



Centre for Sustainability

St Albans District Council

**Civic Centre Opportunity Site Supplementary
Planning Document**

Sustainability Appraisal Adoption Statement

July 2012

Report Number: CPR1377

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Client: St Albans City and District Council

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1 Introduction

1.1 Background

A sustainability appraisal (incorporating the requirements of the Strategic Environmental Assessment (SEA) Regulations) has been undertaken on St Albans City and District Council's Civic Centre Opportunity Site (CCOS) Development Brief Supplementary Planning Document. Consultation on the Brief was undertaken between 1st November and 13th December 2011. The brief builds on District Local Plan Policy 116 2E which sets out the potential for redevelopment of the Civic Centre South Site.

Since the consultation some minor changes have been made to the plan. In addition it is now clear that all elements of the CCOS Brief have Supplementary Planning Document (SPD) status. In the 2011 SA Report it was stated that only the Civic Centre South Site (CCSS) elements of the brief had SPD status, whereas it stated in the Preface of the 2011 Draft Brief that the whole brief had been prepared as an SPD.

The Civic Centre Opportunity Site SPD was formally adopted by St Albans City and District Council on 11th July 2012.

The SEA Regulations require that a 'statement' be made available to accompany¹ the adopted plan or programme which must contain information on:

- How environmental considerations have been integrated into the plan or programme;
- How the Environmental Report has been taken into account;
- How opinions expressed in relation to the consultations on the plan/ programme and Environmental Report have been taken into account;
- The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
- The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

This Sustainability Appraisal Adoption Statement has been produced to fulfil this regulatory requirement, and has been widened to cover all aspects of sustainability, not just those relating to the environment.

¹ The Regulations require that the statement should be made available "As soon as reasonably practicable after the adoption of a plan or programme..." (SI 2004 No. 1633 Article 16 (1))

The statement also provides information on how the changes made to the CCOS SPD between the draft (consultation) and final versions have changed or influenced the original findings of the SA/SEA, as described in the SA Report (September 2011).

This statement is structured as follows:

- Section 2 describes the SEA activities that have been undertaken following consultation on the draft CCOS SPD and SA Report;
- Section 3 provides a summary of the SA/SEA process including how sustainability considerations have been integrated into the CCOS SPD and how the SA Report has been taken into account;
- Section 4 provides an outline of responses to the consultation draft CCOS SPD and SA Report and how these have been taken into account;
- Section 5 describes the CCOS SPD alternatives that were considered and provides the reasons why the adopted CCOS SPD was chosen in light of the other alternatives considered; and
- Section 6 confirms the measures that will be taken for monitoring significant environmental effects of implementing the CCOS SPD.

2 Post-Consultation SA Update

During the period following the close of consultation (December 2011) and prior to the adoption of the SPD, there have been some changes made to the structure and content of the SPD.

An additional stage of appraisal has therefore been undertaken to review whether the original findings of the Sustainability Appraisal, as reported in the SA Report (September 2011) still stand, or whether there are new potential significant effects arising from the changes, or alternatively whether any significant effects originally predicted are no longer valid.

It is necessary to carry out this additional round of assessment as the SEA Regulations require that all significant effects of implementing a plan or programme are monitored. There is therefore a need to understand the significant effects likely to result from the Adopted SPD, not just those identified for the consultation version – although these are often the same.

The changes made to the SPD following consultation are relatively minor, with the majority being of an editorial nature. There are however some changes which have the potential to influence achievement towards meeting the SA objectives and these are summarised below.

Section 3: CCOS Context

The Council now provides strong encouragement for the redevelopment of the Principal Health Clinic (attached to Hertfordshire House). The draft SPD had just stated that the NHS was considering accommodation options and that the LPA considered the use should be relocated to an alternative acceptable location, which could include re-provision elsewhere on site.

Implications for sustainability appraisal: A significant effect is already predicted against the landscape/townscape objective (SA11). This is further supported by this new, stronger wording, but will not result in any changes to the SA 'score'. There is therefore no requirement to update the sustainability appraisal's original assessment finding.

Section 5: Vision, Objectives, Opportunities & Constraints

The SPD now includes the following a new Vision and revised Objectives as follows:

Vision

To extend City Centre vibrancy into the site through the creation of a high quality distinctive redevelopment which is informed by its historic surroundings. The robust and sustainable mixed use development should transform the site and its surroundings and become a catalyst for the renaissance of St Albans.

Objectives

- *Creating a vibrant mixed use quarter of the city that adds value to the existing City Centre offer*
- *Protection and enhancement of historic buildings and spaces*
- *Improve design quality, responding to St Albans' character and identity and establish a robust and attractive public realm*
- *Improve access to and connectivity of the site with the surrounding townscape to encourage walking, cycling and public transport usage*
- *Create a long lasting sustainable development*
- *Sensitively integrate parking and servicing into the site*
- *Integrate existing green spaces to optimise usage and supplement with appropriate new landscaping*

Implications for sustainability appraisal: The new Vision articulates what was already articulated in the introductory section of the Development Brief and therefore does not have implications for the SA.

The objectives do not now include some of the specifics included in the previous set of objectives (e.g. the future of the Alban Arena, reference to the Council's Height of Buildings policy, and Improvement of the pedestrian link between the Magistrates Court site and

Waterend Barn), but instead provide more overarching objectives for the area as a whole. These encompass all the aims of the previous objectives and therefore there is no requirement to update the SA based on these changes.

Section 6: Appropriate Uses

This section has been expanded to now also consider leisure uses. In addition it supports a new public space for outdoor performance events and recognises that conference facilities are in demand and could become a component of the redevelopment.

Implications for sustainability appraisal: These new additions would help to progress SA objectives, including SA14 (Equality and social exclusion), SA16 (Community identity & participation), SA 18 (Sustainable prosperity & growth) and SA20 (Revitalise town centres). Positive effects (significant for the latter three) have already been identified for these objectives, and the changes will not result in any changes to the SA 'scores'. There is therefore no requirement to update the findings of the SA.

Section 7: Development Form and Design

This section includes some new content relating to Public Realm and Open Space, including further detail on the qualities of the new public square, spillout opportunities and using space to present artefacts from St Albans' history. The section also now encourages the integration of cycle facilities into new developments.

Implications for sustainability appraisal: These new additions would help to progress SA objectives SA5 (Greenhouse gas emissions), SA12 (Health), SA10 (Historic and cultural assets) and SA16 (Community identity & participation). As positive effects (significant for SA16) have already been identified for these objectives there is no requirement to update the findings of the SA.

Section 8: Site Specific Factors

New elements in the final SPD include the importance of Victoria Street as a gateway into the City Centre and the reference to public realm and wayfinding projects. This section also now includes information on the importance of rooftop gardens and SUDS in new developments.

Implications for sustainability appraisal: The new elements will support SA objectives relating to biodiversity (SA1), water quality and flooding (SA2 and SA3), climate change adaptation (SA6), townscape (SA11), and revitalising town centres (SA20). All of these SA objectives already have positive effects identified for them and in some cases these are

significant. The new elements will help further support the objectives but will not result in any changes to the SA 'scores'. There is therefore no requirement to update the findings of the SA.

Section 9: Delivery

The sub-section on Planning Obligations has been expanded and now provides more detail on the types of service and infrastructure for which contributions will be sought, as well as providing more information on the mechanisms through which this will take place.

Implications for sustainability appraisal: The greater level of detail now included provides more clarity as to the types of service/infrastructure areas that would be sought, but does not mean that this will result in different outcomes in terms of levels or types of contribution. There are therefore no implications for the original findings of the SA.

3 How sustainability considerations have been integrated into the SPD and how the SA Report has been taken into account

The SPD encourages a range of measures that will help to enhance the sustainability of any new development/refurbishment and the wider City centre. These include measures such as:

- Use of district heating systems;
- Incorporation of Sustainable Drainage Systems (SuDS);
- Encouraging the use of green roofs and roof top gardens;
- Improved permeability to encourage walking;
- Improved connectivity with the surrounding area to encourage walking, cycling and public transport use; and
- Design principles appropriate to the historic and forward-looking City Centre.

The SA Report included a series of recommendations to help improve the sustainability of the SPD. This included recommendations on how surface water flooding and groundwater protection issues could be mitigated, these recommendations having originated through consultation with the Environment Agency (See Section 4.3 below). In response to these recommendations, the Adopted SPD now includes information on the importance of rooftop gardens and SuDS in new developments

Another recommendation made in the SA Report related to the need for cycle parking facilities in new developments. This has now been incorporated into the 'Site Access' section of the SPD.

Whilst not being a recommendation, the SA Report also identified that the creation of Network St Albans could provide a suitable opportunity for promoting sustainable transport measures that would help to reduce car use and associated airborne emissions.

4 How consultation comments have been taken into account

The SEA Regulations require that the statement produced on adoption of the plan or programme (this statement) should provide information on how the opinions expressed in response to consultation on "*the relevant documents*" have been taken into account. For this statement the relevant documents are as follows:

- The Civic Centre Opportunity Site Brief – Public Consultation June 2011; and
- The Sustainability Appraisal Report (June 2011)

4.1 Civic Centre Opportunity Site Development Brief

59 representations were received during the consultation on the CCOS Development Brief. Full details of these representations and how they have been taken into account in finalising the CCOS SPD are provided in the Consultation Statement which is available on the St Albans DC website.

The representations covered a range of issues which can be categorised around the themes of Access; Conservation; Context; Ecology; Built Form; Infrastructure; Objectives; Ownership; Parking; Phasing; Policy; Sustainability; Uses – Residential; Uses – Retail; Uses – Other; and Viability.

Based on the representations received, a series of minor changes were made during the development of the final CCOS SPD. These changes are identified in the Consultation Statement.

4.2 SA Report

Only one SA related response was received following the consultation on the SA Report in November 2011. This was received from the Senior Ecology Officer at the Hertfordshire

Environmental Records Centre and it is set out below along with a response to this representation.

Representation from the Senior Ecology Officer at the Hertfordshire Environmental Records Centre	Response
<i>"I have no reason to believe that the Civic Centre proposals - as part of the emerging SADC Core Strategy - would have an adverse effect on any European (ecological) Sites"</i> ²	No action required
<i>In terms of biodiversity the SA of the Planning Brief scores the SPD as Sustainable – likely to contribute in some way to the SA/SEA objective. The retention of the Burial Ground is a given; the gardens and scattered trees (or their replacements/enhancements) desirable. However these resources are already present and as such unless the proposals can demonstrate clear enhancements to these or the general area (which given its aims and locations are likely to be limited), I would not consider that simply the 'retention' of these features is sufficient to consider that the 're-development' will make a significant contribution. Without further information (e.g. on brown/green roofs/walls or additional landscaping potential) I would have considered a neutral significant would have been more reasonable in the circumstances. This is, however, reflected with the SA for the Civic Centre (south). I accept that development of housing within this site may prevent housing development elsewhere that could have a negative impact, although this presumption is very dependable on the location of such potential housing"</i>	<p>The SA reported neutral effects in relation to the SPD element and minor positive effects for the wider Development Brief. It did not identify that it would make a significant contribution.</p> <p>The final SPD now identifies the importance of rooftop gardens and SUDS in new developments. These will help support the SA objective for biodiversity but the finding of 'minor positive' effects remains.</p>

4.3 Earlier consultation

At the initial stage of the sustainability appraisal a Scoping Note (April 2011) was produced to consult with the three statutory consultation bodies³ on the scope and level of detail of the information to be included in the SA Report. Responses were received from the Environment Agency and Natural England. The full details of the responses, along with details as to how the comments were taken on board were provided in Appendix A of the SA Report. In summary:

- Natural England supported the chosen approach to the SA/SEA scoping and considered that the proposed scope of the SA/SEA should adequately cover all of the relevant issues;

² The initial response received from the Senior Ecology Officer read *"I have no reason to believe that the Civic Centre proposals - as part of the emerging SADC Core Strategy - would not have an adverse effect on any European (ecological) Sites"*, However it was then acknowledged in a later e-mail dated 6th June 2012 that the use of the double-negative in this response was an error.

³ English Heritage, Natural England and Environment Agency

- The Environment Agency (EA) identified that there is some reported flooding within the opportunity area from surface water and recommended that this could be dealt with by the use of Sustainable Drainage Systems (SuDS). EA also noted that the site has some vulnerability in terms of pollution to groundwater resources as it lies in Source Protection Zone 2 and is close to Source Protection Zone 1 from which abstractions for public water supplies are made. Finally, EA identified that the development is located within an area of “serious” water stress”.

As a result of these responses the SA Framework of objectives was updated to include consideration of surface water (pluvial) flooding issues.

5 Reasons why the adopted CCOS SPD was chosen in light of the other alternatives considered

The sustainability appraisal considered the alternatives of: developing just the area covered by the SPD (i.e. the Civic Centre South Site); and developing the whole area covered by the Development Brief, against the ‘business-as-usual’ scenario of not undertaking any redevelopment.

5.1 Business-as-Usual Option

The SA found that without the redevelopment proposed in the SPD or the wider Development Brief, this area of St Albans would remain as a part of the City centre that is out of keeping with the historic townscape, contains a number of poor quality, low energy efficient buildings, and which does not offer a pedestrian friendly environment to join up the adjacent areas of the public realm. Local residents would continue to have to travel to other neighbouring centres for retail and leisure activities and visitors will have limited opportunities to stay in the City centre, all to the detriment of the local economy.

5.2 Civic Centre South Site SPD only

As the area covered by the SPD is only approximately a quarter of the size of that covered by the wider Development Brief and the predicted effects of taking forward the SPD in isolation were generally found to be less significant than those predicted for the wider CCOS area. No negative effects were identified, with minor positive effects being identified for the majority of SA objectives. Uncertainty was identified against three of the SA objectives as follows:

- The uncertainty over the provision, or not, of new residential units if the SPD were to be taken forward in isolation has led to uncertainty as to the effects on the waste water infrastructure capacity;
- As for the wider Development Brief, there is uncertainty as to how local air quality would be affected if the SPD were to be delivered due to uncertainty as to how vehicle movements would change as a result of implementing the SPD; and
- There is uncertainty as to the effect against the 'Good quality housing' objective because it is unclear whether there would be any new residential units provided if the SPD were to be taken forward in isolation from the wider Development Brief.

5.3 Area covered in the CCOS Development Brief

The SA for the whole CCOS area identified that if the proposals and conditions that are included in the CCOS Development Brief are all realised there could be significant positive effects against a number of the SA objectives as follows:

- Through improvements to resource efficiency (e.g. energy and water use) due to the proposed improvements to the quality of the building stock in the CCOS area;
- Through improvements to the townscape in the CCOS area from the proposed redevelopment, including improvements to the design and quality of the buildings, replacement of some of the aesthetically poor quality buildings, and through the general improvements to the public realm;
- Enhancing the public realm and making the City centre more attractive in which to live, work, and visit should help to improve community vitality and participation. The vibrancy of this part of the City centre will be improved through improved connectivity and greater activity outside normal working hours.
- Redevelopment of the CCOS area would provide additional employment opportunities in the retail and service sectors and by improving the retail offer of the City could have wider benefits for other retailers, restaurants, service providers etc. as more people come to the City to shop and use new leisure facilities and less local residents travel out to neighbouring centres for shopping and leisure activities.
- Taking forward the Development Brief encourages the local provision of, and access to, jobs and services. Any new employment opportunities that will help reduce levels of out-commuting from the District will help to support the SA objective to provide local jobs.

- Through improvements to the public realm, the redevelopment of the CCOS area as laid out in the Development Brief would have a significant positive effect on this area of the City as well as wider benefits for the City as a whole. The Brief encourages well-designed mixed-use developments in the heart of the urban area, which should help to improve the visitor appeal, attractiveness and vitality of the City centre and improve the viability of existing businesses. Removing some of the existing pedestrian/vehicle conflicts will further help to revitalise the area.

In addition to the significant positive effects a range of minor positive effects were predicted in relation to the SA objectives for biodiversity, water quantity, flood risk, climate change, cultural heritage, health, sustainable locations, equality, housing and crime.

One potentially adverse effect was identified in terms of waste water treatment capacity as follows:

- There are District-wide issues with the capacity of waste water treatment works. Given that delivery of the CCOS Development Brief will result in additional residential units as well as guest accommodation there could be additional pressure on the existing and future capacity of the sewerage network.

Uncertainty in the potential effects was identified for the air quality objective as follows:

- There is uncertainty as to how local air quality would be affected if the Development Brief were to be delivered. This is due to uncertainty as to how vehicle movements would change as a result. Attracting more people into the City centre to use new and improved facilities is likely to result in increased car use which would exacerbate existing air quality issues in the City centre. However if the Development Brief is developed in conjunction with the St Albans Urban Transport Plan Congestion Strategy there could be opportunities to help bring benefits to the wider City centre.

5.4 Preferred option

Developing the wider CCOS area was identified as providing the greatest potential for maximising the opportunities towards achieving the SA objectives. This was the option chosen for inclusion in the final SPD.

6 Measures for monitoring the significant effects of implementing the CCOS SPD

The SEA Regulations requires that the responsible authority shall monitor the significant (adverse and positive) environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action. The combined SA/SEA process expands this to include other significant sustainability effects of the implementation of the plan (i.e. to also include significant social and economic effects).

The monitoring put in place should fulfil the following requirements:

- To monitor the significant effects of the SPD;
- To monitor any unforeseen effects of the SPD;
- To ensure that action can be taken to reduce / offset the significant effects of the SPD; and
- To provide baseline data for the next SA/SEA and to provide a picture of how the environment / sustainability criteria of the area are evolving.

The SEA Regulations allow for existing monitoring arrangements to be used if appropriate. Monitoring may cover several plans or programmes as long as sufficient information about environmental effects is provided for the individual plans or programmes.

For monitoring the effects related to the CCOS SPD, measures will be required in relation to the topic areas for which significant effects have been identified in the assessment as well as those topics where there is uncertainty over the resulting effects.

The SA objectives and the associated measures that will be monitored as the CCOS area is redeveloped are shown in Table 1.

Table 1 Monitoring Measures

SA Objective	Effect to be Monitored		Monitoring Measure
SA2 - Water quality/quantity	Impact on waste water treatment works	?/x	Capacity of waste water treatment works serving St Albans
SA7 - Air Quality	Local air quality in the City Centre area	?	Existing City Centre air quality monitoring
SA9 – Resource Efficiency	Energy efficiency of new buildings and use of renewable energy technologies (including district heating)	✓✓	Annual Monitoring Report Indicator E3: Renewable energy generation (CCOS area contribution)
SA11 – Landscape & Townscape	Changes to townscape and public realm	✓✓	Implementation of the Public Realm Delivery Strategy
SA16: Community Identity and Participation and SA20: Revitalise Town Centres	Changes to the public realm and vibrancy of the area	✓✓	Improvements to public realm (through future City Centre satisfaction surveys)
SA18: Sustainable Prosperity and Growth and SA19: Fairer Access to Services	Changes to the prosperity of the City Centre area, including job creation.	✓✓	Uptake of commercial/office units on site Amount of new commercial development floorspace that is completed. Annual Monitoring Report Indicator BD4i: Total floorspace for 'town centre uses' within town centre area (CCOS area contribution) Shopping Monitoring Report

Monitoring measures required in relation to the implementation of the SPD will be incorporated into the Authority's Monitoring Report that is required for the Local Development Framework.