the Publication Local Plan.”</p> <p>In terms of representing a guide for future plan-making or to demonstrate that reasonable alternatives to the spatial strategy have been appropriately considered these statements should be regarded as flawed. In-particular, they repeat many of the grounds on which preparation of the previous Strategic Local Plan failed. Redbourn Parish Council has previously highlighted that land East of Hemel Hempstead cannot be regarded as sustainable in terms of its access to public transport and key facilities and services, while substantial queries remain over deliverability and the infrastructure required to support development in this location. It is currently impossible to conclude that the evidence base would support a given scale of development in any location. For example, in relation to land East of Hemel Hempstead the previous Green Belt Study indicated that a specific area might be considered suitable to support the potential alteration of Green Belt boundaries. The current findings of the Sustainability Appraisal ‘Working Note’, and in-particular the reliance on conclusions for the assessment of effects in earlier rounds of plan-making, should not be relied upon and do not support any current conclusions that exceptional circumstances exist for given alterations to Green Belt boundaries.</p>	
1051022 Legal and General	
<p>Highly relevant to the question of the provision of infrastructure is the statement made by SACDC in the supporting text to questions 2 and 3 that ‘Large-scale development on Green Belt generates the money and land that provides new infrastructure like roads, schools, shops, and parks’. This is also repeated in the Regulation 18 SA Working Note (TRL, January 2018, p17 para 2). On this basis it is clear that SACDC should support the allocation of the NW Harpenden broad location for a residential-led development as it is a strategic green belt release of a sufficient size to provide for necessary related infrastructure.</p>	<p>Noted. No change to SA needed.</p>
1153774 Goodman Logistics Development UK Ltd	
<p>6.9 Not justified. The approach to the plan must consider the strategy against reasonable alternatives. The strategy following a unilateral pursuit of only one Growth Area corridor, the M25/M1, has evidently not been considered against reasonable alternatives in the Regulation 18 Sustainability Appraisal Working Note prepared by TRL. The more robust pursuit of promoting economic growth in two or more areas of the District, most notably the A1(M) Growth Area corridor along the eastern boundary must be considered. While the majority of this growth area is located outside the District, the cross boundary Duty to Cooperate provides a mechanism by which this strategy can be pursued. An allocation of land at Roehyde to deliver a pharmaceutical, bioscience, engineering and logistics park represents a reasonable alternative and must be assessed as such in the Sustainability Appraisal.</p>	<p>During the development of the SLP (and formerly Core Strategy) the site at Roehyde had been considered as a potential option for employment development, but was not taken forward for inclusion in the SLP.</p> <p>The SA provided an assessment of the site at Roehyde in both the Emerging Core Strategy SA Report (July 2009) and the St Albans Pre-Submission SLP SA Report (November 2012).</p> <p>The SA Report (November 2012) identified the ‘E4 Roehyde’ employment site as a rejected option, and provided the following reasons:</p> <ul style="list-style-type: none"> • Development of part greenfield Green Belt land with detrimental landscape and environmental impacts; • Access issues cannot be resolved; and • A proportion of the site is with Welwyn Hatfield Borough. They do not support the proposal, therefore it

	<p>could not be delivered.</p> <p>In addition, in rejecting the site for housing the SHLAA (SHLAA-GB-CH-451) identified that: <i>“The site makes a crucial contribution to Green Belt purposes. Development of the site would affect land that is presently rural, would result in encroachment into open countryside, would be visually intrusive from the surrounding countryside and would cause demonstrable harm to the character and amenity of surrounding areas and land uses.”</i></p> <p>In this new round of planning the site is not considered by the Council to be a reasonable alternative for either housing or employment use and has therefore not been assessed in the SA of the Local Plan.</p>
1155890 Abbey Precincts Residents' Association	
<p>We note that Local Plan 2018 is a comprehensive 16-year plan, not just a list of strategic policies as previously. The sustainability appraisal for this plan should therefore be more detailed and draw out current issues and opportunities more fully than before. The previous Sustainability Appraisal (ref CD 0079) contained little information on issues and opportunities for cultural heritage. We hope that the above issues will be incorporated so that positive policy responses are identified and taken forward.</p>	<p>The new Local Plan includes a detailed policy covering the historic environment (Policy L30) which provides the policy responses that were included in Strategic Local Plan Policy SLP3 and Detailed Local Plan (draft for consultation) Policy DLP4.</p> <p>The SA has identified significant positive effects for Policy L30 in relation to the SA objective (SA10) which covers the historic environment. In addition the baseline and review of other plans and policies have been updated for this new SA, which has resulted in the identification of some new issues and opportunities.</p>
975683 Martin Grant Homes and Kearns Land Ltd	
<p>10. The Regulation 18 document does ask respondents to consider how they feel about expanding existing villages into the Green Belt (Question 2, page 6). In relation to this option, the Regulation 18 Sustainability Appraisal Working Note (January 2016) states:</p> <p><i>“Expanding existing villages, particularly through medium or large scale development, would generally be a less sustainable option for locating new development than the expansion of towns. This is because development at villages would not provide the access to a wide range of services and facilities, which would be the case for development at towns, and would result in an increased need to travel with associated adverse effects in relation to greenhouse gas emissions and air quality. In addition, generally medium and large scale developments at villages are less likely to be in keeping with the local landscape and ‘villagescape’ and could put increased demand on existing small local services and facilities that might not be able to cope. However, some positive effects could arise from development at existing villages, for example by increasing the level of support for the local economy and local services/facilities, as well as increasing the viability of public transport provision.” (paragraph 4.3.3.4.).</i></p> <p>11. The nature of the consultation document means that the sustainability appraisal is fairly broad-brush at this stage. Going forward, SADC should take account of the need to promote sustainable patterns of development when reviewing Green Belt</p>	<p>The NE Redbourn Broad Location was assessed along with 11 other Broad Locations, these 12 being considered by the Council to be ‘reasonable alternatives’ following a three stage site assessment process. The findings of the assessment were included in a second SA Working Note (May 2018) which was prepared to inform the development of the Publication Local Plan, including the selection of Broad Locations for inclusion in that plan.</p> <p>The assessment of the NE Redbourn Broad Location covered the majority of the points identified under ‘social, economic and environmental’ in this representation.</p>

<p>boundaries (NPPF, paragraph 84), but this should be done as part of a site-specific assessment exercise.</p> <p>12. It is our position that sustainable development is achievable at land east of Redbourn and the general negative effects identified at paragraph 4.3.3.4. of the Sustainability Appraisal are not, on the whole, a fair assessment of this particular site. We have considered the proposed development of the site in relation to the three strands of sustainable development (NPPF, paragraph 7) below. At this stage it is envisaged that the proposals would:</p> <p>Social:</p> <ul style="list-style-type: none"> • Deliver new housing, including affordable housing, to help meet local need; • Enable the delivery of community benefits for local residents (for example, public open space, new recreational routes/links and a new car park); • Be located within walking/cycling distance of a wide range of local services and facilities; <p>Economic:</p> <ul style="list-style-type: none"> • Deliver positive effects to the local economy and help sustain and enhance local facilities and services; • Create construction jobs and spending related to the construction of the new homes; • Result in New Homes Bonus payments for the local area; • Potentially increase the viability of public transport provision; • Offer a potential site for a new 'hot office' facility (subject to market interest); <p>Environmental</p> <ul style="list-style-type: none"> • Deliver homes on a Green Belt site within an area which is considered to contribute the least to Green Belt purposes as it "does not restrict sprawl, prevent merging, safeguard the countryside, preserve setting or maintain local gaps"; • Deliver a valuable informal greenspace associated with the River Ver corridor, that could deliver biodiversity as well as recreational benefits; • Ensure the release of a site which is not considered suitable for commercial farming purposes; • Encourage modal shift by being located within close proximity of existing facilities and services as well as the Nickey Line; • Be designed in such a way as to have a less than substantial impact upon the Redbourn Conservation Area which lies adjacent to a small part of the site; and • Potentially provide flood alleviation measures which would provide a betterment to existing residents. 	
<p>1156886 DHSC & Bloor Homes</p>	
<p>6. EVIDENCE BASE</p> <p>6.1 The Sustainability Appraisal (SA) Working Note January 2018 states that work on both the Local Plan and the SA/SEA will be informed by the large amount of evidence and policy development previously prepared in respect of the draft Strategic Local Plan and the Detail Local Plan, which have been suspended by this new Local Plan. It is noted from the Council's response to the Secretary of State stated that "We have much of the required evidence base already prepared from our previous SLP to support the new Local Plan."</p> <p>6.2 The SA states at para 4.1, that the work undertaken in developing the Strategic Local Plan (SLP) has already undertaken an assessment of 900 dwellings per annum, this was one of the options considered against the 20 SA Objectives. It is noted in para 4.3.1 that that whilst the Council are not considering options for the level of housing growth as part of this Regulation 18 consultation, they have assumed that they will be seeking to meet the identified housing need in full. However, in the absence of a Statement of Common Ground it is not clear whether the local planning authorities within the HMA are also planning to</p>	<p>Following the Regulation 18 stage a second SA Working Note (May 2018) was prepared which updated earlier assessments to include a higher level alternative for the housing requirement that those previously considered (1,200 dwellings per annum), as well as providing assessments of the 12 Broad Locations which were considered to be reasonable alternatives following the Council's Local Plan site selection process.</p> <p>Whilst it remains the case that the "larger strategic sites provide the best opportunities for infrastructure provision and planning gain opportunities, including biodiversity</p>

<p>meet their respective housing needs in full or whether there will be a need to accommodate housing needs from elsewhere in the HMA. It is noted that in the Dacorum Issues and Options consultation in November 2017 that Dacorum Council had received a request from Welwyn Hatfield Council, which falls outside the South West Hertfordshire HMA (para 6.1.17 of the Dacorum Issues and Options consultation).</p> <p>6.3 Whereas in the SA previously the approach was to assess each Plan Option, and where appropriate combinations of options were assessed against each of the objectives in the SA framework; there now appears to be only one Option i.e. 913 dwellings per annum i.e. in order to accord with the Government’s proposed standard methodology. There is no suggestion of another Option, i.e. a “Policy On Option”, such as to reflect a higher level of growth scenario e.g. as a result of a strategic infrastructure project or through increased employment as a result of Local Economic Partnership Investment Strategy, a bespoke housing deal with the Government or through delivering the modern Industrial Strategy or through the Duty to Co-operate.</p> <p>6.4 It is considered that the SA will need to test reasonable alternatives in meeting the housing requirement of 913 dwellings per annum as a minimum.</p> <p>6.5 It is noted that the SA for the Local Plan is intended to assess reasonable alternatives for sites to deliver the development strategy, and that these sites will be identified for future Plan analysis, as well as from availability/deliverability information from the SHLAA and from a new call for sites.</p> <p>6.6 Pegasus is aware that there is a Call for Sites and a submission has been prepared to accompany these representations.</p> <p>6.7 The SA states that the Council still hold the view that the “larger strategic sites provide the best opportunities for infrastructure provision and planning gain opportunities, including biodiversity enhancements, when compared to a larger number of smaller developments.” However, as set out in Appendix 2 larger sites are more challenging in terms of their deliverability, and in order to achieve the quantum of dwellings in the plan period, a wide range and choice of sites are required.</p>	<p>enhancements, when compared to a larger number of smaller developments”, the SA of the Publication Local Plan recognises that in addition to the larger sites, smaller sites do play an important role in delivering the housing requirement.</p>
<p>1157560 Hallam Land Management Ltd and St Albans School</p>	
<p>We note that the accompanying Sustainability Appraisal Working note indicates that the Sustainability Appraisal framework and Sustainability Appraisal approach used to appraise the previous ‘Strategic Local Plan’ are also being used to inform the preparation of this new Local Plan. Whilst noting that the justification for this is to ensure ‘consistency’, we have reservations that this approach has been adopted without at least reviewing the position on the light of the significant additional growth challenges now facing the District. As discussed above, we would suggest that more emphasis should be placed in weighing the need to meet the social and economic needs of the District.</p> <p>Notwithstanding these concerns we have prepared an updated sustainability appraisal of land north of St Albans which appraises the site against the previous Sustainability Appraisal objectives, based on the evidence and detailed plans now available for this site. This is set out in pages 42-45 of the accompanying Vision Document. This updated appraisal now demonstrates the strong and unique contribution that this site can make towards sustainable development, as measure against the previous local Plan objectives.</p>	<p>The approach taken previously, for the SA of the ‘Strategic Local Plan’, remains valid for the new Local Plan and does not need to be amended along the lines suggested in the representation.</p> <p>In meeting the requirements of the SEA Regulations the SA framework includes more environmental objectives than social and economic ones. However, the SA does not count up the positive and negative scores to arrive at a single score for a policy or site assessment and therefore additional social and economic objectives are not needed. There have been some minor changes to the SA Framework since the consultation on the SA Working note, however these are relatively minor – the number and topics covered by the 20 main SA objectives remaining the same.</p>

9 Comments from the Consultation on the Local Plan SA Scoping Letter (April 2018)

Summary of Comments	Reply to comments / how the comments have been taken on board
Environment Agency	
<p>Thank you for consulting us on the above matter. We welcome the additions to the SA Framework and are in agreement with this approach. We have the additional following comment:</p> <p>Biodiversity</p> <p>We approve of the criteria 'To conserve and enhance the green and blue infrastructure within the District' but would like this expanded to include an 8 meter buffer zone around Main Rivers wherever possible. The majority of watercourses in the district are chalk streams and are of international importance.</p>	<p>The inclusion of a specific reference to an 8m buffer zone around main rivers is considered to be more of a planning requirement than one for inclusion as an SA objective criterion.</p> <p>The SA Framework includes objectives to protect and enhance watercourses and therefore assessment against these objectives would identify potential issues relating to the proximity of a development to a watercourse.</p>
Historic England	
<p>The objectives and criteria set out in Appendix A of the report provide a useful starting point.</p> <p>We make the following specific comments:</p> <p>Objective 10</p> <p>We welcome reference to the historic environment in the objective. The historic environment is considered the most appropriate term to use as a topic heading as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage. To that end we would suggest that the title of this section should also be 'Historic Environment' rather than cultural heritage.</p> <p>We also suggest the use of the term 'heritage assets' rather than cultural assets.</p> <p>Reference should also be made to 'designated and non-designated assets'.</p> <p>When referring to heritage assets, reference should also be made to their 'settings'.</p> <p>We also suggest changing safeguard and enhance to 'conserve and enhance' in line with the wording in chapter 12 of the NPPF.</p> <p>Reference should also be made to 'Heritage at Risk'.</p> <p>Objective 11 Reference should also be made to historic landscape character.</p> <p>NB: Historic England also provided some generic advice on SA Scoping for Local Plans. This has not been reproduced in this table.</p>	<p>The SA Framework has been updated to reflect the comments provided by Historic England (see Appendix C).</p>
Natural England	
<p>Natural England recommends that the biodiversity sustainability objective also includes consideration of increased recreational impacts as a result of the proposed Local Plan and Housing Allocation and suggest the inclusion of the sentence below:</p> <p>Ensure mitigation is provided to counteract any adverse effects of increased access and recreational disturbance to designated sites and for any other identified impacts.</p>	<p>The SA Framework has been amended to incorporate this change (see Appendix C).</p>