

Matter 1 – Legal Compliance

Issue 1 – Sustainability Appraisal

1. In response to the Stage 1 hearing sessions, the Council produced new information which has been subject to public consultation (Examination Documents SADC/ED76-SADC/ED81B). Amongst other things, that information included 'suggested' changes to the Plan. Changes include both the addition of new sites and the deletion/modification of existing ones.

Q1 Has the Council updated the SA to reflect the suggested changes? Does the SA assess the proposed changes and compare these against all reasonable alternatives?

Has the Council updated the SA to reflect the suggested changes?

- 1.1 No, the Council has not yet updated the SA to reflect the suggested changes. The Council currently intends to update the SA based on all the proposed Main Modifications that arise through the Stage 1 and Stage 2 Hearings in advance of a Main Modifications consultation, in due course.
- 1.2 The Council has incorporated all the proposed Main Modifications so far addressed in the Stage 1 Hearings and has further proposed Main Modifications that will arise through the Stage 2 Hearings. This includes, for example, proposed Main Modifications that have arisen from further engagement with Hertfordshire County Council and National Highways. These can all be seen at M111Q1 – Appendix 1 - Local Plan Part A, M111Q1 – Appendix 2 – Local Plan Part B; and M111Q1 – Appendix 3 - Local Plan Table of Modifications. These are also reproduced as Examination Documents SADC/ED85A, SADC/ED85B and SADC/ED85C.

Does the SA assess the proposed changes and compare these against all reasonable alternatives?

- 1.3 No, as set out above. It can be noted that the Interim SA (LPCD 03.03 - Sustainability Appraisal Interim Study (July 2023)) did assess the four proposed (at that time) sites that were subsequently removed at Regulation 19 stage because they lay within the area identified for the extension to the Chilterns National Landscape.
- 1.4 It is considered important to remember that LPCD 03.01 - St Albans Local Plan Sustainability Appraisal Report (2024) sets out, in the context of Reasonable Alternatives (RAs):

4.1.7 Whilst individual site options generate a high degree of interest, they are not RAs in the context of most local plans. Were a local plan setting out to allocate one site, then site options would be RAs, but that is rarely the case, and is not the case for the St Albans Local Plan. Rather, the objective is to allocate a package of sites to meet needs and wider objectives, hence RAs must be in the form of alternative

packages of sites, in so far as possible. Nonetheless, consideration is naturally given to the merits of site options as part of the process of establishing reasonable growth scenarios – see Sections 5.3 and 5.4.