

Matter 1 – Legal Compliance

Issue 4 – Climate Change

Q1 Is it sufficiently clear what is required of proposals for new development under Policies SP2, CE1 and CE2?

- 1.1 Yes, the Council considers that policies SP2, CE1 and CE2 do make it sufficiently clear what is required of proposals for new development in relation to Climate Change.
- 1.2 The policies set out expectations on addressing Climate Change through sustainable design, construction and building efficiency and seeking to increase the use of renewable energy generation.
- 1.3 The policies set out an approach that is relatively broad in its requirements, avoiding unwarranted and inflexible specificity.
- 1.4 This is in line with the Government's Written Ministerial Statement of 13 December 2023 that stated:
To be sound, local plans must be consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and other statements of national planning policy
- 1.5 And that:
the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale.

Q2 Does the Plan (taken as a whole) include policies designed to secure that the development and use of land in the area contributes to the mitigation of, and adaptation to, climate change? If so, how?

2.1 Yes, the Plan as a whole does include policies designed to secure that the development and use of land in the area contributes to the mitigation of, and adaptation to, climate change.

2.2 Paragraph 1.30 of the Plan states that:

This Plan is pursuing a strategy of generally locating growth in the most sustainable locations, minimising the need to travel. It also means planning for sustainable layouts that encourage and enable a shift from the private car towards walking and cycling and the use of public transport, and also greener places with high levels of tree planting which act as carbon sinks and create a sense of wellbeing. It is recognised that planning to act on Climate Change will often contribute to other agendas such as promoting better air quality, biodiversity and health. As such, opportunities to embed these 'joint benefits' throughout this Plan have been taken

2.3 Policy SP1: A Spatial Strategy for St Albans District states that:

Growth will be located to make the most sustainable use of land in urban areas and then the Green Belt. The approach seeks first to develop Brownfield Land. Development will address the Climate Emergency with regard to layouts, energy and water efficiency and sustainable movement that reduces reliance on private car use. Larger settlements provide a more comprehensive range of services, employment, retail and community facilities, including healthcare facilities, as well as better accessibility and connectivity by walking, cycling and public transport to key destinations.

2.4 Paragraph 2.2 of the draft Plan states that:

Tackling Climate Change is a theme that runs throughout the Local Plan. In many cases the Council is seeking multiple benefits from development and other activity. For example tree planting tackles Climate Change in terms of carbon capture, helps us adapt to a warmer climate by providing shade and reducing the urban heat island effect, while providing other benefits for the environment such as biodiversity, along with wellbeing benefits for people's physical and mental health. Therefore some of these detailed policies are set out in other parts of this Plan.

2.5 Draft Local Plan policies in numerous parts of the document support Climate Change mitigation and adaptation, for example:

- Policy LG1 – Broad Locations
 - d) Demonstrate excellence in design, energy efficiency and water management;

- *e) Provide appropriate renewable energy production and supply mechanisms;*
- *l) ... Proposals should include excellent walking and cycling links, including accessible routes and public transport services upgrades / improvements*
- *m) Normally retain significant healthy trees and other important landscape features*
- *n) Plant at least 1 semi-mature tree for each dwelling; for C2 accommodation plant 1 semi-mature tree for every 2.5 dwelling equivalent bed spaces*
- *o) Provide new or provide contributions to enhance existing strategic ... local and recreational public open space, including managed woodland and ecological network links;*
- The requirements set out under LG4 – Large, Medium and Small Sites are similar to those for LG1.
- Strategic Policy SP8 - Transport Strategy:
 - *The Council will prioritise the use of active and sustainable transport modes;*
 - *b) Supporting development in locations which enable active and / or sustainable transport journeys, including to key destinations; where this is not possible ensuring that sustainable and active transport infrastructure is delivered at the earliest reasonable opportunity;*
 - *c) Supporting reductions in car journeys for existing and new settlements; including in relation to education sites and school journey planning initiatives;*
 - *d) Requiring all high trip generating uses generating trips in excess of the thresholds set in Hertfordshire County Council's Travel Plan Guidance to prepare, submit and implement Travel Plans to embed sustainable and active travel at an early stage;*
 - *h) Supporting inter-settlement connectivity for active modes (e.g. Alban Way, Nickey Line, Ayot Greenway and Upper Lea Valley Walk) and identification and delivery of new routes;*
 - *i) Seeking Masterplans at Broad Locations to include implementation of sustainable travel infrastructure, including for bus services, at the earliest reasonable opportunity in order that sustainable travel patterns become embedded at an early stage;*
- TRA1 – Transport Considerations for New Development:
 - *b. Major proposals must demonstrate as appropriate how:*
 - i. Measures to reduce the need to travel by private car are identified and implemented;*
 - ii. Active and sustainable connections to key destinations are deliverable at an early stage of development;*

- iii. *The proposed scheme would be served by public transport and would not have a detrimental impact to any existing or planned public transport provision;*
- iv. *Safe, direct and convenient routes for active journeys to key destinations are provided and prioritised in their design;*
- v. *Comprehensive and coherent integration into the existing pedestrian and cycle, Rights of Way, public transport and road networks will be secured;*
- viii. *The charging of plug-in and other ultra-low emission vehicles will be enabled in safe, accessible and convenient locations;*
- ix. *Suitable travel plans will be provided and appropriate measures for implementation will be secured. Such plans will set out measures to encourage people to use alternative modes of travel to single-occupancy car use; and*
- x. *Suitable mechanisms will be provided to secure sustainable transport measures, including delivery of schemes identified in the LCWIP, Bus Service Improvement Plan, Growth & Transport Plan and IDP and improvements to the existing highway network and other appropriate transport mitigations, including as identified in Supporting Documents to the Local Transport Plan.*

- Strategic Policy SP10 – Natural Environment, Biodiversity and Green and Blue Infrastructure states that: *The Council will protect and enhance green and blue infrastructure for its role in combating Climate Change and supporting biodiversity ...*
- NEB6 – Biodiversity and Biodiversity Net Gain:
 - *Relevant development proposals must ensure that they:*
 - i. *Meet a minimum 10% net gain in biodiversity that is calculated using the latest Biodiversity Metric from Government guidance and is approved via a Biodiversity Gain Plan.*
- NEB8 – Managing Flood Risk: *proposals located within areas identified as being at risk of flooding will not be permitted unless the following is demonstrated: ... That the development is appropriately flood resistant and resilient and incorporates appropriate infrastructure to address the increasing potential for flood events due to Climate Change*
- NEB10 – Landscape and Design:
 - a) *Proposals must demonstrate:*
 - v. *That opportunities are taken for biodiversity net gain, and making connections to existing biodiversity and habitat networks outside of the site;*
 - ix. *That opportunities are taken to provide above ground Sustainable Drainage Systems (SuDS) where appropriate.*

- DES2 – Public Space:
 - Proposals that create or affect public space should:
 - a) *Contribute to the creation of legible and easily navigated routes and spaces that are designed for all users and make appropriate links to existing movement routes;*
 - b) *Prioritise pedestrian and bicycle movements and be integrated with active travel networks;*
 - c) *Contribute to the creation of places where car movements interact safely with pedestrians and bicycles, and where cars and associated infrastructure are not visually dominant; with any parking, garaging and service access providing a visually attractive setting;*
 - d) *Contribute to the creation of an attractive environment with soft landscaping that provides appropriate planting of trees and shrubs, incorporates and protects existing planting and landscape features of value, integrates naturalised Sustainable Drainage Systems (SuDS),*
- Strategic Policy SP13 – Health and Wellbeing: *Schemes to be resilient and adaptable to Climate Change, including through SUDs, rainwater collection, and efficient design*

2.6 Site allocations in Part B set out *Key development requirements* that include details that address Climate Change. Each allocation has its own *Key development requirements*, with Broad Locations and larger sites having the greatest number, for example:

- H1 - North Hemel Hempstead
 1. *Strategic and local public open space, including sports facilities, managed woodland and ecological network links that preserve and enhance links to site allocation H2, Spencer's Park, Woodhall Farm and Holtsmere End.*
 2. *The high-quality Key and Local Transport Network including the Sustainable Transport Corridor, active and sustainable routes, wider routes, and interventions (as set out in the IDPs). The Key and Local Transport Network should connect the site with local and key destinations including the new local centre, surrounding neighbourhoods, schools, Woodhall Farm, Country Park, the Nickey Line, Hemel Hempstead Town Centre and railway station and Redbourn.*
 3. *Contributions to improve and enhance co countryside access links and off-road paths (Public Rights of Way) including Footpath 9, 10 and 11.*
 4. *A range of community food growing opportunities including edible trails, orchards and community gardens.*
 6. *Green and blue infrastructure provision that includes a contribution to the SANG required across the HGC growth*

areas and BNG requirements (which aims to exceed the minimum target of 10%).

13. Safe, high-quality pedestrian and cycle crossings, including the Redbourn Road (B487). A high-quality gateway entrance along the Redbourn Road (B487) to Hemel Hempstead serving H1 and H2.

- **B1 - North St Albans:**

7. Support for a transport network (including walking and cycling links) and public transport services upgrades / improvements, including off-site improvements to Harpenden Road, Sandridgebury Lane, Valley Road, Ancient Briton junction and King William IV junction, links to St Albans City Centre, station and education; aligned to schemes in the GTPs and LCWIP.

8. Provide pedestrian and cycle links with the part of the site that is delivering 150 homes from planning permission 5/2021/0423.

9. Support for the improvement of the Public Rights of Way network to enable active travel and recreational use to Heartwood Forest and Nomansland Common.

10. Development proposals must take appropriate account of the Ancient Woodland, County Wildlife Site, Priority Habitat and trees covered by Tree Preservation Order along the south-east boundary, and the Priority Habitat close to the eastern boundary comprising an area of deciduous woodland.