



Centre for Sustainability

St Albans District Council

Civic Centre Opportunity Site Planning Brief

Sustainability Appraisal (incorporating Strategic
Environmental Assessment)

SA Report

September 2011

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Author: Rob Gardner

Quality reviewed: Clare Harmer

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CONTENTS

NON-TECHNICAL SUMMARY.....	I
INTRODUCTION.....	I
SA METHODOLOGY	I
HABITATS REGULATIONS ASSESSMENT (HRA)	I
APPRAISAL AND KEY FINDINGS	I
MONITORING.....	II
NEXT STEPS.....	II
1 INTRODUCTION.....	1
1.1 BACKGROUND	1
1.2 SUSTAINABILITY APPRAISAL AND STRATEGIC ENVIRONMENTAL ASSESSMENT	1
1.2.1 <i>Scope of the SA/SEA</i>	2
1.3 SCOPE OF THE PLANNING BRIEF.....	3
1.3.1 <i>The CCSS SPD</i>	3
1.3.2 <i>The wider CCOS area</i>	4
1.3.3 <i>CCOS Options</i>	5
1.4 INTERFACE WITH CORE STRATEGY	5
2 SA/SEA PROCESS	5
2.1.1 <i>Links with Core Strategy SA/SEA</i>	6
2.2 PROPOSED APPROACH TO SCOPING THE SA/SEA OF THE CCOS	6
2.3 SUSTAINABILITY CHARACTERISTICS AND ISSUES IN THE CCOS AREA	7
2.3.1 <i>Air Quality</i>	7
2.3.2 <i>Biodiversity</i>	8
2.3.3 <i>Climatic Factors</i>	8
2.3.4 <i>Cultural Heritage</i>	9
2.3.5 <i>Landscape and Townscape</i>	9

2.3.6	<i>Material Assets</i>	10
2.3.7	<i>Population and Human Health</i>	10
2.3.8	<i>Soil</i>	10
2.3.9	<i>Water</i>	10
2.3.10	<i>Social Factors</i>	11
2.3.11	<i>Economic Factors</i>	12
2.4	SA/SEA FRAMEWORK OF OBJECTIVES.....	13
2.4.1	<i>Scope of topics to be covered by the SA/SEA</i>	13
2.4.2	<i>SA/SEA Framework</i>	13
2.4.3	<i>Geographical and temporal scope</i>	13
2.5	ASSESSMENT METHODOLOGY	17
3	ASSESSMENT RESULTS	18
3.1	BUSINESS AS USUAL	18
3.2	CIVIC CENTRE OPPORTUNITY SITE PLANNING BRIEF	19
3.3	CIVIC CENTRE SOUTH SITE SPD	21
3.4	RECOMMENDATIONS	22
4	MONITORING	22
4.1	INTRODUCTION	22
4.2	MONITORING MEASURES	23
5	HABITATS REGULATIONS ASSESSMENT	23
6	NEXT SA/SEA STEPS	24
6.1	RESPONDING TO THIS SA REPORT	24

APPENDIX A – SCOPING REPORT CONSULTATION RESPONSES: INCLUDED IN A SEPARATE DOCUMENT

APPENDIX B – DETAILED ASSESSMENT OF THE CCOS PLANNING BRIEF (INCLUDING SPD): INCLUDED IN A SEPARATE DOCUMENT

Non-technical summary

Introduction

This report outlines the findings of the Sustainability Appraisal (SA) of the Civic Centre Opportunity Site (CCOS) Planning Brief which incorporates the Civic Centre South Site (CCSS) Supplementary Planning Document (SPD).

SA is required if the higher level policy to which the SPD relates has not had an SA undertaken on it and where the SPD is likely to give rise to significant effects on the environment – either positive or negative.

The principal purpose of SA is to promote sustainable development through planning policy. This report incorporates an environmental assessment in accordance with the requirements of European Directive 2001/42/EC (the SEA Directive).

SA Methodology

The SA has been undertaken by the Centre for Sustainability at TRL Ltd, during the preparation of the SPD. The approach adopted is based on the SA/SEA process set out in Government guidance.

The elements that make up the Planning Brief have been appraised against a set of 20 sustainability objectives. These objectives have been previously developed for the SA of the emerging St Albans Local Development Framework. Some minor modifications have been made to the objectives to make them appropriate for appraising the detailed Planning Brief.

Habitats Regulations Assessment (HRA)

EU Directive 92/43/EEC requires an assessment to be undertaken to assess the possible impacts of a land-use plan against the conservation objectives of a European Site (often called Natura2000 sites).

An HRA screening exercise has been undertaken as part of the emerging St Albans Core Strategy. This found that the Core Strategy would not have an adverse effect on any European Sites. The CCOS Planning Brief does not add any additional elements that would change this conclusion.

Appraisal and key findings

The appraisal has considered the potential effects that would result from taking forward the proposals included in the CCOS Planning Brief and the more limited proposals in the CCSS SPD compared to a do-nothing or 'business as usual' option.

The results of the appraisal are presented in Section 3 and Appendix B of the main SA Report.

In terms of sustainability, the SA has identified and described a range of potential significant effects all of which are positive. These relate to the proposed improvements to the public realm, and the improved provision of retail/services/facilities that will result from the redevelopment of this currently 'dysfunctional' area of the City centre.

Key benefits of the Planning Brief/SPD are likely to relate to:

- Improved energy efficiency and increased potential for low carbon and renewable energy generation;
- Increased permeability of the area through provision of improved pedestrian links and removal of some existing conflicts between pedestrians and motor vehicles;
- Improvements to the local townscape through replacement of some existing poor quality buildings;
- Improvements to the public realm which should result in improved community vitality, as should proposed improvements in the culture and leisure offering of the City centre;
- Benefits to the local economy from the provision of new shops, linking neighbouring retail areas, an increase in the number of visitors to the City, and the retention of local residents who previously would travel outside the City to access retail and leisure.

Other potential effects

There is some uncertainty as to the effects on local air quality which are linked to uncertainty as to how traffic volumes and flows will be affected by the proposed redevelopments.

One adverse effect has been identified in the appraisal. This relates to the increased pressure that would be placed on waste water treatment infrastructure if new residential units and guest accommodation are developed.

Mitigation

The Sustainability Appraisal has made some recommendations for mitigation and enhancement, including those in relation to trees, surface water flooding, the protection of groundwater and making links to Network St Albans initiatives.

Monitoring

Monitoring allows the actual significant effects of implementing the Planning Brief/SPD to be tested against the predicted effects. The monitoring measures will be finalised when the Planning Brief and/or SPD are adopted.

Next steps

All comments regarding the SA received through the public consultation exercise will be reviewed, and the SA Report may be updated if appropriate. If significant changes are made to the Planning Brief/SPD as a result of consultation, these will need to be considered as part of any review of the SA work.

1 Introduction

1.1 Background

The St Albans City Vision identified the 3 hectare Civic Centre Opportunity Site (CCOS) as a priority for early development in taking forward the City Vision and in 2009 a high level conceptual masterplan was produced. The southern part of this site, which has an area of 0.77 hectares, was already identified in the current Local Plan as an area for redevelopment. This is called the Civic Centre South Site (CCSS).

A planning brief is now being prepared to propose how the whole CCOS area, including CCSS, will be redeveloped. This brief will also serve as a Supplementary Planning Document (SPD) for the area covered by the Saved Policy of the Local Plan (i.e. CCSS).

A Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) is being undertaken on the CCOS planning brief and will therefore also cover the SPD. The combined SA and SEA processes are referred to in this report as 'SA/SEA'.

1.2 Sustainability Appraisal and Strategic Environmental Assessment

The purpose of SA/SEA is to promote sustainable development through better integration of sustainability considerations into the preparation and adoption of the SPD.

SA/SEA is a process that highlights any significant environmental, social or economic effects of the plan. It assesses the plan against a number of sustainability objectives in order to identify these impacts. The appraisal needs to be fully integrated into the plan process, so that it can inform and influence the plan as it develops.

SA/SEA is required for SPDs only if they are likely to have significant effects (positive or negative) on the environment which have not already been assessed in the appraisal of a higher level plan.

For the CCOS Planning Brief and SPD the relevant higher level plan would either be the existing Local Plan or the emerging Core Strategy.

However as the St Albans District Local Plan Review 1994 was not subject to Sustainability Appraisal, as it was adopted prior to there being a requirement for such a process, and as the Emerging Core Strategy has yet to have a formal Sustainability Appraisal Report¹, so there is a requirement to undertake Sustainability Appraisal on the CCOS Development Brief/SPD.

NB: The Emerging Core Strategy has undergone several stages of SA, however not to the stage of formal submission and consultation on a Sustainability Appraisal Report and also not to the level of spatial detail associated with the CCOS.

The SA/SEA on the CCOS Planning Brief and SPD is being undertaken to identify any potential significant effects that could result from their implementation so that where necessary mitigation can be considered to avoid or minimise these effects and so that the effects can be monitored.

Ongoing SA/SEA on St Albans Development Plan Documents (DPDs) is being carried out as part of a joint project commissioned by the four Hertfordshire local authorities situated in the south west of the county – Dacorum Borough Council, St Albans City and District Council, Three Rivers District Council, and Watford Borough Council. The Centre for Sustainability (C4S) at TRL Ltd and their project partners Halcrow Group Ltd have been appointed to undertake this project.

1.2.1 *Scope of the SA/SEA*

It has become standard practice at the scoping stage of the SA/SEA process to produce a detailed Scoping Report. However, a Scoping Report has already been produced to cover all the DPDs in the St Albans Local Development Framework, and the SA/SEA for the CCOS Planning Brief and SPD will draw heavily on the information in that document, as well as the subsequent SA/SEA work that has been carried out for the emerging Core Strategy.

For this SA/SEA, instead of duplicating the information included in the earlier reports, a short Scoping Note was produced in April 2011 that provided supplementary information on the specific issues that are faced in the area affected

by the CCOS. The purpose of the Scoping Note was to consult with the three statutory consultation bodies¹ on the scope and level of detail of the information to be included in the SA Report for the CCOS Planning Brief and SPD (this report). The aim of this stage is to finalise the SA framework to be used to appraise the draft CCOS Planning Brief and SPD and to provide the opportunity for the statutory consultees to raise any locally specific issues which can feed into the assessment process.

Responses were received from Natural England and the Environment Agency and these are detailed in Appendix A. Following the consultation some changes were made to the SA/SEA framework so that the assessment can cover all the issues relating to redevelopment of the CCOS area. The issues and SA framework are detailed in Sections 2.3 and 2.5.

1.3 Scope of the Planning Brief

The CCOS Planning Brief relates to a substantial area in the centre of the City of St Albans which the Local Planning Authority (LPA) is keen to promote for comprehensive redevelopment and enhancement.

1.3.1 The CCSS SPD

The CCSS SPD responds to the requirement identified in Policy 116 of the St. Albans District Local Plan Review 1994 Policy Area 2E, relating to the Civic Centre South Site.

Policy 116 states: "If the site becomes available, the District Council and County Council will prepare a planning brief for the redevelopment of the area. Proposals should enhance the character and appearance of this part of the conservation area. A mix of uses will be favoured and particular consideration will be given to incorporating the following elements:

- (i) shopping, including a possible department store;
- (ii) civic, leisure, cultural or entertainment uses;

¹ English Heritage, Natural England and Environment Agency

(iii) public car parking;

(iv) an improved pedestrian route through the site from the Maltings to the Alban Arena.”

The Planning Brief therefore is being prepared partly as a Supplementary Planning Document (SPD) to that saved Policy.

1.3.2 The wider CCOS area

The area covered by the CCOS Planning Brief extends the area covered by Local Plan Policy Area 2E to also include the Alban Arena, Council Offices, Council car park, Quaker burial ground and the Municipal Gardens. Additional potential uses to those included in the Local Plan include residential units and hotels.

The extent of the area covered by the CCOS is shown in Figure 1.

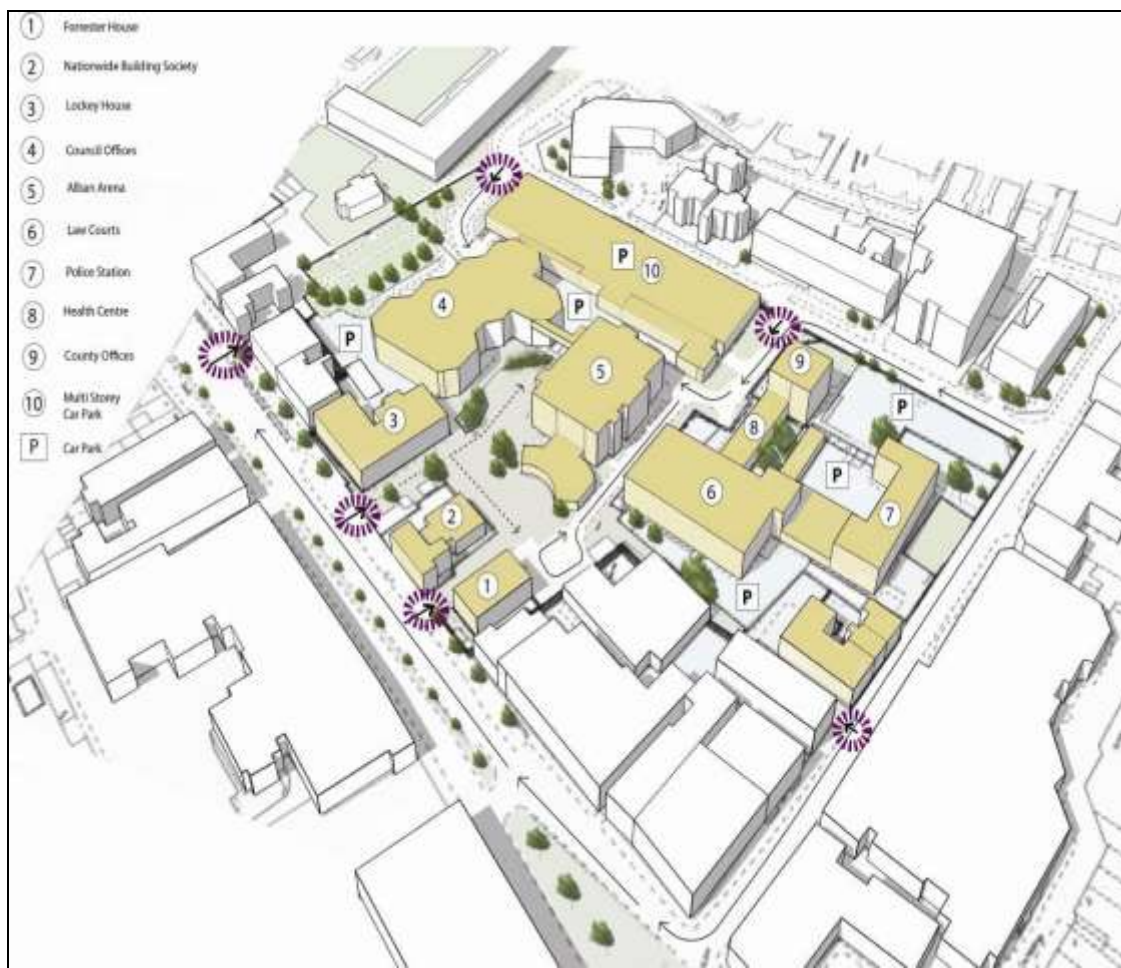


Figure 1: Area covered by the Civic Centre Opportunity Site Planning Brief

1.3.3 CCOS Options

The two main options considered in relation to the CCOS area are:

- A do nothing option – which the Council consider would be to accept piecemeal uncoordinated development; and
- Having a Planning Brief (and SPD) in place – which the Council consider would promote a comprehensive, phased approach to development in the area.

The SA/SEA has assessed the likely effects of going forward with or without the Planning Brief (and SPD) in place. Where effects differ depending on whether the whole Planning Brief is taken forward, or whether only the area covered by the SPD is developed, these are reported in the assessment findings.

Within the context of the Planning Brief itself there could be alternative scenarios that would see different mixes of uses (e.g. retail / office / residential / community uses) predominating to differing extents. These alternatives will be considered as the Planning Brief is developed further.

1.4 Interface with Core Strategy

The Core Strategy for the St Albans City and District Local Development Framework (LDF) is currently being developed with adoption planned for late 2012. Had the Core Strategy already been adopted, the CCOS planning brief would now be being developed as a SPD to that planning document. However as the Core Strategy is not yet adopted, the SPD can only apply to that part of the CCOS that is covered by the Local Plan (i.e. the CCSS), which remains as the extant Statutory Plan for the District until the Core Strategy is adopted.

2 SA/SEA Process

The combined SA/SEA that has been undertaken during the development of the CCOS provides an independent assessment of the effects that the Brief/SPD will have on a range of sustainability objectives. The SA/SEA provides the necessary information to enable decisions to be made in accordance with sustainable development principles.

2.1.1 Links with Core Strategy SA/SEA

As mentioned earlier, a Scoping Report for the St Albans LDF SA/SEA was prepared and consulted upon with statutory consultees and stakeholders in March 2006. This Scoping Report provided an overview of the completed SA tasks, presented the baseline information and the SA framework and outlined the proposed methodology for the remaining stages of the LDF SA. The Scoping Report set the sustainability framework for the SA process for the St Albans LDF. This Scoping Report acts as the basis for all DPDs and SPDs including the SA/SEA being undertaken for CCOS. The LDF Scoping Report can be viewed at:

<http://www.stalbans.gov.uk/environment-and-planning/planning/policy/ldfevidencebase.aspx>

Following consultation on the Scoping Report the sustainability framework was updated to take into account recommendations from the consultees.

Additional SA/SEA has been undertaken as follows:

- In 2006 during the preparation of the St Albans Core Strategy and Development Control DPDs Initial Issues and Options;
- In 2007 for Core Strategy Revised Issues and Options;
- In 2009 for the Emerging Core Strategy; and
- In 2010 for the Core Strategy: Consultation on the Strategy for Locating Future Development in the District.

During some of these earlier stages, assessment was undertaken on the Civic Centre strategic development site and therefore where appropriate this earlier SA work has been used to inform the SA/SEA of the CCOS Planning Brief and SPD.

2.2 Proposed approach to scoping the SA/SEA of the CCOS

As discussed in Section 1.2, given the level of detail and amount of baseline information already collected as part of these earlier SA/SEA activities an individual Scoping Report for the SA/SEA of the CCOS Planning Brief and SPD has not been prepared. However, given the more detailed focus of the CCOS Planning Brief and SPD it has been considered necessary to provide further updates to the existing SA

framework in order to make it more appropriate for undertaking assessment of the specific effects that may result from implementation of the SPD.

The text in Box 1, taken from the original Government guidance on SA of SPDs explains this requirement in greater detail. The same principle will apply to the review of other policies, plans and programmes (Stage A1 of the SA process).

Box 1: Baseline requirements for SPDs

4.2.8 Much baseline information will be generic to the authority's area rather than specific to the particular SPD on which a SA is being carried out. It could therefore be used to support the SA of future LDDs. These potential uses should be kept in mind when information is being collected.

4.2.9 Sufficient information about the current and likely future state of the area covered by the SPD needs to be collected to allow its effects to be adequately predicted. Information collected needs to focus on the social, environmental and economic characteristics of the area that relate to the issues to be tackled in the SPD. The SA Report can then focus on those where significant effects are likely.

Source: Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (ODPM, 2005)

2.3 Sustainability Characteristics and Issues in the CCOS Area

The following sections provide details on the specific characteristics of the CCOS area and its surroundings. This builds on the information at a District level that has already been provided in the earlier LDF SA/SEA Scoping Report.

For some topics there is limited information available that relates specifically to the CCOS and this is reflected in the brevity of some sections. Where there is limited information specific to the area, where appropriate the SA/SEA will default to using the District wide information included in the LDF Scoping Report.

2.3.1 Air Quality

St Albans District has declared three AQMAs, one of which is in St Albans City on the London Road close to the crossroads with Chequer Street. This AQMA is approximately 200m from the CCOS and has been declared for high levels of Nitrogen Dioxide (NO₂).

In addition, the 2009 Air Quality Updating and Screening Assessment² for St Albans District Council reports that *"the 2008 Detailed Assessment concluded that the annual objective for NO₂ would be exceeded in 2010 at locations of relevant exposure in the vicinities of the monitoring sites SA137 on High Street and SA136 on St Peters Street. However it was subsequently decided by St Albans District Council that there was no relevant exposure in these areas at locations where an exceedance of the objectives was likely"*. Monitoring site SA 136 is located in the immediate vicinity of the CCOS area and therefore, notwithstanding this decision by the Council, there are obviously some issues relating to air quality in the vicinity of the area covered by the Planning Brief.

Objectives in the SA/SEA framework already deal with the air quality issues and therefore no amendments to the objectives are proposed for this SA/SEA.

2.3.2 Biodiversity

The CCOS includes some trees and green spaces (the Quaker Burial Ground and the Municipal Gardens). All trees on the site are protected by the Conservation Area status that covers the entire CCOS area and some trees are the subject of specific Tree Preservation Orders.

The Council proposes to attach appropriate landscaping conditions to planning permissions to safeguard existing trees and ensure that new planting is established and protected.

Objectives in the SA/SEA framework already deal with protection and enhancement of biodiversity and therefore no amendments are proposed for the CCOS Planning Brief and SPD SA/SEA.

2.3.3 Climatic Factors

Some of the existing buildings in the CCOS area (e.g. Hertfordshire House) are of relatively poor quality in terms of energy efficiency. Redevelopment of this area provides an opportunity to install district heating systems and combined heat and power.

² Available at URL: <http://www.stalbans.gov.uk/environment-and-planning/pollution/air-pollution/default.aspx>

No amendments are proposed for the SA/SEA framework for this SA/SEA objective.

2.3.4 Cultural Heritage

The following site constraints are identified in the CCOS Planning Brief:

- The entire CCOS is within both the St Albans Conservation Area and more specifically the City Centre Building Height Control Area, the requirements of which must be respected;
- The settings of the Grade II listed Waterend Barn and 19 / 21 Victoria Street together with the Grade II* listed The Grange (Nationwide BS) should be enhanced through development proposals for CCOS;
- The relationship between the height of buildings on the north-east corner of the site and the Grade II* listed Marlborough Almshouses in Hatfield Road needs to be carefully considered;
- The Municipal Gardens adjoining the northern boundary of the site and Quaker Gardens, at the southern boundary, are subject to covenants; and
- The CCOS is in AS.R.25, an archaeological site where planning permissions may be subject to a recording condition (St Albans - including Saxon Kingsbury, Saxon and medieval town and Sopwell Nunnery) as defined in the St Albans District Local Plan Review (November 1994).

Objectives in the SA/SEA framework already deal with protection and enhancement of the historic environment and therefore no amendments are proposed for the CCOS Planning Brief and SPD SA/SEA.

2.3.5 Landscape and Townscape

There are parts of the CCOS area which are not of high townscape quality which would benefit from redevelopment, either through building replacement or refurbishment. The Planning brief identifies that:

"The public realm enclosed by current buildings is of poor quality that lacks defined enclosure, permeability and legibility throughout. Sight lines from the key gateway points along St Peter's Street are weak and provide limited visibility for uses that are located behind the retail frontage, such as the Alban Arena and the Civic Centre. This constrains footfall to specific trips and discourages recreational use of the public realm, which is further undermined

by existing rights of way and vehicular usage. The intensive use of land adjoining The Grange for car parking which is accessed entirely across the pedestrian area adjoining Cafe Nes is particularly intrusive."

Objectives in the SA/SEA framework already deal with protection and enhancement of the townscape and therefore no amendments are proposed for the CCOS Planning Brief and SPD SA/SEA.

2.3.6 *Material Assets*

The CCOS area contains a number of buildings that have poor energy efficiency.

No amendments are proposed for the SA/SEA framework for this SA/SEA objective.

2.3.7 *Population and Human Health*

There is limited baseline information specifically relating to the areas of the CCOS. The site's location at the heart of the City centre means that it is accessible to public transport and a wide range of services. The City centre can become congested with traffic.

The CCOS area contains two areas of public open space.

No amendments are proposed for the SA/SEA framework for these SA/SEA objectives.

2.3.8 *Soil*

There is no specific baseline information or issues relating to soils for the CCOS area. The area is already predominantly built up with large areas of soil sealing.

It is proposed that this topic is 'scoped out' of the assessment (see Section 2.4.1)

2.3.9 *Water*

The site has some vulnerability in terms of pollution to groundwater resources. It lies in Source Protection Zone 2 and is close to Source Protection Zone 1 from which abstractions for public water supplies are made³.

³ Source: Environment Agency response to scoping consultation. See Appendix 1.

This development is located within an area of 'serious' water stress. Average water use in St Albans is 170 litres per head per day (l/h/d) which is above the England and Wales average of 146l/h/d³.

For the most recent SA activities for the St Albans Draft Core Strategy the capacity of waste water treatment works was highlighted as an issue that needed to be taken into consideration. As a result an additional criterion was added for the water objective relating to taking account of the existing and future capacity of the sewerage network.

There is some reported flooding within the opportunity area from surface water³ and the objective relating to flooding has therefore been expanded to include 'pluvial' flooding⁴.

2.3.10 Social Factors

The CCOS area falls within "St Albans 012B" Lower Super Output Area⁵ (LSOAs).

The Index of Multiple Deprivation (2010)⁶ provides an Overall Index of Multiple Deprivation (IMD) based on seven individual Domain Indices. These indices are shown below along with their weighting in determining the overall IMD:

- Income (22.5%)
- Employment (22.5%)
- Health Deprivation and Disability (13.5%)
- Education, Skills and Training (13.5%)
- Barriers to Housing and Services (9.3%)
- Crime (9.3%)
- Living Environment (9.3%)

Quartiles.

There are 32,482 LSOAs in England which can be split into quartiles as follows:

⁴ Pluvial flooding is flooding which results from excess rainfall that is not able to infiltrate the ground or which exceeds the capacity of surface water drainage systems.

⁵ Super Output Areas (SOAs) are a geographic hierarchy designed to improve the reporting of small area statistics. Within England and Wales a Lower Layer (minimum population 1000) and a Middle Layer (minimum population 5000) were introduced in 2004. (Source: <http://www.statistics.gov.uk/geography/glossary/s.asp>)

⁶ <http://www.imd.communities.gov.uk/>

Quartile 1: Most deprived quartile: Rankings 1 – 8,120

Quartile 2: Second most deprived quartile: Rankings 8120 – 16,241

Quartile 3: Second least deprived quartile: Rankings 16,242 – 24,361

Quartile 4: Least deprived quartile: Rankings 24,362 – 32,482

The rankings for the LSOA that covers the CCOS area are shown in Table 1. Those falling in the two most deprived quartiles are shown as italics and bold italics. As can be seen there are several indices in which the “St Albans 012B” LSOA falls within the most or second most deprived quartile England-wide.

Table 1: Rankings for “St Albans 012B” (LSOA code - E01023727)

2010 Indices of Multiple Deprivation			Trend Data	
Index	Rank	Quartile	2004	2007
<i>Overall Index of Multiple Deprivation</i>	14,626	<i>Quartile 2</i>	15,408	13,829
<i>IMD Income Deprivation Domain</i>	12,967	<i>Quartile 2</i>	13,999	14,755
<i>IMD Employment Deprivation Domain</i>	9,747	<i>Quartile 2</i>	12,692	11,595
<i>IMD Health Deprivation and Disability Domain</i>	16,239	<i>Quartile 2</i>	10,937	14,749
IMD Education Skills and Training Deprivation Domain	30,374	Quartile 4	32,236	29,619
IMD Barriers to Housing and Services Domain	26,969	Quartile 4	23,054	21,690
IMD Crime Domain	6,987	Quartile 1	9,903	3,248
<i>IMD Living Environment Deprivation Domain</i>	9,654	<i>Quartile 2</i>	10,143	9,031

The CCOS area is currently not easy for pedestrians to use for movement between neighbouring areas of the city centre. In addition the Municipal Gardens are not easy to access.

House prices and rental rates in St Albans are significantly higher than in other Districts within Hertfordshire. Consequently there is a need for affordable housing.

Objectives in the SA framework already deal with social factors and therefore no amendments are proposed for the CCOS SPD SA/SEA.

2.3.11 Economic Factors

There is no specific baseline information or issues relating to the economic factors for the CCOS area.

No amendments are proposed for the SA/SEA framework for this SA/SEA objective.

2.4 SA/SEA Framework of Objectives

2.4.1 Scope of topics to be covered by the SA/SEA

Given the wide range of effects, some positive and some negative, that are likely to arise from the implementation of the CCOS, the vast majority of the topics covered by the LDF SA/SEA framework are relevant to the assessment of the CCOS Planning Brief and SPD. However one SA/SEA objective has been identified against which there are unlikely to be any significant effects and this has therefore been scoped out of the assessment. This objective is:

- Objective 4 – *'Minimise development of land with high quality soils and minimise the degradation/loss of soils due to new developments'.*

The majority of the area is already built-up, and with the existing areas of greenspace planned for retention, it is unlikely that there will be any significant effects on soils.

2.4.2 SA/SEA Framework

An SA/SEA Framework of objectives was developed for the overall LDF SA/SEA at the scoping stage in February 2006 and was then updated following consultation on the Scoping Report. This updated framework has been used for all subsequent SA/SEA activities.

The SA/SEA framework proposed for use in the assessment of the CCOS Planning Brief/SPD is provided in Table 2. Additions to the SA objectives to pick up issues relevant to the SPD are shown in ***bold italics***. Criteria that are not applicable for the SA/SEA of the SPD are shown as ~~strikethrough~~ text.

2.4.3 Geographical and temporal scope

The spatial scope for the assessment will primarily be the CCOS area and its immediate environs. However where potential impacts are identified that could affect areas further afield these will also be assessed for their significance.

As with the LDF SA/SEA the assessment for the CCOS will examine three temporal scales:

- Short term effects: effects expected in the next 1-5 years.
- Medium term effects: effects expected in the next 5-10 years.
- Long term effects: effects expected in the next 10+years.

Table 2: The SA/SEA Appraisal Framework

Objective	Criteria
Biodiversity	
1. To protect, maintain and enhance biodiversity and geodiversity at all levels, including the maintenance and enhancement of Biodiversity Action Plan habitats and species in line with local targets	To protect, maintain and enhance designated wildlife and geological sites (international, national and local) and protected species to achieve favourable condition
	To restore characteristic habitats and species, to achieve BAP targets
	To support farming and countryside practices that enhance wider biodiversity and landscape quality by economically and socially valuable activities (e.g. grazing, coppicing, nature reserves) [not applicable to urban boroughs, such as Watford]
	To manage woodlands and other habitats of value for biodiversity in a sustainable manner and protect them against conversion to other uses
	To recognise the social/environmental value and increase access to woodlands, wildlife & geological sites and green spaces particularly near/in urban areas
	To encourage people to come into contact with, understand, and enjoy nature
Water	
2. To protect, maintain and enhance water resources (including water quality and quantity) while taking into account the impacts of climate change	To raise awareness and encourage higher water efficiency and conservation by for instance promoting water reuse in new and existing developments
	To ensure water consumption does not exceed levels which can be supported by natural processes and storage systems
	To improve chemical and biological quality and flow of rivers and encourage practices which reduce nitrate levels in groundwater
	To improve flow of rivers
	To reduce the number and severity of pollution incidents
	To maintain or restore the integrity of water dependent wildlife sites in the area
	To take account of the existing and future capacity of sewerage network
3. Ensure that new developments avoid areas which are at risk from flooding and natural flood storage areas	To avoid developments in areas being at risk from fluvial, pluvial , sewer or groundwater flooding (for instance natural flood plains) while taking into account the impacts of climate change
	To ensure that developments, which are at risk from flooding or are likely to be at risk in future due to climate change, are sufficiently adapted
	To promote properly maintained sustainable urban drainage systems to reduce flood risk and run off in areas outside Source Protection Zones 1 (SPZ)
Soil	

Objective	Criteria
4. Minimise development of land with high quality soils and minimise the degradation/loss of soils due to new developments	To safeguard high quality soils, such as agricultural land grades 1, 2 and 3a) from development [Might not be applicable for urban boroughs, such as Watford]
	To limit contamination/degradation/loss of soils due to development
Climatic Factors	
5. Reduce the impacts of climate change, with a particular focus on reducing the consumption of fossil fuels and levels of CO ₂	To minimise greenhouse gas emissions (particularly CO ₂) for instance through more energy efficient design and reducing the need to travel
	To promote increased carbon sequestration e.g. through increases in woodland cover
	To adopt lifestyle changes which help to mitigate and adapt to climate change, such as promoting water and energy efficiency (through for instance higher levels of home insulation)
6. Ensure that developments are capable of withstanding the effects of climate change (adaptation to climate change)	To promote design measures which enable developments to withstand and accommodate the likely impacts and results of climate change (for instance through robust and weather resistant building structures)
Air Quality	
7. Achieve good air quality, especially in urban areas	To reduce the need to travel by car through planning settlement patterns and economic activity in a way that reduces dependence on the car and maintains access to work and essential services for non-car-owners
	To integrate land use and transport planning by for instance: <ul style="list-style-type: none"> Promoting Green Transport Plans, including car pools, car sharing as part of new developments Ensuring services and facilities are accessible by sustainable modes of transport
	To ensure that development proposals do not make existing air quality problems worse
	To address existing or potential air quality problems
Material Assets	
8. Maximise the use of previously developed land and buildings, and the efficient use of land	To concentrate new developments on previously developed land (PDL)
	To avoid use of Greenfield sites for development
	To maximise the efficient use of land and existing buildings by measures such as higher densities and mixed use developments
	To encourage the remediation of contaminated and derelict land and buildings
9. To use natural resources, both finite and renewable, as efficiently as possible, and re-use finite resources or recycled alternatives wherever possible	To encourage maximum efficiency and appropriate use of materials, particularly from local and regional sources
	To require new developments to incorporate renewable, secondary, or sustainably sourced local materials in buildings and infrastructure
	To safeguard reserves of exploitable minerals from sterilisation by other developments
	To promote renewable energy sources as part of new or refurbished developments

Objective	Criteria
	To increase recycling and composting rates and encourage easily accessible recycling systems as part of new developments
	To promote awareness regarding waste/recycling and renewable energy issues through education programmes in schools and the community
Cultural Heritage	
10. To identify, maintain and enhance the historic environment and cultural assets	To safeguard and enhance the historic environment and restore historic character where appropriate, based on sound historical evidence
	To promote local distinctiveness by maintaining and restoring historic buildings and areas, encouraging the re-use of valued buildings and thoughtful high quality design in housing and mixed use developments – to a density which respects the local context and townscape character, and includes enhancement of the public realm
	To promote public education, enjoyment and access of the built heritage and archaeology
Landscape & Townscape	
11. To conserve and enhance landscape and townscape character and encourage local distinctiveness	To protect and enhance landscape and townscape character
	To evaluate the sensitivity of the landscape to new/inappropriate developments and avoid inappropriate developments in these areas
	To protect 'dark skies' from light pollution, and promote low energy and less invasive lighting sources while considering the balance between safety and environmental impacts
	To minimise the visual impact of new developments
Population and Human Health	
12. To encourage healthier lifestyles and reduce adverse health impacts of new developments	To promote the health advantages of walking and cycling and community based activities
	To identify, protect and enhance open spaces, such as rivers and canals, parks and gardens, allotments and playing fields, and the links between them, for the benefit of people and wildlife
	To include specific design and amenity policies to minimise noise and odour pollution, particularly in residential areas
	To narrow the income gap between the poorest and wealthiest parts of the area and to reduce health differential
13. To deliver more sustainable patterns of location of development	To reduce the need to travel through closer integration of housing, jobs and services
	To promote better and more sustainable access to health facilities
Social Factors	
14. Promote equity & address social exclusion by closing the gap between the poorest communities and the rest	To include measures which will improve everyone's access to high quality health, education, recreation, community facilities and public transport
	To ensure facilities and services are accessible by people with disabilities and minority groups
	To encourage people to access the learning and skills they need for high quality of life
	To ensure that the LDF does not discriminate on the basis of disability, ethnic minority, or gender.

Objective	Criteria
15. Ensure that everyone has access to good quality housing that meets their needs	Promote a range housing types and tenure, including high quality affordable and key worker housing
16. Enhance community identity and participation	To recognise the value of the multi-cultural/faith diversity of the peoples in the region
	To improve the quality of life in urban areas by making them more attractive places in which to live and work, and to visit
	To encourage high quality design in new developments, including mixed uses, to create local identity and encourage a sense of community pride
17. Reduce both crime and fear of crime	To reduce all levels of crime with particular focus on violent, drug related, environmental and racially motivated crime
	To plan new developments to help reducing crime and fear of crime through thoughtful design of the physical environment, and by promoting well-used streets and public spaces
	To support government-sponsored crime/safety initiatives, maximising the use of all tools available to police, local authorities and other agencies to tackle anti-social behaviour
Economic Factors	
18. Achieve sustainable levels of prosperity and economic growth	To support an economy in the Authority which draws on the knowledge base, creativity and enterprise of its people.
	To promote and support economic diversity, small and medium sized enterprises and community-based enterprises
	To support the economy with high quality infrastructure and a high quality environment
19. Achieve a more equitable sharing of the benefits of prosperity across all sectors of society and fairer access to services, focusing on deprived areas in the region	To encourage local provision of and access to jobs and services
	To improve the competitiveness of the rural economy [not applicable for urban boroughs, such as Watford]
20. Revitalise town centres to promote a return to sustainable urban living	To promote the role of local centres as centres for sustainable development providing services, housing and employment, drawing on the principles of urban renaissance
	To encourage well-designed mixed-use developments in the heart of urban areas, create viable and attractive town centres that have vitality and life, and discourage out-of-town developments

2.5 Assessment Methodology

The approach taken within this sustainability appraisal utilises the SA/SEA Framework Objectives provided in Table 2.

The Brief/SPD have been assessed against these objectives in terms of their overall performance ranked from 'very sustainable' to 'very unsustainable', using the scoring criteria outlined below.

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

The assessment has considered the “do-nothing” or “business as usual” option to demonstrate how the situation following the adoption of the Brief/SPD would differ from the situation without the Brief/SPD in place.

The findings of the assessment, along with recommendations for mitigation and enhancement, and proposals for monitoring are documented in this Sustainability Appraisal Report.

3 Assessment Results

The following section provides a summary of the assessment findings. The full assessment is documented in Appendix B, with tables providing detailed information on the effects that are predicted to result from the implementation of the developments proposed in the Brief/SPD.

3.1 Business as Usual

Without the redevelopment proposed in the SPD or the wider Planning Brief this area will 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 will 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.

3.2 Civic Centre Opportunity Site Planning Brief

The table below summarises the findings of the assessment undertaken on the CCOS Planning brief. Details of the assessment are provided in Appendix B.

SA Objectives (Abridged)																			
1. Biodiversity	2. Water quality/quantity	3. Flood risk	4. Soils	5. GHG Emissions	6. Climate Change Proof	7. Air Quality	8. Use of brownfield sites	9. Resource Efficiency	10. Historic & Cultural Assets	11. Landscape & Townscape	12. Health	13. Sustainable Locations	14. Equality/ Social Inclusion	15. Good Quality Housing	16. Community Identity and Participation	17. Crime and Fear of Crime	18. Sustainable Prosperity and Growth	19. Fairer Access to Services	20. Revitalise Town Centres
✓	✓ x	✓	N/A	✓	✓	?	✓	✓✓	✓	✓✓	✓	✓	✓	✓	✓✓	✓	✓✓	✓✓	✓✓

If the proposals and conditions that are included in the CCOS Planning 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 Planning 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 Planning 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 there are a range of minor positive effects that are 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 has been 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 Planning 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 has been identified for the air quality objective as follows:

- There is uncertainty as to how local air quality would be affected if the Planning 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 Planning 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.

3.3 Civic Centre South Site SPD

The table below summarises the findings of the assessment undertaken on the CCSS SPD. Details of the assessment are provided in Appendix B.

SA Objectives (Abridged)																			
1. Biodiversity	2. Water quality/quantity	3. Flood risk	4. Soils	5. GHG Emissions	6. Climate Change Proof	7. Air Quality	8. Use of brownfield sites	9. Resource Efficiency	10. Historic & Cultural Assets	11. Landscape & Townscape	12. Health	13. Sustainable Locations	14. Equality/ Social Inclusion	15. Good Quality Housing	16. Community Identity and Participation	17. Crime and Fear of Crime	18. Sustainable Prosperity and Growth	19. Fairer Access to Services	20. Revitalise Town Centres
-	✓ ?	✓	N/A	✓	✓	?	✓	✓	✓	✓	-	✓	-	?	✓	-	✓	✓	✓

As the area covered by the SPD is only approximately a quarter of the size of that covered but the wider Brief, so the predicted effects of taking forward the SPD in isolation are generally less significant than those summarised in Section 3.2.

No negative effects have been identified, with minor positive effects being identified for the majority of SA objectives. Uncertainty has been 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 Planning 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 Planning Brief.

3.4 Recommendations

Some recommendations for mitigation and enhancement have been made in relation to the topics covered by the SA objectives. These are detailed in the assessment tables in Appendix B and cover areas including:

- Trees
- Surface water flooding;
- Protection of groundwater; and
- Making links to Network St Albans initiatives

4 Monitoring

4.1 Introduction

The SEA Directive requires that the significant environmental effects of implementing a plan are monitored so that appropriate remedial actions can be taken if required.

The monitoring put in place needs to fulfil the following requirements:

- To monitor the significant effects of the plan;
- To monitor any unforeseen effects of the plan;
- To ensure that action can be taken to reduce / offset the significant effects of the plan; and

- To provide baseline data for the next SEA and to provide a picture of how the environment / sustainability criteria of the area are evolving.

4.2 Monitoring Measures

Monitoring measures will be required in relation to the significant effects identified in the assessment as well as the uncertain effects and will therefore cover the following SA objectives:

- Water quality/quantity
- Air Quality
- Resource Efficiency
- Landscape& Townscape
- Community Identity and Participation
- Sustainable Prosperity and Growth
- Fairer Access to Services
- Revitalise Town Centres

The potential indicators that will be used to monitor these effects are included in the detailed SA Framework included in the original LDF SA/SEA Scoping Report. The most appropriate indicators to be used for monitoring indicators will be reviewed after the consultation period and prior to the adoption of the SPD and/or Planning Brief.

It is proposed that any monitoring measures required in relation to the implementation of the Planning Brief and/or SPD be incorporated into the Annual Monitoring Report that is required for the Local Development Framework.

5 Habitats Regulations Assessment

As part of the development of the St Albans Core Strategy an Appropriate Assessment Screening Report was produced in April 2008 on the Core Strategy Issues and Options. The report concluded that the Core Strategy would not have significant adverse effects on European sites, in particular the Chiltern Beechwoods Special Area for Conservation (SAC), provided that large Greenbelt sites (>400 homes) were not taken forward and provided that the option to increase net out-commuting from the District was not pursued as a preferred option.

The development of the CCOS will not contribute to either of these factors and no additional effects on European sites are predicted from implementation of the Planning Brief/SPD. As a result it is concluded that the CCOS Planning Brief and SPD will not have any likely significant effects on European sites, either alone or in combination with other plans and projects.

6 Next SA/SEA Steps

This draft Sustainability Appraisal Report will be submitted with the draft Brief/SPD for public consultation in summer 2011. If any significant changes are made to the Brief/SPD as a result of the public consultation, these changes will need to be assessed and documented in an updated SA Report to accompany the final SPD when it is formally adopted.

When the SPD is adopted it will be accompanied by a SA/SEA Statement. In line with the SEA Regulations, the SA/SEA Statement will provide the following information:

- How environmental considerations have been integrated into the SPD;
- How the SA Report has been taken into account;
- How opinions expressed in relation to the consultations on the SPD and SA Report have been taken into account;
- The reasons for choosing the SPD 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 SPD.

6.1 Responding to this SA Report

The SEA Regulations set specific requirements for consultation with the Statutory Environmental Bodies, the public and other interested parties (these could include NGO's, and community groups for example). This SA Report will be published for consultation alongside the draft Brief/SPD and will be made available to all these

parties so that they can provide a response to the contents of the Draft Core Strategy and the accompanying SA Report.

Comments on the SA Report should be sent in writing to:

Jonathan Baldwin
District Vision Implementation Manager
Planning & Building Control
St Albans District Council
St Peters Street
St Albans
Herts
AL1 3JE
Jonathan.Baldwin@stalbans.gov.uk



Centre for Sustainability

St Albans District Council

Civic Centre Opportunity Site Planning Brief

Sustainability Appraisal (incorporating Strategic Environmental Assessment)

Appendix A – Scoping Consultation Comments

Appendix B – Assessment of CCOS

September 2011

Appendix A: Scoping Report Consultation

Summary of Comments	How comments taken on board
Environment Agency	
<p>There is some reported flooding within the opportunity area from surface water. This could be dealt with by incorporating Sustainable Drainage Systems (SuDS) into the area. These could be in the form of Green Roofs or soakaways. There are a variety of techniques available. I have attached our SuDS guidance for more information. It is also worth reviewing the draft Surface Water Management Plan for St Albans to identify areas of surface water flooding and possible solutions.</p> <p>The site has some vulnerability in terms of pollution to groundwater resources. It lies in Source Protection Zone 2 and is close to Source Protection Zone 1 from which abstractions for public water supplies are made. It is important that these areas are protected from pollution. This means for the redevelopment of the Civic Centre that any contaminated land must be cleaned up to ensure the pollution source is removed and where necessary, pollution prevention measures are incorporated.</p> <p>It is also important to ensure that any infiltration drainage should only pass clean water through clean ground. Infiltration SuDS such as soakaways can act as a pathway for pollution to reach groundwater.</p> <p>This development is located within an area of 'serious' water stress. Average water use in St Albans is 170 litres per head per day (l/h/d) which is above the England and Wales average of 146l/h/d. We therefore suggest the applicant investigates the use of water-efficiency measures and aims to achieve BREEAM (BRE Environmental Assessment Method) 'Excellent' rating. Residential development should aim to achieve 105 l/h/d or better. There are also carbon savings made by taking this approach.</p>	<p>Issues to be taken into account in the SA will be updated to take account of the information provided by the Environment Agency.</p> <p>The Scoping Report proposed to scope out the SA objective on flooding. This objective will be reinstated to the SA framework.</p>
Natural England	
<p>Thank you for your consultation dated 26 April 2011 regarding the above.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England supports the chosen approach to the SA/SEA scoping and considers that the proposed scope of the SA/SEA should adequately cover all of the relevant issues.</p>	<p>No change.</p>

Appendix B: Assessment of the Civic Centre Opportunity Site Planning Brief

This appendix includes the assessment tables for the Civic Centre Opportunity Site (CCOS) Planning Brief (incorporating the Civic Centre South Site (CCSS) SPD). The CCOS Planning Brief has been assessed against the SA/SEA framework objectives in terms of their overall performance ranked from 'very sustainable' to 'very unsustainable', using the scoring criteria outlined below.

Key to Assessment Scores

The following table outlines the symbols and abbreviations used to document the results of the assessment process.

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

SA Objectives

The table below outlines the Sustainability Objectives that have been used to focus the assessment process and details the reference term which is used in the assessment tables for the sake of brevity. The full framework of objectives and associated sub-objectives can be found as Table 2 in the main SA Report.

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

Assessment of Planning Brief (PB) and CCSS SPD

SA Objective (Reference Term)		Description of Effects	SPD	PB	Mitigation / Recommendations
1	Biodiversity	<p>The Brief/SPD proposes to retain the existing areas of green space and there could be opportunities to enhance biodiversity through the introduction of green and brown roofs. These benefits will be more limited if only the CCSS SPD is adopted.</p> <p>The importance of the trees in the area is recognised in the Planning Brief. Trees will be protected, and if any trees have to be removed to allow for new development there are commitments to replace them with semi-mature specimens.</p> <p>In addition, any housing that is provided in the CCOS area will reduce the demand for greenfield sites in edge of settlement. This will therefore have indirect positive effects on local biodiversity in those areas that may otherwise need to be developed in order to meet the housing targets for the District.</p>	-	✓	<p>The trees on site are already protected by the Conservation Area status, with some trees subject to Tree Preservation Orders.</p> <p>New trees should help contribute towards the delivery of the St Albans Tree Strategy.</p> <p>Enhancements should help towards delivering the objectives of the Hertfordshire Biodiversity Action Plan - Urban Habitats Action Plan.</p>
2	Water quality/ quantity	<p>New developments will be built to higher standards of water efficiency than any existing developments that they replace. This will have a positive effect in terms of water quantity.</p>	✓	✓	<p>It is important that SPZs are protected from pollution. This means for the redevelopment of the Civic Centre that any contaminated land must be cleaned up to ensure the pollution source is removed and where necessary, pollution prevention measures are incorporated.</p> <p>It is also important to ensure that any infiltration drainage should only pass clean water through clean ground. Infiltration SuDS such as soakaways can act as a pathway for pollution to reach groundwater.</p>
		<p>There are District-wide issues with the capacity of waste water treatment works. Given that delivery of the CCOS Planning 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. Effects in relation to the SPD element are uncertain as it is unclear whether new residential units will be developed.</p>	?	x	<p>Investigates the use of water-efficiency measures and aim to achieve BREEAM (BRE Environmental Assessment Method) 'Excellent' rating. Residential development should aim to achieve 105 l/h/d or better.</p>

3	Flood risk	Redevelopment of the area provides an opportunity to increase the area of permeable surfacing and thereby reduce the risk of surface water (pluvial) flooding. Introduction of green and brown roofs would also help in this respect.	✓	✓	Surface water flooding could be dealt with by incorporating Sustainable Drainage Systems (SuDS) into the area. These could be in the form of Green Roofs or soakaways.
4	Soils	Objective scoped out of assessment	N/A	N/A	NB: The majority of the CCOS area is currently already covered with impermeable surfaces and therefore effects on soils through any redevelopment will be minor.
5	Greenhouse gas emissions	<p>The City centre location makes the site very accessible to a large proportion of the District's population and would provide alternatives to retail and leisure facilities in neighbouring towns (for example Watford) thereby reducing the need to travel to these other locations, with associated savings in greenhouse gas emissions.</p> <p>The Planning Brief requires the development of Green Travel Plans and developer contributions towards sustainable transport solutions. Both should help to reduce any increases in greenhouse gas emissions.</p> <p>The improvements proposed for the energy efficiency of the building stock will also help to minimise greenhouse gas emissions as will design to incorporate low carbon and renewable energy generation technologies into new developments.</p>	✓	✓	The creation of Network St Albans could provide a suitable opportunity for promoting sustainable transport measures.
6	Climate change proof	<p>When compared to the existing building stock in the area, the improved design proposed for new developments will help to make them better suited to adapt to the changing climate (for example through robust and weather resistant building structures).</p> <p>The protection and introduction of new vegetation, including green and brown roofs will help with the adaptation to climate change (e.g. hotter summers and more extreme rainfall). For example through a reduction in the urban heat island and helping to reduce the impact of flooding from flash storms.</p>	✓	✓	
7	Air Quality	<p>There is uncertainty as to how local air quality would be affected if the Planning Brief, or smaller scale SPD, were to be delivered. This is due to uncertainty as to how vehicle movements would change as a result.</p> <p>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 Planning Brief is developed in conjunction with the St Albans Urban Transport Plan Congestion Strategy there could be opportunities to help bring</p>	?	?	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.

		benefits to the wider City centre.			
8	Use of brownfield sites	The majority of the CCOS area is currently already previously developed and this objective is therefore supported. In addition, any housing development on the site would reduce the need to develop other greenfield sites in the District which have been considered in the emerging Core Strategy.	✓	✓	
9	Resource efficiency	The Planning Brief makes requirements for development to incorporate high standards of sustainable design relating to energy efficiency, material use and waste/recycling. This includes design to incorporate low carbon and renewable energy generation technologies. The larger scale of development proposed in the Planning Brief, when compared to the CCSS SPD, would provide a greater potential to introduce district heating system in the area.	✓	✓✓	
10	Historic & cultural assets	The site lies within the St Albans Conservation Area and an Area Subject to Recording Condition (archaeology). However redevelopment will provide an opportunity to enhance the historic environment and restore historic character where appropriate thereby improving the quality of the environment in the Conservation Area. Whilst redevelopment could potentially have adverse effects on the setting of two listed buildings that are immediately adjacent to the site, the Planning Brief requires that submitted proposals demonstrate that not only has the setting of the listed buildings been considered and respected, but that positive enhancements to their settings have been achieved. The proposed improvements to the public realm, including the replacement of some poor quality existing buildings (e.g. Hertfordshire House) should help to enhance the historic environment. Introduction of a new museum as part of the proposed redevelopments will help to promote public education, enjoyment and access of the built heritage and archaeology and the interpretation of the City's strong cultural heritage.	✓	✓	Location within a Conservation Area already places restrictions on the nature of any redevelopment.
11	Landscape & Townscape	The redevelopment proposed in the Planning Brief, and at a reduced scale in the SPD, will result in improvement to some degraded aspects of St Albans' townscape and to the public realm. Development proposals will be expected to demonstrate an <i>"exceedingly high quality urban design and architectural solution."</i> The screening of car parking areas, below ground level where possible, will contribute towards an improved local townscape. In addition, any housing that is provided in the CCOS area will reduce	✓	✓✓	The location of CCOS in the City Centre Building Height Control Area already serves to protect the City's historic roofscape. The requirements for high quality of design as being proposed by emerging LDF policies will help to ensure that new developments enhance rather

		<p>the demand for sites in edge of settlement locations in the Greenbelt. This will therefore have indirect positive effects on local landscapes in those areas that may otherwise need to be developed in order to meet the housing targets for the District.</p> <p>The main purpose behind developing the Planning Brief is to provide a comprehensive development approach to cover the whole of this part of the City centre, rather than allowing piecemeal development to take place that would not be able to realise the same benefits in terms of townscape improvements, increased permeability etc.</p> <p>If the CCSS SPD is taken forward alone these benefits would not be realised.</p>			than detract from a high quality townscape in this area of the City.
12	Health	<p>Improvements to the public realm, pedestrian environment and an increased emphasis on the provision of sustainable transport options are all likely to increase the levels of active travel (walking and cycling) thereby providing opportunities for improving overall health and wellbeing. However it should be noted that access from the south up Holywell Hill is difficult for cyclists and pedestrians due to the steep gradient and this will act to limit the level of benefits that can be anticipated from any improvements in the CCOS area.</p> <p>In addition, removing some of the existing conflicts between pedestrians and vehicles should further help to progress this SA objective. The positive effects predicted against this objective are likely to be more marked if the whole Planning Brief were to be realised rather than just the CCSS SPD elements.</p> <p>The protection and enhancement of the open spaces within the area will also go some way towards the achievement of this objective.</p>	-	✓	Cycle parking should be considered in new developments, as should the provision of workplace showers.
13	Sustainable locations	This is a sustainable location for the provision of retail as well as other potential uses (e.g. housing, indoor leisure) and depending on the final configuration of the development should help to meet the needs of the District's population thereby reducing the need to travel to other centres for shops, cinemas etc. – for example to the Harlequin Centre in Watford for shopping.	✓	✓	
14	Equality & social exclusion	<p>The new and improved leisure and community facilities proposed in the Planning Brief will improve access to such facilities for local residents, particularly those who are less able to travel outside the District to access equivalent facilities elsewhere.</p> <p>The improved public realm and pedestrian environment that would result from the redevelopment of the CCOS area would provide an</p>	-	✓	Network St Albans will be supporting accessibility improvements and these need to be taken into account in any new development.

		<p>improved environment for all pedestrians, particularly the disabled, elderly and parents with young children. The opportunities that would be provided from redeveloping just the CCSS SPD area are limited in comparison.</p> <p>Where sustainable transport options are improved through developer contributions this will help to improve accessibility to facilities, particularly for those without access to a car.</p> <p>The positive effects predicted against this objective are likely to be more marked if the whole Planning Brief were to be realised rather than just the CCSS SPD elements.</p> <p>Taking forward either the SPD or the wider Planning Brief would not result in any discrimination on the basis of disability, ethnic minority, or gender.</p>			
15	Good quality housing	<p>The proposals in the Planning Brief to provide mixed-use developments which include housing (including affordable housing) will help towards meeting local housing needs.</p> <p>The proposals for the CCSS area as outlined in Policy 116 (Area 2E) of the Local Plan do not provide a requirement for residential development and it is uncertain if this situation would change if the CCSS area were to be developed in isolation from the wider Planning Brief. However the brief identifies that the <i>"Private sector-led development of CCSS will be subject to a Planning Obligations agreement with the LPA to include infrastructure, and affordable housing contributions ..."</i></p>	?	✓	
16	Community Identity & participation	<p>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 increased permeability of the area proposed in the Planning Brief will help to improve vibrancy of this part of the City centre, as would any residential development that increases activity outside of normal business hours. Improvements resulting from the CCSS SPD alone would not be as marked, due to the smaller scale of the proposed redevelopment and the limited potential for 'joining up' the neighbouring areas of the City centre.</p> <p>New cultural facilities will help towards delivering the City Centre Cultural Hub that forms part of the Council's Cultural Strategy.</p>	✓	✓✓	
17	Crime and fear of crime	Any residential element introduced to the development should help to increase activity in the area outside of normal office hours and thereby improve the natural surveillance in the area at night time and weekends which could help to 'design-out' crime.	-	✓	

		<p>Promoting well-used streets and public spaces will result in similar benefits.</p> <p>The increased permeability proposed for the CCOS area as a whole could also result in a reduction in the fear of crime for those who would like to use the footpaths and the Municipal Gardens but are currently discouraged due to the limited natural surveillance and the unwelcoming environment of this part of the City centre. Taking forward just the CCSS SPD would not provide these potential benefits as there would not be the same levels of improved connectivity.</p>			
18	Sustainable prosperity & growth	<p>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.</p> <p>The introduction of new residential units and visitor accommodation will help to improve the night-time economy.</p> <p>The Planning Brief aims to complete the retail circuit linking St Peter's Street to The Maltings. This would help to improve the opportunities for an improved retail offering in the northern end of the retail centre.</p> <p>Whilst there will be similar benefits if just the CCSS SPD area were to be redeveloped, the scale of these benefits will be limited in comparison.</p>	✓	✓✓	
19	Fairer access to services	<p>Taking forward the Planning Brief encourages the local provision of, and access to, jobs and services which directly supports this objective. The scale of the benefits associated with developing the smaller CCSS area would not be as great as if the whole CCOS were to be redeveloped.</p> <p>Any new employment opportunities that will help reduce levels of out-commuting from the District will help to support this SA objective.</p>	✓	✓✓	
20	Revitalise town centres	<p>Through improvements to the public realm, the redevelopment of the CCOS area as laid out in the Planning 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. The introduction of new residential units and visitor accommodation will help to improve the vitality of the area outside normal business hours. Removing some of the existing pedestrian/vehicle conflicts will further help to revitalise the</p>	✓	✓✓	

		<p>area.</p> <p>Whilst taking forward just the CCSS SPD would have some similar benefits, these would not be on the same scale as those predicted for the Brief as a whole. In particular the lack of a housing element in the SPD would mean that the benefits that come with mixed-use development, such as increased pedestrian activity, would not be realised.</p>			
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