



# Sustainability Appraisal of North Hertfordshire Local Plan Adoption Statement

North Hertfordshire District Council  
**Sustainability Appraisal of North Hertfordshire Local Plan**

Adoption Statement

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# 1 Introduction

Sustainability appraisal (SA) is a mechanism for considering and communicating the likely effects of a draft plan and reasonable alternatives; with a view to avoiding and mitigating negative effects and maximising the positives before the Plan is finalised.

This document is the Sustainability Appraisal (incorporating the Strategic Environmental Assessment) Statement to accompany the adoption of the North Hertfordshire Local Plan. The Sustainability Appraisal (SA) Statement describes: the process; how the findings of the SA were taken into account and informed the development of the Local Plan; and the monitoring indicators that will be applied to check the accuracy of predicted effects and to monitor progress against sustainability objectives.

A parallel process of SA was undertaken alongside the Plan-making. CAG was commissioned to support North Hertfordshire in undertaking the SA process. It is a requirement that SA involves a series of procedural steps. The final step in the process involves preparing a 'statement' at the time of Plan adoption.

The local planning authority has to make publicly available a copy of the Plan and an SA Adoption Statement, in line with the Planning and Compulsory Purchase Act (2004) and in accordance with the SEA Regulations (Environmental Assessment of Plans and Programmes Regulations 2004, Regulation 16(3) and (4)). The SEA Regulations require the statement to contain the following:

- How environmental considerations have been integrated into the Plan or programme (see Section 2 of this document);
- How the environmental report has been taken into account (see Section 2 of this document);
- How opinions were expressed in response to:
  - the invitation in Regulation 13(2)(d); and Draft Plan
  - action taken by the responsible authority in accordance with Regulation 13(4); have been taken into account;
- (see section 3 and the Appendix of this document);
- How the results of any consultations entered into under Regulation 14(4) have been taken into account. There were no requests from member states for consultation under this regulation.
  
- The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with (see section 4 of this document); and
- The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme (see section 5 of this document).

The new Local Plan replaces the 1996 Local Plan. It covers the period 2011-2031 and sets targets for new homes, employment and retail development as well as identifying areas of land where these developments should be built. It also considers what infrastructure is needed to support development.

The Plan was formally published in October 2016 and submitted for examination in June 2017. It was the subject of initial examination hearings from November 2017 to March 2018. Following the hearings, consultation was carried out on proposed Main Modifications between January and April 2019. Subsequent to that consultation, the Planning Inspector identified a number of areas where further hearing sessions would be required. These were held between November 2020 and February 2021.

Following these hearings, the Council drafted and submitted proposed further modifications to ensure the Plan's soundness to the Inspector, for his consideration. Further consultation took place in 2021, with all responses forwarded for the Inspector's consideration in preparing his final report. The Inspector's report was received in September 2022 and presented for adoption in November 2022.

## 2 How environmental considerations have been integrated into the Local Plan

### 2.1 Introduction

This section considers each of the Plan-making/SA steps in turn. It is typical for the Plan-making / SA process to involve numerous iterations of the draft Plan, and this was the case with the North Hertfordshire Local Plan. The table below describes the plan-making stages and the relevant appraisal stages.

**Table 1: Sustainability appraisal stages and tasks**

<b>Local Plan Stage 1: Pre-production – Evidence gathering</b>
<b>Appraisal stage A (scoping): Setting the context and objectives, establishing the baseline and deciding on the scope of the SA</b>
A1 Identifying other relevant policies, plans, programmes and sustainability objectives
A2 Collecting baseline information
A3 Identifying sustainability issues and problems
A4 Developing the SA framework
A5 Consulting on the scope of the SA
<b>Local Plan Stage 2: Production</b>
<b>Appraisal stage B: Developing and refining options and assessing effects</b>
B1 Testing the Plan objectives against the SA framework
B2 Appraising the Plan options
B3 Predicting the effects of the Plan
B4 Evaluating the effects of the Plan
B5 Considering ways of mitigating adverse effects and maximising beneficial effects
B6 Proposing measures to monitor the significant effects of implementing the Plan
<b>Appraisal stage C: Preparing the SA Report</b>
C1 Preparing the SA Report
<b>Appraisal stage D: Consulting on the preferred options of the Local Plan SA report</b>
D1 Public participation on the preferred options of the Local Plan and the SA report
D2 (i) Appraising significant changes
<b>Local Plan Stage 3: Examination</b>
D2 (ii) Appraising significant changes resulting from representations

<b>Local Plan Stage 4: Adoption and monitoring</b>
D3 Making decisions and providing information
<b>Appraisal stage E: Monitoring the significant effects of implementing the Local Plan</b>
E1 Finalising aims and methods for monitoring
E2 Responding to adverse effects

## 2.2 Integration of environmental considerations during scoping

The preparation of the Scoping Report to support the Local Plan was informed by a context review which included the following elements:

- Review of plans, programmes and policies relevant to North Hertfordshire and identification of key sustainability issues; and
- A review of baseline data relating to these issues.

This information was used to develop a framework of SA objectives against which the Local Plan and its reasonable alternatives were tested. The SA framework is presented in the table below.

**Table 2: Appraisal framework**

SA Objective <sup>1</sup>	SA Sub Objective: <i>will the policy or proposal help to...</i>
<b>ECONOMIC ACTIVITY</b>	
1 Achieve sustainable levels of prosperity and economic growth	<ul style="list-style-type: none"> <li>• maintain a diversified economy, with increased resilience to external shocks?</li> <li>• encourage new business to start-up and thrive in the District?</li> <li>• support and encourage the rural economy and diversification?</li> <li>• support and promote sustainable tourism in towns and rural areas?</li> <li>• improve the quality of local jobs available to people in the District?</li> <li>• increase the skills base?</li> <li>• make the cost of housing more affordable to those employed in the District?</li> </ul>
<b>LAND USE AND DEVELOPMENT PATTERNS</b>	
<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"> <li>• promote the use of brownfield sites and, if brownfield sites are not available, land of low environmental and amenity value?</li> <li>• maximise reuse of vacant buildings and derelict land?</li> <li>• minimise the loss of the best and most versatile agricultural land?</li> <li>• reduce quantity of unremediated contaminated land?</li> </ul>

<sup>1</sup> Those relevant to the SEA Regulations are shown underlined

<b>SA Objective<sup>1</sup></b>	<b>SA Sub Objective: will the policy or proposal help to...</b>
<u>2(b) Provide access to green spaces</u>	<ul style="list-style-type: none"> <li>• provide/improve access for all residents of the District to green spaces?</li> <li>• provide opportunities for people to come into contact with and appreciate wildlife and wild places?</li> <li>• maintain/improve the public right of way network?</li> </ul>
<u>2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles</u>	<ul style="list-style-type: none"> <li>• locate development so as to reduce the need to travel?</li> <li>• reduce car reliance, encourage walking, cycle, bus, and train use?</li> <li>• reduce road freight movements?</li> <li>• avoid exacerbating local traffic congestion?</li> <li>• provide affordable, accessible public transport in towns and in rural areas?</li> </ul>
<b>ENVIRONMENTAL PROTECTION</b>	
<u>3(a) Protect and enhance biodiversity</u>	<ul style="list-style-type: none"> <li>• protect habitats and species, especially those designated as being of importance, and provide opportunities for creation of new habitats?</li> <li>• support and maintain extent of wetland habitat and river habitats?</li> </ul>
<u>3(b) Protect and enhance landscapes</u>	<ul style="list-style-type: none"> <li>• protect and enhance landscapes, especially those of historic, recreational or amenity value, and within the Chilterns Area of Outstanding Natural Beauty (AONB)?</li> </ul>
<u>3(c) Conserve and where appropriate, enhance the historic environment</u>	<ul style="list-style-type: none"> <li>• conserve and enhance the historic built character of the District's towns and villages?</li> <li>• protect sites of archaeological and historic importance, whether designated or not?</li> </ul>
<u>3(d) Reduce pollution from any source</u>	<ul style="list-style-type: none"> <li>• improve the water quality of rivers and groundwater supplies?</li> <li>• achieve good air quality?</li> <li>• reduce ambient noise, especially from traffic?</li> <li>• reduce light pollution in the District?</li> <li>• protect soil quality?</li> </ul>
<b>CLIMATE CHANGE</b>	
<u>4(a) Reduce greenhouse gas emissions</u>	<ul style="list-style-type: none"> <li>• minimise energy consumption by transport and in buildings?</li> <li>• increase proportion of energy generated by renewable sources?</li> <li>• encourage use of local suppliers and the consumption of local produce?</li> </ul>
<u>4(b) Improve the District's ability to adapt to climate change</u>	<ul style="list-style-type: none"> <li>• reduce vulnerability to climate change, exploit any benefits?</li> <li>• avoid development in areas at risk from flooding?</li> </ul>
<b>A JUST SOCIETY</b>	
<u>5(a) Share benefits of prosperity fairly</u>	<ul style="list-style-type: none"> <li>• reduce disparities in income levels?</li> <li>• contribute to regeneration of deprived areas (estates in Letchworth and Hitchin)?</li> </ul>

SA Objective <sup>1</sup>	SA Sub Objective: <i>will the policy or proposal help to...</i>
	<ul style="list-style-type: none"> <li>• provide employment and other opportunities for unemployed, especially long-term unemployed and the disabled?</li> <li>• encourage entrepreneurial activity in deprived areas?</li> </ul>
5(b) Provide access to services and facilities for all	<ul style="list-style-type: none"> <li>• provide access to services and facilities without need to use a car?</li> <li>• retain rural services, especially shops, post offices, schools, health centres and bus services?</li> <li>• recognise the needs of specific groups such as minority ethnic groups, the young, the elderly and the disabled?</li> </ul>
5(c) Promote community cohesion	<ul style="list-style-type: none"> <li>• support development of voluntary sector?</li> <li>• encourage development of community run business?</li> <li>• encourage people's feelings of belonging, for example by providing community meeting places?</li> <li>• recognise and value cultural and ethnic diversity?</li> </ul>
5(d) Increase access to decent and affordable housing	<ul style="list-style-type: none"> <li>• help improve the quality of the housing stock and reduce the number of unfit homes?</li> <li>• increase access to affordable housing, particularly for the young, the disabled and key workers?</li> </ul>
5(e) Reduce crime rates and fear of crime	<ul style="list-style-type: none"> <li>• encourage crime reduction, particularly through the appropriate design of new development?</li> <li>• help reduce the fear of crime?</li> </ul>
<u>5(f) Improve conditions and services that engender good health and reduce health inequalities</u>	<ul style="list-style-type: none"> <li>• help promote healthy lifestyles?</li> <li>• improve access to health services by means other than private cars?</li> <li>• reduce ambient noise near residential and amenity areas?</li> <li>• reduce road accidents?</li> <li>• reduce accidents and damage from fires?</li> </ul>
5(g) Increase participation in education and life-long learning	<ul style="list-style-type: none"> <li>• improve access to skills learning by young people?</li> <li>• improve access to skills learning by adults?</li> </ul>
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	<ul style="list-style-type: none"> <li>• increase access to culture, leisure and recreational activities?</li> </ul>
<b>RESOURCE USE AND WASTE</b>	
<u>6(a) Use natural resources efficiently; reuse, use recycled where possible</u>	<ul style="list-style-type: none"> <li>• minimise the demand for raw materials?</li> <li>• encourage sustainable design, use of sustainable building materials and minimise wastage caused by construction methods?</li> <li>• limit water consumption to levels supportable by natural process and storage systems?</li> <li>• protect groundwater resources?</li> <li>• promote sustainable drainage systems?</li> </ul>

SA Objective <sup>1</sup>	SA Sub Objective: <i>will the policy or proposal help to...</i>
	<ul style="list-style-type: none"> <li>• reduce minerals extracted and imported?</li> </ul>
<u>6(b) Reduce waste</u>	<ul style="list-style-type: none"> <li>• reduce, reuse or recycle waste generated?</li> </ul>
<b>TOWN CENTRES</b>	
7 Promote sustainable urban living	<ul style="list-style-type: none"> <li>• encourage wider range of shops and services in town centres?</li> <li>• encourage more people to live in town centres?</li> <li>• encourage mixed use developments in town centres?</li> <li>• improve transport connections in, and to, town centres?</li> <li>• encourage synergy in land uses, which supports the continued and enhanced viability of a wide range of shops and services?</li> <li>• protect or improve the quality of the public realm in towns?</li> </ul>

As noted in the SA Report, the development of the Local Plan was restarted following changes to the planning system in March 2012. Work on a replacement Local Plan captured by SA requirements had begun in 2005 under the preceding regional planning system, with the publication of an Issues and Options Paper for the Core Strategy and a Sustainability Appraisal Scoping Report. This initial work for SA was 'rolled over' for consistency with the final SA<sup>2</sup>.

At each stage of the SA, the scope and the level of detail were consulted on as part of the SA documents. This was updated in response to consultation comments at the following stages:

- Initial scoping consultation June/July 2005 with statutory consultees;
- Core Strategy and Development Control Policies Issues and Options Sustainability Appraisal (2005);
- Land Allocations DPD Scoping Report (2007);
- Stakeholders meeting on approach to Sustainability Appraisal (2008);
- Local Plan Preferred Options Sustainability Appraisal (2014);
- Proposed Submission Local Plan Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) (September 2016); and
- Examination in public (2017-2018 and 2020).

In addition, the following updates were undertaken:

- The review of plans, programmes and policies was completely reviewed and updated in June 2012 to reflect changes in national planning policy and the introduction of the NPPF, and again in July 2016.

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<sup>2</sup> This 'rollover' process also took account of consultation responses to the Land Allocation DPD Scoping Report and feedback from the SA stakeholder engagement meeting held in 2008.

- The identification of sustainability issues was updated in June 2012, again in August 2014 and completely reviewed and updated in July 2016. (Minor changes were made in October 2021 to reflect issues raised at the examination in public).
- The baseline data was updated in November/ December 2012 and July 2016. (Minor changes were made in October 2021 to reflect issues raised at the examination in public).
- The framework was reviewed in December 2012 and in August 2016. These reviews took account of the review of plans, programmes and policies (particularly the introduction of the NPPF), and of key sustainability issues.

The SA scoping process described above influenced the development of the Core Strategy published in May 2007 and the development of the Local Plan after 2012 by identifying the sustainability objectives and issues which the LDF and then the Local Plan needed to address. There was an initial stakeholder consultation event in 2008 facilitated by CAG Consultants where council officers and stakeholders discussed sustainability issues that needed to be addressed by the Plan. Subsequent consultation comments have contributed to this process on an iterative basis as described.

## **2.3 Integration of environmental considerations during appraisal**

This section gives details of the appraisal undertaken, outlining the assessments undertaken at different stages and describes how the different elements of the appraisal have influenced decision making.

### **2.3.1 Plan objectives**

Assessment of the Plan objectives has been an iterative process. It was first undertaken August 2005 as part of the appraisal of the Core Strategy and Development Policies. Local Plan objectives were reappraised in September 2014 and then again in August 2016. The final version was reassessed in September 2021.

### **2.3.2 Policy alternatives**

Strategic and policy alternatives were initially outlined, appraised and consulted on in 2005. These covered a range of issues including options for the location of new housing. These options were then reconsidered by the Council at a number of stages in the Local Plan development process. Alternatives for housing numbers have been considered throughout the Local Plan development process. In order to reflect changing circumstances and support the decision-making process, a new set of alternatives for housing numbers was identified and appraised in 2016.

### **2.3.3 Site alternatives**

All of the reasonable site alternatives considered for inclusion in the Local Plan have been appraised. Those sites appraised before 2016 were reviewed in 2016 to ensure the information used was up to date. The appraisal used a modified version of the framework shown in table 2. This modified framework includes specific sub-questions related to site allocations and excludes issues which are addressed in the Local Plan and cannot be influenced by site allocations.

For all site appraisals, significance criteria were used to aid the identification of significant positive and negative effects. These criteria were also reviewed in 2016 and the wording tightened in some instances to clarify the meaning. Additional minor clarifications were also made in 2017 as a result of consultation comments received.

### **2.3.4 Policies**

All policies, except those that are site-specific were appraised in July and August 2016.

An appraisal of all site-specific policies was undertaken in 2018 and published in the first SA Report Addendum. The Addendum was produced to accompany modifications to the Submission version of the Plan as a result of the examination process.

Changed and new policies that arose from the examination were appraised in the Report Addenda in 2018 and 2021.

### 2.3.5 Cumulative effects

The assessment considered potential cumulative effects on three levels; 'localised', 'strategic plan-wide' and 'strategic inter-plan'. The assessment of the cumulative effects of the current plan was undertaken in 2016 and updated in 2021 to reflect the changes arising from the modifications and to reflect changed circumstances.

### 2.3.6 How the SA influenced decision making on the spatial strategy

As noted in the Adopted Local Plan<sup>3</sup>:

*In preparing our spatial strategy a number of options have been considered through the SA/SEA process, this includes identifying policy options for how the District should develop, and in particular where development should happen, and how much development there should be.*

A key factor in determining the spatial strategy was the amount of housing provided for. This decision was influenced by the SA assessment of options for housing numbers. The SA noted that the chosen option for housing numbers<sup>4</sup> makes the strongest contribution to the sustainability objective of providing access to decent and affordable housing. It is the only option which would meet the objectively assessed need for North Hertfordshire and contribute to the unmet need for Luton.

In terms of locations for housing provision, the decision takes account of the SA assessment of options for housing location. The Council chose a combined approach which involved these elements:

- Continue current policy of focusing development on the four towns and fourteen villages;
- Focus development on previously developed land (PDL) within existing urban areas;
- Urban extensions on greenfield land adjoining existing towns.

The SA noted that all options enable the provision of large amounts of new housing, which will meet the SA objective of providing access to decent and affordable housing. Focusing development on existing towns may reduce the need to travel and could result in increased services in some villages. The SA also noted that all options (except development on previously developed land) involved major development on greenfield sites. It identified potential significant impacts on other SA objectives from the greenfield development, which depending on location could include impacts on biodiversity and landscape. These impacts would require mitigation through the Plan policies.

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<sup>3</sup> Para 3.2

<sup>4</sup> A total of 17,000 houses, including 2,500 houses completed/granted planning permission. As was clarified in the examination process, not all this housing will now be delivered in the Plan period.

### 2.3.7 How the SA influenced decision making on the site allocations

As noted in the Adopted Local Plan<sup>5</sup>:

*The supporting text to Policy SP8 sets out the key findings of our Sustainability Appraisal in relation to housing. Each Strategic Housing Site has additionally been subject to an individual appraisal which has informed the policies below.*

The site appraisals were taken into account in the decision making by the Council on which sites to take forward in the Local Plan. The process is explained in detail in a Statement by the Council at the examination hearing sessions<sup>6</sup>. The Local Plan contains site specific policies for all of the allocated sites. As outlined in Appendices 8 and 9 of the SA report, these policies include mitigation for impacts identified by the SA. The mitigation provided by these detailed policies was strengthened by conclusions from the SA process, as shown in the box below.

#### **Figure 1: examples of changes made to site specific policies as a result of SA recommendations**

- Policy SP14/Site BA1 - protection for Ivel Springs SAM
- Policy SP15/Site LG1 - taking account of landscape and traffic impacts when considering vehicular access points
- Policy SP16/Site NS1 - protection for specific heritage assets
- Policy SP17/Site HT1 - protection for Hitchin Railway Banks Wildlife site
- Requiring landscape mitigation to be informed by detailed assessment for a number of strategic sites
- Policy HT11 - ensuring that development addresses fluvial and pluvial flood risks
- Policy LG19 - ensuring that fluvial flood risks are addressed

### 2.3.8 How the SA influenced decision making on the policy content

The developing policies in the Local Plan were appraised in the Preferred Options and Submission versions of the Plan. Changes made to the policies are shown in the box below.

#### **Figure 2: examples of changes made to Plan policies as a result of SA recommendations**

- SP1 - references to the use of previously developed land and protection of the water environment added
- SP6 - specific references added to reducing road freight movements and making provision for those with mobility impairments
- SP11 - specific references added to low carbon energy development and remediation of contaminated land, and protection for the water environment strengthened

<sup>5</sup> Para 4.193

<sup>6</sup> Matter 9, Statement of North Hertfordshire District Council, para 25, available at <https://www.north-herts.gov.uk/sites/default/files/NHDC%20Matter%209%20FINAL.pdf>

- SP12 - protection for wetland and riverine habitats added
- T1 - requirements for sustainable transport for major development proposals strengthened
- T2 - reference to managing surface water run-off in car parks added
- D1 - amendments made to refer to reducing energy consumption and waste
- NE6 - role of open space in flood risk management specifically recognised
- NE4 - policy strengthened to include protection of important species on all sites
- Protection of hedgerows included in SP12 and natural environment policies NE3 and NE4
- NE12 – low carbon energy developments now addressed within the policy

### 2.3.9 How the SA influenced decision making on the main modifications

The SA was considered and discussed at various stages in the examination process, and influenced the development of the two sets of modifications; for example, the discussion of how air quality is addressed in the Plan<sup>7</sup>.

As noted above, changed and new policies included in the modifications were appraised in the Report Addenda in 2018 and 2021. All changes were screened and those identified as significant were reappraised. No recommendations were made within the SA for the appraised changes, as the changes mainly improved the sustainability effects of policies.

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<sup>7</sup> See Matter 21 Statement of North Hertfordshire District Council on Air Quality. Available at <https://www.north-herts.gov.uk/sites/default/files/ED62%20NHDC%20Matter%202021%20Air%20Quality%20Statement.pdf>

## 3 Consultation

### 3.1 Introduction

Consultation, including with the public and environmental authorities, has provided an opportunity to comment on the SA at key stages throughout the plan's development.

### 3.2 Consultation at scoping stage

The log of comments which resulted in changes to the SA is included as an appendix to this document. This lists the comments and the changes that were made as a result. A full log of all consultation comments and responses (including those where no changes were made) is included in the SA Report as Appendix 12.

As discussed in 2.2 above, the initial work on the SA process was started in 2005 under the preceding regional planning system, with the publication of an Issues and Options Paper for the Core Strategy and a Sustainability Appraisal Scoping Report. This initial work for SA was 'rolled over' for consistency with the final SA<sup>8</sup>.

The Scoping Report was sent to a range of consultees, including the statutory consultees, who were given a five-week period from June to July 2005 to respond with comments. It was also made available on the Council's website. Comments received were recorded by CAG Consultants and used to update the Scoping Report.

There was further engagement with stakeholders in March 2008 through a stakeholder consultation event facilitated by CAG Consultants where council officers and stakeholders discussed sustainability issues that needed to be addressed by the Plan and information that needed to be considered by the SA.

Consultation on the Local Plan reports from 2013- 2016 also influenced the elements of the scoping process as described in section 2 above. For example, consultation comments on the SA accompanying the Submission Local Plan resulted in changes to the appraisal framework and key sustainability issues.

Actions taken in response to the consultation comments have included:

- Changes to the appraisal objectives, including amendments and new sub-objectives
- Review of additional plans programmes and policies
- Identification of additional sustainability issues
- Changes to the baseline data review.

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<sup>8</sup> This 'rollover' process also took account of consultation responses to the Land Allocation DPD Scoping Report.

### 3.3 Consultation on SA reports

Details of consultation on each of the SA reports are shown in the table below<sup>9</sup>.

**Table 3: Consultation process for SA reports**

Stage of Local Plan	Date	Consultation methods
Housing Options	February-March 2013	The Housing Options consultation documents were sent out to statutory consultees and other key stakeholders, and made available on the Council's website. The Housing Options Appraisal Report was also made available on the Council's website.
Housing Additional Location Options	July-August 2013	The Housing Additional Location Options consultation documents were sent out to statutory consultees and other key stakeholders, and made available on the Council's website. The Housing Additional Location Options Appraisal Report was also made available on the Council's website.
Preferred Options	December 2014 - January 2015	The Preferred Options consultation documents were sent out to statutory consultees and other key stakeholders, and made available on the Council's website. The Preferred Options Appraisal Report was also made available on the Council's website.
Proposed Submission Version	October – November 2016	The Proposed Submission Local Plan was sent out to statutory consultees and other key stakeholders, and made available on the Council's website. This Appraisal Report was also made available on the Council's website.

Following this consultation and consideration of the comments made, the Council submitted the Local Plan and supporting SA Report for examination to the Planning Inspectorate on 9<sup>th</sup> June 2017.

In response to the examination hearings from November 2017 to March 2018, the Council proposed Modifications to the submitted Local Plan and an Addendum to the SA Report was consulted on during the period January to April 2019. The schedule of Main Modifications was sent out to statutory consultees and other key stakeholders, and made available along with the 2019 Sustainability Appraisal addendum on the Council's website.

Subsequent to that consultation, the Inspector identified a number of areas where further hearing sessions would be required. These were held between November 2020 and February 2021. Following these hearings, the Council drafted and submitted proposed further modifications to ensure the Plan's soundness. A further Addendum to the SA Report was consulted on during the period May to June 2021. The schedule of Further Proposed Main

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<sup>9</sup> In addition, the SA for the 2005 Issues and Options paper for the Core Strategy referred to in 3.2 was also subject to consultation.

Modifications was sent out to statutory consultees and other key stakeholders, and made available along with the further Addendum on the Council's website.

## 4 The reasons for choosing the Local Plan as adopted

### 4.1 Introduction

A key part of the process of producing the Local Plan has been to identify policy options for how the District should develop and, in particular, where development should happen and how much development there should be. It is the role of the SA to support this process by appraising each of the options considered.

This section outlines the options that were considered in developing the Plan and the reason for choosing the options that were included in the Local Plan as adopted.

### 4.2 Choice of preferred spatial strategy

#### 4.2.1 Housing numbers

An appraisal of housing options was undertaken to assess the likely significant effect of the amount of housing proposed. Three options were considered for provision of additional housing:

- a) 17,000 houses (the total provision included for consideration in the Draft Local Plan);
- b) 11,000 houses (an intermediate figure between 17,000 and 6,500); and
- c) 6,500 houses (this is the 'business as usual' option, which assumes there is no Local Plan produced and excludes the use of green belt sites).

The numbers for each option included 2,500 new houses which had already been completed, or granted planning permission at this time.

The Council chose option a), as this was the only option which met the objectively assessed need for North Hertfordshire and contributed to the unmet need for Luton. As was clarified in the examination process, not all this housing will now be delivered in the Plan period. However, as outlined in policy SP8, the Plan identifies Strategic Housing Sites that will continue delivery beyond the end of the Plan period in 2031.

#### 4.2.2 Housing location

The following options for housing delivery were identified:

- 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 (PDL) within existing urban areas;
- c) Urban extensions on greenfield land adjoining existing towns;
- d) Build a new settlement; and
- e) Use smaller greenfield sites in the villages.

These options were appraised through the SA process.

The Council has chosen a combination of options a), b), c) and e) as part of the solution to providing additional housing to meet the District's need. The development is spread across the District combining a number of the spatial options. Sites have been assessed against planning issues and those performing well in terms of constraints, as well as being located closer to services and facilities, have been chosen. The quantum of development is such that all options have been considered where deliverable sites are identified. There is also more development in the villages based on the number of sites that have been submitted in these locations and the site's suitability based on the services that exist.

The option to build a new settlement has not been pursued. This is because no options for new settlements have been put to the Council and with the amount of deliverable land submitted as part the Local Plan process by developers and landowners, compulsory purchase would not be considered in the public interest.

### **4.3 Choice of preferred site allocations**

All of the sites included in the adopted Local Plan have been appraised using the appraisal framework included above<sup>10</sup>.

The Strategic Housing Land Availability Assessment (SHLAA) process helped identify sites which were deliverable. It considered sites which may be available for residential development over the period between 1 April 2011 and 31 March 2031. It assessed sites against three tests:

- Is the site suitable for development? This question is about the physical ability of the site to accommodate development and identification of (potential) policy constraints which might influence how desirable it is to develop it.
- Is the site available for development? This is about landowner intentions.
- Would development here be achievable? This question is about whether development would be financially viable or whether there might be any other reasons why it may not be delivered.

Sites which met all three tests in the SHLAA were then reviewed by the Council and a final decision made on which sites to include based on the results of the Sustainability Appraisal and a number of key planning considerations.

The process for selecting employment sites and retail sites largely took into account the same considerations as those for residential, including the results of the Sustainability Appraisal.

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<sup>10</sup> A slightly modified version of the framework was used for the appraisal of sites. This modified framework includes specific sub-questions related to site allocations and excludes issues which are addressed in the Local Plan and cannot be influenced by site allocations.

## 4.4 Choice of preferred policy approaches

### 4.4.1 Other housing options considered

A number of other policy options were considered for housing. The preferred option and the reasons for choosing it are outlined in the table below.

**Table 4: Housing policy options**

Issue around which options were developed	Local Plan policy option	Council's reasons for selecting
Provision of affordable housing	<p>The following options form part of Policy HS2:</p> <ul style="list-style-type: none"> <li>• Increase the amount of affordable housing on larger sites to a higher percentage; and</li> <li>• Lower the threshold to include smaller sites.</li> </ul> <p>The Council has issued draft supplementary guidance which provides further information on the provision of affordable homes in the District<sup>11</sup>.</p>	<p>The issue of affordable housing is well recognised across the country as a whole and the Government encourages local planning authorities to set out policies on affordable housing, based on assessments of local housing needs. The policy is based on what's viable, but recognises that larger sites have the potential to deliver a higher figure.</p> <p>The requirement starts at 10 houses, reflecting current Government guidance in the PPG.</p>
How to obtain additional funding for affordable housing	This matter is not addressed in the Plan.	-
Affordable housing in rural areas	The option to continue to encourage rural exception sites, in or adjacent to villages, where appropriate, in environmental terms and where there is a proven local need, has been pursued as policy CGB2(a) and (b).	Policy provides opportunity to deliver affordable housing in the rural area where issues of affordability are particularly acute. Applications would need to be supported by specific evidence of need commissioned, or otherwise endorsed, by the relevant Parish Council.
Ensuring a range of housing types and styles	The option to include a policy which ensures that a mix of sizes and types of property is built on all sites over a certain size has been pursued as Policy HS3.	Policy applies to all residential allocations and requires a mix of housing that meets the requirements of different groups within the community.
Accommodation for Gypsy and Traveller families	The option to develop a new site has been included in Policy HS7 on	The Plan includes an allocation as national guidance requires the

<sup>11</sup> Draft Developer Contributions SPD (North Hertfordshire District Council, 2022)

Issue around which options were developed	Local Plan policy option	Council's reasons for selecting
	sites for Gypsies and Travelling Showpeople. This is a criteria-based policy to be used to assess any application for a site should it come forward.	council to meet its own need. Meeting need where it arises is the most sustainable option.
Contributions to local facilities	The option to include a policy requiring contributions from all new housing developments is reflected in the Plan (Policy SP7) within restrictions of national government and the pooling restrictions. Strategic Policies SP14-SP19 set out the infrastructure requirements and mitigation measures for strategic sites. The communities chapter of the Plan provides the same detail for the non-strategic sites. The IDP sets out the infrastructure requirements for the District which is translated into the infrastructure chapter of the Local Plan.	Approach to infrastructure is transparent and identifies what is required over the Plan period.

#### 4.4.2 Natural and built environment options considered

A number of policy options were considered for the natural and built environment, and the preferred option and the reasons for choosing it are outlined in the table below.

**Table 5: Natural and built environment policy options**

Issue around which options were developed	Local Plan policy option	Council's reasons for selecting
Protecting landscapes	The option to include policies protecting landscapes based on their amenity and recreational value and national designations (such as AONB) is reflected in Policy NE3.	NPPF (para 109) requires the protection and enhancement of valued landscapes. The emphasis of the policy is to ensure that the design of a development proposal is sensitive to the local context to ensure that the scheme makes a positive contribution to the landscape.
Protecting biodiversity	The option to include a policy requiring all new developments to protect or enhance biodiversity <i>and</i> encouraging additional wildlife	Policies provide protection to sites in line with NPPF, but provide opportunity for appropriate mitigation as last resort, the

Issue around which options were developed	Local Plan policy option	Council's reasons for selecting
	<p>features, such as green corridors linking open spaces within urban areas to each other and the countryside is reflected in the Plan. The protection and enhancement of existing sites together with a clause which will encourage developers to contribute to the biodiversity of the District as part of the development scheme is set out in Policies SP9, NE1 and NE4. SP9 and NE4 encourage a net gain for biodiversity.</p>	<p>policy identifies a net gain for biodiversity.</p>
<p>Minimising pollution</p>	<p>The following options are reflected in the Plan:</p> <ul style="list-style-type: none"> <li>• To aim to protect watercourses and groundwater sources from pollution is reflected in the Plan.</li> <li>• Encourage alternative forms of drainage such as soakaways and filter strips which increase infiltration and natural recharge of groundwater resources.</li> <li>• Prohibit development in natural floodplains and in locations where development would increase flood risk in areas downstream because of additional surface run-off, unless appropriate attenuation measures are put in place.</li> </ul> <p>Policies SP11, NE10 and NE11 aim to protect watercourses and groundwater sources from pollution, including taking into account the impact of new housing developments.</p> <p>Policy NE8 encourages sustainable drainage solutions.</p> <p>Policy NE8 prohibits development in floodplains and areas of surface water flood risk.</p>	<p>The Water Framework Directive requires improvement to watercourses.</p> <p>Policies take account of the Flood and Management Act, NPPF and the NPPF and PPG.</p>
<p>Energy generation</p>	<p>The original options considered were modified to take account of the Hertfordshire Renewable Energy Study</p>	<p>Policy is positive in trying to deliver renewable energy schemes where acceptable – The National Planning Policy</p>

Issue around which options were developed	Local Plan policy option	Council's reasons for selecting
	and ministerial statements on renewable energy and national guidance. Policy NE12 seeks to guide renewable energy and energy efficiency to appropriate locations across the district.	Framework says that Local Plans should maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily.
Waste management	The option to encourage the use of renewable resources and the re-use of building materials in new developments is reflected in the Plan. Policy D1 ensures that development uses sustainable design and sustainable materials.	Using innovative design to reduce energy consumption and waste from the construction and use of buildings can optimise the potential of the site and have a positive influence on the environment.
Local character	The Plan reflects the options to include a general policy requiring development to preserve or enhance local character and open space pattern. Policy D1 in relation to design includes a criterion on responding positively to the site's local context.	Development must respond positively to the site and the local context taking into consideration position, orientation, scale, height, layout, massing, detailing and use of materials.
Density of development	The Plan reflects the option of not including a specific policy on density. However, there is guidance in Policy D1, HS3 and the Design SPD.	Given the design-led approach to development set out through this Plan, district-wide density standards have not been prescribed. Development on the periphery of settlements should generally be at a lower density to mark the transition to the rural area beyond. In town centres and close to the railway stations higher densities will be considered appropriate in principle but will require particular care in the design with respect to avoiding the sense of overcrowding or congestion.
Historic environment	The Plan reflects the following options: <ul style="list-style-type: none"> <li>• Ensure that developers carry out investigation and evaluation of archaeological sites if it is established there is a potential interest.</li> <li>• Make sure that development does not adversely affect or lead to the</li> </ul>	The Council recognises the significance of designated heritage assets within the District and the contribution they make to defining local character, providing a sense of place and achieving sustainable development. Their conservation and preservation is an important consideration within the planning process

Issue around which options were developed	Local Plan policy option	Council's reasons for selecting
	<p>loss of important areas and features of the historic landscape.</p> <ul style="list-style-type: none"> <li>• Ensure that developments related to listed buildings are not detrimental to their setting and that materials are sympathetic to those used in the original dwelling.</li> <li>• Make sure that any development proposals respect or enhance the special character or appearance of Conservation Areas, especially in terms of scale, mass, height or materials.</li> </ul> <p>Strategic policy sets the context for historic environment in North Hertfordshire. There are specific development management policies relating to archaeology, conservation areas and listed buildings. Policies HE1-HE4 set specific requirements for local issues, providing appropriate protection of the historic environment.</p>	<p>and is recognised within specific legislation.</p>

#### 4.4.3 Rural areas and settlement pattern options considered

A number of policy options were considered for rural areas and the settlement pattern, and the preferred option and the reasons for choosing it are outlined in the table below.

**Table 6: Rural areas and settlement pattern policy options**

Issue around which options were developed	Local Plan policy option	Council's reasons for selecting
<p>How to identify which villages within the rural area might be able to accommodate development</p>	<p>The Plan reflects the option to identify villages which may take further development based on the level of facilities in the village and the availability of appropriate sites. Policy SP2 defines a list of villages based on those which have schools and appropriate services and the levels of development that will take</p>	<p>The North Hertfordshire villages tend to be more expensive than the towns and are therefore finding it harder to retain young families, which is leading to a skewed age population.</p> <p>On the need to travel, modelling to show modal share arising from new development in these villages would give an incomplete answer. One</p>

Issue around which options were developed	Local Plan policy option	Council's reasons for selecting
	<p>place. New development is fairly substantial in certain locations. Villages will have a boundary drawn around their existing built-up areas within which additional infill development is acceptable.</p>	<p>justification for allowing additional development in these villages is in order to safeguard existing facilities. Using the schools as an example, villages without schools export all their children every day to other villages or towns for schooling. If the schools in any of these villages closed, there would be a significant increase in journeys to and from these villages. A small amount of additional development as infill or for local needs (which would by definition be for people who already live or work in the area) will therefore give a small increase in travel, but may prevent the even larger increase in travel that would arise if the schools closed.</p> <p>On social and economic aspects of sustainability, village schools act as a focus point for the villages and ensure that villages continue to attract and retain young families, which prevents them stagnating as dormitories for older families and retirees. Schools also provide local employment.</p>
<p>Whether to distinguish between levels of development appropriate at different villages</p>	<p>The Plan has been modified to outline development expected in the villages. This reflects the recommendation made when options were originally assessed to clarify the type and level of development that would be allowed in villages. Five villages are identified as accommodating a greater share of development than the Category A villages: Knebworth, Codicote, Ickleford, Little Wymondley and Barkway.</p> <p>Knebworth and Codicote include a greater number of services and facilities and so have a greater</p>	<p>This is a combination of factors.</p> <p>The two largest villages where major development is identified (Knebworth &amp; Codicote) are those which have a good range of local shops and other facilities.</p> <p>Ickleford and Little Wymondley are recognised as being located close to towns with a wide range of services (Hitchin and Hitchin / Stevenage respectively). Barkway is identified as a focus for development in the rural east, in preference to a potentially more dispersed approach to development.</p> <p>The other villages identified as Category A villages are those which</p>

Issue around which options were developed	Local Plan policy option	Council's reasons for selecting
	ability to potentially accommodate growth.	have a school and a range of other local facilities. All villages may also see some development for local needs - notably affordable housing - where there is a proven local need.
Development in the rural areas outside the villages	<p>The Plan reflects the option to afford the green belt greater protection than the remainder of the rural area.</p> <p>There is no specific policy on green belt other than SP5, which sets out the strategy for the areas of green belt and the rural area. In the green belt, national policies in the NPPF will apply. Policy CGB1 controls the type of development allowed outside of green belt areas. A separate policy (NE3) applies in addition to SP12 within the Chilterns AONB.</p>	Policy on the green belt reflects the NPPF. The Rural Area beyond the green belt covers the countryside to the east of the District that lies outside of the towns and Category A villages identified in Policy SP2 [settlement hierarchy]. These areas do not meet the necessary criteria to be designated as green belt, but it is still necessary to impose restraints on development to prevent inappropriate schemes.
Replacement buildings in the countryside	Policy CGB4 is based on the option to allow replacement buildings, providing the new building would not have a materially greater impact than the existing one. CGB1 and ETC8 allow for farm diversification schemes. Policy D1 requires all new buildings to be in harmony with their surroundings, so it is inappropriate to stipulate that in every policy.	In line with the NPPF, the policy seeks to support economic growth in rural areas and also avoid the provision of new, isolated homes in the countryside.

#### 4.4.5 Employment and tourism options considered

A number of policy options were considered for rural areas and the settlement pattern, and the preferred option and the reasons for choosing it are outlined in the table below.

**Table 7: Rural areas and settlement pattern policy options**

Issue around which options were developed	Local Plan policy option	Council's reasons for selecting
Location of additional employment land	<p>The Plan reflects these options:</p> <ul style="list-style-type: none"> <li>• Completely new Employment Areas should be designated within or adjoining existing settlements.</li> <li>• There should be extensions to existing Employment Areas, but only within existing settlements.</li> </ul> <p>Strategic Policy 3: Employment clarifies where sites are allocated.</p>	<p>A significant new employment site will be developed at the east of Baldock, supporting the proposed increase in residential development in the town (see Policy SP8). The allocation benefits from proximity to existing employment uses as well as existing and planned residential development. It has access to the strategic road network via the A505 Baldock Bypass. Economic activity is not contained by the District boundary and, within Hitchin and Letchworth Garden City, employment area designations from the previous local Plan will be broadly retained, with some modest releases of sustainable brownfield sites for residential development. The Royston economy is influenced by both Hertfordshire and Cambridgeshire economies. Consequently, the employment area has a low vacancy rate. The allocation of further land here as a planned extension to the York Way employment area is a sustainable approach that will enable flexibility in the long term, especially in conjunction with the additional residential growth allocated to this area.</p>
Loss of employment uses	<p>The Plan reflects the option to safeguard employment uses within the Employment Areas, unless studies demonstrate lack of need in the area. Policies ETC1 and ETC2 set out policies protecting allocated and non-allocated sites in order to protect the supply of land currently used for employment uses. Additionally, the overall quantum of employment land includes any active employment land that is to be lost as a result of employment allocations.</p>	<p>Land in employment uses will be protected where it is still appropriate for the use unless evidence suggests otherwise in line with NPPF.</p>

Issue around which options were developed	Local Plan policy option	Council's reasons for selecting
Distribution of employment provision	<p>The Plan reflects the option that any new employment provision should be allocated where there are available sites which are accessible by public transport and a market for the premises</p> <p>Policy SP3 clarifies where sites will be located (see 4.1 above), largely in the locations where employment land currently exists but also in combination with new residential development</p>	See location of additional employment land above.
Promotion of tourism	<p>The Plan reflects the option to include a general policy covering a variety of tourist related proposals.</p> <p>Policy ETC8 is a fairly general policy in relation to tourism, identifying locations where tourism development will be appropriate.</p>	The Council supports proposals for new or extended tourist developments as a means to strengthen the local economy and increase visitors to the area in line with policies in the NPPF.

#### 4.4.6 Town centre policy options considered

A number of policy options were considered for town centres and the preferred option and the reason for choosing it for each is outlined in the table below.

**Table 8: Town centre environment policy options**

Issue around which options were developed	Local Plan policy option	Council's reasons for selecting
Shopping uses	<p>The Plan reflects the option to define primary and secondary shopping areas, with greater restrictions on the loss of shops in the primary areas.</p> <p>Policies ETC4 and ETC5 set the policy on primary and secondary shopping frontages. The primary shopping frontage part will list Hitchin, Letchworth Garden City and Royston as town centres where primary shopping frontage has been identified, while the secondary shopping frontage will list Hitchin, Letchworth Garden City, Royston and</p>	The Council wants to ensure that the town centres maintain their primary retail function whilst increasing their diversity with a range of complementary uses, promoting competitive, flexible town centre environments. The concept of shopping as a leisure activity supports the encouragement of uses which increases the vitality throughout the day, extending the range of services for local people throughout the day and into the evening.

Issue around which options were developed	Local Plan policy option	Council's reasons for selecting
	Baldock as town centres where secondary shopping frontage has been identified.	
Other uses in town centres	The Plan reflects a modification of the option to include policies requiring large town centre developments to contain a mix of uses. Allocations for town centre uses are titled 'mixed use allocations'. The sites are allocated for mixed use to ensure flexibility. Policy ETC3 encourages a mix of town centre uses.	The policies and allocations will ensure that a mixture of uses is delivered within the town to meet the need identified by the Town Centre and Retail study (2016).
How to promote the health and wellbeing of the smaller centres	<p>The Plan reflects both the options:</p> <ul style="list-style-type: none"> <li>• Allow the loss of shops and services where it can be shown that there is no longer a demand for the unit.</li> <li>• Resist the loss of any shops or services to other uses.</li> </ul> <p>The Council collects data on vacancies in the local centres, and will use this when monitoring its policies on local centres. Policy ETC4, 5 and 6 seek to protect existing town centre uses.</p>	In all local centres, the Council wants to retain local facilities and at the same time prevent changes to non-retail uses that would be more appropriate in larger centres or employment areas. Attempting to stop any further losses of retail, under any circumstances, would have been difficult to sustain, and may harm the centre by leading to more vacant units.
Should all the smaller centres be treated the same?	<p>The Plan reflects the option that all planning applications within the smaller centres should be assessed in the same way.</p> <p>Local centres as identified in the Plan consist of village centres such as Codicote, Knebworth and Ashwell, and neighbourhood centres such as Walsworth (Hitchin), Jackmans (Letchworth Garden City) and Great Ashby. ETC6 sets the requirements which apply to all local centres.</p>	In all local centres, the Council wants to retain local facilities and at the same time prevent changes from main town centre uses. Additional protection is afforded to A1 retail uses.
Should we promote the 'evening economy' in the four main towns and, if so, how?	The Plan reflects the option to let market forces determine the level and mix of 'evening' uses in the town centres. Whilst the Plan does not include a specific policy on this issue, flexibility is built into the frontage policies to enable this part of the economy to grow.	Encouraging a mix of uses increases footfall and makes the town centres more vibrant.

#### 4.4.7 Transport options considered

A number of policy options were considered for transport, and the preferred option and the reasons for choosing it are outlined in the table below.

**Table 9: Transport policy options**

Issue around which options were developed	Local Plan policy option	Council's reasons for selecting
Encouraging alternative modes and reducing car use	<p>The Plan reflects the following options:</p> <ul style="list-style-type: none"> <li>• Ensure that developers make adequate provision for non-car modes; public transport, cycling and walking.</li> <li>• Introduce car parking standards that are compatible with the location in line with maximum standards.</li> <li>• Make sure large developments make provision for improved and integrated transport infrastructure</li> </ul> <p>Policy SP6 promotes non-car modes hierarchy and individual policies on non-car modes secures provision of services/infrastructure in lasting manner. Mode hierarchy set out in Policy T1. Car-sharing potential will be explored via policy on Travel Plans.</p> <p>Adopted SPD on vehicle parking at new development introduces zonal based reduction in maximum parking standards, reflecting location and accessibility. This SPD will be carried forward in Policy T2.</p>	Sustainable development, including sustainable transport, underpins national planning policy and the Council seeks to promote this in new development. However, paragraph 29 of the National Planning Policy Framework 2012 does state that "different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas."
Park and ride	The Plan reflects the option to not pursue park and ride schemes.	There is no specific policy recommendation for Park and Ride as previous considerations have concluded that there is no commercial case for Park and Ride. Policy on passenger transport does not rule provision of Park and Ride if the situation changes.

#### 4.4.8 Leisure and community facilities policy options considered

A number of policy options were considered for leisure and community facilities and the preferred option and the reasons for choosing it are outlined in the table below.

**Table 10: Leisure and community facility policy options**

Issue around which options were developed	Local Plan policy option	Council's reasons for selecting
How should we secure adequate provision of sports pitches and sports facilities in the District?	The Plan reflects the option to seek contributions from developers to provide or improve sports facilities. Policy NE6 will ensure open space and sports facilities as part of developments.	To support growth over the Plan period, relevant development proposals will be expected to contribute towards open space provision in the District.
Should developers contribute more towards community facilities and services?	The Plan reflects the option to seek to improve existing facilities <i>and</i> encourage the provision of new community facilities where new development takes place. Policy HC1 will combine the options to allow community facilities to be enhanced or improved whilst at the same time, in new developments, expecting developers to provide new facilities at an appropriate scale.	The nature of planned growth in the District is such that new facilities and infrastructure will be required. In promoting the creation of healthy communities, the NPPF states that local authorities should identify specific needs, qualitative and quantitative deficits and any surpluses in open space provision, as well as any open space that is required. These requirements are set out in the detailed policies  In development schemes, the Council will expect developers to make provision for new community, cultural, leisure and recreation facilities on or off-site at a scale which is proportionate to the scale of the development. Where on-site provision is not appropriate, the Council will seek contributions towards community facilities in accordance with the Planning Obligations Supplementary Planning Document.

#### 4.4.9 Plan review policy options considered

Following on from the examination process, the Further Proposed Main Modifications<sup>12</sup> proposed a new policy on Local Plan review. Two options were considered and appraised for this policy, as shown below.

<b>Option (a) Review Plan after 2 years</b>
<b>Conclusions</b>

<sup>12</sup> Schedule of Further Proposed Modifications to the North Hertfordshire Local Plan 2011-2031, available at <https://www.north-herts.gov.uk/sites/default/files/Schedule%20of%20Further%20Proposed%20Main%20Modifications%20for%20Consultation%20-%20May%202021.pdf> (last accessed 30/8/21)

Because of current uncertainties in the short term, the review will ensure that the plan responds effectively to changes which may arise in this time scale, and continues to deliver housing and other services and support economic growth. This option will have a positive effect on the objectives of achieving sustainable economic growth and increasing access to affordable housing.

Many of the other effects are uncertain, since a review may result in different levels or location of development provision.

#### **Option (b) Follow statutory requirements and review Plan after five years**

##### **Conclusions**

This option will result in more uncertainty in the short term (up to five years) as it is unclear whether it will still be possible to effectively deliver housing and other services. It will have uncertain effects on the objectives of achieving sustainable economic growth and increasing access to affordable housing.

Many of the other effects are uncertain, for the medium and long-term, since a review may result in different levels or location of development provision.

The Council's evidence to the examination recognised that there will now likely be around 10 years of the Plan period remaining at the point of adoption, whereas the National Planning Policy Framework suggests plans should preferably cover a period of 15 years. The Council considered and rejected a number of options for addressing this matter within the current examination. In light of this and a number of matters which became apparent through the examination (and which are set out in Policy IMR2), the Council considered the most reasonable alternative was to commit to an early review rather than rely upon the statutory maximum five-year period.

## 5 The monitoring framework

The SEA Regulations require monitoring of the significant environmental effects of implementing the Plan. SA monitoring will cover the significant economic and social effects, as well as the environmental ones.

For the sake of efficiency and integration, North Hertfordshire District Council will include significant sustainability effects in future Annual Monitoring Reports. Where necessary, the Reports will also propose measures for addressing adverse effects, including unexpected problems. The significant sustainability effects indicators have been drawn from the indicators in the baseline data of this Sustainability Appraisal (which are linked to the sustainability objectives used in the appraisal). They aim to:

- Concentrate on the residual significant effects (after mitigation measures) identified in the appraisal;
- Provide information to identify when problems, including unexpected ones, arise; and
- Contribute to addressing deficiencies in data availability identified in this appraisal.

The following table sets out the monitoring indicators for each of the residual significant effects identified by the SA. These indicators are unchanged from those identified in the final SA Report (Table 39).

**Table 11: Indicators of residual significant effects**

Residual significant effect	Monitoring indicator	Data source
Loss of land with high agricultural value	Area of high grade (1-3 <sup>13</sup> ) agricultural land lost to new development each year	Data from planning permissions Agricultural land classification data is held by North Herts District Council (NHDC)
Loss of greenfield land and reduction in access to open countryside	Greenfield land (ha.) lost to new development each year	Data from planning permissions
Provision of new housing without access to greenspace	Number of dwellings granted permission on sites without access to greenspace within 800m each year	Data from planning permissions
Traffic congestion and associated pollution	Average annual vehicle speeds (flow-weighted) during the weekday morning peak on locally managed 'A' roads	Data collected by the Department for Transport

<sup>13</sup> The best and most versatile agricultural land does not include land graded 3b. However, the data held by NHDC does not distinguish between 3a and 3b. If such data becomes available in future, the indicator should be changed to only include grades 1-3a.

<b>Residual significant effect</b>	<b>Monitoring indicator</b>	<b>Data source</b>
	Local air quality monitory data	Data collected by NHDC Environmental Health
Potential impacts on Therfield Heath SSSI	Provision of Suitable Alternative Natural Greenspace (SANG) in development which is granted planning permission in the Therfield Heath zone of influence Visitor numbers to the site	Data from planning permissions Visitor survey
Landscape and townscape impacts	Number of planning applications granted on sites of moderate or high landscape sensitivity Number of applications refused within landscapes of moderate or high sensitivity	Data from planning permissions Data on the classification of sites is contained in the Landscape Sensitivity Reports which form part of the evidence base for the Local Plan
Impacts on heritage assets	Number of planning applications granted contrary to the advice of Historic England Number of applications refused in line with Historic England recommendations	Data from planning permissions
Reduction in water quality	The number of applications granted contrary to the advice of the EA on water quality grounds.	The indicator is already included in the North Herts Annual Monitoring Report (AMR)
Development in flood risk areas	Number of planning applications granted contrary to the advice of the Environment Agency on flood defence grounds	The indicator is already included in the North Herts (AMR)
Surface water flooding	Percentage of new developments with adopted SUDS schemes each year	Data from planning permissions
Climate change	Annual local authority carbon dioxide emissions estimates for domestic and transport	Data collected by the Department for Business, Energy and Industrial Strategy
Amenity impacts on existing residents	Number of noise complaints per year divided by type	Data collected by NHDC Environmental Health
Water usage	Percentage of new dwellings each year achieving the optional Building	Data from planning permissions

<b>Residual significant effect</b>	<b>Monitoring indicator</b>	<b>Data source</b>
	Regulations requirement of 110 litres per person per day	
Potential negative effects on Letchworth town centre	Annual vacancy rates in Letchworth	The indicator is already included in the North Herts AMR



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## Appendix: consultation comments that resulted in a change to the SA

**Table 12: Core Strategy Scoping Report (2005) consultation comments and how they were addressed**

Consultee	Comments	Response
<b>Herts Biological Records Centre</b>	<b>Land use &amp; development patterns 2(a)</b> - Potential expansion Luton airport & associated transport links should be added.	The potential expansion of Luton Airport is included.
	Environmental Protection Objectives 3(a) Protect and maintain biodiversity - Amend to Protect and enhance biodiversity	Has been amended to read, 'Protect and enhance biodiversity'
	<b>Number and extent of designated sites</b> -county Wildlife Sites have to meet a set of selection criteria and are <b>identified</b> not designated please change wording accordingly.	Baseline amended to clarify.
<b>Chilterns Conservation Board</b>	AONB Management Plan not mentioned at all. Other documents Board produces should also be scoped due to their ability to encourage more sustainable forms of development.	The AONB Management Plan has been included in the review of other plans, programmes and policies, but other documents considered too specific and detailed to scope.
<b>CPRE Hertfordshire</b>	<b>A just society 5(e)</b> - add a bullet point to require crime reduction to be built into design of developments. Consider 2 other objectives (1) provide affordable, accessible public transport in towns and rural areas (2) ensure that all developments have in place adequate infrastructure before completion. In each case some bullet points would need to be developed as sub-objectives.	First sub-objective of 5 (e) has been amended to read, 'encourage crime reduction, particularly through the appropriate design of new development'.
	3(a) & (b) - Reference made to expansion Luton airport, should also refer to Stansted.	Has now been included in the cumulative effects section of the report.
	Suggest 2 additional SA objectives 1 - Provide affordable, accessible public transport in towns and rural areas - Can a reasonably frequent service at an affordable cost be provided in rural areas and how might this be done? Services in towns and between towns are not well used and deteriorating, ways need to be investigated to reverse this trend	Additional sub-objective has been added under 2 (c) - 'Provide affordable, accessible public transport in towns and rural areas'.

Consultee	Comments	Response
<b>English Nature</b>	<b>Objective 3(a) Biodiversity</b> - should be changed to <u>protect and enhance</u> . Would bring in line with 3(b) and (c).	Has been amended to read, 'Protect and enhance biodiversity'.
<b>Hitchin Society</b>	SA Objectives - concerned groundwater resource and supply and river quality issues has been diluted and disaggregated into a series of sub-objectives. Groundwater resource should be listed at least as a SA Objective, but could be a Strategic Option in its own right.	Neither Environment Agency nor Three Valleys Water have asked that this issue become a main objective. We do not agree that because a specific kind of natural resource, i.e. water is a sub-objective rather than an objective it is diluted. The objectives are supposed to be broad. However, an additional sub-objective in 6 (a) has added to make specific mention of groundwater resources.
	Protect soil quality' in Resource Use and Waste should be part of 3(d) Reduce pollution from any source.	The objective to protect soil quality has been moved to 3 (d).
<b>Environment Agency</b>	Additional policies to consider including: 1) Water Framework Directive 2) DEF 3) Environment Agency: Policy and Practice for the Protection of floodplains, 2004. Making Space for Water: Developing a New Government Strategy for Flood Risk and Coastal Erosion Risk Management in England 4) Environment Agency: Policy on culverting of watercourses.	The Water Framework Directive has been included in the review of other plans, programmes and policies but other documents considered too specific and detailed to scope.
	<b>Biodiversity</b> - Document needs to assess implications of Water Framework directive.	The Water Framework Directive has been included in the review of other plans, programmes and policies
	<b>Environmental Protection - Land Use and Development patterns</b> should read <u>Aim to reduce quantity of unremediated contaminated land</u>	Have added extra sub-objective under 2 (a) 'Reduce quantity of unremediated contaminated land'.
<b>Herts County Council - Rights of Way Unit</b>	<b>Appendix 1</b> - You may want to refer more specifically to Public Rights of Way in additional issues under objective <b>2(b)</b> , provide access to green spaces, or objective <b>3(b)</b> protect and enhance landscapes.	See below
	Public rights of way network can play a key part in the following objectives. You may wish to mention Rights of way more specifically. <b>2(b), 2(c), 5(f), 5(h)</b>	Agree, but do not think it necessary to mention public rights of way in sub-objectives of 2 (c), 5 (f) or 5 (h). However, have amended 2 (b) by adding extra sub objective stating: 'maintain/improve the public right of way network'.

**Table 13: Land Allocations DPD Scoping Report (2007) consultation comments and how they were addressed**

Consultee/comments made	Response	How the comments were addressed in subsequent reports
<b>Review of Plans, Programmes and Policies, Baseline Data and Sustainability Issues</b>		
<b>Environment Agency</b>		
<p>The following additional documents should be reviewed:</p> <ul style="list-style-type: none"> <li>▪ EU Habitats Directive</li> <li>▪ EA Catchment Flood Management Plan</li> <li>▪ EA Catchment Abstraction Management Plan</li> <li>▪ EA Water Cycle Scoping Document</li> </ul>	<p>Agreed. CFMP not available for Anglian Region.</p>	<p>The following documents were reviewed and are included in Appendix 1 attached to the reports: Habitats Directive; Thames Region Catchment Flood Management Plan; relevant Catchment Abstraction Management Strategies, and Rye Meads Water Cycle Scoping Document.</p>
<b>Natural England</b>		
<p>With regard to SA Objective 3(a) as cited in Appendix 2, the Council is however advised to rephrase this from 'protect and maintain' to 'protect and enhance' to ensure consistency with the scoping report itself (see page 17). The Council is also advised that the North Herts figures for SSSI condition status are incorrect and should be reassessed for accuracy. These have been updated within the last few months.</p>	<p>Noted</p>	<p>Wording of 3a has been changed to read "protect and enhance." A full update of North Hertfordshire baseline data will be undertaken prior to the Proposed Submission version of the Local Plan.</p>
<p>Similarly, there is no issue identified around the objective for the conservation of the historic environment. Again, whilst the broad locations have been identified, the district's rich heritage of market towns and the Garden City certainly suggest that there are local issues which will arise over more detailed site selection.</p>	<p>The historic environment is included in the appraisal framework. However, the suggestion that the historic environment in the District could be under particular pressure is noted.</p>	<p>The historic environment has been included in the list of key sustainability issues in Appendix 2.</p>

Consultee/comments made	Response	How the comments were addressed in subsequent reports
<b>Appraisal Framework</b>		
<b>Environment Agency</b>		
Section 3 should include river corridors in 3(a) and improving water quality and land contamination	It is agreed that river corridors should be included. To avoid repetition this has been done in 3(a).	Reference to river corridors included in 3(a) in the site appraisal framework
There are known capacity issues in and around Stevenage. The Rye Meads Water Cycle Strategy Scoping Document identifies the trunk sewer from Stevenage south as being at capacity. The full Water Cycle Strategy is due to commence imminently and the outputs from the first phase of this study should be used to inform the allocations document.	When it is available it will be used to inform the final SA report.	Rye Meads Water Cycle Strategy Scoping Document referenced in Appendix 1.
We suggest an additional sub objective: protect water resource availability and promote water efficiency through location and design.	Agreed, but it is considered that to avoid repetition this objective would fit best in section 6.	New sub-objective included in section 6 of the site appraisal framework.
We would like to remind you that your SFRA must be used to inform your SA and DPDs.	Noted. The appraisal will take account of the Strategic Flood Risk Assessment (SFRA).	SFRA has been included in the information to be used in the appraisal process.
We request additional sub objectives relating to climate change adaptation: contribute to reducing the effects of the urban heat island associated with urban areas; promote strategic use of Sustainable Urban Drainage Systems (SUDS) at chosen locations for development. SUDS can be used to reduce potable water supply requirement to a development through the use of rainwater harvesting systems. SUDS are also instrumental to reducing the risk of surface water flooding and have wider environmental benefits.	It is agreed that these are important issues, though the urban heat island effect is unlikely to be a significant issue in North Herts, with the relatively small size and low density of its main settlements. It is accepted that viability for SUDs is an issue which should be addressed within the land allocations document (and information on this is provided in the SFRA).	SUDS included in objective 6(a) of the appraisal framework

**Table 14 : Stakeholders meeting (2008) consultation comments and how they were addressed**

Consultee/comments made	Response	How the comments were addressed in subsequent reports
<b>Stakeholders meeting 19/3/08</b>		
Any site development will have an impact on habitats. Biodiversity Records Centre to submit site specific comments (including noting that 5 sites are designated).	Agreed and noted	Site specific information included in matrices
Measures to avoid pollution of groundwater need to be taken on all sites, not just those in Groundwater Protection Zones.	Agreed	Included as a sub-objective in 3(d)
Some elements of SUDS can be used on all sites. Sites which are shown as SUDS not viable should be described as "constraints on the use of SUDS" as some measures will still be able to be taken.	Agreed	Included in commentary in relevant appraisal matrices
What about air quality impacts of sites near main roads? Environmental Health to submit site specific comments on environmental protection issues (including pollution and noise) for all sites.	Noted	Site specific information included in site appraisal matrices
There is a potential for archaeological features on any site, as designations only note currently known features. Some site specific information included in site specific comments.	Agreed and noted	Included in sub objective to 3(c) Site specific information provided included in appraisal matrices

**Table 15 Proposed Submission Local Plan SA/SEA (September 2016) consultation comments and how they were addressed**

Representation	Consultee	NHDC response	Change made to Submission SA
<p><b>Policy SP19: Sites EL1, EL2 &amp; EL3 – East of Luton</b></p> <p><b>There hasn't been an adequate assessment of alternatives. The Sustainability Appraisal (SA) should set out the alternative locations/sites considered to meet the housing need elsewhere or alternative ways of meeting the need, as well as the rationale for selecting the allocation site. We note that only 150 homes are required to meet North Hertfordshire's housing requirement with the remaining 1950 homes addressing needs that cannot be physically accommodated within Luton. Thus alternatives for this 1950 should be presented both within Luton and other neighbouring local authorities.</b></p>	<p>Representations by Natural England [15697] (Rep 5526)</p>	<p>Alternatives were considered, but no reasonable alternatives were identified to providing EL1, EL2 and EL3 to contribute to the housing need in the Luton Housing Market Area. However, it is acknowledged that this wasn't outlined in the Draft SA report.</p>	<p>Information on the approach to selecting EL1, EL2 and EL3 to be added to section 4 of the report as follows:</p> <p>The four local authorities in the Luton Housing Marking Area (HMA) commissioned a study to consider reasonable alternatives for delivering the housing need for the HMA and to help meet unmet need arising from Luton BC. The four authorities on the Steering Group for the study comprise Central Bedfordshire Council (CBC), Luton Borough Council (Luton BC), Aylesbury Vale District Council (AVDC), and North Hertfordshire District Council (NHDC).</p> <p>As outlined in this study<sup>[1]</sup>, it is possible to meet this need within the HMA. As part of the study, sites EL1, EL2 and EL3 (jointly named East Luton) are assessed as having a high deliverability and medium viability. NHDC has concluded that there are no reasonable alternatives to developing these sites to contribute to the need for the HMA and unmet need arising from Luton. That is because:</p> <ul style="list-style-type: none"> <li>• The duty to co-operate as set out in the NPPF and PPG requires the Council to make every effort to secure cooperation on strategic issues. In this regard meeting unmet need arising from Luton - The sites to the east of Luton are in close proximity to Luton (within the HMA) and are deliverable within the timescale and their selection is justified through the plan process;</li> <li>• The NPPF outlines that housing need should be met within a HMA (i.e. it is not reasonable to seek sites</li> </ul>

<sup>[1]</sup> Luton HMA Growth Options Study, LUC in association with BBP Regeneration, November 2016

Representation	Consultee	NHDC response	Change made to Submission SA
			<p>outside the HMA for this purpose) - Whilst large portions of the HMA lie outside the North Hertfordshire district area, it is not in the authority's jurisdiction to makes judgements regarding the acceptability of these alternative sites. As neighbouring authority's plans emerge the provision of need within the HMA will become clearer. The HMA Growth Study has highlighted that the need can be accommodated within the HMA boundary and so alternatives outside the HMA boundary cannot be considered as reasonable at this time; and</p> <ul style="list-style-type: none"> <li>• There are no other reasonable alternative sites within the North Hertfordshire part of the HMA that can contribute significantly to meeting the need. The HMA area is assessed in the growth study through constraints mapping and absolute constraints cover a large majority of the area within North Hertfordshire outside of the allocated sites.</li> </ul>
<p><b>Table 6: Key sustainability issues - Specific reference needs to be made to the issue of recreational disturbance on ecological designated sites under the heading 'Environmental protection. This is a key issue at, for example, Therfield Heath SSSI and should be a prominent element of the assessment of sites.</b></p>	<p>Representations by Natural England [15697] Rep 5526</p>	<p>Impacts on ecological sites were considered in each appraisal. Table 6 (and table 17) noted the pressure that key habitats are under pressure from a number of sources, including new development.</p>	<p>Add recreational disturbance as a cause of pressure on habitats in tables 6, 17 and Appendix 2.</p>
<p><b>Table 7: Appraisal framework - The SA objectives and sub objectives make no reference to geodiversity and soils. We would also expect to see an objective relating to Green Infrastructure.</b></p>	<p>Representations by Natural England [15697] Rep 5526</p>	<p>Protecting soil quality is included within objective 3(d). Geodiversity was included within objective 3(d) but this was not made clear. Impacts on RIGS sites has</p>	<p>Significance criteria for objective 3(d) changed to reference impacts on RIGS sites (appendix 5) and reflect this in appraisal matrices for preferred sites (appendix 6).</p>

Representation	Consultee	NHDC response	Change made to Submission SA
		now been included in the significance criteria (appendix 5) and we have reviewed the appraisals to ensure that potential impacts on RIGS sites have been considered. It is considered that green infrastructure is adequately addressed by a combination of objective 2(b) and 3(a).	
<b>Table 9: Residual significant sustainability effects of the Plan - Residual effects should include increased recreational pressure on ecological sites such Therfield Heath SSSI and appropriate monitoring should be added to Table 10 -</b>	Representations by Natural England [15697] Rep 5526	As noted below, it is acknowledged that there are likely to be significant negative effects on the SSSI due to recreational pressures.	See below
<b>2 Context, baseline and sustainability objectives</b> <b>We would have expected to see a list of important ecological features in this section. As a minimum nationally designated sites within and in close proximity to the district should be included.</b>	Representations by Natural England [15697] Rep 5526		Main reported amended to note the presence of the 6 SSIs and the 3 European sites within 15km of the District.
<b>2.16 Royston - RY1 –formerly site 218 – West of Ivy Farm The site assessment of RY1 has given assigned a ‘?’ indicating uncertainty for SA Objective 3a (will the site protect and enhance biodiversity). Given that we consider current mitigation to be insufficient to prevent impacts on the adjacent SSSI this site should be assigned a negative or major negative score. It is notable that would leave the site scoring</b>	Representations by Natural England [15697] Rep 5526	A cumulative impact assessment of development in Royston is included within the report -this is cluster A listed and shown in map form in para 7.2 in the report. Potential impacts on Therfield Heath are identified and listed in table 31, and mitigation measures	Appendix 6 – the summary and matrix for this site amended to reflect a negative score for objective 3a. Mitigation Table (Appendix 9) page 87 amended so that in the row noting impact on Therfield Heath SSSI the last sentence in the column regarding recommendations/mitigation reads: It is recommended that a Mitigation Strategy be developed in consultation with Natural England to ensure that developers of these sites contribute towards appropriate measures to protect the SSSI from recreational pressures. The

Representation	Consultee	NHDC response	Change made to Submission SA
<p><b>negatively in all of the Environmental Protection SA Objectives as well as for soils and a number of other sustainability criteria.</b></p> <p><b>There is no cumulative assessment of impacts arising from the sum of development in Royston and no consideration of alternatives.</b></p>		<p>identified. Given the concern expressed by Natural England it is agreed that stronger mitigation measures are needed to address potential disturbance and it is agreed that the site should be assigned a negative score for objective 3a. With regard to options for sites, a wide range of sites have been considered to meet the identified housing need and assessed as described in the report.</p>	<p>mitigation strategy should include appropriate monitoring". Row also amended to show that the residual effect is uncertain (because it is not clear whether the proposed mitigation will fully mitigate the potentially significant effect). Row also amended to correct the typographical error which is in the published version.</p> <p>In the main report, tables 9, 31, 35 and 36 amended to reflect this change</p>
<p><b>Sites EL1, EL2 &amp; EL3 – East of Luton. The long term, cross-boundary and cumulative effects on the Chilterns AONB have not been satisfactorily addressed in the Sustainability Appraisal. The duty to cooperate and the unmet needs of neighbouring Luton are not a reason to harm the AONB or its setting. There appears to be a lack of consideration of alternatives not affecting the AONB.</b></p>	<p>Chilterns Conservation Board Ms Lucy Murfett [8390] (Rep 5806)</p>	<p>The cross-boundary effects of the East of Luton sites were considered in the SA, and the proximity of the AONB is noted in the SA matrix (Appendix 6, page 116), however it is accepted that the matrix didn't specifically comment on cross boundary impacts in terms of views from the AONB. In the SA, the three sites were considered as a whole, and therefore the cumulative effects of the development of the three sites was taken into account. The SA mitigation table (Appendix 9 and table 35 in</p>	<p>Refer to the consideration of cross boundary impacts in terms of views from the AONB in the appraisal matrix (Appendix 6).</p>

Representation	Consultee	NHDC response	Change made to Submission SA
		<p>the main report) noted that there will be significant landscape impacts and that these will be partly mitigated by policies SP12 and SP19, and recommended as additional mitigation a site-specific landscape assessment to inform the masterplan for the sites. The two planning applications covering the sites included detailed landscape and visual assessments as part of the Environmental Statements. The Crown Estate application reports no impact on the AONB where as Bloor's reports no impact on the AONB, but negligible impact on the setting based on a combination of screening, use of the ridgeline and overall distance from the site<sup>14</sup>.</p>	
<p><b>IC2 (Burford Grange)</b>  <b>I also want to highlight inaccuracies in the council's Environmental Sustainability Appraisal dated September 2016.</b>  <b>In the site matrix (Appendix 6, page 76), the</b></p>	<p>Mr Nick Richardson [ ]  (Representation 5632)</p>	<p>Reference to the site being a brownfield site is incorrect and should be removed, but this does not affect the scoring as the appraisal clearly recognises that, despite the lack of a</p>	<p>Reference to the site being a brownfield site has been removed.</p>

<sup>14</sup> Environmental Statement P102- see [http://documentportal.north-herts.gov.uk/GetDocList/Default.aspx?doc\\_class\\_code=DC&case\\_number=17/00830/1](http://documentportal.north-herts.gov.uk/GetDocList/Default.aspx?doc_class_code=DC&case_number=17/00830/1)

Representation	Consultee	NHDC response	Change made to Submission SA
<p>site is correctly noted under 'Land Use' as greenfield and grade 3 agricultural land but then under 'Environmental Protection' it is incorrectly noted as an existing brownfield site. The vast majority of the site is open field and grazing land. Living nearby and walking along the river into Oughton Head, I regularly see birds of prey hunting over that site in the field and I am sure the field part of the site provides an important ecological resource. This aspect of the site sustainability review is therefore Not Sound.</p> <p>I also take issue with the comments within 'Protect and enhance landscapes' where the report states "the landscape is common and the impact of development moderate'. As already mentioned, this development would significantly impact on the outlook and landscape from the River Oughton pathway, which currently benefits from open countryside views here. If suddenly the horizon outlook is 40 houses this would significantly detract from the landscape. The report notes that this is a Landscape Conservation Area and it should therefore be protected. Again I think the comments and proposed allocation are therefore Not Sound.</p> <p>The report also says that the site has access to open space. Yes the site adjoins green fields but these are in private ownership and used for agricultural purposes. There is</p>		<p>designation, the site may have biodiversity value.</p> <p>The site is scored negatively for 3(b) Protect and Enhance Landscapes, i.e. the appraisal recognises that the impact on landscape of the development of this site would be negative.</p> <p>The appraisal does not state that 'the site has access to open space' but that there is access to open space within 400m of the site. For example, there is a footpath along the River Oughton which can be accessed within 150m of the site.</p>	

Representation	Consultee	NHDC response	Change made to Submission SA
<p>therefore actually no access to open space. Again the comment is Not Sound.</p>			
<p><b>LG6</b>  <b>The former orchard is recognised in the document 'Draft Sustainability Appraisal of North Hertford' (CAG consultants and NHDC, September 2016). The report erroneously contends that '[t]here is no biodiversity designation' even though this site has been on the national Priority Habitat inventory for six years and available to view or download on several Governmental web portals in a variety of formats. Indeed if a search had been done for Priority Habitats, it would be difficult to miss. Such a glaring oversight could call into question the competence of the consultants and the entire sustainability assessment. The document suggests that it has: '...no amenity value. Development would remove an urban eyesore'. This is an entirely subjective statement and has no place in an objective appraisal. The line should be redacted.</b></p> <p><b>(Appendix 6: Preferred sites – summaries and appraisal matrices. Page 96)</b>  <b>I am startled that a professional consultant could conclude that a group of trees, be it forest, plantation, orchard or woodland, has no amenity value. How do they possibly reach this conclusion? It is widely accepted</b></p>	<p>People's Trust for Endangered Specific (Mr Steve Oram) [11629 ]</p>	<p>In general the SA used the expert advice of Hertfordshire Ecology to identify significant biodiversity interest on sites in the plan (rather than the Priority Habitats Inventory). The comment made has alerted us to the fact that an earlier iteration of an appraisal matrix relating to an earlier iteration of the Plan was included in error. This did not include comments from Hertfordshire Ecology made in January 2015 which state that there is <i>potential for reptiles associated with allotments, and bats associated with some trees having splits and hollows etc.</i> They also note that opportunities are limited if site is developed due to size, but recommend <i>compensation (for)loss of what is traditional orchard Priority Habitat given high numbers of surviving fruit trees and that surveys are needed to properly</i></p>	<p>The correct appraisal matrix is now included and the summary (appendix 6) and the mitigation table has been amended to reflect the comments of Hertfordshire Ecology, acknowledging the biodiversity assets of the site and removing the references highlighted by the consultee. Potential negative effects on biodiversity are listed in the mitigation table (appendix 9), which requires an ecological survey and protection of traditional orchard or compensation for any loss by appropriate offsetting. Appendix 6 has been reviewed to check all the matrices and a small number of other matrices have been amended to reflect comments from Hertfordshire Ecology with appropriate amendments to the mitigation table (appendix 9).</p>

Representation	Consultee	NHDC response	Change made to Submission SA
<p>that a green vista, however poorly managed, is better for the health and wellbeing of those living nearby or who can see and use it than a view of buildings, concrete, or infrastructure; and almost always preferable. Indeed, if this site is an 'urban eyesore', the group of unmanaged trees in the nearby Jackson's Plantation must be a terrible eyesore, yet no one is suggesting that be removed for housing (N.B. by definition a plantation is generally planted for future timber extraction).</p>		<p><i>assess site and any species interest.</i></p>	
<p><b>Reference to RY7:</b>  <b>SA Objective 1- Achieve sustainable levels of prosperity and economic growth</b>  <b>6. It is stated that development of the site will reduce the supply of employment land in Royston. Consequently, it is scored as having a negative impact against this particular strategic objective.</b></p> <p><b>7. It is evident that many of today's employers are seeking large edge of town employment facilities with good road access. It is likely that any businesses vacating the Anglian Business Park site would be seeking to relocate to such facilities. It is clearly the case that there has been a movement in recent years out from constrained town centre employment sites to more spacious edge of town accommodation. We note that the Draft Plan makes provision for a new employment designation of 10.9 ha on land west of Royston.</b></p>	<p>James Property Investments LLP (Mr Richard James) represented by JB Planning Associates (Mr Paul Cronk) [16083]</p>	<p>In relation to the comments on objective 1, the significance test for a negative score is whether development of the site would lead to the loss of land in active employment use. In this instance, it is clear it would and that this would have a negative impact on businesses, even if this negative impact could be mitigated to some degree through provision elsewhere and even though this is outweighed by other positive impacts.</p> <p>In terms of the comments relating to criteria 5(c), all sites proposed for major development which adjoin existing residential areas</p>	<p>Significance criteria for 5(c) adjusted to reflect this point (appendix 5) and site matrices revised for all sites (appendix 6). Changes also carried through to the mitigation table (appendix 9).</p>

Representation	Consultee	NHDC response	Change made to Submission SA
<p><b>8. Residential development already exists to the east of the site. In such circumstances we consider that the allocation of the site for housing is not likely to be harmful to economic growth. Accordingly, in terms of impact, we consider that the scoring against this objective should be amended to neutral.</b></p> <p><b>SA Objective 5(c) Improve conditions and services that engender good health and reduce health inequalities</b></p> <p><b>28. The site is a major development and appears to be in a residential area. Residential properties will be adjacent to manufacturing / storage and distribution uses. The site is scored as having a negative impact against this objective.</b></p> <p><b>29. The development site is actually located in the heart of the town. We consider that there is no justification for scoring the site negatively given it will provide opportunities for future occupiers to cycle and walk to the nearby Royston town centre. Furthermore, it should be recognised that in relation to proposed site allocation RY7, residential properties are presently situated adjacent to manufacturing / storage and distribution uses. Accordingly, we feel that the site should at the very least be scored neutral in terms of impact against this objective.</b></p>		<p>were scored negatively against this criteria. However, we recognise that on sites which formerly accommodated employment-related uses, the impact of development for residential use may not have significant negative effects beyond the construction phase. We have adjusted the significance criteria for 5(c) to reflect this and adjusted the site scoring for all sites accordingly. In the case of this site, however, the score remains negative because of the potential impacts on amenity for new residents from the adjoining employment uses.</p>	
<p><b>Site HT2</b> <b>SA Objective 2 (a) - Minimise the development of greenfield land and other</b></p>	<p>Beechwood Homes (Mr Sean Harries)</p>	<p>Since data on agricultural land classification is not accessible for sub-levels (i.e.</p>	<p>The score for 3(c) has been changed to ?, recognising the fact the potential negative impacts of the development on the adjoining designated site could be</p>

Representation	Consultee	NHDC response	Change made to Submission SA
<p><b>land with high environmental and amenity value?</b></p> <p><b>This site is a greenfield site. The land is designated as grade 3 agricultural land, though most of it is grade 3b. The objective identifies that site HT2 will result in the permanent loss of greenfield agricultural land. It is scored as having a negative impact.</b></p> <p><b>Clearly given the scale and nature of North Hertfordshire's housing land supply requirement, and its limited brownfield sites capacity, it is inevitable that the Council will be required to heavily draw upon greenfield sites such as proposed allocation site HT2 in order to meet its overall housing requirement figure. The development of lower quality agricultural land such as site HT2 is clearly preferable to the loss of higher quality agricultural land.</b></p> <p><b>SA Objective 2 (c) - Deliver more sustainable location patterns and reduce the use of motor vehicles</b></p> <p><b>12. The site is identified as being located within 400m of a bus stop, but only with an infrequent service. The site is more than 400m from the nearest frequent service, and more than 800m from the railway station It is noted that the owners have produced a highway statement indicating that the site is 2km from Hitchin station which could be reached by cycling. Site on the edge of town – residents likely to commute, despite public</b></p>	<p>represented by JB Planning Associates (Mr Paul Cronk) [16080] (representation 3805)</p>	<p>it is not possible to distinction between grade 3a and 3b for all sites), for consistency in the treatment of all sites, negative scores have been applied to all sites falling within grades 2 or 3.</p> <p>The information regarding public transport access, including potential mitigation, is noted. However, for consistency in the assessment across all sites, a site can only be scored positively if it meets the stated criteria.</p> <p>Regarding the comments on objective 3(c), the significance test for a negative score is whether there is a 'potential impact on sites designated for their ecological value or features of ecological interest which cannot be mitigated.' The site was given a negative score because it adjoins a negative site. However, we recognise that a sensitive approach to development may enable any impacts to be mitigated and the limited biodiversity value of the site itself could be enhanced.</p>	<p>mitigated, e.g. through retaining and enhancing the tree line and hedgerows around the perimeter, and maintaining appropriate buffers and set back from the designated site.</p>

Representation	Consultee	NHDC response	Change made to Submission SA
<p><b>transport and cycling options. Mitigation – Enhance pedestrian routes; encourage and promote sustainable transport initiatives. The impact against this objective is scored as negative.</b></p> <p><b>13. We consider that the site’s location on the edge of the urban area means that it will be positioned to access a range of the town’s facilities and services, particularly given that the distance between it and the town centre is not great in size. We would point out that:</b></p> <p><b>The proposed allocation is compliant with the standards advocated by the Institute of Highways and Transportation which support the sustainability of the site;</b></p> <p><b>☐ Most people will walk to a destination that is less than 1 mile in distance (Planning for Walking, 2015 – Chartered Institute of Highways &amp; Transportation [CIHT]);</b></p> <p><b>☐ Bicycles are a potential mode of transport for all journeys under 5 miles (Planning for Cycling, 2015 – Chartered Institute of Highways &amp; Transportation [CIHT])</b></p> <p><b>14. Consequently, we consider that site HT2 should be scored as having a positive impact against this particular objective.</b></p> <p><b>SA Objective 3 (a) - Protect and enhance biodiversity</b></p>		<p>In terms of the comments relating to criteria 5(c), for consistency all sites proposed for major development which adjoin existing residential areas were scored negatively against this criteria. Some impact on the existing residential area is considered inevitable, even if this is greater during the construction phase.</p>	

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<p>15. This site is a greenfield site. A designated wildlife site borders this site, containing a woodland and further investigation will be needed on potential impact on site. Site is an open field, bordered by trees and hedgerows. It is noted that an ecological survey funded by the owners has shown no habitats of ecological value and that the site is of no botanical interest. Mitigation: ensure that the development retains and enhances the tree line and hedgerows around the perimeter. Mitigation - Ecological and habitat survey Mitigation - Tree survey. This site is scored as having a negative impact against this objective.</p> <p>16. Given that the site itself is an agricultural field, it is currently of limited ecological value given the lack of biodiversity present. This fact is acknowledged in the SA assessment which refers to the fact that the Council has been supplied with ecological survey evidence to demonstrate this. We do not consider that the negative impact score is justified with regard to this S.A. objective.</p> <p>17. Beechwood Homes is committed to ensuring that the design and layout of any development is sensitive to the ecological value of the adjoining Ippollitt Brook Local Wildlife Site. The proposed development will provide appropriate buffers and set back from the woodland plantation including further enhancements which will be</p>			

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<p>submitted and assessed at the outline planning application stage. Therefore, we consider that the proposed allocation offers opportunities to actually protect and enhance biodiversity and should be scored positively against this particular objective.</p> <p><b>SA Objective 5(c) Improve conditions and services that engender good health and reduce health inequalities</b></p> <p><b>30. The site is a major development and appears to be in a residential area. The site is not likely to cause any problems with regards to health Initial construction phase could possibly cause noise and nuisance effects to local residents. The impact against this objective is scored as negative.</b></p> <p><b>31. The development site is actually located on the edge of a residential area. We consider that there is no justification for scoring the site negatively given it will provide opportunities for future occupiers to cycle and walk in to Hitchin town centre. Accordingly, we feel that the site should at the very least be scored neutral in terms of impact against this objective.</b></p>			