



Dacorum Borough Council

Local Plan

Dacorum Local Plan (2020-2038) Emerging Strategy for Growth Interim Sustainability Appraisal Report

November 2020

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1 Introduction

1.1 Background

Dacorum Borough Council is preparing a new Local Plan which will provide a planning strategy for the Borough up to 2038. The new Local Plan will incorporate strategic policies, development management policies and site allocations into a single document, replacing those in the Core Strategy (adopted September 2013), the Site Allocations DPD (adopted July 2017) and the 'saved' parts of the Dacorum Borough Local Plan 1991-2011 (adopted May 2004).

During its preparation this new Local Plan must be subject to both Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) under the 'Town and Country Planning, England Regulations (2012)' and 'The Environmental Assessment of Plans and Programmes Regulations' (2004)¹ respectively.

Both the SA and the SEA processes help planning authorities to fulfil the objective of contributing to the achievement of sustainable development in preparing their plans through a structured assessment of the Plan against key sustainability issues.

Independent consultants TRL Ltd have been appointed by the Council to undertake Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) in support of the new Local Plan.

1.2 Purpose of the Interim SA Report

This Interim Sustainability Appraisal Report has been produced in order to provide an assessment of the environmental, social and economic effects that would be likely to result from the implementation of strategies, policies and sites included in the Dacorum Draft Local Plan (2020 - 2038) Emerging Strategy for Growth, along with the consideration of wider cumulative effects associated with the Plan as a whole.

The report also provides information on the range of options which have been considered during the development of the Dacorum Draft Local Plan (2020 - 2038) Emerging Strategy for Growth, through the development leading up to the Issues and Options consultation in autumn 2017 and then subsequently up to the second Regulation 18 stage².

The Interim Sustainability Report builds on the SA work previously undertaken through the consultation on a Scoping Report in spring 2017, and subsequent update, and through the SA of the Local Plan Issues and Options and the SA of the Schedule of Site Appraisals, both of which were published in autumn 2017 to accompany the Issues and Options consultation.

¹ This regulation implements European Directive 2001/42/EC, known as the Strategic Environmental Assessment (SEA) Directive

² Regulation 18 of the Local Plan Regulations (England) 2004 (As Amended)

1.3 Interim SA Report Structure

This Interim SA Report is structured as follows:

- Section 1 provides an introduction to the SA/SEA process and to this report and describes how the SA/SEA meets regulatory requirements. It also provides a summary of the Habitats Regulations Assessment (HRA) process;
- Section 2 provides an outline of the contents and main objectives of the Draft Local Plan;
- Section 3 provides details on the scope and approach to the SA, including the methodology and details of consultation undertaken to date;
- Section 4 provides information relating to the scoping stage and provides a summary of the key sustainability issues based on the baseline research and the framework of SA/SEA objectives that are proposed for the assessment stage of the SA/SEA. It also includes analysis of the compatibility between the SA/SEA objectives and the Draft Local Plan objectives;
- Section 5 provides details the different stages that have been undertaken during the development of the Local Plan and the accompanying SA/SEA and describes how options/alternatives have been considered when developing the Draft Local Plan;
- Section 6 provides details of the findings of the assessment of the Draft Local Plan;
- Section 7 provides a brief conclusion and details on the next steps for the SA/SEA.

Appendices are contained within a separate volume, as follows:

- Appendix A: provides the full Sustainability Appraisal Framework;
- Appendix B: provides an update to the information provided in the 2017 Scoping Report;
- Appendix C: provides details on the assessment of options/alternatives at the previous stages;
- Appendix D: provides the detailed findings of the SA/SEA assessment process for the policies in the Draft Local Plan;
- Appendix E provides details of the assessments for sites proposed for allocation in the Local Plan;
- Appendix F provides details of the assessments for sites not proposed for allocation in the Local Plan.

A Non-Technical Summary (NTS) has also been prepared as a separate document.

1.4 SA process

The process for undertaking the SA/SEA process for Local Plans is summarised in Figure 1-1, with Table 1-1 providing the details as to how this process has been, and will be, undertaken in relation to the Dacorum Local Plan.

1.4.1 Stage A – Scoping

During Stage A of the process a scoping exercise was undertaken in order to identify the key issues and opportunities within the Borough, which can then inform the development of the new Local Plan,

and to develop the SA/SEA methodology for undertaking the assessment of the Plan. A Scoping Report was then prepared and published for consultation from 23rd March to 5th May 2017.

The Scoping Report provided information relating to the current Environmental and Sustainability Context for the Borough as well as providing an indication of the likely evolution of the baseline without the Plan. From the issues identified a draft framework of SA Objectives was prepared. The purpose of the SA Framework is to provide a way in which the effects of the Plan can be described, analysed, and compared. The SA Framework, which was originally developed in 2006, formed the 'starting point' for the SA Framework for the new Local Plan

Following the consultation the Scoping Report was updated to take on-board comments received. The updated Scoping Report Update (October 2017) provided a summary of the consultation responses received along with an explanation of how each comment has been taken into account.

Given the length of time between the Scoping Report Update and the production of this Interim SA Report it has been necessary to provide further updates to the scoping information. This update is provided as Appendix B to this report.

1.4.2 Stage B – Developing and refining alternatives and assessing effects

Stage B of the SA process involves feeding in to the development of the Local Plan during the Regulation 18 stage, through the consideration and assessment of Local Plan options and finally preparing an SA Report for the Regulation 19 consultation (see Section 1.4.3).

The development and refinement of options, and the evaluation of their likely effects is a process which can have more than one iteration, and this has been the case for the development of the Dacorum Local Plan – as described below.

1.4.2.1 Issues and Options November 2017

An SA Working Note was prepared to accompany the Regulation 18 consultation on the Dacorum Local Plan Issues and Options document in November 2017. That Working Note provided the following information relating to the SA/SEA of the Issues and Options:

- An analysis on the relationship between the Issues identified by the SA/SEA and the Issues identified by the Council in the Issues and Options document;
- A compatibility assessment of the proposed Vision and Objectives for the Local Plan against the SA Objectives;
- An assessment of the growth options identified by the Council against each of the SA Objectives; and
- The reasons for rejecting options which the Council do not consider to be 'reasonable alternatives'.

In addition, a second SA Working Note was prepared to accompany the parallel consultation on the Council's Schedule of Site Appraisals. That SA Working Note provided an assessment of all the potential sites which were included in the Schedule of Site Appraisals against each of the SA objectives.

1.4.2.2 Draft Local Plan – Emerging Strategy for Growth November 2020

Since the Issues and Options consultation the Council have been undertaking further development of the Local Plan, including, amongst other issues, the consideration of different levels of housing growth and different spatial strategies for delivering this growth.

A second Regulation 18 consultation is being undertaken to provide an opportunity for the local community, other stakeholders and developers to provide feedback on the emerging approach to development before the Publication of the local Plan at the Regulation 19 stage.

This Interim SA Report has been prepared to accompany this new stage of consultation. It provides an assessment of the likely effects of implementing the Draft Local Plan as well as providing information on the options which have been considered during this latest round of plan making.

1.4.3 Stage C – Preparing the SA Report (a future stage)

The SA Report will be prepared alongside the preparation and publication of the Pre-Submission Local Plan at the Regulation 19 stage. This is currently planned for spring 2021. The SA Report will fully meet the requirements of Schedule 2 of the SEA Regulations – which relates to the requirements for what must be included in an Environmental Report.

1.4.4 Stage D – Consultation and Examination (a future stage)

Following the Pre-Submission consultation the Local Plan will be submitted to the Secretary of State for Examination. If necessary an SA Report Addendum will be produced to reflect any minor changes to the Plan. The Submission is planned for autumn 2021 with Examination anticipated in winter 2021.

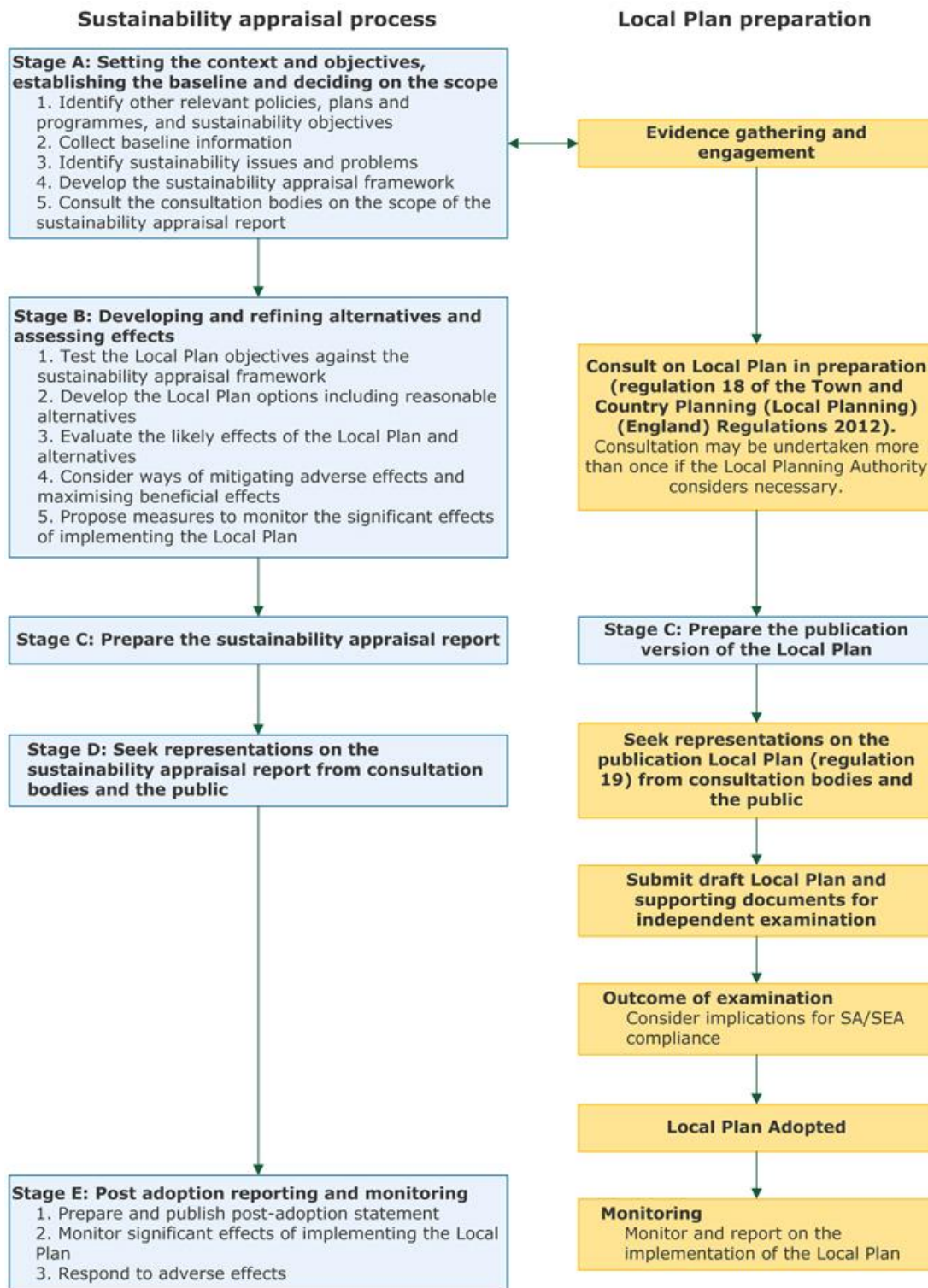
1.4.5 Stage E – Adoption (a future stage)

When the Local Plan is adopted (anticipated for autumn 2022) it will be accompanied by a SA/SEA Adoption Statement. In line with the SEA Regulations, the SA/SEA Adoption Statement will provide the following information:

- How environmental considerations have been integrated into the plan;
- How the SA Report has been taken into account;
- How opinions expressed in relation to the consultations on the Local Plan and SA 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.

Figure 1-1: Relationships between Local Plan preparation and SA processes

(Source: Planning Practice Guidance, 2016)



The key stages of the SA/SEA and Local Plan preparation processes are summarised in Table 1-1.

Table 1-1: Stages in the SA/SEA and Dacorum Local Plan

Local Plan	SA/SEA Stages	SA documents/outputs and Dates
Begin document preparation	<p>Stage A: Setting the context, establishing the baseline and deciding on the scope.</p> <p>A1: Identify other relevant policies, plans and document programmes, and sustainability objectives.</p> <p>A2: Collecting baseline information.</p> <p>A3: Identifying sustainability issues and problems.</p> <p>A4: Developing the SA framework.</p> <p>A5: Consulting on the scope of the SA (Scoping Report).</p>	<p>SA Scoping Report, prepared March 2017.</p> <p>Consultation on Scoping Report, March-May 2017.</p> <p>SA Scoping Report Update, October 2017.</p>
<p>Regulation 18 Local Plan Issues and Options consultation, including Schedule of Site Appraisals. November 2017.</p> <p>Ongoing development of Draft Local Plan, including consideration of spatial strategy and site allocations options.</p> <p>Regulation 18 consultation on Draft Local Plan, November 2020.</p>	<p>Stage B: Developing and refining options and assessing of effects.</p> <p>B1: Testing the Local Plan objectives against the SA framework.</p> <p>B2: Developing the Local Plan options including reasonable alternatives.</p> <p>B3: Evaluate the likely effects of the Local Plan and alternatives.</p> <p>B4: Considering ways of mitigating adverse effects and maximising beneficial effects.</p> <p>B5: Proposing measures to monitor the significant effects of implementing the Local Plan.</p>	<p>Preparation of SA Working Note on I&O¹ November 2017.</p> <p>Preparation of SA Working Note on Schedule of Site Appraisals, November 2017.</p> <p>Consultation on Issues & Options (I&O) and SA Working Notes, November 2017.</p> <p>Preparation of SA Working Note on Spatial Strategy Options and Site Allocations, September 2020.</p> <p>Preparation of Interim SA Working Report for Draft Local Plan, November 2020 (this report).</p> <p>Consultation on Draft Local Plan and accompanying Interim SA Report, November 2020.</p>
Regulation 19 of Publication Draft Local Plan (planned for spring 2021)	<p>Stage C: Preparing the Sustainability Appraisal Report.</p> <p>C1: Preparing the SA Report.</p>	SA Report (planned for Spring 2021)
Submission of Local Plan to Secretary of State (planned for October 2021)	<p>Stage D: Seek representations on the SA Report from consultation bodies and the public</p>	
Examination (planned for winter 2021)	<p>Consultation on any major modifications arising from the Examination (if required)</p>	
Adoption of the Local Plan (planned for autumn 2022)	<p>Stage E: Post adoption reporting and monitoring</p> <p>E1: Prepare and publish post-adoption statement</p> <p>E2: Monitor significant effects of implementing the Local Plan.</p> <p>E2: Responding to adverse effects.</p>	To be completed when the Local Plan is adopted.

¹ This output is not required by the SEA Regulations but was produced to assist in selecting the preferred options.

1.5 Habitats Regulations Assessment

The Council is required by legislation to undertake a Habitats Regulations Assessment (HRA) on the Local Plan, in order to determine whether there may be 'likely significant effects' on European Sites of importance for nature conservation from the Local Plan, either alone or in combination with other plans or projects. If 'likely significant effects' are predicted, then an Appropriate Assessment needs to be undertaken in order to ascertain whether the Local Plan would have an adverse effect the integrity of the European site.

Within Dacorum Borough there is one such European Site, this being the Chilterns Beechwoods Special Area for Conservation (SAC) which has 'sub-sites' at Ashridge (Ashridge Woods and Commons SSSI) and south-west of Tring (Tring Woodlands SSSI). There also other European Sites within 15km of the Borough which will need to be taken into account in the HRA. The HRA will be informed by the previous HRA for the Core Strategy and Site Allocations DPD.

The HRA will be undertaken as a separate process to the SA/SEA, and reported separately. However, there are links between the two assessments, and one will inform the other.

2 The Draft Local Plan

2.1 Introduction

The Local Plan – Emerging Strategy for Growth (2020-2038) sets out the planning policies and proposals for accommodating growth across Dacorum, the level of growth being significantly higher than that under the current Core Strategy.

The Draft Local Plan contains a range of ‘component parts’ which are outlined in the following sub-sections.

2.2 Local Plan Vision and Objectives

The Draft Local Plan includes a Borough Vision to 2038 which the plan will seek to enable. The Vision is made up of an ‘Overarching Vision for Dacorum’s Growth’, which considers the provision of new development in the Borough, Environmental Sustainability, Economic Growth and Health and Wellbeing, and ‘The Vision for Dacorum’s Places’ which outlines what the different settlements and categories of settlements will look like in 2038.

The Vision is supported by eight Strategic Objectives, each of which as a series of more detailed sub-objectives. The Strategic Objectives are as follows:

- Delivering Dacorum’s future with homes for everyone;
- Generating a vibrant economy with opportunities for all;
- Mitigating and adapting to climate change;
- Conserving and protecting the natural environment;
- Ensuring an attractive and valued built and historic environment;
- Promoting and facilitating sustainable transport and connectivity;
- Supporting community health, wellbeing and cohesion; and
- Enabling the delivery of infrastructure.

2.3 Local Plan Policies

The policies that make up the Draft Local Plan, grouped by plan theme/section are as follows:

Development Strategy

SP1 – Sustainable Development in Dacorum
 SP2 – Spatial Strategy for Growth
 SP3 – The Settlement Hierarchy
 SP4 – Delivering the Housing Strategy
 SP5 – Delivering the Employment Strategy
 SP6 – Delivering the Retail and Leisure Strategy
 SP7 – Delivering Infrastructure
 SP8 – Neighbourhood Planning
 SP9 – Monitoring and Review

Housing

DM1 - Mix of Housing
 DM2 - Affordable Housing
 DM3 – Rural Exceptions
 DM4 – Agriculture and Forestry Workers Dwellings
 DM5 – Conversions and changes of use to housing
 DM6 – Residential Annexes
 DM7 – Houses in Multiple Occupation
 DM8 - Custom and Self Build
 DM9 - Housing for Older People

DM10 – Accessible and Adaptable Homes

DM11 - Density of Development

DM12 - Nationally Described Space Standards

DM13 – Existing Accommodation for Traveller Communities

DM14 - Gypsies and Travellers

DM15 - Residential Moorings

Economic Development

DM16 - General Employment Areas

DM17 - Other office and industrial sites

DM18 - Tourism

Retailing

DM19 - Mix of uses in Town Centres , District and Local Centres

DM20 - Neighbourhood centres and scattered local shops

DM21 – Main Town Centre uses outside existing centres

Climate Change & Sustainability

SP10 - Climate Change Mitigation and Adaptation

DM22 - Sustainable Design and Construction

DM23 – Energy and Carbon Emissions Reductions in New Development

DM24 - Low Carbon Community Heat and Energy Networks

DM25 – Stand-alone renewable or Low Carbon Energy

DM26 - Carbon Offsetting

Environment & Biodiversity

DM27 - Landscape Character and Chilterns Area of Outstanding Natural Beauty

DM28 – Protection of Sites

DM29 – Protected Species and Priority Species and Habitats Policy

DM30 – Biodiversity Net Gain

DM31 - Chilterns Beechwoods Special Area of Conservation

DM32 – Development on the Ashridge Estate

DM33 - Protection and Enhancement of the River Character and Water Environment

DM34 – Flood Risk and Protection

DM35 - Protection from Environmental Pollution

DM36 – Tree Retention and Protection

DM37 – Landscaping on Development Sites

DM38 - Open Land

The Green Belt & Rural Area

SP11 - Development in the Green Belt

DM39 - Limited Infilling in Selected Small Villages in the Countryside

DM40 - Bovingdon Airfield

SP12 - Development in the Rural Area

Delivering Great Places

SP13 - Delivering High Quality Design

DM41 - Height of Buildings

DM42 - Crime and Security

DM43 – Historic Environment

DM44 - Development Affecting Non-Designated Heritage Assets

DM45 – Heritage assets with Archaeological Interest

DM46 - Conservation Areas

DM47 - Listed Buildings

DM48 - Advertisements

DM49 - Canalside Environment and Recreational Moorings

Sustainable Transport & Connectivity

DM50 - Transport and Movement

DM51 – Supporting and protecting land for transport interventions

DM52 – Movement and Access

DM53 – Walking and Cycling

DM54 – Public Transport

DM55 - Parking Provision – Residential

DM56 - Parking Provision – Commercial

DM57 – Digital Communications

DM58 – Mobile Communications

Healthy Communities

DM59 – Health Facilities

DM60 – Health Impact Assessments

DM61 – Education

DM62 – Sport and Leisure

DM63 – Open Space Provision

DM64 - Community Facilities

DM65 - Community Stewardship and Management

Delivery Strategy

SP14 – Delivering Hemel Garden Communities

SP15 – Delivering Growth in Hemel Hempstead

SP16 – North and East of Hemel Hempstead Growth Areas

SP17 – Hemel Hempstead Town Centre

SP18 – Two Waters Opportunity Area

SP19 – Maylands Business Park

SP20 – Delivering Growth in Berkhamsted

SP21 – Delivering Growth in South Berkhamsted

SP22 – Delivering Growth in West of Berkhamsted

SP23 – Delivering Growth in Tring

SP24 – Delivering Growth in East Tring

SP25 – Delivering Growth at South East Tring

SP26 – Delivering Growth in Kings Langley

SP27 – Delivering Growth in Bovington

SP28 – Delivering Growth at Markyate

SP29 – Delivering Growth in the Countryside

2.4 Local Plan Proposals and Sites

The Draft Local Plan includes a series of proposals and sites which reflect the Council’s current understanding at this second Regulation 18 stage.

The full list of these Proposals and Sites (and associated details) is not provided in this section but can be found in the ‘Proposal and Sites’ chapter of the Draft Local Plan document. The sites which have been subject to assessment as part of the SA process are listed in Section 6.3 of this Interim SA Report, along with summaries of the findings of those assessments.

3 Approach to the SA

3.1 Introduction

This Interim SA Report has been produced to accompany the Draft Local Plan during the Regulation 18 stage consultation. There is no formal requirement to prepare an SA Report at this stage, however it is common practice to do so as it provides stakeholders with information on how the Draft Local Plan is predicted to perform in terms of sustainability, as well as providing an opportunity for stakeholders to input into the ongoing SA process prior to the production of the full SA Report at the Regulation 19 stage.

3.2 Methodology

The methodology used to undertake the assessments is generally consistent with that used in the SA for the Core Strategy and Site Allocations DPD, with some minor amendments to improve the efficiency and effectiveness of the process.

The criteria which have been considered during the assessment process are outlined below.

3.2.1 *Geographic and temporal scope*

The spatial scope for the assessment is largely local (Dacorum Borough); however, the assessment takes into account potential cross-boundary effects, as well as regional effects (e.g. given Hemel Hempstead's wider role as an economic hub). National effects have also been taken into account wherever appropriate. For example, the effect on CO₂ emissions is likely to have both local and national implications as any reduction will contribute to national targets, whereas effects on surface water quality may be most relevant to the regional water bodies as well as local water bodies, depending on presence of any such water features and their existing quality.

Based on the above, the following terms have been used in the assessment to denote the geographical scale of predicted effects.

Scale		
Symbol	Meaning	Comment
L	Local	Within the Borough
R	Regional	Affecting neighbouring local authorities
N	National	UK or a wider global impact

3.2.2 *Temporal Scope*

In terms of the temporal scope, the SA/SEA examines effects across three temporal scales:

- Short term effects: effects expected in the next 1-10 years;
- Medium term effects: effects expected in the next 10-20 years; and
- Long term effects: effects expected in the next 20+ years (after the life of the plan)

Based on the above, the following terms have been used in the assessment to denote the temporal scale of predicted effects.

Symbol	Timescale	
S	In the Short Term	0-10 years
M	In the Medium Term	10-20 years
L	In the Long Term	After life of plan

3.2.3 Permanence of effects

The assessment of policies, sites and their options also considers whether the effects will be temporary or permanent. These are reported in the assessment as shown below.

Permanence		
Symbol	Meaning	Comment
P	Permanent	E.g. Effects lasting during and beyond the life of the plan
T	Temporary	E.g. Effects during construction

3.2.4 Significance of effects

The significance of the effects predicted in the assessment are denoted using the symbology shown below.

Significance Assessment	Description
✓✓	The option is likely to have a significant positive effect
✓	The option is likely to have a positive effect which is not significant
?	Uncertain – It is uncertain how or if the option impacts on the SA/SEA objective
–	Neutral – The option is unlikely to impact on the SA/SEA objective
✘	The option is likely to have a negative effect which is not significant
✘✘	The option is likely to have a significant negative effect

3.2.5 Other assessment factors

The assessment will also consider cumulative/synergistic effects, cross-boundary effects and interrelationships between the SA objectives.

Where assumptions have been made these will be described in the assessment commentary, as will any uncertainties in the assessments.

Where relevant, suggested mitigation measures and other recommendations will be included in the assessment commentary.

3.3 Consultation

3.3.1 Introduction

The SEA Regulations require consultation at various stages of the SA/SEA process, as indicated in Table 1-1. To date consultation has been undertaken at the stages outlined below.

3.3.2 Scoping Report – March 2017

It is a statutory requirement to consult the Environment Agency, Historic England and Natural England on the scope and level of details to be included in the SEA Environmental Report (the SA Report for Dacorum Local Plan SA/SEA). Common practice is to do this through the preparation of a Scoping Report and such a Scoping Report was prepared in March 2017.

It is also best practice to widen out the consultation to include a wide range of stakeholders and whilst the SA/SEA process was not covered at the time by Dacorum BC's Statement of Community Involvement (SCI) this consultation was widened to include a larger number of interested stakeholders, to reflect the principles of this SCI.

Responses were received from Environment Agency, Historic England and Natural England, as well as a range of non-statutory consultees, including Hertfordshire Gardens Trust, Hertfordshire and Middlesex Wildlife Trust, NHS England and Herts Valleys Clinical Commissioning Group, neighbouring local authorities, residents' groups and parish councils.

The representations provided recommendations for additions to the SA Framework Objectives and indicators, as well as identifying issues that should be taken into account in the SA process. Some identified additional policies, plans and programmes which should be taken into account, whilst others provided input relevant to the baseline information.

The full details of the consultation responses received can be found in Appendix A of the Scoping Report Update (October 2017) which is available at the following weblink:

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan>

3.3.3 Issues and Options SA Working Note November 2017

Question 1 of the Issues and Options paper asked: *“Do you agree with the conclusions reached in the Sustainability Appraisal Working Notes that accompanies this Issues and Options document?”*

Of the 718 responses to Question 1, over 35% made no reference to the Sustainability Appraisal. These responses were therefore picked up in the analyses for the other relevant questions. A further 17% of the responses related specifically to the SA Working Note for the Schedule of Site Appraisals and were therefore covered by the report for Question 46.

Representations were received from statutory consultees Environment Agency and Historic England as well as a range of other stakeholders, including county, local authority and parish bodies, non-governmental organisations, commercial developers, residents' associations and individual representatives.

Amongst other issues the responses: identified some areas of the SA methodology which should be considered for update; requested that cumulative effects of development on individual settlements and designated areas should be given greater focus in the SA; considered that new development could not result in environmental benefits; raised settlement/site specific objections to the SA findings;

raised concerns that smaller sites had not been considered for delivering the growth planned for the Borough; and identified that the SA had not considered the pressure that would be placed on infrastructure from delivering the planned levels of growth.

The full details of the representations and how they would be taken into account in the later SA process are documented in Appendix 4 of the “Issues and Options Consultation Report of Responses, Local Plan to 2036” (Dacorum BC, September 2019) which is available at the following link.

http://www.dacorum.gov.uk/docs/default-source/strategic-planning/01---issues-and-options-consultation-report-of-responses-main-report-to-appendix-5---sept-2019---final.pdf?sfvrsn=5d500c9e_8

3.3.4 Schedule of Site Appraisals SA Working Note November 2017

Alongside the Issues and Options paper and its accompanying SA Working Note the Council also consulted on the Schedule of Site Appraisals, which was accompanied by a separate SA Working Note.

Question 46 of the Issues and Options paper asked: “Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisal working note which accompanies it?”

Representations were received from the statutory consultee Historic England as well as a range of other stakeholders, including county, local authority and parish bodies, non-governmental organisations, commercial developers, residents’ associations and individual representors.

The representations included some general comments relating to the site appraisal methodology and how certain topics had been considered. At a site specific level, representations from those opposing the inclusion of certain sites questioned the findings of the SA for certain topics, putting forward reasons as to why the site in question should not be allocated. Conversely, proponents for particular sites also questioned the findings of the SA for certain sites, putting forward reasons as to why the site in question should be allocated.

The full details of the representations are available at the following weblink:

http://www.dacorum.gov.uk/docs/default-source/strategic-planning/01---issues-and-options-consultation-report-of-responses-main-report-to-appendix-5---sept-2019---final.pdf?sfvrsn=5d500c9e_8

4 Sustainability Context and SA Framework

4.1 Introduction

This section summarises the findings from the SA scoping stages. The scoping process seeks to ensure that the Sustainability Appraisal encompasses the key sustainability issues relevant to the Borough in the context of the Local Plan. This section provides the environmental and sustainability context by:

- Examining the relationship of the Local Plan with other policies, plans and programmes, to identify all relevant environmental protection objectives and to identify potential conflicts to be addressed within the plan-making process;
- Assembling baseline data on the current and future state of the Borough for the environment and sustainability topics which may be affected by the Local Plan;
- Identifying the key sustainability issues and opportunities which need to be taken into account in the SA; and
- Presenting the SA Framework of Objectives which have been developed to reflect the findings of the three points above and which are used to structure the assessment process.

4.2 Policy Context and Baseline Review

4.2.1 *Policy Context*

The SEA process requires authorities to review the requirements of policies, plans and programmes (PPPs) relevant to the content of the Plan to outline:

- The relationship of the Development Plan (Local Plan) with other relevant plans and programmes; and
- The environmental protection objectives - established at international, community or Member State level - relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.

To fulfil this requirement, a review of the relevant plans, policies and programmes has been carried out to identify environmental objectives which may provide constraints or synergies with the plan being formulated. The review was undertaken on SA topic by topic basis, with the findings being presented in the update to the Scoping Report information which is included in Appendix B to this report.

4.2.2 *Baseline review*

In order to assess how the Local Plan will contribute to sustainable development, it is essential to understand the present economic, environmental and social baseline of the Borough, and to predict how they may progress without implementation of the Plan. Therefore, a key step in the SA process is establishing the current state of the environment and its likely evolution in the future. This process assists in the identification of sustainability and environmental issues/opportunities in the Borough. It is also important to consider the implications of the Local Plan in its wider context. Baseline data is required to establish the present state of the Borough and its surrounding area and will be used subsequently for comparative purposes when monitoring and evaluating the Local Plan.

A practical approach is generally taken to data collection bearing in mind data availability and trend analysis, following which the actual data and gaps in information to consider in the future are reported

at the scoping stage. This reporting also takes into account uncertainties in the data. A Scoping Report was prepared in March 2017 and was updated in October 2017 to take account of responses received during the consultation of the original Scoping Report.

The baseline data in the Scoping Report has been further updated and is presented in Appendix B to this report.

The information has helped to identify the key sustainability issues and opportunities which have been used in the development of the SA Framework of Objectives. Key issues and opportunities are discussed in Section 4.3.

NB: As with the review of other plans, policies and programmes this baseline review does not provide an exhaustive review of information but aims to identify the information most relevant to the SA and Local Plan. Prediction of future trends can be highly uncertain but key trends identified from the available baseline data, and therefore potential sustainability issues have been identified.

4.3 Identifying Environmental and Sustainability Issues

The review of plans and programmes affecting the Borough, and the collation of the baseline data informed the identification of a series of environmental problems or issues that could be addressed by, or affect the strategies, policies and allocations developed in the Local Plan. Such issues, problems and opportunities have been identified through:

- Review of other policies, plans and programmes and the baseline data;
- Response to the Scoping Report consultation and subsequent consultations on SA/SEA documents; and
- Additional work on the sustainability appraisal during the post-scoping stages for the new Local Plan.

The issues and opportunities that have been identified during these stages are provided at the end of each of the Topic sections in the Sustainability Context Review in Appendix B and are repeated in Table 4-1.

Table 4-1: Key sustainability Issues and Opportunities

Biodiversity, including flora and fauna, and Geodiversity
<ul style="list-style-type: none"> • Opportunities are to link the 'Living Landscape' areas of the Gade Valley and Berkhamsted Common, as well as to provide an appropriate landscape/ecological buffer to Ashridge in the face of planned growth of Hemel Hempstead. Transport corridors such as the A41 often represent key wildlife corridors and opportunities to provide enhanced habitat linkages. • Ashridge SAC/SSSI, Tring Park, Tring Reservoirs and the Grand Union Canal are all reported to be experiencing visitor pressures. As the urban population increases, pressures on access to the countryside and these key attractions will increase. • Maintaining, restoring and expanding BAP habitats • Enhancing Green Infrastructure at a local level and a strategic level with neighbouring authorities. • Compensation for features lost to development where loss is completely unavoidable. • Protection of existing networks of natural habitats including buffer areas, migration routes, stepping stones and landscape features of major importance for wildlife. • Restoration of existing habitats and landscape features which could potentially be of major importance for wildlife, for example chalk river valleys like the River Bulbourne. • Linking and connecting isolated and fragmented habitats, important species populations and landscape features through creation of wildlife corridor (greenway) networks.

- Promote the use of management agreements for designated sites, where this can be linked to development.
- The declining rural infrastructure of farming diversity (livestock farming, mixed farming and forestry activities) which helps to maintain the character of the landscape and its biodiversity may be negatively affected by development.

Climatic factors

- Carbon emissions per capita for Dacorum are above the regional average but below the national average.
- The future climate in Hertfordshire is predicted to become warmer, with drier summers and wetter winters.
- The combined effects of climate change, population growth and development needs will increase pressures on the natural environment. These impacts must be reduced through the prudent use of natural resources, encouraging renewable energy production, the effective disposal of waste, the sustainable design of new development and careful land management.
- Development can help to mitigate and adapt to the impacts of climate change, through sustainable design and construction and reducing the need to travel, particularly by car.
- Climate change is likely to affect water resources (supply and demand), alter habitats, affect air quality and public health and increase flood risk and likelihood of drought conditions. These could all adversely impact upon the Borough's economy.
- Greenhouse gas emissions are likely to lead to significant climate changes which could have significant implications for other aspects of quality of life.
- Development proposals could exacerbate flooding elsewhere in catchment and this needs to be avoided by adopting the sequential approach to site selection advocated in the NPPF.
- Implement Sustainable Drainage Systems – porous surfaces, greenspace, wetlands, flood storage areas, urban forestry to help manage some of the effects from climate change.
- Opportunity to decrease greenhouse gas emissions through reduced reliance on the private car.

Air quality

- Whilst overall levels of pollutants have decreased across the Borough there are some areas where annual mean nitrogen dioxide concentrations continue to exceed the relevant Air Quality Objectives.
- Ensuring that potentially polluting processes incorporate pollution minimisation measures.
- Ensuring that potentially polluting developments are not located close to sensitive developments (e.g. care homes, schools etc.) or in areas of existing poor air quality.
- Ensuring that sensitive developments are not located in areas of poor air quality.
- Promoting the development of Green Travel Plans.
- Improving cycle and pedestrian routes and links and cycle parking facilities to encourage the use of non-motorised transport.
- Promoting low emission vehicles, such as through the provision of electric vehicle charging infrastructure.
- Reducing the need to travel through developing in sustainable locations.

Landscape and Townscape

- There is increasing pressure on the landscape due to increased visitor numbers and increased access routes, pressure from development in areas surrounding the Chilterns (including High Speed Two rail), increased water extraction due to population increases, loss of traditional farming practices such as grazing and the livestock sector, and influence of climate change.
- Light pollution is rapidly increasing and tranquillity is rapidly decreasing in the East of England. New lighting should be designed and selected that minimises light pollution.
- Ensuring that landscape proposals for development schemes reflect local landscape character.
- Ensuring that the character, diversity and local distinctiveness of all the landscapes of the Borough are maintained, enhanced or restored, in particular the Chilterns AONB.
- Preserve, and appropriately manage development within, the Green Belt
- Ensuring that access to landscape character areas is socially inclusive.
- The expansions of Luton and Heathrow Airport could lead to more noise related issues and complaints.

Historic Environment
<ul style="list-style-type: none"> • The historic environment, including heritage assets, is under pressure from development and regeneration and associated traffic congestion, air quality and noise pollution. This puts heritage assets at risk of neglect or decay. The threat of infilling and replacement with new buildings and the erosion of historic features in the public realm need to be carefully mitigated and managed. • Archaeological remains, both known and unknown have the potential to be affected by new development. • Recognise the importance of cultural heritage and archaeological features and the importance of regenerating and re-using important buildings, particularly those listed as ‘heritage at risk’. • Be proactive in preparing development briefs to renew, restore and redevelop neglected and deteriorating sites of historic character. • Ensure there are strong and robust design standards for new development. • Ensure that new and existing developments have regard to settlement patterns, the local vernacular style and incorporate local materials. • Ensure that the public realm is effectively designed using quality materials that maintain or add to the character/distinctiveness of an area. • Recognise the importance of archaeological features and advocate a programme of archaeological investigation prior to initial earthworks. • Retain features of historic landscape significance, where possible. • The historic environment can make a significant contribution to the success of development. Opportunities to conserve and enhance the historic environment including designated and non-designated heritage assets and their settings should be sought where possible through sustainable development proposals. • Development may result in significant loss or erosion of the landscape or townscape character or quality, which is likely to also have significant impact (direct and or indirect) upon the historic environment and people’s enjoyment of it.
Material Assets
<ul style="list-style-type: none"> • Waste production and disposal is a growing problem. Production of waste and disposal of this waste is becoming increasingly difficult, with diminishing numbers of suitable sites for landfill disposal. Hertfordshire as a county is having to use sites in Buckinghamshire and Oxfordshire in order to meet its needs. There is however, an increasing move towards Energy Recovery Facilities (ERF) rather than landfill. • There is the opportunity to promote the use of renewable resources, protect natural resources and reduce waste. • Previously developed land is a finite source that is being depleted over time. This will put greater pressure to build on greenfield sites and to increase housing densities on these sites. • Supporting a reduction in the amount of waste deposited in landfill. • Supporting alternative methods of waste management, e.g. minimisation and recycling by incorporating facilities within development schemes. • Encouraging re-use and recycling of construction waste in development schemes through the use of planning conditions. • Promoting development on previously developed land and maximise the efficient use of land. • Avoiding the sterilisation of mineral resources.
Soils
<ul style="list-style-type: none"> • Protecting the best and most versatile agricultural land. • Promoting good soil handling practices. • Encouraging development on previously developed land.
Water
<ul style="list-style-type: none"> • There are some issues with river water quality in Dacorum • Over abstraction of water resources is an issue in the region. The Chilterns Chalk Streams are particularly susceptible to over abstraction. • Some areas of Dacorum are at risk from flooding.

- There are issues relating to the future capacity of waste water treatment works serving the area.
- Considering overall siting of development schemes in order to minimise potential effects on water quality.
- Taking account of groundwater resources and sensitivities (e.g. source protection zones) when allocating sites for development
- Encouraging the use of Sustainable Drainage Systems in new developments.
- Ensuring that efficient use of water resources in development schemes, this includes the use of recycled water and incorporating rainwater re-use.
- Ensuring that new potentially polluting processes are located in areas where groundwater is not vulnerable.

Population

- Despite the relatively low levels of deprivation in the Borough as a whole, there are however small pockets of more deprived areas within Dacorum
- Take account of an increasing population
- Take account of an ageing population
- Tackle issues of deprivation in certain areas of the Borough
- Ensure adequate housing, facilities and infrastructure whilst protecting and enhancing the local environment.
- Use planning obligations to help secure an appropriate range of facilities.

Health and Wellbeing

- Need to address health inequalities.
- Demand for healthcare in the Borough is likely to increase as the population increasing, particularly the number of elderly residents.
- Priorities in Dacorum are to reduce levels of obesity and increase levels of physical activity in adults, and to reduce the prevalence of smoking.
- Much of the West Herts Hospital Trust (WHHT) estate is in poor condition and is in urgent need of investment.
- Dacorum's increasing population will lead to additional pressure on secondary healthcare services in the Borough and also the County as a whole. The increasing proportion of older people in the Borough's population is also likely to put pressure on secondary healthcare needs, as they are likely to utilise healthcare services more than others.
- Encourage healthy forms of travel and exercise, e.g. walking/cycling and access to leisure and recreational facilities.
- Certain areas within the Borough, in particular Berkhamsted, Markyate and to a lesser extent Hemel Hempstead, are deficient of leisure space and this should be addressed in order to encourage a healthier lifestyle amongst residents.
- Encourage the provision of convenience stores that provide fresh produce in accessible locations.
- Designing out crime by improving the urban environment. This may be through redevelopment or adding additional security features such as CCTV and improved lighting.
- Developing community activities and facilities that can divert people away from crime, improve tolerance and prevent anti-social behaviour.

Housing

- The Borough's population is changing with growing numbers of elderly residents forecast as a result of increased life expectancy. While this will add to the number of one person households and the population in communal homes, there is also evidence of an increase in the number of young children and more sharing. The past long term trend of declining household size has slowed significantly.
- The price of housing compared to earnings is an issue.
- The need for new pitches for Gypsies and Travellers is difficult to estimate accurately, principally because of the nomadic lifestyle of the communities themselves: it is difficult to identify all sources of need and there is a danger of double-counting individual requirements across different local authority areas.
- Meeting needs of Gypsy and Traveller communities even when they no longer choose to travel

- Ensuring the provision of a range of housing types to satisfy demand including affordable housing and mixed use developments and a range of housing types of varying sizes.
- Affordable housing provision is a challenge that needs to be addressed to ensure the future prosperity of the area.
- Provision of affordable housing in accessible locations.
- Ensuring appropriate housing provision for the elderly and disabled population, e.g. through independent living housing, Life-long homes and appropriate forms of affordable housing.
- Ensuring that such housing is located near to the necessary services and facilities and public transport.

Transport and Accessibility

- Pressures due to population growth which leads to increasing levels of traffic, which in turn exacerbates congestion, particularly during peak times.
- All the key roads in south-west Hertfordshire are under pressure from heavy levels of traffic, and associated congestion, which has adverse effects on air quality, quality of life and the local economy.
- Bus services are not adequately linked between Hemel Hempstead rail station, Maylands and Hemel Hempstead town centre.
- The walking and cycling network generally meets current demand however there are localised issues, such as congestion on some routes putting people off using those routes. Routes to stations in particular are considered to be inadequate
- Use planning obligations to secure improvements to public transport.
- Providing and maintaining safe and available infrastructure for healthy pursuits – cycleways, dedicated walkways.
- Requiring green travel plans in large new developments.
- Expansion of Luton Airport could put increased pressure on M1, motorway junctions and wider road network
- Provision of infrastructure to enable the increased use of sustainable modes of transport (e.g. cycle parking facilities, electric vehicle charging points)
- Make developments permeable to provide improved opportunities for walking and cycling
- There may be increased noise pollution as a result of expansions of Luton and Heathrow airports.

Economy, employment and education

- Maintaining a strong employment base is essential for the future prosperity of the area.
- Providing a range of employment sites, including ones that will be attractive to inward investment.
- Providing incubator units and units with shared facilities, e.g. reception and meeting facilities etc. Local Plan to identify suitable locations.
- Using planning obligations used to enhance existing educational facilities – including allocating land for new schools where required.
- Providing a range of employment sites that will be attractive to knowledge based industries
- Expanding or creating new primary and secondary schools to ensure there are enough school places to support the growing population
- Providing facilities and services to support the improvement of GCSE attainment in schools.
- Ensuring that educational opportunities are available to provide the training and skills necessary to support Dacorum's local economy.
- Aiming to reduce levels of out-commuting.
- Strengthening the retail offering of the Borough in order to reduce out-flows of retail spending and support the local economy.

4.4 SA Framework

Informed by the issues identified at the SA/SEA scoping stage, a framework of SA objectives has been developed covering a range of environmental, social and economic topics. It is similar to that used

during the SA of the Dacorum Core Strategy and Site Allocations DPD, but with some modifications in order to simplify and to fill some gaps in the previous framework.

The sustainability objectives are quite distinct from the Local Plan objectives. They focus on outcomes, and define the basis for achieving social, economic and environmentally sustainable development. They have been compiled using information from the review of relevant plans and programmes, baseline review and review of key issues.

The purpose of the SA Framework is to provide a way in which the effects of the plan can be described, analysed, and compared. This process involves considering the content of the Local Plan against the identified SA objectives.

The SA Framework contains a high level objective for each topic (see Table 4-2), supported by a set of more detailed sub-objectives (appraisal criteria) for use when assessing Plan policies and considering wider whole-Plan effects. For undertaking the assessment of the individual site allocations and area specific policies a more detailed set of site specific criteria has also been developed. This full SA Framework is presented in Appendix A.

Table 4-2: SA Framework Objectives

SA Objective		Abbreviated Reference Term
1	To protect, maintain and enhance biodiversity and geodiversity at all levels	Biodiversity & geodiversity
2	To protect, maintain and enhance water resources (including water quality and quantity)	Water quality/quantity
3	To reduce flood risk	Flood risk
4	Reduce greenhouse gas emissions and adapt to the effects of climate	Climate change
5	Achieve good air quality, especially in urban areas	Air quality
6	Make efficient use of land and protect soils	Soils
7	To use natural resources, both finite and renewable, as efficiently as possible, and re-use finite resources or recycled alternatives wherever possible	Resource efficiency
8	To identify, conserve and enhance the historic environment and cultural assets	Historic environment
9	To conserve and enhance landscape and townscape character and encourage local distinctiveness	Landscape & townscape
10	To improve the health and wellbeing of the local population	Health & wellbeing
11	To develop in sustainable locations	Sustainable locations
12	To improve community cohesion through reducing inequalities, promoting social inclusion and reducing crime and the fear of crime	Community cohesion
13	Ensure that everyone has access to good quality housing that meets their needs	Housing
14	Achieve sustainable levels of prosperity and economic growth	Sustainable prosperity
15	To ensure local residents have employment opportunities and access to training	Employment & skills

These SA objectives have been and will continue to be used to structure and inform the assessment of the Local Plan through all stages of its development.

4.5 Inter-relationships between SA Objectives

The SEA topics cannot be considered in isolation from one another, as there are a variety of inter-relationships that exist. Air quality is a topic which cuts across most of the other SEA topics, with proven links between air quality and human health (respiratory problems). It can also have indirect effects on biodiversity, soil and water quality, and the condition of heritage assets, whilst there is a more direct link between traffic emissions causing poor air quality and the emissions of CO₂.

The development of sites (residential, employment, retail etc) may show inter-related effects on criteria such as biodiversity, air quality, greenhouse gas emissions, landscape and townscape depending on where they are located, how the development takes shape/is designed, and how it is accessed.

Positive effects can also occur from inter-relationships, for example, protecting landscape quality and/or soil, may lead to habitats and species being indirectly protected, whilst improvements to water quality could result in positive effects for biodiversity.

During the assessment the SA/SEA topics (through the SA Objectives) should not be considered in isolation as many inter-relationships exist that need to be taken into account. Some of these relationships are clear cut and easy to understand, for example reduced greenhouse gas emissions and improved air quality which would both result from transport modal shift to sustainable travel modes. Others however can be less obvious, but are equally important and need to be understood when assessing the Local Plan. For example there are inter-relationships between climate change adaptation measures and improvement in human health, from improved safety associated with reducing the risk of properties flooding, through to reduced levels of stress and improved well-being resulting from improvements to energy efficiencies of homes.

Close inter-relationships exist between environmental topics such as air quality, water quality, soil and biodiversity, with improvements or degradation to one often resulting in a similar effect on the other related media/topics. For example increased air pollution can have adverse effects on soil, water quality, and biodiversity through acidification. These effects can then cause issues relating to landscape degradation.

Inter-relationships that will be considered in the SA/SEA include the following:

- Air quality influences human health which affects quality of life and also economic activity.
- Local residents and businesses experience air quality at the local level, which affects health and amenity.
- A healthy natural environment improves quality of life. Provides economic benefits through attracting inward investment and increased revenue through tourism.
- Economic growth if undertaken unsustainably could adversely impact upon these assets.
- Greenhouse gas emissions could lead to significant climate change which is likely to affect water resources (supply and demand), alter habitats, affect air quality and public health and increase flood risk. These could all adversely impact upon the Borough's economy.
- Local topography can influence the levels of walking and cycling and therefore have implications for greenhouse gas emissions, air quality and health and wellbeing.

-
- The historic environment and cultural heritage contributes to the overall diversity and value of the landscape. It also provides economic benefits and is a source of enjoyment for the population.
 - An attractive landscape improves quality of life which in turn could contribute to increase inward investment. Green infrastructure provides health and wellbeing benefits.
 - Noise pollution can both affect tranquillity of landscapes and have adverse effects on health and wellbeing.
 - Woodland provides an important role in carbon sequestration.
 - Material assets include resources such as land, building materials and other resources which are non-renewable. The topic is concerned with the efficient use of resources, including re-use of brownfield sites and sustainable waste management.
 - The quality of the material assets in the borough contributes to overall quality of life and can impact upon the region's economy.
 - Soil resources are key to sustaining the agricultural economy.
 - Climate change is resulting in more extreme weather conditions and will heighten flood risk and demands on water resources.
 - Negative synergy likely for flora and fauna when water bodies with low water flow combined with poor quality water
 - Benefits of improved human health include employment provision and contribution to the local economy, training, research opportunities, reduced burden on social services and public finances.
 - Provision of housing to meet local needs is important both for the wellbeing of communities and also for the local economy.
 - Poor health and well-being will adversely impact upon economic growth in the borough.
 - Social considerations and quality of life will impact on employment opportunities and ability to attract inward investment.

4.6 Compatibility between SA Objectives and Local Plan Objectives

A compatibility assessment of the SA/SEA objectives with the Local Plan Vision and Objectives has been undertaken. The results of this assessment are shown in Figure 4-1.

Figure 4-1: Compatibility between SA/SEA Objectives and Local Plan Objectives

SA Objectives		Local Plan Strategic Objectives							
		Delivering Dacorum's future with homes for everyone	Generating a vibrant economy with opportunities for all	Mitigating and adapting to climate change	Conserving and protecting the natural environment	Ensuring an attractive and valued built and historic environment	Promoting and facilitating sustainable transport and connectivity	Supporting community health, wellbeing and cohesion	Enabling the delivery of infrastructure
1	Biodiversity	N	?	C	C	C	-	C	?
2	Water	N	-	C	C	-	-	-	-
3	Flood risk	-	-	C	C	-	-	-	-
4	Climate Change	N	N	C	-	-	C	-	-
5	Air Quality	N	N	-	C	-	C	-	-
6	Soils	N	?	-	C	C	-	-	?
7	Resource efficiency	-	-	C	-	-	-	-	-
8	Historic Environment	?	?	-	-	C	-	-	?
9	Landscape/ Townscape	?	?	-	C	C	-	-	?
10	Health and Wellbeing	C	-	C	C	C	C	C	C
11	Sustainable Locations	-	-	C	-	C	C	-	C
12	Community cohesion	C	C	-	-	C	C	C	C
13	Housing	C	-	-	-	-	-	-	-
14	Sustainable prosperity	-	C	-	-	C	C	-	C
15	Employment and skills	-	C	-	-	C	C	-	C

(N) Potentially incompatible	(C) Compatible	(?) Uncertain	(-) No significant relationship
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The Compatibility Matrix indicates that generally, the Local Plan Strategic Objectives are compatible with the SA/SEA objectives. However, the assessment indicates that there are some potential conflicts and some uncertainties over the compatibility between the SA/SEA and Local Plan objectives. Where potential incompatibilities have been identified, the reasons for these are discussed below for each affected Local Plan objective.

It should be recognised that whilst some incompatibilities have been identified for specific objectives, there are other objectives that will help to overcome these. For example, where incompatibility has been identified between housing and biodiversity, the Local Plan objective “*Conserving and protecting the natural environment*” will help to ensure that adverse effects are minimised.

The Local Plan includes a series of policies aimed at protecting and enhancing the environment and public realm and helping towards achievement of associated Local Plan objectives. These policies, supported by more detailed development management policies, will help towards mitigating the negative effects associated with new development that are identified in the sustainability appraisal for the individual policies and sites.

Local Plan Objective: “Delivering Dacorum’s future with homes for everyone”

This objective is potentially incompatible with a number of the SA objectives:

- The level of housing development required in the Borough will require development of greenfield land. Development of greenfield land is not compatible with biodiversity (SA1) due to landtake, potential habitat fragmentation and urban pollution issues. Development on greenfield land would also result in soil sealing (SA6).
- Providing new homes in the Borough will put direct pressure on water resources (SA2) which are already identified as ‘over-abstracted’.
- Housing development will result in increases in greenhouse gas emissions from new housing and associated activities (SA4). It will also contribute to background emissions through an increase in the number of vehicles on the road thereby reducing air quality (SA5).

The objective also has uncertain compatibilities with a number of the SA objectives:

- Parts of the Borough lie within areas of flood risk and there is the potential for new housing sites to lie within these zones (SA3).
- Housing development on greenfield sites is potentially incompatible with the SA objectives on historic environment (SA8), and landscape / townscape (SA9).

Local Plan Objective: “Generating a vibrant economy with opportunities for all”

This objective is incompatible with the SA objectives on climate change (SA4) and air quality (SA5) as activities relating to the new employment sites, such as transport and travel, will result in increases in greenhouse gas emissions and other airborne emissions.

The objective also has uncertain compatibilities with a number of other SA objectives. For example, developing employment sites on greenfield land will have uncertain effects on biodiversity (SA1), soils (SA6), historic environment (SA8) and landscape / townscape (SA9) depending on the exact location and type of employment to be provided.

Local Plan Objective: “Enabling the delivery of infrastructure”

Through the provision of new infrastructure to enable there are potential incompatibilities with the SA objectives for biodiversity (SA1), soils (SA6), historic environment (SA8) and landscape / townscape (SA9), as providing infrastructure, e.g. roads, utilities, services and community facilities, could lead to effects such as habitat fragmentation, soil sealing and adverse effects on the historic environment and landscapes, depending on the location and design of the infrastructure.

5 Consideration of Options

5.1 Introduction

The consideration and appraisal of alternative options is an integral part of the plan making and SA processes. During the development of the Local Plan a range of both strategic and more detailed options have been considered and assessed through the sustainability appraisal process in order to arrive at the Council's proposed approach in the Draft Local Plan - Emerging Strategy for Growth.

The Environmental Assessment of Plans and Programmes Regulations 2004³ require that the SEA shall:

"... identify, describe and evaluate the likely significant effects on the environment of -

(a) implementing the plan or programme; and

(b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme." Article 11 (2).

and that the Environmental Report (the Publication SA Report in the case of the new Dacorum Local Plan) should include:

"8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information." Schedule 2.

The SA Working Notes and SA Reports that are being prepared during the development of the Local Plan provide the findings of the assessments of options that are undertaken during the various stages of the development of the Local Plan and where appropriate provide the reasons for selecting the options taken forward to the next stage of the planning process and the reasons for not taking forward others.

It should be noted that the role of the SA/SEA in this process is to provide assessments of the alternatives being considered, not to make the decision as to which alternatives are taken forward or which alternatives should be considered to be 'reasonable alternatives'. This is made clear in Government guidance on SEA⁴:

"It is not the purpose of the SEA to decide the alternative to be chosen for the plan or programme. This is the role of the decision-makers who have to make choices on the plan or programme to be adopted. The SEA simply provides information on the relative environmental performance of alternatives and can make the decision-making process more transparent". (Paragraph 5.B.7)

The guidance provides further details on how to consider alternatives as summarised in the following extracts:

Identifying alternatives

"Only reasonable, realistic and relevant alternatives need to be put forward. It is helpful if they are sufficiently distinct to enable meaningful comparisons to be made of the environmental implications of each".

³ Statutory Instrument 2004 No. 1633

⁴ A Practical Guide to the Strategic Environmental Assessment Directive. ODPM, 2005

Assessing alternatives

“The assessment of alternatives may be made in broad terms against the SEA objectives, provided there is sufficient detail to identify the significant environmental effects of each alternative. Where appropriate any cumulative, secondary and synergistic, short, medium, and long-term effects need to be highlighted, indicating whether they are likely to be permanent or temporary”.

In developing the Local Plan the Council have considered a range of alternative strategies, policies and sites, with the SA feeding into this process. The following sections provide details of the different stages at which this has occurred and a summary of the SA findings at each stage.

Further details of the SA findings are provided in Appendix C and also through cross-referencing to SA documents on the Council’s website at the following weblink:

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan>

5.2 Issues and Options – November 2017

As part of the consultation on Issues and Options in November 2017 the Council considered a range of options relating to the level of housing growth over the Local Plan period and the spatial strategy for how future growth in the Borough could be accommodated.

The SA Working Note (October 2017) which accompanied the Issues and Options consultation provided assessments of the growth and spatial strategy options (reasonable alternatives) against each of the SA objectives. Summaries of these assessments are provided in Appendix C1. The full SA Working Note is available at the following weblink:

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan>

In addition to the options assessed in the SA/SEA, at the Issues and Options stage the Council had ruled out some other potential options as they were not considered to be ‘reasonable alternatives’. These options, along with the Council’s reasoning are summarised in Section 5.3.5.

In relation to options beyond those relating to housing growth and spatial distribution, at the Issues and Options stage the Council used the consultation to request input views from stakeholders. Where appropriate, within the discussion on individual Issues in the Issues and Options Paper the Council picked up any ‘reasonable alternatives’ in terms of the approach to be taken in the Local Plan process to address the issues identified (e.g. the proposed approach to meeting future jobs growth). The questions throughout the Issues and Options Paper were worded to enable respondents to put forward what they considered to be additional reasonable alternatives for consideration.

The Council took consultation responses relating to reasonable alternatives into account when further developing the Draft Local Plan.

In addition to the consultation on the Issues and Options paper and its accompanying SA Working Note, at the same time the Council undertook consultation on the Schedule of Site Appraisals. This was also accompanied by an SA Working Note in which each of the sites that have been included in the Schedule of Site Appraisals were assessed against the objectives in the SA Framework.

The Schedules included sites in the Green Belt or Rural Area that were on the edge of the towns and large villages and had a potential capacity of 50 dwellings or more as well as some sites that could deliver employment development, including mixed-use development.

The full assessments of these sites and a summary of the assessments are provided in the Schedule of Site Appraisals SA Working Note which is available at the following weblink:

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan>

5.3 Additional Spatial Strategy and Growth Options Considered

5.3.1 Introduction

As part of the Issues and Options consultation in 2017 three different levels of housing growth were considered (602 dpa; 756 dpa; and 1,000-1,100 dpa), along with three spatial strategies for distributing that growth ('Focus on three towns'; 'Hemel Hempstead focus'; and 'Spread more evenly across the Borough').

Since that consultation additional / modified options have been considered to take account of changes to the Objectively Assessed Housing Need (OAN) of the Borough, as well to consider revised / additional spatial strategies.

This section provides details of the new options considered, along with the findings of the SA for each option.

5.3.2 Spatial Strategy and Growth Options Considered

In developing the Preferred Spatial Strategy to include in the Dacorum Local Plan (2020 - 2038) Emerging Strategy for Growth the Council has considered the following spatial strategy and growth options:

- Option A - Focus growth on the 3 main towns (Hemel Hempstead, Berkhamsted, and Tring);
- Option B - Focus growth on Hemel Hempstead;
- Option C (i & ii) - Spread growth across the six main settlements;
 - Option Ci: Spread across the six main settlements (low growth at villages);
 - Option Cii: Spread across the six main settlements (high growth at Bovington and Kings Langley);
- Option D (i & ii) - New settlement alongside growth at the 3 main towns;
 - Option Di: New settlement in the north-west of Borough
 - Option Dii: New settlement at Bovington airfield; and
- Option E - Higher growth option. This option would require the delivery of 1,100 dwellings per annum (dpa) as opposed to Options A—D which are based on 922 dpa, this being Dacorum's emerging objectively assessed housing need (OAN).

NB: Option E does not specify a particular spatial strategy for delivery and therefore the assessment of this option is generally focused on the different quantum of development compared to Options A-D – although the assessments do pick up on spatial distribution specifics where relevant.

Common to all options are the c.10,900 new homes inside settlement boundaries (the Urban Capacity sites). The options are therefore limited to how to distribute additional housing in the Green Belt, and not how to distribute all the proposed new housing.

Full details of the options, including explanatory figures and narratives providing the rationale behind each option are provided in Appendix C2.

5.3.3 Assessment Results

Each of the reasonable alternatives (options) considered during the preparation of the Local Plan was assessed against the SA objectives using the methodology described in Section 3.2. The findings of the option assessments are summarised in Table 5-1. The detailed assessment for each option is provided in Appendix C2.

Table 5-1: Summary of Assessment of Spatial Strategy and Growth Options

Option	SA Objectives														
	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment
Option A	x/?	x	-	x	x	x	x	?	x	✓	✓✓	✓/?	✓/✓✓	✓	✓
	✓	x	-	?	x	x	x	?	x	?	✓✓	✓/?	✓/✓✓	✓	✓
Option B	x/?	x	-	x	x	x	x	?	x	✓	✓✓	✓/?	✓/✓✓	✓	✓
	✓	x	-	✓	x	x	x	?	x	?	✓✓	✓/?	✓/✓✓	✓	✓
Option Ci	x/?	x	-	x	x	x	x	?	x	✓	✓✓	✓/?	✓/✓✓	✓	✓
	✓	x	-	?	x	x	x	?	x	?	✓✓	✓/?	✓/✓✓	✓	✓
Option Cii	x/?	x	-	x	x	x	x	?	x	✓	✓	✓/?	✓/✓✓	✓	✓
	✓	x	-	?	x	x	x	?	x	?	✓	✓/?	✓/✓✓	✓	✓
Option Di	x/?	x	-	x	x	x	x	?	x	✓	✓/?	✓/?	✓/✓✓	✓	✓
	✓	x	-	?	?	x	x	?	x	?	✓/?	✓/?	✓/✓✓	✓	✓
Option Dii	x/?	x	-	x	x	x	x	?	x	✓	✓/?	✓/?	✓/✓✓	✓	✓
	✓	x	-	?	x	✓	x	?	x	?	✓/?	✓/?	✓/✓✓	✓	✓
Option E	x/?	x	-	x	x	x/xx	x	?	x/xx	✓	✓/?	✓/?	✓✓	✓	✓
	✓	x	-	?	?	x	x	?	x/xx	?	✓/?	✓/?	✓✓	✓	✓

As was found to be the case for the equivalent assessments in 2017 (see Appendix C1) undertaking the high level assessments on the options meant that there was a large amount of uncertainty relating to the prediction of the likely effects against the SA/SEA objectives and this was reflected in the assessment findings. Notwithstanding this, the assessments, in particular the assessment commentaries as set out in Appendix C2, identified the main differences in effects between the options to provide information to inform the development of the Local Plan.

5.3.3.1 Levels of growth

Under all the options any development that takes place on greenfield sites, including that in areas currently in the Green Belt has the potential for adverse effects including amongst others those relating to habitat loss, increased water consumption, impacts on local landscapes, soil sealing, natural

resource use, increased waste, and increased emissions of both greenhouse gases and airborne pollutants. Option E, which would require a higher level of growth than Options A-D, has been predicted to result in the greatest level of such adverse effects due to the larger amount of land that would be required to deliver the development and the greater level of 'human activity' that would result.

NB: It should be noted that the effects will be very dependent on the location and characteristics of the sites selected to deliver the housing growth, as well as the controls provided by the other policies in the Local Plan, in particular the development management policies.

New development, which in some cases would be through redevelopment of current sites within the settlements and in others developing outside current settlement boundaries, need not however always result in adverse effects on the environment. For example, new large greenfield developments could provide opportunities for biodiversity enhancements and make use of district heating systems, whilst redeveloped sites within settlements could result in remediation of contaminated land, improvements to local townscapes and improvements to the energy efficiency of the building stock. Such effects will be site dependent and the Policies proposed for the new Local Plan should help to maximise any such opportunities where they exist. The 'Mitigation' section for each SA topic identifies the relevant Local Plan policies which would provide such policy led mitigation.

In terms of the social and economic SA objectives, in general terms the higher level of growth (Option E) performs the best as it would result in housing levels that would provide a number and range of homes to meet future needs of the Borough, particularly in relation to affordable housing. As a result significant positive effects have been identified for Option E in relation to the 'housing' SA objective as the provision of 1,100 dwellings per annum (dpa) would exceed the objectively assessed need of the Borough (922 dpa) and would provide additional affordable housing.

5.3.3.2 *Spatial distribution of growth*

All the options require the delivery of the c.10,900 homes on existing and planned sites within settlement boundaries that are consistent with existing planning policies (the Urban Capacity sites). In terms of the SA/SEA, given that the Urban Capacity sites account for approx. 65% of the housing under Options A-D and approx. 55% under Option E, this means that there are a range of effects against each SA/SEA objective that are consistent/constant across all options.

Given this fixed element common to all options, it was challenging for the SA/SEA to differentiate the effects predicted for each 'Option v. SA Objective' relationship using the 'scoring' system alone. The assessment therefore relies on the narratives provided in the assessment tables to identify how the different options perform in relationship to the objective and to each other, picking out the many nuances associated with the effects associated with the different options.

One major differentiator is that Options A, B and Ci, which would require the higher levels of growth in the three main towns were found to be the most sustainable in terms of reducing the need to travel to access services and facilities, as well as through their greater accessibility to public transport.

5.3.4 *Selected Option for Draft Local Plan*

Of the six Spatial Strategy options considered (see Section 5.3.2) the Council has chosen Option Ci as the preferred option on which to base the Spatial Strategy for the Draft Local Plan. That option requires a high percentage of the Borough's growth to take place in the three main towns, albeit not as high as for Options A and B, but at the same time enabling some growth in the three large villages thereby allowing the ability to deliver proportionate improvements such as new public open spaces

to serve existing and new communities, while not significantly impacting the ability of existing infrastructure to cope. The SA identified that locating the vast majority of the development in the Borough's most sustainable settlements was a key differentiator for Option Ci (and Options A and B) when compared to Options Cii, Di and Dii.

The option is based on the growth level of 922 dpa and not the alternative of 1,100 dpa which was also considered (in Option E). The 922 dpa figure was chosen as it will meet the Objectively Assessed Need for the Borough, whilst at the same time not placing unnecessary burden on infrastructure such as schools, health facilities, transport, water treatment etc. – which would probably have been the case if the figure of 1,100 dpa had been selected.

The Council's reasons for taking Option Ci forward into the Draft Local Plan are provided by the Council in Section 5.5 of this Interim SA Report.

5.3.5 Rejected Options

The reasons for not taking the other options forward into the Draft Local Plan are provided by the Council in Section 5.5 of this Interim SA Report.

5.3.6 Options which were not considered to be reasonable alternatives

The Issues and Options Paper provided details on alternative growth levels and alternative growth distributions which at that time weren't considered to be reasonable alternatives. This information was also provided in the SA Working Note (in Section 4.4 of that Working Note)

The SA is only required to provide assessments of reasonable alternatives – and it is for the Council to determine whether an alternative is reasonable or not and to provide reasons for that decision. As a result, these alternatives were not assessed by the SA process.

Since the Issues and Options stage the 'planning landscape' has changed such that some of the alternatives considered to not be reasonable at the I&O stage have now been examined in the SA (i.e.. the consideration of a new settlement option), whilst other potential alternatives have also emerged, but which the Council consider to be not reasonable. This was informed by consultation responses received in response to the Issues and Options paper.

In working towards this second Regulation 18 stage the Council have therefore updated their position as to what are now considered to not be 'reasonable alternatives'. These are summarised in the sections below.

5.3.6.1 Reasons for rejecting alternative growth levels

The reasons behind the decisions for rejecting alternative growth levels are provided in Table 5-2.

Table 5-2: Reasons for rejecting alternative growth levels (Source: DBC)

<p>Continuing the previous housing target (430 homes / year) / a lower growth scenario</p>	<p>This option would rely mainly on the existing housing supply assumptions of the Core Strategy/Site Allocations DPD and falls significantly short of the revised standard method for calculating housing need (i.e. 922 dwellings per annum, or 16,596 dwellings over the plan period). The NPPF states under paragraph 59 that <i>“strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which reflects current and future demographic trends and market signals”</i>. In addition to this, one of the important tests of soundness for plan making (Paragraph 35 of the NPPF) is that they should be <i>“positively prepared”</i>. With this, the Local Plan should provide <i>“a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs”</i>. The Council is confident that the requirement set by the revised standard method can be met through a combination of known commitments, existing allocations, new allocations and an allowance for windfall sites. To consider a lower growth option raises a fundamental soundness issue with the Local Plan where evidence indicates that the minimum requirement can be met.</p>
<p>Urban Capacity option (600 homes / year) / a lower growth scenario</p>	<p>This option would equate to a level of development of about 600 dwellings per annum or 10,440 dwellings over the plan period i.e. the calculated urban capacity of the Borough. When other commitments and a windfall allowance is made for the rural area outside of the six main settlements, the total capacity is 10,954. The option would not require any further land to be released from the Green Belt, but equates to a level of growth that falls significantly short of the revised standard method for calculating housing need (i.e. 922 dwellings per annum, or 16,596 dwellings over the plan period). The Council’s reason for rejecting this option is the same as with the <i>“continuing the previous housing target”</i> option as set out above.</p>

5.3.6.2 Reasons for rejecting alternative growth distributions

The reasons behind the decisions for rejecting alternative growth levels are provided in Table 5-3.

Table 5-3: Reasons for rejecting alternative growth distributions (Source: DBC)

<p>Rural growth</p>	<p>Focusing growth in rural parts of the Borough would result in development being directed to the least sustainable parts of the Borough – many of which are protected by environmental and landscape designations. It would also fail to make use of some development locations on the edge of the three larger settlements, many of which are assessed in the initial assessment process to be suitable potential sites. An exception to this approach is the delivery of a new settlement which is of a scale that can be made</p>
<p>Growth in the Chilterns AONB</p>	<p>A number of sites have been promoted for development that are either wholly or in part located within the Chilterns Area of Outstanding Natural Beauty. The Council affords great weight to the conservation of this nationally important landscape designation. This is consistent with paragraph 172 of the NPPF, which recognises the AONB as having <i>“the highest status of protection”</i>. Paragraph 170 of the NPPF recognises that planning policies <i>“should contribute to and enhance the natural and local environment by... protecting and enhancing valued landscapes”</i>.</p> <p>For this reason the Council’s methodology to site selection seeks first to identify sufficient sites (including reasonable alternatives) that could meet future needs on land not designated as AONB. Only if this process concluded that there would unlikely be sufficient sites to deliver this need, then would sites in the AONB be exceptionally considered. The evidence to date concludes that there</p>

	<p>is sufficient sites, including the consideration of reasonable alternatives, outside of the AONB capable of meeting future needs. For this reason, an option to allocate sites in the AONB is rejected.</p> <p>The rejection of this option does not stop some modest growth from coming forward on land designated as AONB. Paragraph 172 of the NPPF allows for some growth in the AONB, albeit proposals for major development should only be permitted in exceptional circumstances. Any strategy that the Local Plan carries forward will need to ensure consistency with this part of National Policy.</p>
<p>Export growth to another Council area</p>	<p>The NPPF and Planning Practice Guidance are clear that every Council should first try to meet its growth needs within its own boundaries, or seek agreement with neighbouring authorities to ensure they are met across the wider housing market area (HMA). Dacorum is constrained by the Green Belt, landscape and environmental designations, as are the other authorities within the HMA (and beyond). The evidence prepared by the Council to date suggests that the proposed future housing requirement can be met within Dacorum's boundaries, but is dependent on land to be released from the Green Belt.</p> <p>The Council has carefully considered the various steps set out in Paragraph 137 of the NPPF before concluding that exceptional circumstances exist to remove land from the Green Belt. This includes that the strategy "has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development". The Council has given detailed consideration to each neighbouring authorities potential to deliver some of Dacorum's own needs, in a manner that would "<i>promote sustainable patterns of development</i>" (NPPF Paragraph 138).</p> <p>The only option that could feasibly be considered is for some of the homes to be delivered at East Hemel Hempstead, in St Albans district, to count towards Dacorum's needs. This land is also currently designated as Green Belt land and St. Albans are under similar pressures to deliver their housing requirements in full within their own administrative area. The emerging St. Albans Local Plan proposes this land to be released to meet their own housing needs.</p> <p>It is possible that some of Dacorum's future jobs and housing needs (particularly affordable housing) could be met through development on land at East Hemel Hempstead, and discussions are ongoing with St. Albans in relation to their new Local Plan. There is significant uncertainty at present about the St. Albans Local Plan and the reliance on land to be released at East Hemel Hempstead to meet Dacorum's needs is equally uncertain, particularly given the expectation that it will meet St. Albans housing and employment needs in the first instance, means that it is rejected as an option to meet Dacorum's housing needs.</p>
<p>Use greenfield before brownfield land (Lower urban capacity)</p>	<p>The Council consider this option to be inconsistent with the NPPF, which places a strong emphasis on optimising the use of underutilised/brownfield land for any strategy that considers the release of Green Belt land to meet its growth requirements. This option fail to support urban regeneration and result in development being directed to less sustainable parts of the Borough – many of which are protected by environmental and landscape designations. Given the high level of local housing need, a combination of greenfield alongside the optimum use of brownfield sites is likely to be required to meet targets and maintain supply.</p>

5.4 Site Allocation Options

5.4.1 Introduction

To deliver the level of housing growth proposed in the Draft Local Plan Spatial Strategy a series of development sites need to be allocated in the Local Plan. In order to meet the 16,596 net additional new homes proposed for the Local Plan period the housing delivered within these site allocations will be supplemented by existing commitments, windfall sites and a number of allocations carried forward from previous development plan documents.

This section provides details of the sites which have been considered by the Council as reasonable alternatives for allocation in the Local Plan, along with the findings of the assessments undertaken for each of these sites.

5.4.2 Options Considered

A wide range of sites in existing settlements and sites in the Green Belt have been considered for inclusion in the Local Plan.

This follows a thorough assessment of sites promoted to the Council as well as other sites not necessarily promoted in urban areas but which the Council consider could contribute towards future housing supply.

The Urban Capacity Study includes a review of existing allocations for their potential to be carried forward into the new Local Plan, with a further 108 sites identified from a range of sources and subject to full assessment. The AECOM Site Assessment Study assessed in detail a further 117 sites promoted for development outside of the built up area of the six main settlements. An addendum has been prepared to this study which includes an assessment of a further 10 sites (promoted after the original study was progressed, and also a small number of omission sites). The addendum follows the methodology used by AECOM.

From these studies, 65 sites (almost a quarter of all sites assessed) were identified as having the greatest potential to meet the future needs of the new Local Plan, including its emerging strategy. These were subject to detailed testing by the Council, including through the SA. Almost all of the sites are promoted for the development and would be expected to come forward at some point during the plan period up to 2038.

Of these identified sites, the Council exceptionally put forward two sites for detailed testing which are not currently promoted for development and allocation in the new Local Plan. These consist of new settlement options on land near to Long Marston, in the western edge of the district, and at Bovingdon Airfield. The Council's justification for this is that these sites have been raised as possible alternative locations for growth in the borough by a number of respondents to the I&O consultation.

In coming to this decision, the Council has given consideration to the NPPF requirements surrounding changes to the Green Belt. In particular, Paragraph 138 of the NPPF states that "*when drawing up or reviewing Green Belt boundaries... strategic policy-making authorities should consider the consequences for sustainable development of channelling development... towards locations beyond the outer Green Belt boundary*". The inclusion of the land near to Long Marston demonstrates this.

The same paragraph also recognises that "*where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport*". The Council recognises that

Bovingdon Airfield constitutes a significant amount of previously developed land within the Green Belt and for this reason has been appraised as an alternative growth option for a new settlement.

The identified sites were subject to a number of technical evidence studies, including a Level 2 Strategic Flood Risk Assessment, strategic transport modelling, landscape sensitivity assessment, Green Belt Review Stage 3 as well as formal and informal engagement with statutory bodies and other key stakeholders, all of which have informed the recommendations for the draft Local Plan.

5.4.3 Assessment of Site Allocations Options

Each of the sites considered as being a reasonable alternative for inclusion in the Local Plan has been assessed against the SA objectives using the same methodology as was used in the SA for the Schedule of Site Appraisals in 2017, with all sites being assessed to the same level of detail.

The findings of the individual site assessments are provided in Appendix E (for sites included in the Draft Local Plan) and Appendix F (for sites not included in the Draft Local Plan), ordered by settlement. The assessments of sites included in the plan are summarised in the tables below.

The symbol ✱ against the site name has been used to denote which sites have been included in the Draft Local Plan.

Table 5-4: Hemel Hempstead site assessment summary (continued on next page)

	North Hemel*	Field Ends Farm	Fields End Lane	Polehanger Lane	Shendish Manor	Pouchen End Lane	Land south of Link Road	Red Lion Lane	Station Gateway*	Frogmore Road*	Hospital Site, Hillfield Road*	Two Waters North*	Two Waters South*	Market Square and Bus Station*	NCP Car Park*	Paradise/ Wood Lane*	National Grid Land*
Biodiversity	* ✓	*	*	*	*	*	*	?	?	?	?	?	* ✓	-	-	?	?
Water	?	?	?	?	?	?	?	?	-	?	-	?	?	?	-	-	-
Flood risk	-	-	-	-	-	-	-	?	-	?	-	*	?	?	-	-	-
Climate change	✓ *	*	*	?	✓	*	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Air Quality	?	*	*	?	✓	*	✓	✓	✓	*	✓	✓	✓	✓	✓	✓	?
Soils	*	✓ *	*	*	*	*	*	*	✓	✓	✓	✓	*	✓	✓	✓	✓
Resource efficiency	-	-	-	-	?	-	?	?	-	-	-	-	-	-	-	-	-
Historic environment	*	-	-	?	?	?	?	?	?	-	-	?	*	?	?	-	?
Landscape / Townscape	* ✓	*	*	*	*	*	*	?	?	✓	✓	✓	?	✓	✓	✓	✓
Health and wellbeing	✓ *	✓	✓	✓	?	*	?	?	✓	✓	✓	✓	✓	✓	✓	✓	?
Sustainable locations	✓	✓	*	✓	✓	✓	✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
Community cohesion	✓	?	?	✓	✓	?	✓	-	✓	-	✓	✓	✓	?	✓	✓	✓
Housing	✓✓	✓	✓	✓✓	✓✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Sustainable prosperity	✓	✓	✓	✓	✓	✓	✓	✓	✓	*	✓	✓	✓	✓	✓	✓	*
Employment and skills	✓	✓ *	✓	✓	?	✓	✓	✓	✓	*	✓	?	✓	✓	*	?	*

	Hemel Hempstead Sites																
	Marchmont Farm *	Old Town *	West Hemel Hempstead *	Civic Centre Site *	Ebbens Road *	Land at Turners Hill *	233 London Road *	Land r/o St Margaret's Way *	Cupid Green Depot *	Kier Park *	Symbio Place, Whiteleaf Road *	South of Green Lane *	Wood Lane End *	Two Waters Road/A41 Junction *	Breakspear Way/ Green Lane/ Boundary Way *	Jarman Park *	Bunkers Park *
Biodiversity	?	x	x	-	?	x	-	x	-	-	?	x	?	x	x	x	?
Water	?	-	-	?	?	-	-	-	-	-	-	-	-	-	-	-	-
Flood risk	-	-	-	?	?	-	-	-	-	?	-	-	-	?	-	-	-
Climate change	✓	✓	x	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	?	x
Air Quality	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	?	-	?	x
Soils	x	x	x	✓	✓	x	✓	x	✓	✓	✓	x	✓	x	x	✓	x
Resource efficiency	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Historic environment	-	?	?	?	-	-	?	-	-	-	?	?	?	-	?	-	-
Landscape / Townscape	x	x	x	✓	✓	x	✓	x	✓	✓	✓	x	✓	x	x	x	x
Health and wellbeing	✓	✓	?	✓	✓	✓	x	?	✓	✓	✓	x	✓	?	-	-	✓
Sustainable locations	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	x
Community cohesion	✓	✓	✓	✓	?	✓	-	x	✓	✓	✓	x	✓	-	-	-	✓
Housing	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	-	-	-	-
Sustainable prosperity	✓	✓	✓	✓	x	✓	x	✓	?	?	x	✓	x	✓	✓	✓	-
Employment and skills	✓	✓	✓	✓	x	✓	x	✓	?	?	✓	✓	x	✓	✓	✓	-

Table 5-5: Berkhamsted site assessment summary

	South of Berkhamsted*	Haslam Playing Fields, Shootersway*	Land east of Darrs Lane*	Land adj. to Blegberry Gardens, Shootersway*	Land East of Berkhamsted	British Film Institute Archive*	Land at Rossway Farm*	Land between Hanburys and the A41*	Lock Field, Northchurch*	Ivy House Lane	Bank Mill Lane*	Former Durrants Furniture*	Hanburys, Shootersway (LA4)*	Berkhamsted Civic Centre*	Gossoms End/Billet Lane*
Biodiversity	x ✓	x ✓	x ✓	x	x ✓	-	x	x	x	x	x	?	x	-	-
Water	?	?	?	?	?	?	?	?	?	?	?	?	-	-	?
Flood risk	-	?	-	?	?	?	-	-	-	-	x	x	?	?	?
Climate change	x ✓	x	x	x	x ✓	x	x	x	✓	x	✓	✓	x	✓	✓
Air Quality	?	x	x	x	?	x	x	x	?	x	?	?	x	✓	✓
Soils	x	x	x	x	x	✓	x	x	x	x	x	✓	x	✓	✓
Resource efficiency	?	?	?	?	?	?	?	-	-	-	?	-	-	-	-
Historic environment	x	?	x	?	?	?	?	?	?	?	?	?	?	?	?
Landscape / Townscape	x	x	x	x	**	?	x	x	x	x	x	?	x	?	?
Health and wellbeing	x ✓	x ✓	✓	x ✓	x ✓	x ✓	x ✓	x ✓	✓ x	x ✓	✓	?	x	✓	✓
Sustainable locations	✓	x	✓	x	✓	x	x	x	✓	x	✓	✓	x ✓	✓	✓
Community cohesion	✓	✓	✓	✓	✓	✓	✓	✓	✓	x ✓	✓	✓	✓	-	✓
Housing	✓✓	✓	✓	✓	✓✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Sustainable prosperity	✓	✓	✓	✓	✓	x ✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Employment and skills	✓	✓	✓	✓	✓	?	✓	✓	✓	✓	✓	✓	✓	?	✓

Table 5-6: Tring site assessment summary

	East of Tring*	New Mill*	Dunsley Farm*	South of Gammel Farm	Ickfield Way, West of Tring*	Miswell Lane*	Tring High Street/Brook Street*
Biodiversity	x	x	x	x	x	x	-
Water	?	?	?	-	-	-	-
Flood risk	?	?	?	-	-	-	-
Climate change	x	x	✓	x	x	x	✓
Air Quality	x	x	✓	x	x	x	✓
Soils	xx	x	x	x	x	x	✓
Resource efficiency	-	-	-	-	-	-	-
Historic environment	x	-	?	-	-	?	?
Landscape / Townscape	x	x	x	x	?	x	✓
Health and wellbeing	✓	✓	x	✓	?	✓	?
Sustainable locations	✓	✓	✓	✓	✓	✓	✓
Community cohesion	✓	✓	✓	✓	✓	-	✓
Housing	✓	✓	✓	✓	✓	✓	?
Sustainable prosperity	✓	✓	✓	✓	✓	✓	✓
Employment and skills	✓	✓	✓	✓	x	✓	✓

Table 5-7: Kings Langley Site Assessment summary

	Hill Farm	Rectory Farm*	Land adjacent to Coniston Road*	Wayside Farm
Biodiversity	x	x	x	x
Water	?	?	-	?
Flood risk	-	x	-	x
Climate change	x	✓	x	✓
Air Quality	x	✓	x	✓
Soils	x	x	x	x
Resource efficiency	?	?	?	?
Historic environment	?	-	-	x
Landscape / Townscape	x	x	x	x
Health and wellbeing	✓	✓	x	✓
Sustainable locations	✓	✓	✓	✓
Community cohesion	✓	✓	-	✓
Housing	✓	✓	✓	✓
Sustainable prosperity	✓	x	✓	✓
Employment and skills	✓	x	✓	✓

Table 5-8: Bovingdon site assessment summary

	Grange Farm*	Homefield	Fox Meadow	Duckhall Farm	South of Hempstead Road	Chesham Rd Molyneux Ave*	Bovingdon High Street Regeneration
Biodiversity	x	x	?	x	x	x	?
Water	?	?	?	?	?	?	-
Flood risk	?	-	-	?	?	?	?
Climate change	✓	✓	✓	✓	✓	✓	✓
Air Quality	✓	✓	✓	✓	✓	✓	✓
Soils	xx	x	xx	x	x	x	x
Resource efficiency	?	?	?	?	?	-	-
Historic environment	?	-	-	?	?	-	x
Landscape / Townscape	x	x	x	x	x	x	?
Health and wellbeing	✓	✓	✓	✓	✓	✓	✓
Sustainable locations	✓	✓	✓	✓	✓	✓	✓
Community cohesion	✓	✓	✓	x	-	x	?
Housing	✓	✓	✓	✓	✓	✓	✓
Sustainable prosperity	✓	✓	✓	✓	✓	✓	✓
Employment and skills	✓	✓	✓	✓	✓	✓	✓

Table 5-9: Markyate site assessment summary

	South of London Road *	Cotton Spring Farm	Hicks Road/ High Street	Watling Street (r/o Hicks Rd and High St) *
Biodiversity	x ✓	x	-	?
Water	?	-	-	-
Flood risk	xx	?	?	-
Climate change	?	?	?	?
Air Quality	?	?	?	?
Soils	x	x	✓	✓
Resource efficiency	-	-	-	-
Historic environment	-	?	?	?
Landscape / Townscape	x	x	✓	✓
Health and wellbeing	✓ x	x ✓	✓ x	✓ x
Sustainable locations	✓	✓	✓	✓
Community cohesion	✓	✓	-	-
Housing	✓	✓	✓	✓
Sustainable prosperity	✓	✓	?	✓
Employment and skills	✓	✓	x	x

Table 5-10: New settlement site assessment summary

	New Settlements	
	Bovingdon airfield	Long Marston
Biodiversity	? ✓	x ✓
Water	-	?
Flood risk	-	xx
Climate change	✓ x	x ✓
Air Quality	✓ x	x
Soils	✓	x
Resource efficiency	-	-
Historic environment	?	?
Landscape / Townscape	x	xx
Health and wellbeing	✓	?
Sustainable locations	x	x
Community cohesion	✓	✓
Housing	✓✓	✓✓
Sustainable prosperity	✓	✓
Employment and skills	✓	✓

Table 5-11: Countryside site assessment summary

	Countryside Sites				
	Bourne End Mills GEA extension *	Bovingdon Brickworks *	Watling Street Truck Stop*	Haresfoot Campus*	Amaravati Buddhist Monastery*
Biodiversity	x	?	x	-	-
Water	-	-	?	-	-
Flood risk	-	-	x	-	-
Climate change	x	x	-	-	-
Air Quality	x	x	?	-	-
Soils	x	✓	x	?	✓
Resource efficiency	-	-	-	-	-
Historic environment	-	-	?	?	?
Landscape / Townscape	x	-	x	?	?
Health and wellbeing	-	-	?	✓	-
Sustainable locations	x	x	-	x	-
Community cohesion	-	-	-	?	✓
Housing	-	-	-	-	-
Sustainable prosperity	✓✓	✓✓	✓	-	-
Employment and skills	✓✓	✓✓	✓	-	-

The site assessments identified some significant effects against sustainability objectives as described below:

	SA Objective	Significant effects identified
1	To protect, maintain and enhance biodiversity and geodiversity at all levels.	No significant effects identified
2	To protect, maintain and enhance water resources (including water quality and quantity)	No significant effects identified
3	To reduce flood risk	✗✗ in relation to Land South of London Road, Markyate and Long Marston due to a considerable area the sites being within Flood Zones 3a or 3b.
4	Reduce greenhouse gas emissions and adapt to the effects of climate	No significant effects identified
5	Achieve good air quality, especially in urban areas	No significant effects identified
6	Make efficient use of land and protect soils	✗✗ in relation to East of Tring, Fox Meadow and Grange Farm, Bovington as a large part of all of these sites is Grade 2 agricultural land.
7	To use natural resources, both finite and renewable, as efficiently as possible, and re-use finite resources or recycled alternatives wherever possible	No significant effects identified
8	To identify, conserve and enhance the historic environment and cultural assets	No significant effects identified
9	To conserve and enhance landscape and townscape character and encourage local distinctiveness	✗✗ in relation to Long Marston and Land East of Berkhamsted due to the impact the developments would have on the Borough's landscape.
10	To improve the health and wellbeing of the local population	No significant effects identified
11	To develop in sustainable locations	✓✓ for many of the urban sites in Hemel Hempstead which is considered to be the most sustainable location in the Borough. These sites are close to facilities and services and are well connected by transport infrastructure.
12	To improve community cohesion through reducing inequalities, promoting social inclusion and reducing crime and the fear of crime	No significant effects identified
13	Ensure that everyone has access to good quality housing that meets their needs	✓✓ for the strategic sites which can provide in excess of 500 new dwellings; North Hemel Hempstead, West Hemel Hempstead, South of Berkhamsted and East of Tring.

	SA Objective	Significant effects identified
14	Achieve sustainable levels of prosperity and economic growth	✓✓ for the sites which would contribute considerable amounts of employment space which would support the local economy - Two Waters Road/A41 Junction and Breakspear Way/ Green Lane/ Boundary Way, Hemel Hempstead and Bourne End Mills GEA extension and Bovingdon Brickworks, countryside sites.
15	To ensure local residents have employment opportunities and access to training	✓✓ for the sites which would contribute considerable amounts of employment space which would provide new employment opportunities - Two Waters Road/A41 Junction and Breakspear Way/ Green Lane/ Boundary Way, Hemel Hempstead and Bourne End Mills GEA extension and Bovingdon Brickworks, countryside sites..

For the sites that were considered but which have not been included in the Draft Local Plan the reasons for not including the sites is provided alongside the detailed site assessment in Appendix F.

5.5 The Council's Preferred Approach

5.5.1 Introduction

This section provides the Council's reasoning for selecting the preferred approach for delivering development in Dacorum which has been included in the Draft Local Plan.

5.5.2 Council's Reasoning

"The Council has followed an iterative approach to plan making, ensuring the draft plan is informed by a wide range of technical evidence including the Sustainability Appraisal (SA) as well as formal and informal consultation. The later includes key stakeholders such as Hertfordshire County Council and the Statutory Bodies such as the Environment Agency, Natural England and Historic England. The SA has informed each stage of plan making, with a 'Working Note' published as part of the 'Issues and Options' consultation in November 2017. The Council recognises that further work is needed to be undertaken before the Local Plan can be finalised, noting that the SA, including its appraisal of the plan and its emerging strategy, as well as the consideration of alternatives, will continue to evolve beyond the current public consultation period.

The Council has followed a comprehensive approach to site selection, consistent with the methodology set out in the Planning Practice Guidance. This includes assessing over 140 sites in our urban areas and in excess of 125 sites promoted outside of the six main settlements, mainly on land designated as Green Belt or part of the Chilterns AONB. Around a quarter of these sites (65 in total) have been appraised through the SA, taking into account site specific matters as well as potential in-combination effects. A number of other sites have been shortlisted and appraised for future employment provision, as well as other uses, including new community, sports, leisure and transport facilities.

The Council's site selection has been informed by the SA and other wide-ranging factors. Key considerations include:

- *identifying sufficient land to meet a new housing requirement for the borough, set through a new standard method for calculating housing need;*
- *ensuring a sufficient supply of housing across the borough, including allocating sites of differing size, type and geography, including windfall sites;*
- *identifying sufficient land to meet the borough's future employment needs;*
- *minimising, where possible, adverse impacts on the highway network and seeking to maximise opportunities for supporting sustainable modes of travel;*
- *supporting the delivery of appropriate infrastructure; and*
- *seeking to minimise adverse impacts, as far as practicable on the historic and natural environment.*

The allocations set out in the draft Local Plan represent the Council's emerging strategy for achieving sustainable development, having considered a range of alternatives at both the strategic level and site-specific level. With this in mind, the focus for future growth will be at Hemel Hempstead, the most sustainable location in the borough. Here, growth will be delivered through a number of existing and new urban allocations where land has been optimised and densities significantly increased in opportunity areas close to the town centre and key transport hubs. Within the Plan period around 1,500 new homes are to be provided in the Green Belt with additional land with the capacity for a further 4,000 homes, removed from the Green Belt but safeguarded to meet longer term needs beyond the Plan period. This major urban extension to the north and north-east of the town will contribute towards longer term transformative change to Hemel Hempstead. Future employment growth will focus on the expansion of the existing Maylands Business Park to the east of the town as well as to the south of the town, close to the strategic transport network.

Significant growth is also planned for the market towns of Berkhamsted and Tring, which will enable the delivery of new infrastructure, including sustainable transport schemes, new primary and secondary schools, local/community centres, enhancements to health facilities and significant new open spaces. This growth is necessary to consolidate these towns' respective roles as the most sustainable locations outside of Hemel Hempstead, ensuring that the necessary infrastructure is in place to support existing and future communities while maintaining the vitality and viability of the town centres.

Smaller levels of growth are proposed for each of the three larger villages of Bovingdon, Kings Langley and Markyate, recognising the more constrained nature of these settlements to expand, but building upon their ability to serve many of the day-to-day needs of existing and future residents and those in the surrounding rural hinterland.

The Council's preferred strategy reflects Option Ci of the Spatial Strategy and Growth Options appraised by TRL. In coming to this view, the Council recognises that at a high-level there is very little to differentiate between all of the options considered, particularly in relation to likely significant effects against the Sustainability Objectives. Option Ci delivers the same significant positive effects as many of the other options, alongside a number of identified negative and unknown effects, all of which are not considered to be significant.

Options A and B focus growth at the three main settlements, with no growth proposed for the larger villages in the borough. The Council believes it is important that there are opportunities for growth to occur across the borough, including in the larger villages, which would assist in maintaining and enhancing the range of existing services and facilities, as well as potentially delivering new infrastructure, akin to Option Ci and Cii. On Option B, the Council considers that significant growth is

already proposed for Hemel Hempstead through the emerging strategy, delivering almost two thirds of the overall housing requirement and safeguarding land for a further growth beyond the plan period. It also does not take into account potential linked growth to the east of the town, in St. Albans City and District Council, which could add an additional 5,500 dwellings onto the edge of the settlement (can we say this, is it possible in-combination effect?). The Council is working collaboratively with St. Albans City and District Council and other partners as part of the duty to cooperate to ensure a comprehensive development is delivered across the borough boundary.

Option Cii considers higher growth at the villages of Bovington and Kings Langley, building upon their strengths as having a larger range of local services and facilities when compared to Markyate, and also that Kings Langley has better access to public transport. The Council considers that these scales of growth will put increased pressure on existing infrastructure such as education provision, and it is unclear at this stage if the necessary infrastructure could be delivered as a result of viability and/or land availability. Given that Option Ci performs slightly better against objective SA11, recognising that the majority of growth is directed to the most sustainable locations in the borough, the Council agree that Option Cii does not perform as well as the emerging strategy at this stage.

Options Di and Dii consider new settlement options at Long Marston (greenfield land outside of the Green Belt and Chilterns AONB) and at Bovington Airfield (part previously developed land in the Green Belt). Both of these options have not been promoted for a new settlement and therefore raise issues of soundness if chosen at this stage. The Council agreed with the conclusions of the SA that the emerging strategy results in more significant positive effects than with Options Di and Dii, with no real difference in terms of negative effects (Bovington Airfield still contains a substantial amount of grassed areas). For this reason, the Council considers Option Ci to be preferred at this stage.

The Council agrees that Option E (Higher growth of 1,100 dwellings per annum) has the potential to give rise to more significant adverse effects (SA6 – Soils and SA9 – Landscape) but recognises the significant positive effects on the SA13 - Housing. In the absence of evidence which justifies a need for a higher-growth option for Dacorum, the Council considers it appropriate to plan for a likely housing requirement which reflects the new standard methodology for calculating housing need. In doing so, the preferred strategy avoids the potential for significant negative effects to occur in relation to SA Objectives SA6 – Soils and SA9 – Landscape.

In choosing to carry forward Option Ci as the emerging strategy for the draft Local Plan, the Council recognises that this approach gives rise to minor negative effects against a number of the SA Objectives, namely SA1 – Biodiversity; SA2 – Water; SA4 – Climate Change; SA5 – Air Quality; SA6 – Soils; SA7 – Resource Efficiency and SA9 – Landscape and Townscape. There are also some uncertain effects identified against SA8 – Historic Environment; and SA12 – Community Cohesion.

The Council has considered TRL's assessment of the draft Local Plan (Section 6) to which a narrative of the predicted effects, both positive and negative, is presented for each of the SA objectives. The section highlights that where negative effects exist, there are a number of other draft policies in the plan which seek to mitigate these effects where possible.

At the site-specific level, the Council recognises the significant adverse effects identified against three sites recommended to be allocated in the Local Plan. Two sites (East of Tring and Grange Farm, Bovington) are located on Grade 2 agricultural land, and development of this land would result in the sealing of these potentially best and most versatile soils. The Council has carefully considered this against other SA objectives for these sites as well as alternative sites.

At Bovington, much of the land to the west, south and east of the settlement is classified as Grade 2, and Grange Farm offers more sustainability benefits in terms of flood alleviation for the village. The

Council considers that an allocation of 150 dwellings at Grange Farm will allow for significantly more open space to be provided, therefore reducing the amount of soil sealing within the site.

At Tring, the Council has allocated a number of other sites in the settlement that are classified as Grade 3, and considers the allocation of 1,400 homes at East of Tring will enable significant amounts of public open space to be provided, including a new public park of around 20 hectares on land classified as Grade 2. The Council considers that these requirements mitigate the impact that development would have on this particular objective.

At Markyate, the allocation of the site South of London Road will require the provision of a new bridge over the River Ver in order to enable development of this site. The SA correctly appraises this to have a potential significant negative effect on objective SA3 – Flood Risk. The Council has carefully considered the allocation of this site in light of the sequential and exception test to flood risk, as set out in the Planning Practice Guidance. It is unlikely that any alternative site in Markyate would avoid this effect, as land at Cotton Spring Farm would require access from South of London Road, and thus requiring the same bridge over the River Ver. In considering the outcomes of the appraisal of South of London Road, the Council has had regard to positive effects identified against seven of the objectives, and believe that these benefits that the allocation will bring outweigh the negatives, including in relation to Flood Risk. In terms of mitigation, the Council propose that the areas at greatest risk of flooding will be protected and enhanced as a new public park serving the wider settlement, and will deliver an enhanced biodiversity corridor along the River Ver.”

6 Assessment of Draft Local Plan

6.1 Introduction

In addition to the site assessments (see Section 5.4), the policies and proposals which are included in the Draft Local Plan have been assessed in order to identify the likely effects which would result were the policies to be adopted in a new Local Plan. The findings of the SA undertaken at this stage will be used to inform the next stage of the planning process, that being the development of the Publication Local Plan.

The sections which follow summarise the results of the assessments for each Local Plan element followed by an assessment by SA objective of the plan as a whole (including any cumulative, synergistic and secondary effects). In addition, cross boundary effects are discussed in Section 6.5.

6.2 Summary of the Assessment of Policies

The policies which are included in the Draft Local Plan have been subject to assessment based on the methodology described in Section 3.2. These assessments have considered the potential effects which would result from implementation of the policies in isolation and in general do not consider potential mitigation or enhancement measures which could help to improve the sustainability performance of the policy or site, whether this would be from other elements in the Draft Local Plan or non-Local Plan related mitigation/enhancement. Where appropriate the potential mitigation/enhancement is presented as an addition to the specific assessments.

Each of the Strategic Policies and associated Development Management Policies has been assessed against the SA objectives using the methodology described above. The full assessment is included below and is summarised in Table 6-1.

Table 6-1: Summary of assessment of policies in the Local Plan

The Sustainable Development Strategy

Policy	SA Objectives														
	Biodiversity	Water	Flood risk	Climate Change	Air Quality	Soils	Resource Efficiency	Historic Environment	Landscape and Townscape	Health and Wellbeing	Sustainable Location	Community	Housing	Sustainable Prosperity	Employment and Skills
SP1 Sustainable Development	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SP2 Spatial Strategy for Growth	✓ x	x	-	✓ x	✓ x	x	x	?	x	✓	✓	✓	✓	✓	✓
SP3 The Settlement Hierarchy	-	-	-	✓	-	-	-	-	-	-	✓	✓	-	-	-
SP4 The Housing Strategy	x	x	-	x	x	x	x	?	x	✓	✓	✓	✓	✓	✓
SP5 Delivering the Employment Strategy	?	-	-	x	✓	x	✓	?	?	?	?	✓	-	✓	✓
SP6 Delivering the Retail and Leisure Strategy	?	-	-	x	✓	?	-	?	?	✓	✓	✓	-	✓	✓
SP7 Delivering Infrastructure	?	?	?	?	?	-	-	?	?	?	?	?	-	?	?
SP8 Neighbourhood Planning	-	-	-	-	-	-	-	-	-	✓	-	✓	✓	✓	✓
SP9 Monitoring and Review	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Guiding Development

Policy/Theme	SA Objectives														
	Biodiversity	Water	Flood risk	Climate Change	Air Quality	Soils	Resource Efficiency	Historic Environment	Landscape and Townscape	Health and Wellbeing	Sustainable Location	Community	Housing	Sustainable Prosperity	Employment and Skills
SP10 Climate Change Mitigation and Adaptation	✓	✓	✓	✓	✓	✓	✓	?	?	✓	✓	-	-	-	-
Environment and Biodiversity policies	✓	✓	✓	✓	✓	✓	-	-	✓	✓	-	✓	-	-	-
SP11 Development in the Green Belt	?	?	?	✓ x	-	x	-	?	✓ ?	-	✓	✓	✓	✓	✓
SP12 Development in Rural Area	-	-	-	✓	-	-	-	?	?	✓	-	✓	✓	✓	✓
SP13 Delivering High Quality Design	✓	-	-	?	?	-	-	✓	✓	✓	✓	✓	-	✓	✓
Sustainable Transport and Connectivity	?	-	?	✓	✓	?	-	✓	?	✓	✓	✓	-	✓	✓
Healthy Communities	✓	-	-	-	-	-	-	-	✓	✓	✓	✓	-	✓	✓

Delivery Strategies

Delivery Strategy	SA Objectives														
	Biodiversity	Water	Flood risk	Climate Change	Air Quality	Soils	Resource Efficiency	Historic Environment	Landscape and Townscape	Health and Wellbeing	Sustainable Location	Community	Housing	Sustainable Prosperity	Employment and Skills
Hemel Hempstead Delivery Strategy: Policies SP14, SP15, SP16, SP17, SP18, SP19	?	-	?	✓ x	?	✓ x	✓	?	x ✓	✓	✓	✓	✓	✓	✓
Berkhamsted Delivery Strategy: Policies SP20, SP21, SP22	?	-	-	✓ x	?	x	✓	?	x ✓	✓	✓	✓	✓	✓	✓
Tring Delivery Strategy: Policies SP23, SP24, SP25	?	-	-	✓ x	?	x	✓	?	x	✓	✓	✓	✓	✓	✓
Kings Langley Delivery Strategy: Policy SP26	?	✓	?	?	?	x	-	-	x	✓	✓	✓	✓	✓	✓
Bovingdon Delivery Strategy: Policy SP27	?	-	-	-	-	x	-	-	x	✓	✓	✓	✓	✓	✓
Markyate Delivery Strategy: Policy SP28	?	?	?	?	?	x	-	-	x	?	✓	✓	✓	✓	✓
The Countryside Delivery Strategy: Policy SP29	?	?	?	✓ x	-	x	-	✓	✓	?	✓	✓	✓	✓	✓

The assessments of policies included in the plan identified some significant positive effects against sustainability objectives as described below. No significant negative effects were identified:

	SA Objective	Significant effects identified
1	To protect, maintain and enhance biodiversity and geodiversity at all levels.	✓✓ in relation to the 'Environment and Biodiversity' policies
2	To protect, maintain and enhance water resources (including water quality and quantity)	✓✓ in relation to the 'Environment and Biodiversity' policies
3	To reduce flood risk	✓✓ in relation to the 'Environment and Biodiversity' policies
4	Reduce greenhouse gas emissions and adapt to the effects of climate	✓✓ in relation to 'SP10 Climate Change Mitigation and Adaptation' and associated DM policies, the 'Sustainable Transport and Connectivity' policies and Hemel Hempstead Delivery Strategy: Policies SP14, SP15, SP16, SP17, SP18 and SP19 .
5	Achieve good air quality, especially in urban areas	✓✓ in relation to the 'Environment and Biodiversity' policies
6	Make efficient use of land and protect soils	✓✓ in relation to the 'Environment and Biodiversity' policies
7	To use natural resources, both finite and renewable, as efficiently as possible, and re-use finite resources or recycled alternatives wherever possible	✓✓ in relation to 'SP10 Climate Change Mitigation and Adaptation' and associated DM policies
8	To identify, conserve and enhance the historic environment and cultural assets	✓✓ in relation to 'SP13 Delivering High Quality Design' and associated DM policies
9	To conserve and enhance landscape and townscape character and encourage local distinctiveness	✓✓ in relation to the 'Environment and Biodiversity' policies and 'SP13 Delivering High Quality Design' and associated DM policies
10	To improve the health and wellbeing of the local population	✓✓ in relation to the 'Healthy Communities' policies
11	To develop in sustainable locations	✓✓ in relation to policy 'SP2 Spatial Strategy for Growth', 'SP3 The Settlement Hierarchy', 'SP4 The Housing Strategy' and Hemel Hempstead Delivery Strategy: Policies SP14, SP15, SP16, SP17, SP18 and SP19 .
12	To improve community cohesion through reducing inequalities, promoting social inclusion and reducing crime and the fear of crime	✓✓ in relation to 'SP13 Delivering High Quality Design' and associated DM policies

	SA Objective	Significant effects identified
13	Ensure that everyone has access to good quality housing that meets their needs	✓✓ in relation to policy 'SP2 Spatial Strategy for Growth', 'SP4 The Housing Strategy', 'Hemel Hempstead Delivery Strategy: Policies SP14, SP15, SP16, SP17, SP18 and SP19', 'Berkhamsted Delivery Strategy: Policies SP20, SP21 and SP22' and 'Tring Delivery Strategy: Policies SP23, SP24, SP25'.
14	Achieve sustainable levels of prosperity and economic growth	✓✓ in relation to policy 'SP2 Spatial Strategy for Growth', 'SP4 The Housing Strategy', 'SP6 Delivering the Retail and Leisure Strategy', 'Hemel Hempstead Delivery Strategy: Policies SP14, SP15, SP16, SP17, SP18 and SP19' and 'Tring Delivery Strategy: Policies SP23, SP24, SP25'.
15	To ensure local residents have employment opportunities and access to training	✓✓ in relation to policy 'SP2 Spatial Strategy for Growth', 'SP4 The Housing Strategy', 'SP6 Delivering the Retail and Leisure Strategy', 'Hemel Hempstead Delivery Strategy: Policies SP14, SP15, SP16, SP17, SP18 and SP19' and 'Tring Delivery Strategy: Policies SP23, SP24, SP25'.

6.3 Summary of the Assessment of Proposals and Sites

The proposals and sites which are included in the Draft Local Plan have been subject to assessment during the development of the Plan. This process and a summary of its findings are described and presented in Section 5.4 and are not repeated here. As mentioned in that section the detailed assessments for the proposals and sites that have been selected for inclusion in the Draft Local Plan are provided in Appendix E to this report.

6.4 Whole Plan Assessment by SA Topic

6.4.1 Introduction

This section summarises the assessment of the Draft Local Plan by SA objective.

6.4.2 SA1: Biodiversity

The level of development proposed in the Draft Local Plan will inevitably result in the need to develop on some greenfield sites, with associated effects on the biodiversity associated with those development sites taken forward and the green networks of which they may form a part. Also, once the new houses are occupied there will be increased pressure on the natural environment associated with recreational activities of new residents, as well as impacts from increased numbers of domestic pets. The recreational pressures could affect important sites for nature conservation both within and outside the Borough. In addition, there could be some adverse secondary effects on biodiversity as a result of increased pressure on water resources that would result from additional dwellings in the Borough, when considered alongside new developments in neighbouring local authorities.

However, to act as a counter, policies in the Draft Local Plan aimed at concentrating housing and employment development in the urban areas and away from greenfield sites should help to protect,

maintain and enhance designated sites and their buffer zones and should reduce the loss of agricultural land which may have biodiversity value.

The mitigation of any adverse effects associated with new housing developments will need to be undertaken at a location by location level, informed by other policies in the Local Plan, in particular the policies in the 'Environment and Biodiversity' section, including amongst others: 'DM28 – Protection of Sites'; 'DM29 – Protected Species and Priority Species and Habitats'; 'Policy DM30 – Biodiversity Net Gain'; 'DM31 - Chilterns Beechwoods Special Area of Conservation'; and 'DM32 – Development on the Ashridge Estate'.

Policies DM28 and DM29 provide protection to designated sites and protected/priority species and habitats, whilst Policy DM30 requires the delivery of an overall net-biodiversity gain of 10% and positive measures to support wildlife such as restoring degraded or lost ecosystems, offsetting to compensate for residual impacts, avoiding creating a negative biodiversity impact and minimising impacts that cannot be avoided.

Policies DM31 and DM32 should ensure that development within the plan does not adversely affect the internationally important Chiltern Beechwoods SAC. DM31 would assist in conservation and enhancement of the biodiversity of the Chiltern Beechwoods SAC and DM32 would improve onsite management of visitors to the Ashridge Estate and conserve and protect the biodiversity of this site.

'DM33 - Protection and Enhancement of the River Character and Water Environment' would have secondary positive effects for biodiversity, as would SuDS provision requirements in 'DM34 - Flood Risk and Protection' and the pollution related environmental protection requirements of 'DM35 - Protection from Environmental Pollution'. The requirements of 'DM36 - Tree retention and Protection' and 'DM37 - Landscaping on Development Sites' will also help to support this objective.

Significant positive effects against this objective have therefore been identified in relation to these policies.

All new developments will be required to provide a net-gain for biodiversity and through development at the larger sites there are opportunities for more strategic biodiversity gains through the integration of green infrastructure into the new developments.

In relation to the potential for adverse effects on the Chiltern Beechwoods SAC, particularly at the Ashridge Estate, a separate Habitats Regulations Assessment is being undertaken. This will identify and assess the potential effects and their significance and if necessary, will consider how adverse effects could be mitigated.

For several of the policies the SA has a finding of 'uncertain effects' given that the effects which will result are dependent on a variety of factors, such as how developments are delivered on a site and the effectiveness of mitigation and enhancement measures.

6.4.3 SA2: Water

The Catchment Abstraction Management Strategy (CAMS) for the Colne catchment identified that the underlying chalk aquifer is assessed as being 'over-abstracted'. Therefore, providing for a minimum of 16,596 new dwellings in the Local Plan period would increase this pressure on water resources. The effect is likely to become more significant over time as more dwellings are built and risk of periodic water shortages increases.

New development could also result in the pollution of water courses both during construction and when developments are occupied, as well as affecting groundwater resources, particularly if the development is in a Source Protection Zone (SPZ). New development increases the potential for water

pollution, associated with increased run-off from impermeable surfaces and the potential for sewer flooding in high rainfall events. The likelihood and level of such effects will be dependent on the specific development locations.

However, significant positive effects on this SA objective have been identified as a result of the Local Plan policies under the Environment and Biodiversity theme, in particular: 'DM33 - Protection and Enhancement of the River Character and Water Environment'; 'DM34 – Flood Risk and Protection'; and 'DM35 - Protection from Environmental Pollution'.

Policy DM33 requires that the water environment be managed by restoring water courses, avoiding damage of or abstraction from the Rivers Ver, Gade and Bulbourne, and locating development away from waterbodies, thereby directly supporting this objective. In addition, by restricting the types of development which can take place in flood risk areas and requiring measures for the control and reduction of surface water run-off, DM34 should help to protect the water environment, whilst DM35 aims to improve water quality standards. Significant positive effects against this objective have therefore been identified in relation to these policies.

6.4.4 SA3: Flood risk

At a strategic level the SA has found 'no predicted effects' against this objective because the level of growth proposed in the Local Plan should be able to be provided without the need to develop in areas of higher flood risk.

'Policy DM34 – Flood Risk and Protection' should ensure that development: does not take place in Flood Zones 2 or 3 unless it is for a compatible use; does not result in increased flood risk elsewhere; and incorporates flood resistant and resilient measures. The policy should also ensure that any SuDS will be maintained throughout the lifetime of a new development. A significant positive effect has therefore been identified against this objective.

In addition, 'Policy SP10 - Climate Change Mitigation and Adaptation' requires that development avoids areas of flood risk and that green infrastructure is used to reduce flood risk, whilst the Masterplans for delivering the Place Strategies will require the provision of comprehensive green infrastructure networks and in so doing will help to reduce overall flood risk.

6.4.5 SA4: Climate Change

Making provision for 16,596 new homes and 116,500 sqm of industrial floorspace over the Local Plan period would inevitably result in an increase in greenhouse gas emissions from energy used in the construction and occupation of new housing / employment uses and the associated activities including increases in traffic. This is recognised in the SA, with negative effects against this objective being identified for the policies and delivery strategies which include proposals for housing and employment growth.

In relation to increased traffic, the levels of increased vehicle usage and miles travelled would be dependent of how close new developments are to existing services and facilities, as well as the type and level of new services and facilities provided by new developments, either on-site or through CIL and S106.

Growth in and around the Borough would place increased strain on the existing transport infrastructure. Traffic congestion is a problem, particularly in Hemel Hempstead and in order to reduce carbon emissions, there is a need to encourage walking, cycling and public transport as alternatives to the car.

However in terms of travel related greenhouse gas emissions, concentrating the majority of development in the Borough's most sustainable locations, as proposed in 'SP2 – Spatial Strategy for Growth', 'SP3 – Settlement Hierarchy' and 'SP4 – Housing', with the delivery strategies setting out how this would take place, would help to reduce the need to travel and the average distances travelled to access facilities which could have a positive effect on reducing the growth of greenhouse gas emissions from transport. The requirements of policies 'SP5 Delivering the Employment Strategy' and 'SP6 Delivering the Retail and Leisure Strategy' should also help to reduce the growth in emissions through their requirements to retaining and develop existing employment land, expand employment opportunities in the Borough and through the provision of new neighbourhood and local centres to reduce the need to travel.

Significant positive effects have been identified against this objective for 'Policy SP10 - Climate Change Mitigation and Adaptation' and the associated DM policies ('DM22 - Sustainable Design and Construction', 'DM23 – Energy and Carbon Emissions Reductions in New Development', 'DM24 - Low Carbon Community Heat and Energy Networks', 'DM25 – Stand-alone renewable or Low Carbon Energy' and 'DM26 - Carbon Offsetting') as they include a wide range of requirements which are directly related to the reduction in greenhouse gas emissions and the adaptation to climate change.

Significant positive effects have also been identified against this objective for the policies under the 'Transport and Connectivity' theme, as follows. Sustainable Transport Strategies have been developed for Hemel Hempstead, Berkhamsted and Tring which aim to make the transport network more attractive for walking and cycling and improving access to public transport. 'DM51 – Supporting and protecting land for transport interventions' will help to enable sustainable transport interventions to be taken forward. Improvements to transport corridors may help reduce congestion which has environmental benefits. 'DM50 - Transport and Movement', 'DM52 - Movement and Access' and 'DM53 - Walking and Cycling' all focus on reducing the need to travel overall and also ensure that transport is accessible to all user groups, prioritising the movement of pedestrians and cyclists. 'DM54 - Public Transport' encourages the use of public transport by ensuring that public transport is convenient and safe. By reducing the need to travel and encouraging alternative modes of travel other than the car, the growth in greenhouse gas emissions may be reduced. DM51 requires sustainable transport measures to be delivered early on in the delivery of new developments which will help to enable sustainable travel behaviours from the outset.

Further significant positive effects have been identified in relation to the Hemel Hempstead Delivery Strategy policies as the delivery strategy and its supporting policies include a wide range of requirements which would result in positive effects in terms of mitigation and adaptation to climate change. These include the requirement for high densities of development in the most sustainable locations, as well as mixed-use developments, which will reduce the need to travel and the provision of infrastructure for sustainable modes of travel (i.e. non-car travel) and the requirements to deliver integrated and accessible developments with walking, cycling and public transport prioritised – in line with the requirements of the Hemel Hempstead Sustainable Transport Strategy. The level of impact on this objective will however be dependent on the level of behavioural change that would be required to make use of the sustainable travel modes enabled by this strategy. In addition, the provision of significant levels of new employment space across Hemel Hempstead will reduce the need to travel to access employment opportunities – thereby reducing associated growth in greenhouse gas emissions. The strategy and its supporting policies also place considerable emphasis on reduced energy consumption in new developments and the delivery of sustainable energy and power infrastructure, as well as the delivery of significant environmental enhancement to ensure climate resilience.

Positive effects have been identified for the Berkhamsted and Tring Delivery Strategies, which in line with Garden City Principles, SP21 and SP22 would ensure that new developments promote sustainable travel choices and deliver integrated and accessible development with walking, cycling and public transport prioritised. This should reduce reliance on the car and therefore reduce the growth in greenhouse gas emissions. The requirements relating to generating energy from renewable and low carbon sources and delivering other significant environmental enhancement to ensure climate resilience would also support this objective.

Other positive effects relating to climate change mitigation and adaptation could arise as a result of the policies under the 'Environment and Biodiversity' theme, for example through the requirements of policies 'DM36 - Tree Retention and Protection' and 'DM37 - Landscaping on Development Sites' which require new development to incorporate new trees and landscaping. The Masterplans for delivering the Place Strategies will require the provision of comprehensive green infrastructure networks and in so doing will help support this objective.

6.4.6 SA5: Air Quality

Transport is a key source of air pollution and so inevitably making provision for 16,596 new homes and 116,500 sqm of industrial floorspace over the Local Plan period would contribute to background emissions through an increase in the number of vehicles on the road. This is recognised in the SA, with negative effects against this objective being identified for the policies and delivery strategies which include proposals for housing and employment growth.

However, as was the case for greenhouse gas emissions, the strategy to concentrate the majority of development in the Borough's most sustainable locations would help to reduce the need to travel to access facilities and the average distances travelled which would have a positive effect on reducing the growth of airborne emissions from transport. This would also be the case for the economic and retail policies which should also reduce the need to travel to access jobs and services.

'Policy DM35 - Protection from Environmental Pollution' directly supports this objective as new developments would as a minimum maintain air quality standards at AQMAs and any development which is expected to breach objectives for limiting pollutants must demonstrate mitigation or avoidance proposals. Significant positive effects have been identified for this policy in relation to the air quality objective.

In addition the policies under the themes of 'Climate Change & Sustainability' and 'Transport and Connectivity' which encourage the use of more sustainable modes of transport such as walking, cycling and passenger transport over the use of the private car should have a positive effect on reducing pollutants from transport.

6.4.7 SA6: Soils

Making provision for 16,596 new homes and 116,500 sqm of industrial floorspace over the Local Plan period would inevitably require development on greenfield sites – with associated adverse effects on soils. However, concentrating the majority of development in the Borough's most sustainable settlements and the intensification of sites within Hemel Hempstead through increased heights and densities would help to reduce the amount of greenfield land required to deliver the levels of growth in the Local Plan. This should minimise levels of soil sealing and the degradation/loss of soils.

A significant positive effect against the soil objective has been identified for 'Policy DM35 - Protection from Environmental Pollution' as it requires that soil quality standards would be maintained and opportunities would be taken to remediate contaminated land.

Positive effects have been identified for 'Policy SP10 - Climate Change Mitigation and Adaptation' which prioritises the development of previously developed land which would help to protect the Borough's soil resource, which in addition to providing agricultural function acts as an important carbon store.

In addition, policies aimed at protecting open spaces and limiting development in the countryside and on open land ('DM38 – open land', 'DM63 - Open Space Provision', 'SP28 - Delivering Growth in the Countryside') should help to preserve the natural environment and biodiversity. This could lead to indirect positive effects on soils.

The Borough contains some agricultural land which is classified as the 'best and most versatile' including areas to the east of Tring and the west of Bovington in which new development has been proposed. As a result, significant adverse effects have been identified for Growth Areas 'Tr03: East of Tring' and 'Bv01: Grange Farm' which have the majority of the site area located on Grade 2 agricultural land.

6.4.8 SA7: Resource efficiency

The level of new development proposed in the Local Plan will inevitably place demands on natural resources and create additional waste, both during the construction and operation/occupancy stages.

However, the Local Plan includes policies which aim to reduce these adverse effects. Significant positive effects have been identified against the resource efficiency objective for the policies under the 'Climate Change & Sustainability' theme, in particular policies 'SP10 - Climate Change Mitigation and Adaptation' and 'DM22 - Sustainable Design and Construction' which include a wide range of requirements that are directly related to the efficient use of resources and minimisation of waste, both during the construction and operation phases of new developments.

Positive effects have been identified against the delivery strategies for Berkhamsted and Tring which require delivery of an exemplar in sustainable living with a particular focus on reducing energy consumption as well as generating energy from renewable and low carbon sources, thereby supporting this objective. The Hemel Hempstead delivery strategy require that development under Hemel Garden Communities will need to be designed to minimise waste in construction and operation and enable reuse and recycling of materials. In addition, a new Waste Recycling Centre is proposed in the strategy which will help to encourage and enable residents to increase their levels of recycling. Furthermore, requirements to generate energy from renewable and low carbon sources also support this objective.

6.4.9 SA8: Historic Environment

New development proposed in the Draft Local Plan has the potential to result in adverse effects on heritage assets and their settings and the wider historic environment. The significance of the effects on the historic environment of delivering the new development will be largely dependent on the nature of any heritage assets and their settings that are associated with the sites, as well as the scale and design of the new developments relative to these. As a result, the SA has identified uncertain effects for many of the Draft Local Plan policies and topic areas.

New development may also result in significant loss or erosion of the landscape or townscape character or quality, which is likely to also have an impact (direct and or indirect) upon the historic environment and people's enjoyment of it. Again, these effects will be dependent of the setting of the new development, as well as the type and scale of development.

Under the ‘Delivering Great Places’ theme the Draft Local Plan includes policies which will help to support this objective and significant positive effects have been identified for these policies. ‘Policy DM41 – Height of Buildings’ requires that the height of new buildings should reinforce and enhance local character and no development would adversely affect conservation areas or listed buildings; a principle which is echoed in ‘DM46 - Conservation Areas’ and ‘DM47 – Listed Buildings’. The protection and enhancement of the historic environment is emphasised under ‘DM43 – Historic Environment’. Policies ‘DM44 - Development Affecting Non-Designated Heritage Assets’ and ‘DM45 - Heritage assets with Archaeological Interest’ seek to protect those heritage assets which are non-designated and those of archaeological interest, ensuring that no assets are lost or damaged by development. The Borough includes a number of Conservation Areas and developments in or near these areas would be permitted only if they preserve or enhance the character and appearance of the area under ‘DM46 – Conservation Areas’.

For several of the policies the SA has a finding of ‘uncertain effects’ given that the effects which will result are dependent on a variety of factors, such as how developments are delivered on a site and the effectiveness of mitigation and enhancement measures.

None of the site allocations have been identified to have any significant heritage-related constraints but the majority have some associated or nearby heritage assets that will need to be taken into consideration during the planning application process.

6.4.10 SA9: Landscape and Townscape

Making provision for 16,596 new homes and 116,500 sqm of industrial floorspace over the Local Plan period would inevitably result in effects on the local landscapes and townscapes in those areas where new development takes place. This could have the potential to result in adverse effects on the local and wider landscapes, such as the setting of the Chilterns AONB. This is recognised in the SA, with negative effects against this objective being identified for the policies and delivery strategies which include proposals for the housing and employment growth.

However concentrating the majority of development in the Borough’s most sustainable settlements and the intensification of sites within Hemel Hempstead through increased heights and densities would help to reduce the amount of greenfield land required to deliver the levels of growth in the Local Plan, thereby reducing levels of adverse effects on local landscapes.

Significant positive effects have been identified in relation to this objective for the policies under the ‘Environment and Biodiversity’ theme, with ‘DM27 - Landscape Character and Chilterns Area of Outstanding Natural Beauty’ requiring that all development shall help conserve, restore or enhance the prevailing quality, character and condition of the landscape in Dacorum which particular attention to the Chilterns AONB where proposals for major development would be refused except for in exceptional circumstances; ‘DM35 - Protection from Environmental Pollution’ seeking to limit and where possible avoid light pollution; and ‘DM38 – Open Land’ protecting open land from residential development and requiring that any development on open land must not adversely affect character or environment of the setting.

Significant positive effects have also been identified for the policies under the ‘Delivering Great Places’ theme as ‘SP13 - Delivering High Quality Design’ should ensure that new development reflects the character of the local area and enhances and complements its surroundings; ‘DM41- Height of Buildings’ restricts the height of buildings outside of the main urban areas and ensures that any development is sensitive to the distinctive qualities, topography and identity of the area which would have benefits for the landscape; ‘DM46 – Conservation Areas’ seeks to preserve the character of conservation areas, ensuring that the local townscape is not adversely affected by development; and

improvements to the canalside environment under 'DM49 - Canalside Environment and Recreational Moorings' would have a positive effect on townscape.

Positive effects have been identified for the policies under the 'Green Belt and Rural Area' theme as 'SP11 – Development in the Green Belt' restricts inappropriate development in the Green Belt; 'DM39 - Limited Infilling in Selected Small Villages in the Countryside' is restrictive in the type and location of new development which would be permitted, thereby protecting 'villagescapes' and supporting this objective; and 'DM40 - Bovingdon Airfield' requires that any development at Bovingdon Airfield would be carefully controlled and would minimise impact on the landscape.

For several of the policies the SA has a finding of 'uncertain effects' given that the effects which will result are dependent on a variety of factors, such as how developments are delivered on a site and the effectiveness of mitigation and enhancement measures.

None of the site allocations have been identified to have any significant landscape or townscape related constraints but many have the potential to result in localised adverse effects which will need to be taken into consideration during the planning application process.

6.4.11 SA10: Health and Wellbeing

Overall, the predicted impacts of the plan should have positive cumulative impacts against the objective to improve the health and wellbeing of the local population. This is achieved through policies which support the improvements to housing, healthcare, education, the environment and facilities for leisure and recreation. However, uncertainties do exist, arising from the pressure which would be placed on existing facilities as a result of increased housing and population; the unknown nature of the infrastructure that will be delivered to support growth; and the relocation of existing sports facilities to accommodate housing in Berkhamsted.

Significant positive effects have been identified against the Development Management policies relating to the 'Healthy Communities' theme ('DM59 Health Facilities', 'DM60 Health Impact Assessments', 'DM61 Education', 'DM62 Sport and Leisure', 'DM63 Open Space Provision', 'DM64 Community Facilities' and 'DM65 Community Stewardship and Management'). These policies would implement a range of measures to prioritise the health and wellbeing of residents, ensuring access to healthcare facilities and mitigating against negative impacts by requiring a Health Impact Assessment be carried out for new developments. The policies require that sport and leisure facilities be retained, and additional facilities provided. This would ensure residents have the opportunity to engage in healthy activities. Similarly, the provision of new open space alongside development will enable residents to engage in outdoor recreation which further progresses this objective.

Facilitating active travel and outdoor recreation would benefit the health and wellbeing of residents by encouraging people to take part in healthy activities. 'SP2 – Spatial Strategy for Growth' provides positive impacts against the health and wellbeing objective by focusing development in the most sustainable locations in the Borough, thereby providing opportunities for physical activity by providing walkable and cyclable neighbourhoods. 'SP10 – Climate Change Mitigation and Adaptation' encourages the use of sustainable transport modes at new developments which could embed sustainable travel from the outset and the policies under the 'Sustainable Transport and Connectivity' theme further supports this. The 'Environment and Biodiversity' theme policies and 'SP12 - Development in Rural Area' encourage outdoor recreation through the provision of new open space and maintenance of the rural area and outdoor visitor sites such as the Ashridge Estate. There are potential positive synergistic effects on health and wellbeing where policy elements such as active travel infrastructure links to new open space provision or sports facilities, which may result in more healthy lifestyles than would be the case for the elements in isolation.

Policies which support the wellbeing of residents are included in the plan. A sufficient mix of quality housing, supported by 'SP4 - The Housing Strategy', as well as DM1 – Mix of Housing; DM12 - Nationally Described Space Standards; and DM10 – Accessible and Adaptable Homes, would reduce overcrowding and stress related to inadequate housing conditions and 'SP8 - Neighbourhood Planning' would help ensure that the needs of each neighbourhood are met. Policy 'SP13 - Delivering High Quality Design' will have positive effects on the wellbeing of residents by conserving the attractiveness of the Borough and designing with consideration for the reduction of crime. The 'Environment and Biodiversity' theme policy 'DM35 - Protection from Environmental Pollution' gives consideration to the reduction of air and noise pollution which further supports this objective. 'SP5 - Delivering the Employment Strategy' requires that employment opportunities in the Borough are supported; by providing employment opportunities for all, the plan supports the objective to narrow the income gap between the poorest and wealthiest parts of the area, thereby reducing the health differential.

Positive effects have been identified in relation to renewable and low carbon energy proposals, as 'DM25 – Stand-alone renewable or Low Carbon Energy' requires that any harm to residential or local amenity, including air quality, noise and light flicker is not substantial.

The plan includes policies which encourage healthy lifestyles through the provision or protection of facilities, open space and active travel infrastructure. The plan also supports residents' wellbeing through the provision of sufficient, safe accommodation, access to facilities and jobs, and minimising environmental pollution. However, the realisation of these potential health benefits is dependent on individuals' behavioural choices to adopt healthy lifestyles, and the actual infrastructure identified in the Council's Infrastructure Delivery Plan to facilitate healthy choices.

6.4.12 SA11: Sustainable Locations

Positive effects have been forecast overall in relation to the objective to develop in sustainable locations. This is achieved by policies which focus new development in the main settlements, reduce the need to travel, encourage sustainable travel and encourage mixed developments within settlements. Some uncertainties have been identified given the limited capacity to locate all developments in urban areas. Given the level of growth required by the plan, it is proposed that some development must take place on the edge of existing settlements which would be at a distance from facilities and services. It is unclear what infrastructure would be delivered to mitigate against negative effects in the absence of the Infrastructure Delivery Plan.

Significant positive effects have been identified against 'SP2 - Spatial Strategy for Growth', 'SP3 - The Settlement Hierarchy' and 'SP4 - The Housing Strategy'. By concentrating the majority of development in the Borough's most sustainable settlements, the need to travel is reduced and most residents would have good access to services and facilities. For similar reasons significant positive effects have also been identified for the Hemel Hempstead Delivery Strategy policies.

Policies which support the provision of services and facilities within local centres help progress this objective. 'SP5 – Delivering the Employment Strategy' supports the retainment of existing accessible employment sites and 'SP6 – Delivering the Retail and Leisure Strategy' supports the development of retail and leisure enterprises in town centres. Policies 'SP11- Development in the Green Belt' and 'SP29 - Delivering Growth in the Countryside', which limit development in the Green Belt and countryside, would result in developments being focused within the larger settlements. This should mean that homes, employment and other services are within close proximity and therefore reduce the need to travel further. The delivery strategies for each settlement include growth and renewal areas to encourage residential and mixed neighbourhoods. This supports the sub-objective 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.

Policies which support access to sustainable transport further support the sustainable locations objective by connecting residential developments with facilities and services without inducing reliance on a private car. 'SP10 - Climate Change Mitigation and Adaptation' and the 'Sustainable Transport and Connectivity' theme policies encourage the use of sustainable transport modes in all new development. The policies include a wide range of measures to increase use of public transport and walking and cycling, improving access to services and facilities whilst promoting more sustainable modes.

In combination, concentrating development within existing settlements where possible, encouraging the mixed use of local centres and providing sustainable transport options to access those facilities which may be located at a distance, would result in closer integration of homes, jobs and services.

6.4.13 SA12: Community Cohesion

The predicted impacts of the plan against the community cohesion objective are positive. The plan includes policies which would improve access to education, facilities, public transport and would improve quality of life in the Borough whilst helping to reduce crime and deprivation. There is uncertainty about what infrastructure will be provided to support this objective and whether the infrastructure will be sufficient to mitigate against pressure on existing services and facilities.

Policies which give consideration to the design of new development and the preservation of local character would play a part in improving quality of life by making the Borough an attractive place to live. SP13 - Delivering High Quality Design' and its supporting DM policies (DM42 – Crime and Security, DM43 – Historic Environment) directly supports this objective by developing the Borough to be a 'place for all' which integrates and includes people from all backgrounds and requires high quality design and design to reduce the opportunity for crime and fear of crime itself. Significant positive effects have therefore been predicted. Positive effects are identified against 'SP8 – Neighbourhood Planning' which would help ensure that the needs of each neighbourhood are met and 'SP4 - The Housing Strategy' which also supports this objective by requiring that a mix of housing which meets the needs of all residents and the potential for new community facilities to be integrated into larger development sites.

Policies which support development of houses, retail and employment sites in sustainable locations, such as 'SP2 – Spatial Strategy for Growth', 'SP5 - Delivering the Employment Strategy' and 'SP6 - Delivering the Retail and Leisure Strategy', would support this objective by ensuring residents have access to facilities. This is further supported by 'Sustainable Transport and Connectivity' theme policies and 'SP10 - Climate Change Mitigation and Adaptation' which would improve accessibility by providing public transport or sustainable transport to link communities with services.

Policies which support high quality design and liveable neighbourhoods, good access to transport and connectivity between services, and the provision of those services, when combined create an overall positive assessment against the objective for community cohesion through reducing inequalities, promoting social inclusion and reducing crime and the fear of crime.

6.4.14 SA13: Housing

Significant positive effects have been predicted in relation to policies 'SP2 - The Spatial Strategy for Growth', and 'SP4 - The Housing Strategy', as the plan requires the provision of 16,595 homes across the plan period. This meets the Borough's Objectively Assessed Need (OAN) and includes a mix of

housing tenures, types and sizes of home (a minimum of 35% to be affordable housing) as well as specialist accommodation to support the elderly and the protection of authorised sites for gypsies, travellers and travelling showpeople. Policy SP4 in particular contributes to meeting the sub-objectives of providing a range of housing types, size and tenure, including high quality affordable and key worker housing that meet the needs of all communities with the Borough, meeting the needs of the gypsy and traveller communities, and helping to reduce homelessness.

Significant positive effects have also been predicted in relation to the delivery strategies for Hemel Hempstead, Berkhamsted and Tring which are the Borough's largest settlements and will accommodate the highest levels of housing growth.

Policies which accommodate housing growth have been identified as having positive impacts against this objective. 'SP11 - Development in the Green Belt', 'SP12 - Development in the Rural Area' and 'SP29 – Delivering Growth in the Countryside' support housing development, albeit limited levels, in the Green Belt, Rural Area and Countryside. The delivery strategies in the Borough's smaller settlements, Kings Langley, Bovington and Markyate have been assessed as having positive impacts against the housing objective. The relatively lower level of growth in these settlements means that the settlements have not been identified as having a significantly positive contribution against this objective (<500 new dwellings). When considering the cumulative impact of housing in the smaller settlements and outside of settlements, this is a considerable contribution to the OAN.

6.4.15 SA14: Economy and SA15 Employment

The plan is predicted to have positive cumulative effects on economic factors. The plan supports the objectives to achieve sustainable levels of prosperity and economic growth and to ensure local residents have employment opportunities and access to training. The plan enables economic growth in the Borough by retaining and adding to dedicated employment sites and by enabling appropriate retail and leisure developments in accessible locations which will stimulate the local economy and ensure the viability and vitality of local centres within the Borough is maintained.

Significant positive effects have therefore been predicted in relation to 'SP2- The Spatial Strategy for Growth', 'SP5– Delivering the Employment Strategy' and 'SP6 – Delivering the Retail and Leisure Strategy' for both SA objectives (SA14 and SA15). The South West Hertfordshire Economic Study 2019 identified the need for more industrial floorspace in the Borough. SP2 and SP5 make provision for 116,500 sqm of industrial floorspace over the plan period. Locating industrial development in the Borough would provide employment opportunities for residents and help boost the local economy. The DM policies under SP5 ('DM16 – General Employment Areas' and 'DM17 – Other office and industrial sites') further support the economic objectives by requiring the development, redevelopment or retention of employment sites in the Borough. By securing a number of sites as General Employment Areas, the policies would ensure the Borough has a good number of employment opportunities and secures its role as an important economic centre.

The delivery strategies for the Borough's settlements are assessed as having positive effects against the economic objectives, with these effects being considered as significant for the Hemel Hempstead and Tring Delivery Strategies due to the levels of employment development which they propose.

Positive effects have also been identified for 'SP11 - Development in the Green Belt' and 'SP12 – Development in the Rural Area'. These positive effects arise from the policies protecting and expanding areas for retail and/or employment opportunities, which would bring economic benefits.

Policies which attract people to live in or visit the Borough by ensuring it is a pleasant place to be will support the economic objectives. Residents and visitors to the Borough would help support the vitality

and viability of the local economy through increased spending and utilisation of local facilities. SP4 – The Housing Strategy supports this by increasing the housing offering and allowing more people to live in the Borough. The policies under ‘SP13- Delivering High Quality Design’ would support this by making the Borough more attractive through design, conservation and improvements to the local environment which would create more attractive and vibrant centres.

The provision of new educational facilities under the ‘Healthy Communities’ theme policies would help serve the needs of residents and would support the sub-objective to enable the provision of new and enhanced educational facilities.

Policies which support access to transport further support the economic objectives by connecting residential developments with employment areas and local centres. The ‘Sustainable Transport and Connectivity’ theme policies encourage the use of sustainable transport modes in all new development. The policies include a wide range of measures to increase use of public transport and walking and cycling, improving access between residential and employment sites.

In combination, the policies would support the economic objectives by providing the housing and employment options necessary to live there, and by providing the infrastructure to enable transport around the Borough. The vitality and viability of the Borough is helped by the numerous policies which ensure retail, leisure and employment space is retained.

6.5 Cross-boundary effects

Any housing and economic growth in Dacorum could have effects on neighbouring areas, for example through an increase in traffic or through increased pressure on infrastructure and natural resources – with their associated environmental and social impacts.

Due to the inter-connected nature of the water environment which links many rivers, streams and groundwater, any negative effects on water resources could be felt in the surrounding areas. Cross-boundary effects relating to waste water infrastructure (e.g. Maple Cross WWTW) could also be an issue. Joint working with adjoining authorities is taking place on water cycle issues.

A number of other pieces of technical work have been undertaken jointly with other authorities to ensure that cross-boundary issues are assessed, for example employment and housing studies.

However growth could also result in positive effects for neighbouring areas, for example increasing employment opportunities, particularly in Hemel Hempstead, would provide jobs for communities located outside of the Borough, within the immediate sub-region.

In addition to the potential for the implementation of Dacorum Local Plan resulting in effects being felt in neighbouring areas, so the reverse is also the case, with development in neighbouring areas having the potential to have effects on the Borough – for example from growth in East Hemel Hempstead in St Albans District, growth in the Three Rivers District part of Kings Langley, or growth in Aylesbury.

6.6 Difficulties Encountered in Undertaking the Assessment

Given the strategic nature of many of the elements of the Local Plan and the uncertainty in terms of the actual effects that might result from the implementation of the Local Plan policies, there is some uncertainty as to the direction and significance of some ‘Policy v. SA objective’ relationships. Professional judgment has been used to predict the nature of likely effects and their potential significance. However, a range of uncertainties in the assessment remains and where these uncertainties relate to potentially significant effects, monitoring will be required. The requirement for

monitoring will be addressed in the SA Report for the Publication Local Plan – at the Regulation 19 stage.

Whilst the Local Plan can provide the framework for seeking to achieve sustainable development, much will be dependent on whether there are the requisite behavioural changes needed to achieve this goal. For example, the Local Plan can require the integration of sustainable transport measures as part of new development; however, the success of such a requirement is entirely dependent on people changing travel behaviours to make use of such measures. Such a factor means that the SA/SEA can never be entirely accurate in the predictions of effects.

6.7 Mitigation and Recommendations

6.7.1 Introduction

A key role of the SA is to provide recommendations as to how the sustainability performance of a plan can be improved. The Local Plan includes a range of policies that seek to prevent and where possible enhance the environment and overall sustainability of development.

The SA has built on this by identifying a range of recommendations as to how the Local Plan can maximise its performance against the range of sustainability topics. Some of these recommendations seek to mitigate potential adverse effects, whilst others look to build on some of the opportunities that are provided by the Borough's natural environment.

6.7.2 Mitigation

The assessments of the Local Plan in Appendix D have been undertaken on a 'policy by policy' basis, seeking to identify the effects of each policy in isolation – i.e. without considering the potential mitigation and/or enhancements of effects that are included in other policies. As a result many of the potential adverse effects identified in the 'development enabling' policies such as 'SP4 – The Housing Strategy'; 'SP6 - Delivering the Employment Strategy'; and the settlement specific 'Delivery Strategies' and associated 'Proposals and 'Sites', will be avoided or mitigated by the requirements set out in the strategic policies and development management policies under the other Local Plan themes, such as 'Climate Change & Sustainability', 'Environment & Biodiversity', 'Delivering Great Places', 'Sustainable Transport & Connectivity' and 'Healthy Communities'.

The 'within-plan' mitigation identified in relation to Policy SP2 'Spatial Strategy for Growth', which includes provisions for housing an employment growth as well as the strategy for how this would be delivered, is as follows:

The 'Environment and Biodiversity' policies provide the policy framework to help to mitigate the potential adverse effects associated with the potentially high levels of housing and employment development, as well as seeking opportunities for enhancements

Policy DM35 'Protection from Environmental Pollution' should minimise negative impacts on soil by preventing development which would result in harmful soil pollution though this would not prevent soil sealing. However, concentrating the majority of development in the Borough's most sustainable settlements and the intensification of sites within Hemel Hempstead through increased heights and densities would help to reduce the amount of greenfield land required to deliver the levels of growth in the Local Plan. This should minimise levels of soil sealing and the degradation/loss of soils.

A Habitats Regulations Assessment is being undertaken to examine whether the Local Plan would have adverse effects on any European sites, most notably the Chilterns Beechwoods SAC. If likely significant effects are identified there will be a need to develop mitigation measures to reduce or avoid such effects. This could include the provision of SANGs. These mitigation measures would be included in Local Plan policies. Whilst this mitigation will be focused on effects on the SAC it could also help to mitigate wider effects, such as those on SSSIs within the Borough and other designated and non-designated sites which are important for biodiversity.

In relation to potential adverse effects identified against the Landscape objective (SA9), particularly those relating to the setting of the Chilterns AONB, the requirements of Policy DM27 'Landscape Character and Chilterns Area of Outstanding Natural Beauty' provide a robust framework for mitigation and should prevent any development from disrupting the quality, character and condition of the landscape in Dacorum.

The policies covering 'Protection and Enhancement of the River Character and Water Environment' would provide the policy framework to help to mitigate the potential adverse effects on water quality and the availability of water resources that may arise from new development, whilst Policy DM35 Protection from Environmental Pollution should help to address air quality issues.

The policies covering 'Delivering Great Places' would help towards minimising the effects on the landscape, townscape and historic environment, including on designated and non-designated heritage assets and their settings, as well as seeking to provide enhancements.

The policies under 'Transport and Connectivity' would help mitigate against increased transport emissions by helping to enable sustainable transport options such as access to public transport and active travel modes.

The policies covering 'Climate Change and Sustainability' will help to minimise growth in greenhouse gas emissions resulting from the growth proposed in the Spatial Strategy. The policies under 'Sustainable Design and Construction' and 'Carbon Offsetting' would help towards minimising the resources required to deliver new development and reducing the waste generated by the new development, as well as ensuring that there is sufficient infrastructure in place to cope with the increases associated with the potential levels of growth, mitigating the negative effects against Resource Efficiency.

In relation to the uncertainty as to whether growth would impact on infrastructure, Policy SP7 'Delivering Infrastructure' should ensure that the necessary infrastructure requirements are provided in a timely manner.

6.7.3 Recommendations

During the development of the Draft Local Plan the SA team provided a range of suggestions and recommendations as to how the policies and supporting text for the Plan could be updated to fill some gaps and to improve the clarity of the Plan's requirements. Amongst others, this input covered the following topics/issues:

- Under the climate change theme and objectives, providing greater distinction between the greenhouse gas emissions and the adaptation aspects of this topic;
- Give greater emphasis to how the Historic Environment is covered in the Strategic Objectives;

- Greater recognition of how noise pollution can impact on wildlife;
- Requirements for electric vehicle charging points in new developments;
- Recognition that electric bikes are an important element for future sustainable travel, particularly in settlements with steep gradients;
- Improved coverage of active travel modes; and
- Providing greater emphasis on leisure, recreation and open space within the 'Healthy Communities' section.

In undertaking the SA of the Draft Local Plan the SA has identified some further recommendations for the Council's consideration when the Plan is being updated for Publication. These are as follows:

- Providing greater emphasis on the importance of the Borough's soil resource, in particular areas of best and most versatile agricultural land – both at a strategic level and in relation to settlements and sites (as appropriate);
- Inclusion of Strategic Policies for those Plan sections/themes which currently do not have an "SP" policy, for example Environment and Biodiversity and Sustainable Transport and Movement;
- Give greater emphasis to how the Historic Environment is covered by inclusion of a strategic policy; and
- Provision of 'leisure related' supporting text for 'Policy SP6 - Delivering the Retail and Leisure Strategy'

It is anticipated that further input and recommendations are provided through the SA process following the consultation on the Draft Local Plan, through further assessment work and by taking into consideration response received to the consultation on the Draft Local Plan.

6.8 How the SA has influenced the Local Plan

To date the SA has had a range of influences on the development of the Local Plan. Close liaison between the planning officers and SA consultants since the scoping stage in 2017 has meant that the SA has provided input at several stages during the development of the Local Plan.

When the Local Plan is adopted it will be accompanied by an SA Adoption Statement which will need to describe how the Local Plan has been influenced by the SA/SEA. Influences to date include the following:

- Production of the SA/SEA Scoping Report identified issues that the Local Plan needed to help address. The information within the Scoping Report also contributed to the Local Plan evidence base;
- Contributions to the development of the Issues and Options paper during its preparation prior to consultation in autumn 2017, including contributions at an internal DBC workshop early in the I&O development stage;
- Production of an SA Working Note to accompany the consultation on the I&O paper;
- Input into the methodology used by the Council for the Schedule of Site Appraisals and feedback on the document during its preparation prior to consultation in autumn 2017;
- Production of an SA Working Note to accompany the consultation on the Schedule of Site Appraisals;

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- Supporting the Council in the analysis of representations made during the consultation on the I&O paper, the Schedule of Site Appraisals and their accompanying SA Working Notes.
 - Contributing to the development of additional spatial strategy and growth options and undertaking assessments to identify the potential effects associated with each option;
 - Provision of on-going input in relation to the development of the Draft Local Plan and its detailed policies and sites; and
 - Assessment of the Draft Local Plan and providing recommendations for additions and changes.

The SA will continue to inform the development of the Local Plan through the future stages of Publication, Submission and Examination.

7 Conclusion and Next Steps

7.1 Conclusion

The SA has found that overall the Draft Local Plan performs well in relation to the SA objectives, particularly the social and economic objectives through the provision of new homes and employment development which should meet the Borough's needs. Whilst the growth proposed in the Local Plan will inevitably require new development on greenfield sites in the Green Belt, with associated adverse effects and pressures on the natural and historic environment, by maximising the levels of development in the existing urban areas the amount of greenfield land needed will be minimised, thereby reducing the scale of these effects. In addition, allocating sites in the most sustainable edge of settlement locations will also help to reduce adverse effects, particularly those relating to transport issues.

The requirements of the thematic strategic policies and development management policies in the Draft Local Plan will provide many of the mitigation and enhancement measures to improve the sustainability performance of the Local Plan.

7.2 Next Steps

Following the Regulation 18 consultation on the Dacorum Draft Local Plan (2020 - 2038) Emerging Strategy for Growth, further work will be undertaken by the Council to develop the Publication version of the Local Plan. As with all previous stages this process will be informed by the ongoing SA.

When the Local Plan is published at the Regulation 19 stage, planned for mid-2021, it will be accompanied by a full SA Report (with a Non-Technical Summary) which will provide a detailed assessment of all the proposed policies and sites in the Publication document and which will fully meet the requirements for an Environmental Report as specified by the SEA Regulations. The SA Report will build on feedback received through the Regulation 18 consultation as well as the additional evidence base studies that are currently being undertaken.

Abbreviations

AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
CIL	Community Infrastructure Levy
GHG	Greenhouse Gas
GI	Green Infrastructure
HRA	Habitats Regulations Assessment
LB	Listed Building
PDL	Previously Developed Land
SSSI	Site of Special Scientific Interest
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SPZ	Source Protection Zone
SuDS	Sustainable Drainage Systems
TPO	Tree Protection Order