

NORTH HERTFORDSHIRE DISTRICT COUNCIL

Local Development Framework



Sustainability Appraisal and Strategic Environmental Assessment – Report on Appraisal Of Objectives and Options



North Hertfordshire Local
Development Framework

Core Strategy and Development
Control Policies

August
2005

Sustainability Appraisal and SEA of North Hertfordshire LDF

Report on Appraisal of Objectives and Options

A report by **CAG Consultants** for North Hertfordshire District
Council

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(Urdu)

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Introduction

What is this report for?

This report describes the results of the appraisal of options for future development in North Hertfordshire. It considers the options for

- Protecting the natural and built environment
- Allowing development in rural areas
- Provision of housing
- Promoting employment and tourism
- Protecting and developing town and local centres
- Promoting alternative means of transport and reducing car use
- Providing leisure and community facilities

These are the options included in the Issues and Options report produced by the District Council. They relate to the development of the Core Strategy and Development Control Policies for the LDF. The appraisal has been done to accompany the consultation process on the Council's Options document. The Documents will be out for consultation in September for six weeks.

This report describes how the appraisal was done and how each option performs against sustainable development objectives.

Background

Strategic Environmental Appraisal (SEA) is a process of identifying and evaluating the environmental impacts of a plan or programme. In 2001, the EU adopted Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (referred to as the 'SEA Directive' in this report).

The Directive came into force in the UK on 21 July 2004 and applies to a range of English plans and programmes including Local Development Frameworks (LDFs). In North Hertfordshire, the LDF will replace the existing Local Plan.

Sustainability Appraisal (SA) extends the concept of SEA to include economic and social concerns. Under the Planning and Compulsory Purchase Act 2004, Local Authorities must undertake SA for each of their Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs) – the constituent parts of the LDF. SA is therefore a statutory requirement for LDFs along with SEA.

The Government has published draft Guidance¹ (referred to as “the Guidance” in this report) on undertaking SA of the LDFs. This has been followed up by an Interim Advice note² (“Interim Advice”). The approach in the Guidance is to incorporate the requirements of the SEA Directive into a wider Sustainability Appraisal process.

What is Sustainability Appraisal?

Sustainability appraisal is a systematic and iterative appraisal process, incorporating the requirements of the Strategic Environmental Assessment Directive. The main purpose of sustainability appraisal is to appraise the social, environmental and economic effects of plan strategies and policies, from the outset of the preparation process, so that decisions can be made that accord with the objectives of sustainable development.

Planning Policy Statement 12 – Local Development Frameworks

The aim of Sustainability Appraisal is to make sure that plans are doing as much as they can to support the delivery of social, economic and environmental objectives at the same time. Although planning authorities do their best to address these issues, it is easy to miss opportunities for better supporting social, economic and environmental objectives, and for reducing any conflicts. Sustainability Appraisal offers a systematic way for checking and improving on plans as they are being developed.

Ideally, as a result of the appraisal, conflicts with sustainability objectives will be removed, but this is not always possible. The conflicts and the decisions made must be

¹ *Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks* September 2004 ODPM

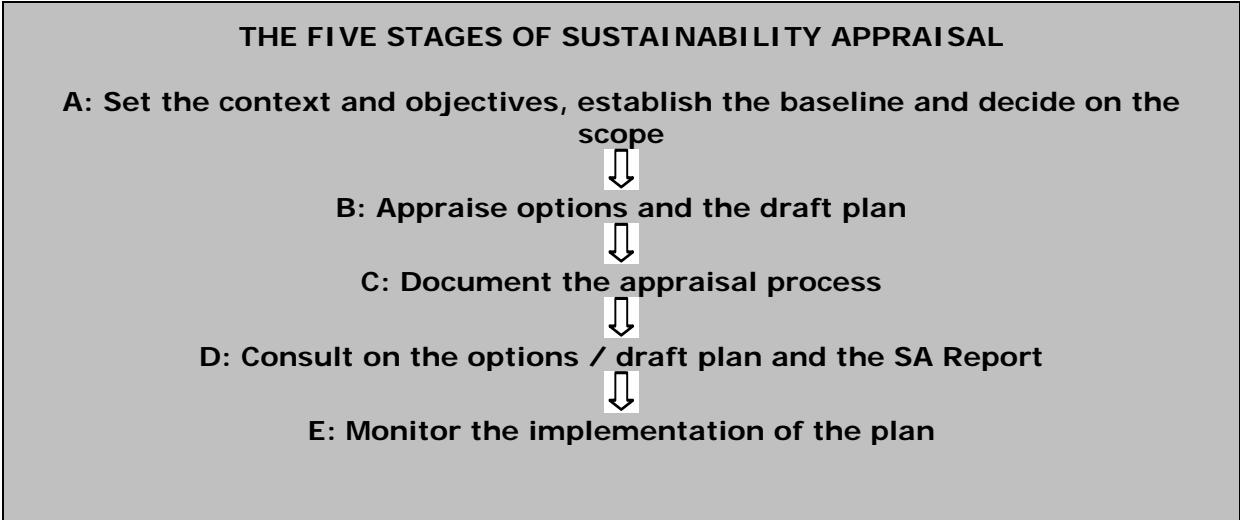
² *Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks: Interim advice note on frequently asked questions* April 2005 ODPM.

explained in reports on the SA, and in consultations on the plan. As a result the public and other stakeholders will find it easier to appreciate the pros and cons of the plan and to make up their own minds about whether the planning authority has made the right decisions.

The Five Stages of Appraisal

The national planning guidance on preparing Local Development Frameworks (PPS12) says that *to be effective sustainability appraisal should be fully integrated into the plan-making process. It should be started as soon as a new or revised local development document is first considered, and should provide input at each stage when decisions are taken.*

There are five stages (A to E) to the Appraisal, shown in the box below. The stages follow those indicated in the ODPM Interim Advice.



The Guidance and Interim Advice outline the following steps to the first two parts of the process.

| |
|---|
| Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope |
| <p>A1. Identify and review other relevant plans, programmes and policies, and sustainable development objectives that will affect or influence the DPD. (Context Review)</p> <p>A2. Collect relevant social, environmental and economic baseline information and</p> |

produce a characterisation of North Hertfordshire (**Baseline**)

A3. Identify key **sustainability issues** for the SA to address.

A4. Develop the **SA framework**, consisting of the sustainability objectives, indicators and targets.

A5. Produce a **Scoping Report** and consult relevant authorities, the public and other key stakeholders on the scope of the appraisal and the key issues and possible options for solutions.

Stage B: Appraise options and the draft plan

B1. **Test the DPD objectives** against the sustainability objectives and whether the DPD objectives are consistent with one another.

B2. **Appraise issues and options** against the sustainability objectives

B3. **Predict the effects of the draft plan (preferred options)** against the sustainability objectives using any available research information

B4. **Assess the effects of the draft plan** against the sustainability objectives

B5. **Improve the sustainability impact** of the draft plan

B6. **Appraise significant changes** just before, during and following examination

B7. Develop proposals for **monitoring**

Appraising the North Hertfordshire LDF

The process to be followed

North Hertfordshire is in the process of developing its LDF. It has published the Local Development Scheme which describes the documents that will make up the LDF and when they will be developed. The council has asked CAG Consultants to undertake the SA and SEA of the Core Strategy and Development Control Policies of the LDF on their behalf. The SA will follow the process laid out in the ODPM's Guidance as amended in the Interim Advice. This process also meets the requirements of the SEA Directive. The appraisal will be undertaken directly by the Consultants reporting to a Steering Group of officers from the District and County Council.

The LDF is required to conform to the East of England Plan which is the Regional Spatial Strategy (RSS). A SEA and SA has already been undertaken of the RSS, and the results of the appraisal of the RSS have been used where appropriate, to inform this appraisal.

There are two formal documents required:

1. The Scoping Report
2. The Sustainability Appraisal Report

The LDF is required to conform to the East of England Plan which is the Regional Spatial Strategy (RSS). A SEA and SA has already been undertaken of the RSS, and the results of the appraisal of the RSS have been used where appropriate, to inform this appraisal.

In addition the ODPM's Interim Advice Note comments that during the preparation of preferred options for the LDF, there should be an opportunity to *participate in the appraisal early in the process of identifying and selecting options*.³ The Council has therefore decided to provide this additional report to accompany the consultation on issues and options.

³ *Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks: Interim advice note on frequently asked questions* ODPM April 2005 page 8

The Scoping Report is the formal report on the first part (Stage A) of the process. It gives an overview of the scope of the appraisal process. It must also include the objectives of the plans to be appraised, the broad strategic options which will be considered, and the methodology that will be used. A Scoping Report for the Core Strategies and Development Control Policies was produced in June and sent to a range of consultees, who were given a five week period to respond with comments. The comments of the consultees have been taken into account in a revised Scoping report which is available on:

<http://www.north-herts.gov.uk/council/default.asp?step=4&pid=1074> The information from the revised report has also been incorporated in this document.

The Sustainability Appraisal Report will also meet the requirements of the SEA Directive to produce an Environmental Report. This report will be produced during 2006, when the Council produces Preferred Options.

Local Development Documents to be appraised

This Appraisal covers the following LDDs:

- The **Core Strategy, which** provides the guiding principles for development. This will include details on matters such as which towns or villages are considered suitable for future development, and the Council's approach to nature conservation and reuse of employment land for other uses. The Core Strategy will not identify individual pieces of land for development. When the Council is preparing the Land Allocations document, which will identify individual pieces of land, the Core Strategy will be the main determinant of which sites are identified.
- The **Development Control Policies Document** gives information on detailed matters such as the Council's approach to design, parking standards and open space requirements.

Strategic Objectives for the LDDs

A number of documents have already been written with high level objectives for the Council's work. The Corporate Plan contains a 'vision' for the District and six strategic objectives to achieve this. This vision and the strategic objectives will apply to the two LDDs.

The Council's vision for the District is: *"Making North Hertfordshire a vibrant place to live, work and prosper."*

The six objectives are:

Sustainable Communities Promoting sustainable development of the District to ensure we deliver adequate affordable housing, protect the environment and conserve the heritage of our historic towns and rural settlements.

Safer Communities Encouraging responsible citizenship and creating safe communities with less crime and less fear of crime.

Healthier Communities Promoting first class leisure and cultural facilities to contribute to healthy living for all of our citizens.

Equal Communities Targeting resources at areas of disadvantage in the District to reduce social exclusion and improve the quality of life for everyone.

Prosperous Communities Creating opportunity for all by promoting sustainable local economic development.

Listening to You Ensuring that we listen to our citizens and deliver high quality, value for money, customer focused services.

There are also a number of objectives identified in the **Community Strategy**, which was prepared with extensive public involvement in 2003. Those which will apply to the two LDDs are:

- Development of brownfield sites should be encouraged in order to preserve greenfield sites;
- All new housing developments to be provided with associated leisure, shopping and health facilities;
- Maintain parks and open green spaces within towns;
- More affordable housing;
- Provide affordable housing for families wanting to remain in rural area; and
- Support local post offices and other rural services such as mobile library and village shops.

Context, Baseline and Sustainability Objectives

Context Review

Stage A1. Identify and review other relevant plans, programmes and policies, and sustainable development objectives that will affect or influence the DPD.

Purpose of the Context Review

The Context review is Stage A1 of the process outlined in the ODPM's Guidance on sustainability appraisal. The Guidance explains that⁴:

A plan may be influenced in various ways by other plans or programmes and sustainability objectives, such as those laid down in policies or legislation. These relationships should be explored to:

- *identify any external social, environmental or economic objectives that should be reflected in the SA process;*
- *identify external factors, such as sustainability issues, that might influence the preparation of the plan; and*
- *determine whether the policies in other plans and programmes might lead to cumulative effects when combined with policies in the plan that is subject to the SA.*

The Context review meets the requirements of the SEA Directive to provide *an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes*⁵

Review of Plans Programmes and Policies relevant to North Hertfordshire

Relevant documents at international, national, regional and local level have been reviewed. For each document the following information has been collated:

- Key objectives relevant to the LDDs and SA

⁴ Annex 1

⁵ Annex 1(a)

- Key targets and indicators relevant to the LDDs and SA
- Implications for the LDDs
- Implications for SA

This information has been used to inform the subsequent stages of the process, which are covered in later sections of this document.

- Identification of sustainability issues (stage A3)
- Development of SA framework (stage A4)
- Baseline review (stage A2)

The LDF is required to conform to the East of England Plan which is the Regional Spatial Strategy (RSS). Therefore the RSS is a key document that informs the context of the LDF and this appraisal. One implication is that when the RSS is finalised, it may mean that policies and proposals in the RSS prohibit some of the options proposed by the District Council. Nevertheless, at this stage it is still necessary to appraise all the suggested options.

A SEA and SA has already been undertaken of the RSS, and of the Hertfordshire LTP. These have also been included in the list of strategies reviewed and where appropriate, have informed this appraisal.

The documents reviewed are listed in the table overleaf. The full review is included as Appendix 2 to this report.

| Plan, Programme or Policy |
|--|
| European |
| EU Sustainable Development Strategy (May 2001) |
| EU Spatial Development Perspective (May 1999) |
| EU Sixth Environmental Action Plan (July 2002) |
| EU Biodiversity Strategy (Feb 1998) |
| EU Water Framework Directive |
| National |
| UK Sustainable Development Strategy 2005 |
| Sustainable communities: building for the future (OMDP Feb 2003) |
| Working with the Grain of Nature – A Biodiversity Strategy For England (DEFRA 2002) |
| PPG2: Greenbelt (1992) |
| PPG3: Housing (2000) |
| PPG4: Industrial, Commercial Development and Small Firms (2001) |
| PPG8: Telecommunications (2001) |
| PPG10: Planning and Waste Management (1999) |
| PPG13: Transport (2001) |
| PPG15: Planning and the Historic Environment (2001) |
| PPG16: Archaeology and Planning (2001) |
| PPG17: Planning for Sport, Open Space and Recreation (1991) |
| PPG24: Planning and Noise (1994) |
| PPG25: Development and Flood Risk (2000) |
| PPS1: Delivering Sustainable Development (2005) |
| PPS6: Planning for Town Centres (2005) |
| PPS7: Sustainable Development in Rural Areas (2004) |
| Draft PPS9: Biodiversity and Geological Conservation (2004) |
| PPS12: Local Development Frameworks, (2004) |
| PPS22: Renewable Energy (2004) |
| PPS23: Planning and Pollution Control (2004) |
| The Future of Transport White Paper (DETR, July 2004) |
| UK Air Quality Strategy (2000) |
| The Air Quality Strategy: Addendum (Defra 2003) |
| UK Climate Change Programme (2000) |
| Energy White Paper: Our energy future – creating a low carbon economy (Dti 2003) |
| The UK Fuel Poverty Strategy (2001) |
| UK Waste Strategy (Defra 2000) |
| Rural Strategy (2004) |
| Saving Lives: Our Healthier Nation White Paper (DoH 1999) |
| Regional |
| East of England Plan: Draft revision to the RSS for the East of England (Dec 2004) |
| East of England Plan: Sustainability Appraisal Report (November 2004) |
| Sustainable Futures: The Integrated Regional Strategy for the East of England (Feb 2005) |
| A Sustainable Development Framework for the East of England (Oct 2001) |
| Our Environment, Our Future: The Regional Environmental Strategy for the East of England (July 2003) |
| Revised regional housing strategy for the East of England: Strategy Document 2005-2010 |
| Regional Social Strategy: A strategy to achieve a fair and inclusive society in the East of England (March 2004) |
| A Shared Vision: The regional economic strategy for the East of England (Nov 2004) |

| |
|---|
| Living with climate change in the East of England (2003) |
| Water resources for the future – A strategy for Anglian Region (March 2001) |
| Creating Sustainable Communities In the East of England (ODPM 2005) |
| Towns and Cities – Strategy and Action Plan: Urban Renaissance in the East of England |
| Sub-Regional |
| A Housing Strategy for the London Commuter Belt Sub-region 2005 - 2008 |
| Chilterns AONB Management Strategy – The Framework for Action 2002 – 2007 |
| Anglian Water Resource Plan 2004 |
| Our Plan for Water Supply to 2030 – Three Rivers Water |
| County |
| Hertfordshire Structure Plan 1991-2011 |
| Hertfordshire Local Transport Plan 2006/7-2010-2011 |
| SEA of Local Transport Plan 2006/7- 2010-2011 |
| A 50 Year Vision for the Wildlife and Natural Habitats of Hertfordshire: BAP (1998) |
| The Hertfordshire Environmental Strategy (June 2001) |
| An Economic Development Strategy for Hertfordshire 2000-2005 (Oct 2000) |
| Hertfordshire Town Renaissance Campaign |
| Hertfordshire Waste Strategy |
| Hertfordshire Waste Local Plan 1995-2005 (1999) |
| Hertfordshire Sustainability Guide |
| The Hertfordshire minerals and waste development framework and scheme |
| Hertfordshire Minerals Local Plan Review |
| Enjoy! A cultural strategy for Hertfordshire |
| Rural Hertfordshire – and Agenda for Action 2001-2005 |
| Rural Innovation Strategy – Hertfordshire Rural Forum (Apr 2003) |
| Hertfordshire Renewable Energy Study (Jan 2005) |
| Local (District wide) |
| North Hertfordshire District Local Plan No.2 with Alterations |
| North Hertfordshire District Council Corporate Plan (2005) |
| North Hertfordshire Housing Strategy 2004-2007 |
| North Hertfordshire Empty Homes Strategy |
| North Hertfordshire Homelessness Strategy 2004-2007 |
| Home Energy Conservation Act (H.E.C.A) Progress Report |
| Biodiversity Action Plan |
| Rural Strategy for North Hertfordshire 2005-2010 |
| Pavilions, Playing Fields and Sports Pitches Strategy |
| Play Area and Outdoor Youth Provision Strategy 2004-2010 |
| Allotment Strategy 2004-2009 |
| Community Strategy for North Hertfordshire |
| Community Safety Strategy |
| Social Inclusion Strategy |
| Health Improvement and Modernisation Programme |
| Contaminated Land Strategy |
| Northern Hertfordshire Area Transport Plan |
| North Hertfordshire District Council Car Parking Strategy |
| Sub-District |
| Hitchin Town Centre Strategy |
| Hitchin Transportation Plan (1998) |
| Draft Hitchin Town Centre Public Transport Strategy (Aug 2004) |

Sustainability Issues

Stage A3. Identify key sustainability issues for the SA to address.

Purpose of identifying sustainability issues

The Guidance comments that *the identification of sustainability problems is an opportunity to define key issues for the DPD⁶ and develop sustainable plan objectives and options.*

The identification of sustainability issues also provides useful information for the sustainability appraisal process itself. It will inform stage B of the process (not covered in this report) where options and policies will be tested against the appraisal objectives. For example when testing options for development in villages, information that *access to services for those in villages without a car* is a sustainability problem will inform the judgements made in the testing process and influence the choice of options.

The identification of sustainability issues meets the requirements of the SEA Directive to identify *any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance⁷.*

Key Sustainability Issues for North Hertfordshire

A list of issues was developed from the review of plans, programmes and policies. The list was then refined, based on discussions with the Officer Steering Group at a meeting on May 18th 2005, which included other sources of information. The revised list is shown in Appendix 1.

Sustainability Appraisal Objectives

Stage A4 Develop the SA framework, consisting of the sustainability objectives, indicators and targets

Purpose of the SA Objectives

Sustainability Appraisal is an objectives-led process. This means that the potential impacts of a plan are tested against a series of objectives for sustainable development (e.g. an objective *to use resources efficiently*).

⁶ Development Plan Document

⁷ Annex 1(d)

Along with their associated indicators and any targets (which are shown in the baseline review in Appendix 3), the objectives form the Appraisal Framework. The Guidance notes that particularly relevant sources for SA objectives include *the UK Sustainable Development Strategy, the Regional Sustainable Development Frameworks, and at the local level Community Strategies or Plans. Baseline information collected and sustainability issues identified at earlier stages in the SA can also be especially useful in identifying objectives and indicators*⁸.

The Guidance also comments that *planning authorities may also choose to include more detailed sub-objectives and related indicators in their SA Framework. Sub-objectives can help to ensure that all the key issues to be considered in the SA are incorporated in the SA Framework. An example of a sub-objective for resource efficiency could be reduce water use.*

It should be noted that the SA objectives are distinct from the LDF objectives though they may in some cases overlap with them.

Developing objectives for appraising the North Hertfordshire LDF

An initial set of objectives and sub-objectives was produced by the consultants, based on the following sources:

- Objectives used in the sustainability appraisal of the East of England Plan⁹. These were derived from objectives from the Sustainable Development Framework for the East of England.
- Priorities defined in the North Hertfordshire Community Strategy
- Information on issues and objectives from the context review and the baseline data
- The objectives have been cross-checked against the priorities in the UK Government Sustainable Development Strategy.¹⁰

It was then refined, based on discussions with the Officer Steering Group at a meeting on May 18th 2005. Some amendments have also been made to take account of comments received during the public consultation. The refined objectives are shown in the table overleaf. The objectives which address the issues which are required to be covered by the SEA Directive¹¹ are shown underlined.

⁸ Annex 5

⁹ *East of England Plan: Sustainability Appraisal Report* Levett-Therival Sustainability Consultants and Land Use Consultants November 2004

¹⁰ *Securing the Future* March 2005

¹¹ listed in Annex 1(f)

| SA Objective (those relevant to the SEA Directive are shown underlined) | SA Sub Objective: <i>will the policy or proposal help to...</i> |
|---|--|
| ECONOMIC ACTIVITY | |
| 1 Achieve sustainable levels of prosperity and economic growth | <ul style="list-style-type: none"> • maintain a diversified economy, with increased resilience to external shocks? • encourage new business to start-up and thrive in the District? • support and encourage the rural economy and diversification? • support and promote sustainable tourism in towns and rural areas? • improve the quality of local jobs available to people in the District? • increase the skills base? • make the cost of housing more affordable to those employed in the District? |
| LAND USE AND DEVELOPMENT PATTERNS | |
| <u>2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?</u> | <ul style="list-style-type: none"> • promote the use of brownfield sites and if brownfield sites are not available, land of low environmental and amenity value? • maximise reuse of vacant buildings and derelict land? • minimise the loss of the best and most versatile agricultural land? • reduce quantity of unremediated contaminated land? |
| <u>2(b) Provide access to green spaces</u> | <ul style="list-style-type: none"> • provide/improve access for all residents of the District to green spaces? • provide opportunities for people to come into contact with and appreciate wildlife and wild places? • maintain/improve the public right of way network? |
| <u>2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles</u> | <ul style="list-style-type: none"> • locate development so as to reduce the need to travel? • reduce car reliance, encourage walking, cycle, bus, and train use? • reduce road freight movements? • avoid exacerbating local traffic congestion? • provide affordable, accessible public transport in towns and in rural areas? |
| ENVIRONMENTAL PROTECTION | |
| <u>3(a) Protect and enhance biodiversity</u> | <ul style="list-style-type: none"> • protect habitats and species, especially those designated as being of importance, and provide opportunities for creation of new habitats? • support and maintain extent of wetland habitat and river habitats? |
| <u>3(b) Protect and enhance</u> | <ul style="list-style-type: none"> • protect and enhance landscapes, especially those of |

| | |
|--|--|
| <u>landscapes</u> | historic, recreational or amenity value, and within the Chilterns AONB? |
| <u>3(c) Conserve and where appropriate, enhance the historic environment</u> | <ul style="list-style-type: none"> • conserve and enhance the historic built character of the District's town's and villages? • protect sites of archaeological and historic importance, whether designated or not? |
| <u>3(d) Reduce pollution from any source</u> | <ul style="list-style-type: none"> • improve the water quality of rivers and groundwater supplies? • achieve good air quality? • reduce ambient noise, especially from traffic? • reduce light pollution in the District? • protect soil quality? |
| CLIMATE CHANGE | |
| <u>4(a) Reduce greenhouse gas emissions</u> | <ul style="list-style-type: none"> • minimise energy consumption by transport and in buildings? • increase proportion of energy generated by renewable sources? • encourage use of local suppliers and the consumption of local produce? |
| <u>4(b) Improve the District's ability to adapt to climate change</u> | <ul style="list-style-type: none"> • reduce vulnerability to climate change, exploit any benefits? • avoid development in areas at risk from flooding? |
| A JUST SOCIETY | |
| <u>5(a) Share benefits of prosperity fairly</u> | <ul style="list-style-type: none"> • reduce disparities in income levels? • contribute to regeneration of deprived areas (estates in Letchworth and Hitchin)? • provide employment and other opportunities for unemployed, especially long term unemployed and the disabled? • encourage entrepreneurial activity in deprived areas? |
| <u>5(b) Provide access to services and facilities for all</u> | <ul style="list-style-type: none"> • provide access to services and facilities without need to use a car? • retain rural services, especially shops, post offices, schools, health centres and bus services? • recognise the needs of specific groups such as minority ethnic groups, the young, the elderly and the disabled? |
| <u>5(c) Promote community cohesion</u> | <ul style="list-style-type: none"> • support development of voluntary sector? • encourage development of community run business? • encourage people's feelings of belonging, for example by providing community meeting places ? • recognise and value cultural and ethnic diversity ? |
| <u>5(d) Increase access to decent and affordable housing</u> | <ul style="list-style-type: none"> • help improve the quality of the housing stock and reduce the number of unfit homes? • increase access to affordable housing, particularly for the young, the disabled and key workers? |
| <u>5(e) Reduce crime rates and fear of crime</u> | <ul style="list-style-type: none"> • encourage crime reduction, particularly through the appropriate design of new development? • help reduce the fear of crime? |
| <u>5(f) Improve conditions and</u> | <ul style="list-style-type: none"> • help promote healthy lifestyles? |

| | |
|--|---|
| <u>services that engender good health and reduce health inequalities</u> | <ul style="list-style-type: none"> • improve access to health services by means other than private cars? • reduce ambient noise near residential and amenity areas? • reduce road accidents? • reduce accidents and damage from fires? |
| 5(g) Increase participation in education and life-long learning | <ul style="list-style-type: none"> • improve access to skills learning by young people? • improve access to skills learning by adults? |
| 5(h) Maintain and improve culture, leisure and recreational activities that are available to all | <ul style="list-style-type: none"> • increase access to culture, leisure and recreational activities? |
| RESOURCE USE AND WASTE | |
| <u>6(a) Use natural resources efficiently; reuse, use recycled where possible</u> | <ul style="list-style-type: none"> • minimise the demand for raw materials? • encourage sustainable design, use of sustainable building materials and minimise wastage caused by construction methods? • limit water consumption to levels supportable by natural process and storage systems? • protect groundwater resources? • promote sustainable drainage systems? • reduce minerals extracted and imported? |
| <u>6(b) Reduce waste</u> | <ul style="list-style-type: none"> • reduce, reuse or recycle waste generated? |
| TOWN CENTRES | |
| 7 Promote sustainable urban living | <ul style="list-style-type: none"> • encourage wider range of shops and services in town centres? • encourage more people to live in town centres? • encourage mixed use developments in town centres? • improve transport connections in, and to, town centres? • encourage synergy in land uses, which supports the continued and enhanced viability of a wide range of shops and services? |

Baseline review

Stage A2. Collect relevant social, environmental and economic baseline information and produce a characterisation of North Hertfordshire

Purpose of baseline review

As its name implies the baseline review describes the current social, economic and environmental conditions in the District. The Guidance notes that *baseline information provides the basis for predicting and monitoring effects and helps to identify sustainability problems*

Collecting baseline information therefore contributes to the effectiveness of the appraisal. The aim is to collect information relating to each of the sustainability objectives. However, in reality there will be gaps in data availability. The Guidance notes that *where there are gaps, it is important to record any resulting uncertainties or risks in the appraisal. Provisions should also be made to fill any major gaps for future programmes or reviews.*

The baseline review meets the requirements of the SEA Directive to provide information on *the environmental characteristics of the area likely to be affected*¹².

The Baseline review for North Hertfordshire is included in Appendix 3.

¹² Annex1 (c)

Testing the LDF Objectives

The Local Development Framework Objectives

The Council will be putting out for consultation 38 plan objectives. These objectives came about through workshops on Local Plan No. 3, which was withdrawn in 2000. The objectives are grouped under seven themes. The objectives which are finally agreed will set the direction and content of the development plan documents. The objectives are presented in a grey box at the beginning of each theme in the Options Paper.

Purpose of testing the LDF objectives

The purpose of testing the LDF objectives is to determine if there are any significant conflicts between the LDF objectives and the appraisal objectives. The LDF objectives will inform the choice of options and the development plan policies. Therefore, wherever possible any conflicts should be avoided between the LDF objectives and sustainability objectives. Reducing conflicts should improve the sustainability of the LDF. However, there are occasions when it is impossible to avoid conflict.

Results of appraisal

The overall conclusions from testing the 38 LDF objectives were that:

- Half (19) of the LDF objectives do not conflict with any of the sustainability appraisal objectives and actively supporting some of them. No changes are recommended.
- Six of the LDF objectives do not conflict with any of the sustainability appraisal objectives, but they would be clearer, or could better support the appraisal objectives, if they were rephrased.
- Three of the LDF objectives supported some appraisal objectives but conflicted with others, although these conflicts were considered inevitable and no change was recommended. Two of these objectives related to housing provision, which had inevitable conflicts with environmental objectives. The third objective related to reducing the need to travel, which could conflict with rural diversification and promoting rural tourism. It is not recommended that this objective is revised, but that objectives on rural diversification should highlight the need to do so in a way that minimises traffic generation.
- Ten of the LDF objectives were thought to conflict or potentially conflict with some of the sustainability appraisal objectives, but that this conflict could be reduced by rephrasing these objectives. Revised wording is suggested in appendix 4.

- One of the LDF objectives was considered too vague to assess its impact. It referred to “securing environmental benefits”, but the nature of these benefits was not clear. It is recommended that the type of benefits should be specified and the objective rephrased to reduce potential conflicts with the provision of affordable housing.
- Finally one LDF objective which referred to “providing a balance between the needs of housing and other land-uses, whilst protecting natural assets” was considered too vague to assess its impact on the appraisal objectives. It is recommended that this objective is removed as it does not add anything new to the other objectives.

A summary of the conclusions from testing each objective is contained in appendix 4. The detailed results of the testing are in appendix 5.

Appraisal of Options

The Options Paper

The Options Paper has seven themes, with several issues grouped under each theme. For each issue a range of options are presented. The options can be divided into two types:-

- **Strategic options** – which consider major strategic alternatives, that could have a fundamental impact on the future development of the district, such as where to locate new housing or employment
- **Other options** – which describe alternative approaches that the plan might take to a variety of important, but less fundamental issues

For each issue there are either:-

- **Alternative options** – where consultees are invited to choose *between* the options
- **Complementary options** – where consultees are invited to choose as many of the options as they wish

The appraisal of these two types of options has been treated differently, as explained below.

Purpose of appraising the options

The appraisal process

The appraisal process for each option involves assessing the impact of the option against each of the sustainability objectives. This is done using a formal matrix. The impact of the option on SA objective is scored as follows: Major positive √ √; positive √; major negative **XX**; negative **X**; uncertain **?**; or neutral **O**.

The SEA Directive requires the appraisal to identify significant impacts. In our appraisal, major positive, positive, major negative and negative impacts are all defined as “significant”. Significance is assessed in terms of the **size** of the impact (eg whether a development will use a large or small amount of greenfield space) and the **importance** (eg will it take place on an important biodiversity site). The third factor is the **cumulative** affect of a number of small impacts, which when taken together can

produce a significant impact (eg the affect on landscape of a number of small developments in the countryside).

The assessment of impacts is based on the current situation and trends for each objective, including where there are particular problems. This information is contained in appendix 3 (baseline data) and appendix 1 (key sustainability issues), and has been referred to throughout the process of compiling the matrices.

For the appraisal of each option, the conclusions, concentrating on the significant impacts are summarised at the bottom, along with recommendations for changes (discussed further below). The full matrices with conclusions and recommendations are contained in appendix 6 and the conclusions and recommendations alone are contained in appendix 4.

Alternative options

The purpose of appraising alternative options is to compare the sustainability impacts of alternative ways of addressing the same issue. The conclusions from the appraisal are designed to assist both decision-makers and those commenting on the Options Paper to compare the potential impacts of alternative options. The aim therefore is to help inform decision-making.

The purpose of appraisal alternative options is *not* to identify which option is more sustainable. In almost every case options will have both positive and negative impacts on the sustainability objectives. Therefore it is not possible to be definitive about whether one option is more sustainable than another. However, sustainability impacts should be given greater weight where they impinge on the key sustainability issues that have been identified for North Hertfordshire. Therefore the conclusions for each option begin by discussing the impact of the option on the key sustainability issues.

In some cases we have made recommendations for changes to options. This has only been done where we have identified opportunities to reduce the adverse impact of an option on one or more appraisal objectives without diluting the positive impact that the option has on other appraisal objectives. The recommendations do *not* include any major changes to the options, because these should already be covered in the alternative options for the issue in question. In some cases we have also recommended clarifications to the text of an option.

Complementary options

The complementary options predominantly describe a variety of different policies that might be included in the plan. These are not alternatives. Several or even all of the options could be included in Local Development Documents (LDDs). The purpose of the appraisal of the complementary options is therefore to describe their sustainability

impact *if they were introduced as policies in LDDs*, and to suggest how their sustainability performance might be improved.

The appraisal and the conclusions from the appraisal of the complementary options have therefore treated these as though they were LDF policies. This has led to recommendations for changes to these options, which will only be applied when they are developed into policies.

Uncertainties in the appraisal

The SEA Directive requires that we identify uncertainties in the appraisal. Where there was insufficient information to predict important sustainability impacts of an option, we have noted this in the matrices. (See appendix 4.) In these cases we have usually specified in our recommendations the additional data, or the need for more information on how the option would be applied, that would help to predict the impact of the option.

Summary of appraisal results for the options

Below we present the main conclusions from the appraisal of the most significant alternative options. These are grouped by theme and issue. The full conclusions and recommendations from the appraisal of all of the options are contained in appendix 4. The detailed results are available in appendix 6.

Most issues include an option entitled “other (please specify).” We have not conducted an appraisal of these options because they are left open for consultees to include their own suggestions.

In some cases, we have also appraised an additional option, reflecting current practice, added to the options included within the Options Paper. This is because SEA Directive requires that current practice (“business as usual”) be appraised. The business as usual options is identified for each issue in appendix 6.

For some options, in order to undertake the appraisal, we have made assumptions about what the option might entail. Our assumptions are explained below.

1. Natural and Built environment

1.4 Energy generation

Four alternative options are suggested for this issue:

- a. To include policies which *only* encourage small-scale renewable energy schemes to be incorporated into new developments.

- b. To include policies which *only* encourage large scale renewable energy schemes such as wind farms.
- c. Both of the above.
- d. Do not include a policy on renewable energy and therefore rely on the latest Government advice.

We have added the words “only” (shown in italics) to options (a) and (b) in order to more clearly to distinguish between them.

Conclusions

Options (a), (b) and (c) would have a positive impact on the key sustainability issues of reducing greenhouse gas emissions, but clearly option (c) would allow greater production of renewable energy and therefore a more substantial reduction in greenhouse gas emissions. Information is not currently available on the comparative potential generating capacity of small-scale and large-scale renewable technologies in North Hertfordshire. In contrast option (d) is likely to result in a much lower level of development of renewable energy technologies in the district.

Options (a), (b) and (c) may have an adverse impact on the key sustainability issues of pressure on landscapes and character of the district, although this would depend on the type of renewable technology used. Photovoltaic cells, for example, may have limited impact on landscape and character, depending on where they are located, while ground source heating and cooling is unlikely to have any impact on landscape and character.

Options (b) and (c) could also support the key sustainability issue of economic diversification, especially in rural areas, where feed stocks such as bio-mass or livestock waste could be generated.

Options (b) and (c) may have an adverse impact on biodiversity, because some large scale renewable energy schemes such as wind farms are likely to be located on greenfield sites. But other large scale renewable schemes such as anaerobic digestion may well be located in urban areas.

It is not possible to be accurate about the overall impact of the options on greenhouse gas emissions, landscape, character and biodiversity until the conclusions from the Hertfordshire Renewable Energy Study are available. This should provide more information on the most suitable renewable technologies, their generation capacity and appropriate locations in the district.

Recommendations

For option (a) include the caveat that externally visible small scale renewable technologies such as PVs are located so as to harmonise with the surrounding landscape and character.

For options (b) and (c) develop more detailed alternative options for suitable large-scale renewable technologies and their locations in the district once the conclusions from the Hertfordshire Renewable Energy Study are available.

1.7 Density of development

Three alternative options are suggested for this issue:

- a. Include a policy that high density developments (i.e. over 50 dwellings per hectare) will only be allowed in close proximity to town centres or railway stations.
- b. Include a policy that high density developments will only be allowed where there is no harm to the local character.
- c. Do not include a specific policy on density and therefore rely on the latest Government advice.

Conclusions

Both options (a) and (b) would have an adverse impact on the key sustainability issues of minimising development on greenfield land and protecting landscapes. This is because they both place limits on where high density developments may be located, and are therefore likely to force more development out to greenfield sites. This might also have an adverse impact on biodiversity, depending on the location of the greenfield sites.

However, option (c) is likely to result in lower densities than either options (a) and (b), and therefore would place even greater pressure on the development of greenfield land and on landscapes than options (a) and (b).

Research has found that public transport is less viable in lower density residential areas, and consequently private car use is likely to be higher with option (c), which would consequently work against reducing car use and reducing greenhouse gas emissions.

The limits placed on the locations for high density housing, or the absence of any requirement for high density housing in the case of option (c), could also restrict opportunities for developing more affordable housing.

Option (a) is likely to result in high density housing being located in areas with good public transport links, but this would not necessarily be the case for option (b). Both options may also rule out locating high density developments in other possible locations with good public transport connections (where these are outside of the town centre or away from railway stations, or in areas where high density could damage character.) As a result, some additional opportunities to locate developments in ways that minimise car journeys might be missed.

Option (a) may have an adverse impact on the historic character of urban areas, but on the other hand it is likely to promote sustainable urban living.

Recommendations

As option (c) has no positive sustainability impacts, remove this option and replace it with options that offer a choice of alternative minimum or average density levels.

Expand option (a) to allow high density housing in any areas that do, or could potentially have good public transport links, but excluding those that have important landscape or biodiversity value – currently or as a potential green link between high biodiversity sites.

Other natural and built environment issues

Options are also identified for a number of other issues relating to the natural and built environment:

- Issue 1.1: Protecting landscapes.
- Issue 1.2: Protecting biodiversity.
- Issue 1.3: Minimising pollution.
- Issue 1.5: Waste management.
- Issue 1.6: How to ensure that the design of development respects local character.

These options have been appraised and the conclusions are contained in Appendix 4, with the full matrices in Appendix 6.

2. Rural areas and settlement pattern

2.1 How to identify which villages within the rural area might be able to accommodate development

Five alternative options are suggested for this issue:

- a. Identify villages which may take further development based on the level of facilities in the village.
- b. Identify villages which may take further development based on the population of the village.
- c. Identify villages which may take further development based on the desires of the parish council and the residents of the village.
- d. Do not identify specific villages and allow some development in all villages.
- e. Do not allow any development in any village.

Conclusions

Options (a), (b) and (d), by allowing development within villages, would have a positive impact on the key sustainability issues of minimising development on greenfield land and therefore protecting landscapes.

On the other hand they would have an adverse impact in terms of generating more and longer car journeys and so would add to greenhouse gas emissions. This is particularly true of option (d) because it would allow development in villages with poor public transport and facilities. Option (b) is likely to have a very similar impact to (a) *if* there is a significant correlation between villages with larger populations and villages with more services and facilities. On the other hand, if there are a number of villages with higher populations but relatively poor access to services and facilities, then this option is likely to have a more severe impact on trip generation than option (a). However, if the villages with higher populations are also those with better public transport links, then this option could have a less severe impact on trip generation than option (a).

All three options would work against the North Hertfordshire targets to: reduce the distance travelled per person by 5% by 2021; reduce the car use modal share from 72.07% to 65.5% by 2021. But there is considerable uncertainty about the extent to which these options would generate new journeys. This would require more information on: the type of facilities that would be considered in option (a); the proposed levels of development and in which villages; and modelling to predict the likely journey generation.

In contrast option (e) would be positive in terms of minimising the generation of new car journeys, but it is likely to have a very negative impact on the key sustainability issues of promoting rural tourism, protecting greenfield land and landscapes, providing affordable housing, and improving access to facilities in rural areas, including health and educational facilities. It may also have an adverse impact on community cohesion.

It is also likely that both options (a) and (b) would prevent the development of affordable housing in some villages where there is a demand for more affordable housing, but to be certain this would require further analysis of the Housing Needs data. Option (d) in contrast would allow affordable housing developments in all villages. Option (d) could also increase the number of households with poor access to services and facilities.

It is very difficult to predict the impact of option (c) because it would depend on the decisions of parish councils and residents. There is no guarantee that their decisions would be based on the need for housing, rural diversification, services or facilities. This option could have an adverse impact on the objective of “sharing access to services and the benefits of prosperity fairly” if the parish council and residents did not consider the needs of the more deprived members of their community.

Recommendations

We recommend that options (a), (b) and (d) are developed further in order to clarify their likely impact. More detailed suggestions are provided in appendix 4.

Once more detail is available on how the alternative options would be implemented in practice, we suggest that the council models the likely impact of options (a), (b) and (d) on village character, journeys and modal share. It could also use information in the Housing Needs Study database to analyse which (if any) villages with a significant demand for more affordable housing would be prevented from accommodating more affordable housing under options (a) and (b).

We recommend that option (c) includes an explanation of how parish councils and residents would be expected to reach decisions, e.g. if their decisions should be backed up by evidence of need, availability of facilities, and how they would involve and consider the needs of the more deprived members of their community, and other issues such as local character and biodiversity.

Finally, we suggest that option (e) is adapted to allow the development of small scale community services, facilities and meeting places, including schools and health facilities, designed to serve the needs of existing village residents only.

Other issues relating to rural areas and settlement patterns

Options are also identified for three other issues relating to rural areas and settlement patterns:

- Issue 2.2: Whether to distinguish between levels of development appropriate at different villages.
- Issue 2.3: Development in the rural area outside the villages.
- Issue 2.4: Replacement buildings in the countryside.

These options have been appraised and the conclusions are contained in Appendix 4, with the full matrices in Appendix 6.

3. Housing

3.1 Where should the required new housing be built?

The draft East of England Plan requires 15,800 new homes to be provided in the District over the period 2001-2021. Five alternative options are identified for providing this housing:

- a. Continue current policy of focusing development on the four towns and fourteen villages, which may include limited development of greenfield sites.
- b. Focus development on previously developed land within existing urban areas.

- c. Allow urban extensions on greenfield land adjoining existing towns.
- d. Build a new settlement.
- e. Use a large number of smaller greenfield sites in the villages.

Conclusions

All options will involve significant development on greenfield sites, with likely significant impacts on biodiversity and landscape. Even under options (a) and (b), according to the Housing Capacity Study there will be a need for around 9,400 dwellings on greenfield sites. Options (a) and (b) also offer the opportunity to remediate existing contaminated land sites in the four towns.

The impacts on biodiversity and landscape will be greater for options (c), (d) and (e), and will clearly depend on location of the development:

- For option (c) the possible extension to Stevenage is shown by the Biodiversity Action Plan (BAP) to include an area high in biodiversity. The possible extension to Stevenage or Luton is also likely to have a significant impact on the landscape of the area which has high recreational and amenity value, and provides an opportunity to be in contact with wildlife and wild places.
- Likewise for option (e), the BAP indicates that the areas around villages include "areas high in biodiversity", key areas for farming wildlife and key grassland habitats. In addition, taken together, the developments around villages are likely to have a significant impact on landscape. Some of the areas around villages are in or close to the AONB.
- For option (d) if the new settlement is an area between Baldock and Royston, this area may have a lower amenity and recreational value than some other parts of the District.

The impacts on travel are complex. Options (c) and (d) would provide an opportunity to include community facilities for the new population, and potentially new public transport infrastructure. If this was done, the impact could be positive. In particular, provision of an additional railway station, could support additional commuting by rail. For option (c), if the extension is located next to Stevenage or Luton, and appropriate public transport is provided, this could also have a positive impact in providing sustainable access to services in the two towns. Likewise, options (a) and (b) could reduce the need to travel by making jobs and services accessible, particularly if public transport is provided. However, 60% of residents currently drive a car or van to work, with an average journey of 15 miles to work and 14 miles for leisure, so this indicates that the majority of people are not working or using leisure facilities in their local town. It therefore implies that all these options would result in increased car travel and the resultant noise and air pollution and production of greenhouse gases. Development around villages in option (e) and part of option (a) are also likely to increase the need

to travel, although this could be partially mitigated if it results in the size of the village increasing to a scale where it can support additional services and public transport provision.

In addition to the traffic impacts, the extension to Luton or Stevenage in option (c) would result in significant loss of tranquillity in the area. For all options, pollution of groundwater is an issue as the District is on a major chalk aquifer with high groundwater vulnerability. Engineering to prevent pollution of groundwater is an issue that needs to be included in the requirements for any new developments.

For all the options, new housing will significantly increase water use in the District, and put significant pressure on water infrastructure. Based on an average use of water by customers of Anglian Water, which covers most of the District of around 127 litres per person per day for metered properties, this would be an increased use of 1.838 billion litres per annum. The Environment Agency water strategy for the Anglian Region (which covers the whole District) says that increases in abstraction from the aquifer are not acceptable, so additional water would need to be provided from regional reservoirs. Recent scenario planning for the region undertaken by the Agency demonstrates that future demands cannot be met from the current planned new resource development alone. It also stresses the need for efficiency savings and suggests the 25% savings advocated by the ODPM are achievable for new housing. The SEA of the RSS for the East of England Plan also notes the pressure on water infrastructure in the region as a result of proposed new housing provision and the impacts of climate change. The SEA recommends that the potential Stevenage extension should include a sustainable water resources management scheme. Since the District has amongst the lowest rainfall (125mm/y) in the UK, the new developments will reduce the District's ability to respond to climate change. Demand for water is therefore one of the most critical impacts of the proposed new housing, that must be managed. More information on managing water resources is available in the recent toolkit produced for the Environment Agency and the South East Regional Assembly.¹³

For all the options, the provision of large amounts of new housing has the potential to have a positive impact on affordability, provided that it includes significant amounts of affordable housing, and if some of this is aimed at particular groups in need such as young people, disabled people and key workers.

Options (c) and (d) have the potential to yield a range of community benefits by giving the opportunity to plan and provide services and facilities including schools, health services and recreational facilities.

¹³ *A Toolkit for Delivering Water Management Climate Change Adaptation Through the Planning System* Prepared for the Environment Agency & SEERA by Land Use Consultants with CAG Consultants, Collingwood Environmental Planning and Wilbraham & Co. March 2005

In summary any of the options will involve a number of significant environmental impacts, the most important of which is impact on groundwater and the water supply infrastructure. This impact must be mitigated in the development process. All the options have the potential to have a positive impact on access to affordable housing, but this can only be achieved if a significant percentage of affordable housing is included in developments.

Recommendations

Given the requirement for the provision of additional housing, we have not been able to identify how any of the options could be made sustainable. For all the options, there clearly needs to be detailed research to determine the impacts on landscape, biodiversity, and groundwater in specific locations. It is essential that any development includes a requirement to achieve 25% water saving (against current rates) which can be achieved by use of currently available technology (water efficient appliances, showers, taps, toilets, use of rain butts etc). As mentioned in the SEA of the RSS, large developments should also include a sustainable water resources management scheme. All options should also include significant provision of affordable housing. Finally the impacts on travel and the opportunities for public transport provision need to be fully researched for all options.

3.2 Provision of affordable housing

Four options are identified:

- a. Continue with the present approach of negotiating for affordable housing at the rate identified in the current Local Plan.
- b. Increase the amount of affordable housing on large sites to a higher percentage.
- c. Lower the threshold to include smaller sites, where the economics of provision will allow.
- d. Introduce a lower threshold for the villages than the towns.

Conclusions

The Housing Needs Survey notes that the current provision is not meeting the growth in need for affordable housing. It also points out that 75% of new households are not able to afford to purchase in their own right. Therefore this option (a) will have a negative affect on affordability and access to decent housing, as it will result in increased, rather than decreased need. Likewise options (b) and (c) will have a positive affect on these issues. Option (d) is likely to meet the needs of the young and older people to remain living in the villages which would promote community cohesion and meet the housing needs of these groups. None of the options address the requirements for different types of affordable housing, and particularly the need for flats.

Apart from the fact that option (d) should meet the needs of some young and older people in villages, the impact of all options on meeting the needs of specific groups in unclear. The Housing Needs Survey notes the need for sheltered housing for older

people and supported and adapted housing for disabled people. It is not clear if any of the options would address these needs. The survey points out that BME households have lower average incomes, and affordability is therefore more of an issue for them. Options (b) and (c) are therefore more likely to meet their needs.

Recommendations

For all options:

- Clarify how the needs of older people and disabled people will be addressed
- Specify that the affordable housing should meet needs for different types of housing, particularly flats

Other housing issues

Options are also identified for a number of other issues relating to housing:

- Issue 3.3: How to deal with the situation where public subsidy is unavailable for the level of affordable housing sought.
- Issue 3.4: How to meet affordable housing needs in rural areas.
- Issue 3.5: How can we ensure that a range of housing types and sizes is built to satisfy the needs of all sectors of the community?
- Issue 3.6: How to best provide accommodation for Gypsy and Traveller families should the need arise.
- Issue 3.7: Whether all new housing developments should contribute towards local facilities

These options have been appraised and the conclusions are contained in Appendix 4, with the full matrices in Appendix 6.

4. Employment and Tourism

4.1 Provision of employment land

Five options are identified for provision of employment land:

- a. No new Employment Areas should be designated and there should no expansion of existing ones.

- b. Completely new Employment Areas should be designated, but only within existing settlements.
- c. Completely new Employment Areas should be designated within or adjoining existing settlements.
- d. There should be extensions to existing Employment Areas, but only within existing settlements.
- e. There should be extensions to existing Employment Areas within or adjoining existing settlements

In addition, we also appraised an additional option, reflecting current practice, added to the options included within the Options Paper. This is because SEA Directive requires that current practice (“business as usual”) be appraised.

This option is:

- g. No formal policy (Note there is no option (f) to appraise, this is simply “other” in the Options Paper).

In the appraisal of this option, it has been assumed that having no formal policy would therefore in result in the designation of no new employment land.

Conclusions

For all the options it is not possible to assess the impact on prosperity and economic growth without more information. A key sustainability issue is provision of more high quality employment in the District, and it is unclear whether this can be addressed through provision of employment land.

The impact of transport on greenhouse gas emissions is another key issue. For all the options, it is difficult to assess the impact because of lack of information. The impact depends whether existing provision is sufficient to attract employers to meet local needs for employment, taking account of the future housing provision. 60% of residents currently drive a car or van to work, with an average journey of 15 miles to work. However, it seems likely that without provision of additional employment land, the increased population will result in increased travel to work by car, and increased impact on global warming. This would work against the District’s targets to reduce the distance travelled per person by 5% by 2021 and reduce car use overall. On this basis, option (a) and (g) would therefore have a negative impact, and the other options would have a positive impact. It is crucial therefore that planning for the provision of new housing be linked with provision of appropriate employment land in order to reduce climate change impacts.

Likewise for all options, it is difficult to assess the impact on disadvantaged communities, due to lack of information. This depends whether provision of sites in Letchworth and Hitchin is sufficient to meet employment needs of those communities. For options (b) to (e), the new or expanded areas theoretically could provide

employment for these people. However, provision of sites alone will not ensure that the jobs go to local people.

If options (b) and (c) include the 14 villages, they could help improve access to village employment (if there are any available sites within the villages), and improve village services.

Options (a), (b), (d) and (g) will have a positive impact on the key sustainability issue of use of greenfield land, assuming that “within existing settlements” means on brownfield sites. Options (c) and (e) will have a negative impact. The impact of options (b) – (e) on town centres depends on location of new sites and the employment classes allowed. Options (b) to (e) will have a negative impact on the use of natural resources. As discussed above, use of water is a key issue and is something that should be managed when agreeing new employment developments.

Recommendations

It is recommended that the employment study examine the following issues:

- Whether provision of more high quality employment in the District can be addressed through appropriate provision of employment land
- The need for additional employment land to ensure that the increased population from the new housing is able to work locally
- How the needs of the disadvantaged communities in Letchworth and Hitchin can be met through the provision of employment land, or other means, such as working with employers to target and support local people into work.

It is also recommended that the options be clarified as follows:

- Clarify that “within existing settlements” means on brownfield sites
- Clarify that “existing settlements” includes the 14 villages

4.2 Employment uses within employment areas

Four options are identified for addressing this issue:

- a. Let market forces determine the uses within Employment Areas.
- b. Safeguard employment uses within the Employment Areas, unless sites are no longer suitable for employment use (e.g. because of poor location, condition or low/no market demand etc), but with restrictions on the type of alternative uses which will be acceptable.
- c. Safeguard employment uses within the Employment Areas, unless sites are no longer suitable for employment use, with no restrictions on the type of alternative uses which will be acceptable.
- d. Safeguard employment uses unless studies demonstrate lack of need in the area.

Conclusions

The same uncertainties arising from lack of data apply to these options as to those in 4.1.

Options (a), (b) and (c) could have a positive impact on the objectives of improving access to local services, improving community cohesion (by providing community facilities) improving access to culture and recreation, and providing affordable housing. However, for option (a), it is not clear that market forces alone will deliver these benefits. It is more likely that option (b) will deliver the positive results than (a) or (c).

For options (a) and (b), impact on town centres depends on whether new uses compete with town centre uses. With no restriction on use, it is more likely that under option (c) new uses would conflict with town centre uses.

Recommendations

The same recommendations regarding the employment study apply as listed under 4.1 above.

4.3 Distribution of employment provision

Five options are identified:

- a. Any new employment provision should be concentrated in Hitchin.
- b. Any new employment provision should be concentrated in Letchworth Garden City.
- c. Any new employment provision should be concentrated in Baldock.
- d. Any new employment provision should be concentrated in Royston.
- e. Any new employment provision should be allocated where there are available sites which are accessible by public transport and a market for the premises.

Conclusions

From a sustainability point of view, there is little difference between options (a) to (d). Theoretically (a), (b) and (e) would provide more access to employment for people in deprived areas in Hitchin and Letchworth, but there is no guarantee the jobs would go to these people. Option (e) would have a positive impact on reducing car use.

The full conclusions are contained in Appendix 4, with the full matrices in Appendix 6.

4.4 Promotion of tourism

Options on policies for promotion of tourism have been appraised, and the conclusions are contained in Appendix 4, with the full matrices in Appendix 6.

5. Town Centres

5.1 Shopping uses

Three alternative options are suggested for this issue:

- a. Let market forces determine the mix of uses in town centres.
- b. Define Primary and Secondary shopping areas, with greater restrictions on the loss of shops in the primary areas.
- c. Resist the loss of shops anywhere within the town centres.

Conclusions

It is very difficult to predict the impact of option (a) because it is impossible to be certain what mix of uses would result in town centres as a result of market forces. However, there is no guarantee that this option would support town centre vitality and viability. The Town Centre Retail Study concludes that this option could be potentially damaging to the balance of retail and other uses within town centres, with an increase in the proportion of non-shop uses such as pub chains and restaurants prepared to pay higher rents than independent shops. This trend could also have an adverse impact on noise levels and disturbance.

It is also difficult to predict the impact of option (b) because of uncertainties about how potential town centre occupiers and developers would respond to this option. However, the Town Centre and Retail Study concludes that if restrictions were placed on the loss of shops in secondary shopping areas that this could lead to an increase in vacant units because demand for retail occupiers is unlikely to be as strong within peripheral parts of the town centres. The study also indicates that this approach would only be suitable for Hitchin, Letchworth and Royston, but not for Baldock which is too small. However, this option might have a positive impact on the key sustainability issue of providing more affordable housing, by allowing the conversion of shops into housing in secondary shopping areas.

Finally, option (c), by restricting the conversion of shops to housing in town centres, may have an adverse impact on the key sustainability issues of providing more affordable housing. It may also lead to more edge of town residential developments that are further away from good public transport links. This would have an adverse impact on the key sustainability issues of reducing car use and greenhouse gas emissions. This option may result in an increase in vacant units which would damage the vitality and viability of town centres and detract from the historic character of some of the towns. It would also restrict the development of new community facilities in the town centres. It should also be noted that there is no evidence from the Town Centre and Retail Study that the town centres have a harmful or disproportionately high level of non-shop uses at present.

Recommendations

We recommend that option (b) is revised to clarify if this approach would apply to all four towns, or if Baldock would be excluded.

Other issues relating to town centres

Options are also identified for a number of other issues relating to town centres:

- Issue 5.2: Other uses in town centres.
- Issue 5.3: How to promote the health and well being of the smaller centres.
- Issue 5.4: Should all the smaller centres be treated the same?
- Issue 5.5: Should we promote the 'evening economy' in the four main towns, and if so how?

These options have been appraised and the conclusions are contained in Appendix 4, with the full matrices in Appendix 6.

6. Transport

6.1 Encouraging alternative modes of travel and reducing car use

Five complementary options are identified:

- a. Ensure that developers make adequate provision for non-car modes; public transport, cycling and walking.
- b. Require all new developments to make a contribution towards improving local transport infrastructure.
- c. Introduce car parking standards that are compatible with the location, in line with maximum standards.
- d. Make sure large new developments make provision for improved and integrated transport infrastructure.
- e. Require Green Travel Plans to be prepared for new or extended large employment sites.

Conclusions

Each of the options have been appraised, and all would have some positive impacts, particularly on reducing car use and the associated pollution and greenhouse gas emissions. Most of the options (except (c)) would also make a positive contribution to improving access to services for those without a car and improving health by promoting walking and cycling. The full conclusions are contained in Appendix 4, with the full matrices in Appendix 6.

Recommendations

Although the options as they stand would have a positive impact, a number of recommendations have been made to make them more sustainable. These are:

- For option (a) require provision to be developed in a way that will last in the long-term.
- For option (a) re-word to encompass the development of car share clubs: by saying "adequate provision for modes which reduce car use: public transport, cycling and

- walking and car-share clubs”
- For options (b) and (d) give priority to infrastructure for modes which reduce car use.
 - For option (c) make the option more proactive by retaining restrictions on car use, but promoting low-car or no-car developments.

6.2 Whether or not to promote ‘park and ride’ schemes

The two options for this issue have been appraised and the conclusions are contained in Appendix 4, with the full matrices in Appendix 6.

7. Leisure and Community Facilities

Options are identified for two issues relating to town centres:

- Issue 7.1: How should we secure adequate provision of sports pitches and sports facilities in the District?
- Issue 7.2: Should developers contribute more towards community facilities and services?

These options have been appraised and the conclusions are contained in Appendix 4, with the full matrices in Appendix 6.

Appendix 1 Key Sustainability Issues

| SA Objective ¹⁴ | Issues | Source |
|--|--|---|
| ECONOMIC ACTIVITY | | |
| <u>1 Achieve sustainable levels of prosperity and economic growth</u> | Difficulties in competing with large urban centres for provision of employment and facilities | Discussion with Officer Steering Group |
| | Promotion of rural tourism. Visitors can be important to rural areas, but the District is not seen as a prime tourist location. | Discussion with Officer Steering Group |
| | Need to provide more high quality employment in the District. This will help reduce the disparity between local income and that of commuters, and to reduce the environmental impacts of commuting. One cause of this is the high cost of housing; employers don't see the District as a location of choice. | Herts Rural Innovation Strategy (p30) North Herts Learning Forum Action Plan LSC Action Plan |
| | Recruitment of skilled workers: within rural Hertfordshire 15% of employers report difficulty in recruiting the skills they need. This compares with a 10% average for Hertfordshire and as little as 2% in the south of the County. Equally 19% of Hertfordshire firms report that a lack of skilled labour is a limiting factor in increasing output. | NHDC Corporate Plan (p6) Discussion with Officer Steering Group |
| LAND USE AND DEVELOPMENT PATTERNS | | |
| <u>2(a) Minimise the development of greenfield land and other land with high environmental and amenity value</u> | The need to provide additional housing for local needs, and to meet additional regional requirements will require the use of greenfield sites and put significant pressure on the environment and quality of life in the District. Possible developments are: <ul style="list-style-type: none"> the proposed expansion of Stevenage (West of A1(M) into the North Hertfordshire green belt the proposed expansion of Luton, which will impact onto the North Hertfordshire parishes lying against its boundary, which are in the green belt | NHDC Corporate Plan (p6) Key issue 'We will protect the environment by vigorously challenging airport and greenfield housing development.' |
| <u>2 (c) deliver more sustainable location patterns and reduce the use of motor vehicles</u> | Population and mobility factors have changed the function of villages from employment service centres to dormitory/residential functions reducing their social and physical diversity. | Herts Rural Innovation Strategy (p31) |
| | The high levels of journeys and complex settlement pattern means that it is difficult to maintain a commercially viable passenger transport for journeys other than to London. | Herts Rural Innovation Strategy (p31) |

¹⁴ Those relevant to the SEA Directive are shown underlined

| SA Objective ¹⁴ | Issues | Source |
|---|--|---|
| ENVIRONMENTAL PROTECTION | | |
| <u>3(a) Protect and enhance biodiversity</u> | Possible housing developments discussed above, plus the proposed expansion of London Luton and Stansted airports will have a significant impact on District's environment. | NHDC Community Strategy (p 7) |
| <u>3(b) Protect and enhance landscapes</u> | Pressures on locally significant habitats and species in the District. These include fragmentation of habitats, loss of corridors and the direct impacts of agriculture and new development. | Discussion with Officer Steering Group Biodiversity Action Plan |
| <u>3(d) Reduce pollution from any source</u> | Quality of surface and ground water is threatened by the water supply needs and drainage from future developments. Adequate supply for future developments is also an issue: see 6a below. | Herts Environmental Forum Strategy Discussion with Officer Steering Group |
| CLIMATE CHANGE | | |
| <u>4(a) Reduce greenhouse gas emissions</u> | Transport use is a significant contributor to global warming. Journey lengths are above the county average for work and leisure journeys in North Hertfordshire//Stevenage, and there is a high car use for the school run. | North Herts Area Transport Plan (NHATP) Table 7 Issues and problems identified through consultation. NHDC Rural Strategy (Annex 4 – Priority 7 – transport) County Transport Plan |
| | Domestic and commercial energy use is also a significant contributor to global warming. | Discussion with Officer Steering Group |
| A JUST SOCIETY | | |
| 5(a) Share access to services and benefits of prosperity fairly | Whilst the District is relatively prosperous there are pockets of income and/ or multiple deprivation in relation to national standards. In the towns these occur in Hitchin (West Mill) and Letchworth (South East) In the rural areas specific issues are isolation and lack of access to services. | NHDC Corporate Plan (p4) Anti-Poverty Strategy 1998, summarised in Appendix to NHDC Social Inclusion Strategy. Herts Rural Innovation Strategy (p31) Community Legal Service Strategy 2003 |
| 5(b) Provide access to services and facilities for all | There has been a reduction in village services and employment over the last 20 years. This particularly affects the elderly and young people. The number of households in the area with an elderly person in it is higher than the national average at 34%. This rises to 43% in some parts of the District. Some villages have high percentages of young people that have limited access to services. This is because of lack of planned recreational activities within | Herts Rural Innovation Strategy (p31) Older Peoples Strategy |

| SA Objective ¹⁴ | Issues | Source |
|---|---|--|
| | villages and limited public transport to larger settlements. The same issue applies to elderly and young people living in some neighbourhood areas of our towns. | |
| 5(d). Increase access to decent and affordable housing | There is a need to improve supply of high-quality affordable housing. The need for affordable housing has been exacerbated by insufficient development of affordable units over the last decade. Coupled with significant inflation in the housing market the gap has widened between the 'haves' and 'have-nots'. Specific issues on affordable housing include key worker housing, housing for young people and the disabled. | NHDC Corporate Plan (p6) Herts Rural Innovation Strategy (p30) NHDC Rural Strategy (Annex 4 – Priority 4 – Housing) Housing Strategy 2004 Affordable housing programme |
| 5(e) Reduce crime rates and fear of crime | NHDC is generally very safe, but fear of crime is an issue in the District. The crime survey showed that areas of concern about crime and disorder are spread throughout the District. A particular issue is street crime in town centres, which is naturally higher due to the concentration of licensed premises, clubs and car parks etc. | NHDC Corporate Plan (p7) North Herts CDRP Strategy 2005-08 Crime Audit 2004 Fear of Crime Survey 2004 Discussion with Officer Steering Group |
| 5(f) Improve conditions and services that engender good health and reduce health inequalities | Generally speaking across all age groups the population of North Hertfordshire and Stevenage enjoys good health compared with national averages. This however masks some areas at ward or sub-ward level of significant deprivation and poorer health status. The incidence of age-related poor health, including fuel poverty (hypothermia related) and senility are higher in North Hertfordshire. | Health Improvement and Modernisation Programme, North Herts and Stevenage PCT 2005 (p6) Director of Public Health Report 2005 Discussion with Officer Steering Group. |
| | Noise from air and road transport has a significant effect on quality of life in the District. Proposed developments will have significant additional impacts. | Discussion with Officer Steering Group |
| | There are also important local issues regarding the need to integrate and co-ordinate transport services and arrangements to improve access to health facilities. | Health Improvement and Modernisation Programme, North Herts and Stevenage PCT. (p35) Health Scrutiny report |
| RESOURCE USE AND WASTE | | |
| 6 (a). Use natural resources efficiently; reuse, use recycled where possible | Hertfordshire has the highest domestic water use in the country. The proposed new developments will put significant pressure on water supply infrastructure, and will require water to be piped in from outside the District. | Discussion with Officer Steering Group |

| SA Objective ¹⁴ | Issues | Source |
|----------------------------|---|---|
| | The most recent figures available (1997) show that Hertfordshire was a net importer of sand and gravel with consumption exceeding sales by 0.356mt. | Herts Minerals Local Plan Second Deposit Draft (para 1.4.3) |
| 6(b) Reduce waste | Need to reduce waste and increase recycling rates, particularly because waste sites within the County will be full by 2008. | NHDC Corporate Plan (p6) Herts Waste Strategy (p5) Discussion with Officer Steering Group |