

# **Sustainability Appraisal and SEA of North Hertfordshire Local Plan Preferred Options**

## **Appendix 10: Consultation comments and how they have been addressed**

November 2014

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

<b>Consultee</b>	<b>Comments</b>	<b>Response</b>
<b>John Harris</b>	Cynical with regard to creating public interest in planning issues that are not "in one's back yard".	Noted
	Keep communications simple and specific.	Noted
	Requests "bulletin board" for consultation topics	Not clear what this would entail. Planning documents which are out for consultation are available on the Council's website, and comments can be sent via e-mail.
<b>Stevenage Borough Council</b>	Strategic Options for LDDs - options identified for future housing provision do not include Stevenage expansion. Sustainability issues identified only focus on env issues from housing dev but do not acknowledge economic and social aspects.	The part of the Scoping Report that makes reference to the Strategic Options for LDDs explains that they are drawn from the detailed options for the Core Strategy and Development Control Policies that are planned to go out to consultation in the early autumn. This latter document expressly states that the option regarding urban extensions on greenfield land adjoining existing towns... "envisages the release of land for large-scale extensions to a town or towns, including Stevenage or Luton". It is therefore consistent in the approach to all LDDs in the LDF, including the identified Stevenage Area Action Plan.

Consultee	Comments	Response
	Appendix 1 - should include recognition that provision of additional hsg will have positive economic effect in that it will help to attract employers to the district.	The assertion that Appendix 1 highlights concern that the lack of housing stock in North Herts is impacting upon the District's desirability for future employers is incorrect. What is stated is not a lack of housing, but that the high cost of housing in the District is leading to employers not seeing the District as a location of choice. The increase in high-quality affordable housing is already acknowledged in the appendix at 5(d).
	Sustainability objectives relating to expansion of Stevenage should be consistent and reflect balanced consideration of environmental, economic and social indicators. These should be acknowledged within this Scoping Report	The sustainability issues as stated by Stevenage BC for Stevenage town expansion are noted. They do not necessarily relate in the same way, however, to the North Hertfordshire towns.
<b>Herts Biological Records Centre</b>	<b>Appendix 1 Key Sustainability issues</b> - Opportunity for range of issues to be addressed through delivery of associated objectives.	Noted
	<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.
	All new hsg developments should respect historic environment, landscape character & biodiversity and consultation should take place with all interested parties	Comments not specifically related to SA/SEA Scoping Report but noted for future reference.
	PPG9 (Draft PPS9) should be used to guide the process. PPG9 (PPS9) should be used in preparation of local development documents.	As above

Consultee	Comments	Response
	Local authority should seek to maintain, enhance or restore networks of inter-connecting natural habitats by linking sites of biodiversity importance, and policies should be included to protect such networks from development.	This comment will be considered and commented upon when the Council consults on policies in its Local Development Documents.
	Any existing sites of wildlife value should be adequately buffered and enhanced through active long-term management agreements. Wildlife sites should play a key role within the urban green spaces and corridors system.	Comments not specifically related to SA/SEA Scoping Report but noted for future reference.
	<b>2(c)</b> - Comprehensive assessment and consultation on historic environment, landscape character and biodiversity issues should take place at an early stage when designing transport infrastructure. Existing sites of wildlife value should be adequately buffered and enhanced through long-term management agreements.	As above
	<b>Environmental Protection</b> 3(a) Protect and maintain biodiversity - Amend to Protect and enhance biodiversity	<b>Amend 3 (a) to read, 'Protect and enhance biodiversity'</b>
	<b>Protection of wildlife</b> - Local Authority should take appropriate measures to ensure that all protected species are safe guarded from any adverse effects of development.	Comments not specifically related to SA/SEA Scoping Report but noted for future reference.
	<b>Enhancement of wildlife</b> - Objective can also be achieved through delivery of county Biodiversity Action Plan (BAP) for individual habitats and species.	Comments forwarded to the NHDC officer responsible for BAP.
	<b>3(a), (b), (d)</b> - Biodiversity, landscapes and pollution control can be physically delivered through Environmental Stewardship (Defra - RDS).	Noted
	<b>Climate change 4(a), (b)</b> - Potential to produce cleaner 'greener' fuels should be fully explored. When considering where to grow 'energy crops' full consideration must be given to location & potential impact on historic environment, local landscape character and biodiversity. Wind farms must make full consideration of the historic environment, landscape and biodiversity in their location and must be governed by SEAs at earliest possible stage of design.	What farmers choose to grow is not a planning matter. However, future policy on renewable energy may encompass this point. Comments on wind farms noted.

Consultee	Comments	Response
	<b>Resource use and waste 6(a)</b>	
	<b>Water</b> - Opportunities should be sought to create new habitats for wildlife when considering design of water storage areas. Opportunities should also be sought when creating new flood storage areas to buffer or link together existing sites of nature conservation value.	The issue of water is taken account of in objective 6 (a ). Other comments noted.
	<b>Waste</b> - Waste management should look at alternative strategies.	Comments not specifically related to SA/SEA Scoping Report but noted for future reference.
	<b>Minerals</b> - Existing grasslands should not be used for minerals extraction. Any extraction adjacent to such sites must be fully assessed via comprehensive SEA process. Opportunities should be sought to enhance ecological connectivity between existing nature conservation sites through the restoration of minerals sites.	Comments not specifically related to SA/SEA Scoping Report but noted for future reference.
	<b>Appendix 3 Baseline data 2(b), (c)</b> - Accessible natural Green Space Standards should be applied. The design and construction of new communities should make full use of best practice guides.	This comment will be considered and commented upon when the Council consults on policies in its Local Development Documents.
	<b>Environmental Protection 3(a) Protect and maintain biodiversity</b>	
	HBRC identified 4 bird species as 'Quality of Life' indicators for Herts.	Noted
	<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.	<b>Amend wording in Baseline.</b>
	<b>% of SSSIs in good condition</b> - this data is available directly from English Nature at Harbour House, Hythe Quay, Colchester, Essex, CO2 8JF (01206) 796666.	Noted
	Implementation of BAP - recommend that NHDC participates in existing county system of Working Groups to enable them to take action locally for a chosen set of HAPs and SAPs.	Comments forwarded to the NHDC officer responsible for BAP.

Consultee	Comments	Response
	<p><b>Extent/population of important BAP habitats and species</b> - Habitats and Land Use of the county were assessed in the Phase 1 Habitat Survey Project conducted from 1994-97. A more up to date reference is the HEF publication The State of Biodiversity in Hertfordshire 1992-2002. Habitats and species are dealt with (not all are relevant to the county BAP). <u>However, the report does not break habitats or species down by district. This indicator will prove to be both difficult and time consuming to deliver.</u></p>	Noted
	<p><b>Area of semi-natural habitat lost to development</b> - This could be delivered through data gathered from NHDC Planning Dept.</p>	Noted
	<p><b>Area of semi-natural habitat created</b> - <u>This indicator will prove to be both difficult and time consuming to deliver.</u> There may be opportunities to gather data on a district scale, provided Defra (Environmental Stewardship) and the Forestry Commission (Woodland Grant Scheme) are prepared to release it. In principle they should as public money is being used to create the habitats.</p>	Noted
<b>Ickleford Parish Council</b>	Agree in principle with general Policy and recommendations.	Noted
	Retain Green Belt wherever possible.	Noted, see Objective 2(a)
	Some concern over 3 Grade 1 and 2 Listed Buildings at Risk and trust these are being monitored.	Noted
	Ensure pollution continues to be reduced in rivers, etc.	The indicator in the baseline review on river quality is under investigation.
	Crime concerns appear high in North Herts as opposed to other areas.	Noted

<b>Consultee</b>	<b>Comments</b>	<b>Response</b>
<b>EEDA</b>	Consideration should be given to socio/economic issues.	The objectives in the sustainability framework include socio/economic objectives and sub-objectives, as well as environmental ones. Many of the issues put forward in the comments are covered in the framework, i.e. deprivation, skills base, landscapes and environmental assets.
<b>Veolia Water</b>	Supports approach of combining SA and SEA into single process and document. Also supports breadth of options appraisal for housing.	Noted
	Suggest environment agency 'cams' and company water resources plans should also be documents to be reviewed.	Documents considered too specific and detailed to scope.
	Support objectives to improve quality of river and groundwater supplies, and the objective to limit water consumption to levels supportable by natural process and storage systems.	Noted
	Support for new storage systems would be advantageous where this is fundamental to the continued economic performance of the area, health and well being of its population.	Noted
<b>Neil Guttridge</b>	Document's scope should include provision of open spaces within built up areas in particular allotments.	Objective 2 (b) deals with access to green spaces, do not think it necessary to make first sub-objective specific about allotments.
	Should also have guidelines as to the level of provision, i.e., 1 acre for every 1000 people. District Plan should set a policy for provision and require developers to make provision for allotments on hsg developments over a certain size.	This comment will be considered and commented upon when the Council consults on policies in its Local Development Documents.

Consultee	Comments	Response
<b>Rambler's Assoc - Herts &amp; N. Middlesex Area</b>	<b>9</b> - Avoid building a new settlement on a greenfield site.	The comments relate to some of the strategic options for the forthcoming Local Development Documents (LDD). The comments will be considered and commented upon when the full Options document is produced later this year.
	<b>11c</b> - May be occasions when other uses are justified.	As above
	<b>11a</b> - Non- car modes - Supported	As above
	<b>11c</b> - Improved/integrated transport structure - Supported	As above
	<b>18 2(a)</b> - Land use & development patterns - Supported	Noted
	<b>19 2(b)</b> - Supported	Noted
	<b>19 2(c)</b> - Supported	Noted
	<b>19 3(a) to 3(d)</b> - Supported	Noted
	<b>19 4 (a) (b)</b> - Supported	Noted
	<b>19/20</b> - Supported	Noted
	<b>20 (h)</b> - Very important to increase and encourage leisure facilities	Noted
	<b>20 6(b)</b> - NHDC already doing good job, but need plastic recycling facilities in Royston	Noted
<b>Highways Agency</b>	No comments, but encourages NHDC to locate future development in areas where services and facilities are readily accessible by non-car modes.	Noted
<b>Chilterns Conservation Board</b>	Should have more than one mention of Chilterns AONB in scoping report.	The AONB and other issues for the District will be discussed in more detail in future Local Development Documents such as the forthcoming Options document.

Consultee	Comments	Response
	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.	<b>Scope AONB Management Plan, but other documents considered too specific and detailed to scope.</b>
	Indicators could be devised to address the need to conserve and enhance the natural beauty of the AONB.	Indicators will be investigated.
<b>Chiltern Society</b>	Typography makes document difficult to read.	Noted
	All LDF documents should reflect local knowledge and recognise local concerns.	Noted
<b>Tony Harcourt</b>	<b>Page 8 Community Strategy</b> - first bullet point should read "Development of brownfield sites must be preferred so as to ensure the preservation of greenfield sites and in particular within the Green Belt.	The Scoping Report is simply re-iterating the objectives of the Council's Corporate Plan and Community Strategy. Not possible for the Scoping Report to amend these objectives as they are adopted in other Council documents.
	<b>Page 9 Housing</b> - after end 1st sentence after 2021 add Without any justification whatsoever and in common with other authorities is totally rejected by the North Hertfordshire District Council. At line 5 of this first paragraph delete the word greenfield. Last sentence should be deleted and replaced by Any increase in the housing at Stevenage must be within their boundary and not extend into any Green Belt. Option b is preferred with only Option a without the final phrase.	The comments relate to some of the strategic options for the forthcoming Local Development Documents (LDD). The comments will be considered and commented upon when the full Options document is produced later this year.
	Add Option e as follows Resist all attempts to impose a significant proportion of the arbitrary 15,800 households suggested for the area of North Hertfordshire and in particular totally reject any building within the Green Belt so as to remain in conformance with PPG2.	As above
	<b>Page 10 Affordable Housing</b> - Option a should be the only	As above

Consultee	Comments	Response
	consideration	
	<b>Page 10 Employment</b> - delete options a and e.	As above
	<b>Page 11 Town Centres</b> - select only options c for both town and smaller centres.	As above
	<b>Page 11 Transport</b> - select option b only.	As above
	Page 22 Appendix 1 Land use and development patterns - delete this whole section in the 'Issues' column it should read Additional housing will only be provided to satisfy local needs and any regional requirements shall not be allowed upon greenfield sites. The land take pressures from Stevenage and Luton must be resisted at every level of the planning process. the extra needs stipulated for these two towns shall be supplied by developments within their own town boundaries and not be allowed to impinge upon the North Hertfordshire Green Belt. The housing pressures to meet regional needs do not have to be satisfied by corresponding land takes. Greenfield sites will only be allowed under very special circumstances and then only to satisfy local needs. Suggested re-write in accordance with statements under SA Objective and Source. Council either means what it says in the outside columns or it is bowing to outside pressures which should not form any part of this plan.	See comments from EERA (439). Cannot ignore the housing requirements set at a regional level.
	<b>Page 23 Row 3 (d)</b> - If Council rejects land expansion plans of its neighbours then water supply needs and drainage from future developments would not be nearly the same problem for NHDC.	Noted
	Page 24 Row 5(d) - add the following sentence under Issues The Council fully endorses the Government plans to subsidise the 'have-nots' to make it possible for key workers to buy houses. 'Affordable housing' is often of lower quality and very difficult to obtain from developers so giving financial aid is the better option.	Unsure which Government plans to subsidise 'have nots' is being alluded to. Do not agree that affordable housing is usually of lower quality.

Consultee	Comments	Response
	Appendix 2 Page 7 - Support . Under key targets, etc, delete 'Not applicable' and insert The Green Belt within the boundaries of North Hertfordshire must be preserved at all costs.	Preserving the Green Belt, 'at all costs' not considered to be an appropriate statement to make. PPG2 does not say Green Belt should be preserved at all costs.
<b>Royston Town Council</b>	All objectives as identified in Appendix 1 are supported.	Noted
	Objectives of LDD and those in Community Strategy are also welcomed	Noted
<b>CPRE Hertfordshire</b>	<b>Strategic objectives for the LDD's</b> - No direct mention made of encouraging/requiring low energy development - should have its own heading, i.e., Low Energy Communities.	The Scoping Report is simply re-iterating the objectives of the Council's Corporate Plan and Community Strategy. Not possible for the Scoping Report to amend these objectives as they are adopted in other Council documents
	<b>Strategic options of the LDD's</b> - Some of the suggestion options are too prescriptive. Options on Rural areas and settlement pattern should have an intermediate position for villages which could accept more limited development. Housing options do not seem to reflect the text. From the text it is clear that the numbers required will be accommodated around Stevenage or within existing settlements, in order to comply with emerging regional spatial strategy. Given that, urban extensions and new towns are not a feasible option. The use of greenfield sites in villages is not advocated by anyone and should be removed from the options.	The comments relate to some of the strategic options for the forthcoming Local Development Documents (LDD). The comments will be considered and commented upon when the full Options document is produced later this year.
	<b>Sustainability appraisal objectives</b> - Why always start with growth? This always implies this is the most important objective around which the other objectives must fit.	Do not consider that because the economic objectives is the first one in the framework, it is the most important.

Consultee	Comments	Response
	Land use and development patterns 2(a) - add a bullet point to require a sequential principle to be incorporated so that such land, particularly greenbelt, should be a last resort.	The sub-objectives are questions which will be asked about each option or policy being appraised, i.e. will the policy or proposal help to maximise re-use of vacant buildings or derelict land? A sequential approach to land is not appropriate as a sub-objective.
	<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.	<b>Amend first sub-objective of 5 (e) to read, 'encourage crime reduction, particularly through the appropriate design of new development'.</b>
	Appendix 1 - additional sustainability issues which should be included. 1 What level of growth is sustainable? How can high quality employment be attracted to the District? Where should growth be located, should it be in one place or distributed across the area? How can working from home be encouraged?	The issue of sustainable economic growth is already contained in the key sustainability issues table, these are specific questions related to this issue. The questions are valid and will be considered when developing policies on this issue. Some questions will be considered in employment study currently being undertaken.

Consultee	Comments	Response
	2(a) If all non settlement development is at Stevenage (or on the outskirts of Luton) how will this impact on the rest of the District? Would any of the settlements benefit from urban extension and would this relieve pressure elsewhere? What new infrastructure would be required and where would it be?	The issue of housing and settlement pattern is contained in the key sustainability issues table, these are specific questions related to this issue. The questions are valid and will be considered when developing policies on this issue. Some of the questions posed, the Council will be asking for the public's views on, within the forthcoming Options document.
	2(b) How can employment currently provided in London be provided in the district? Can more work be done online with fewer journeys to London. Can we increase capacity of rail service to London and reduce cost to minimise car use?	The issue of high quality employment and commuting is contained in the key sustainability issues table, these are specific questions related to this issue. The questions are valid and will be considered when developing policies on this issue. Some questions will be considered in employment study currently being undertaken.
	3(a) & (b) - Reference made to expansion Luton airport, should also refer to Stansted.	<b>Amend to also mention Stansted.</b>

Consultee	Comments	Response
	4(a) - How can energy consumption in new developments be reduced? Can more energy be generated onsite using renewable energy methods? How can we encourage use of less polluting forms of vehicle and fuel? Cycle use in the district is low; can this be increased?	The issue of energy consumption is contained in the key sustainability issues table, these are specific questions related to this issue. The questions are valid and will be considered when developing policies on this issue. However, some question are beyond control of planning such as less polluting forms of vehicles, others are contained elsewhere e.g. renewable energy Objective 4 (a).
	Suggest 2 additional SA objectives1 - 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	<b>Add additional sub-objective under 2 (c) - 'Provide affordable, accessible public transport in towns and rural areas'.</b>
	2 - Ensure that all developments have in place adequate infrastructure before completion - it is difficult to prescribe adequate infrastructure related to each development as the need is often cumulative; however the consequences of not achieving this is all too evident. How can criteria be developed to measure infrastructure need? How can planning rules be written to include an infrastructure test?	By infrastructure, it is assumed that what is meant is roads, sewerage etc. Whilst important, it is not considered that this is a key sustainability issue and should involve a separate objective.
	<b>Appendix 3 - Page 9 - Area of Green Belt</b> - should also indicate area used for development over a period and area added as replacement.	Noted, will investigate this indicator.
	<b>Page 11 - Provide opportunities for people to come into contact with wildlife, etc</b> - No indicators were identified. Perhaps length of footpath in good condition and percentage of total footpath in good condition would be appropriate.	Noted, will investigate this indicator.

Consultee	Comments	Response
	<b>Page 19 - Protect &amp; maintain biodiversity, population of wild birds</b> - Additional bird types should be incorporated as a measure of particular environments.	Noted, though data on population of wild birds is not comprehensive and is unavailable at District level.
	<b>Page 26 - Improve district's ability to deal with climate change</b> - Add water use per household.	Noted, this indicator is already included under 6 (a) Use natural resources efficiently.
	<b>Page 31 - Promote community cohesion</b> - No indicators identified. Following should be considered: No of voluntary clubs & societies; No of festivals, carnivals and fetes; No of ASBO's issued; Amount of vandalism; No of school exclusions; Truancy; and No of sports leagues.	Noted, will consider these indicators.
<b>English Nature</b>	<b>Relationship with other plans &amp; programmes - Appendix 2</b> - all relevant documents included	Noted
	<b>Relevant aspects of state of environment and likely evolution - Appendix 3</b> - all information is accurate	Noted
	<b>Environmental characteristics of area - Appendix 3</b> - all information is accurate	Noted
	<b>Existing environmental problems</b> - No aware any issues specific to North Herts, although area is affected by some generic environmental problems.	Noted
	<b>Objective 3(a) Biodiversity</b> - should be changed to <u>protect and enhance</u> . Would bring in line with 3(b) and (c).	<b>Amend 3 (a) to read, 'Protect and enhance biodiversity'.</b>
	SEA should include consideration of (1) likely significant effects on environment of the plan or programme particularly biodiversity, flora and fauna and consider likely effects on soil, water and landscape in so far as these are necessary to support biodiversity, flora and fauna	Noted
	(2) inter-relationship between these and other issues listed in the Directive; and (3) any short, medium and long-term effects; permanent and temporary effects; positive and negative effects; and secondary, cumulative and synergistic effects.	Noted

Consultee	Comments	Response
Hitchin Society	<b>Strategic Option Housing (p9)</b> - Wording is ambiguous. Sustainability study should address potential greenfield (and probably greenbelt) requirement of 12,000 plus homes in addition to West of Stevenage.	The comments relate to some of the strategic options for the forthcoming Local Development Documents (LDD). The comments will be considered and commented upon when the full Options document is produced later this year.
	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.	<b>Neither Environment Agency nor Three Valleys Water have asked that this issue become a main objective. Do not consider 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, amend third sub-objective in 6 (a) to make specific mention of groundwater resources. The question will be asked of each option/proposed policy - will it help to limit use of groundwater resources?</b>
	protect soil quality' in Resource Use and Waste should be part of 3(d) Reduce pollution from any source.	<b>Move protect soil quality to 3 (d).</b>
	<b>6(a)</b> - needs extra bullet <u>encourage the use of recycled construction materials.</u>	Consider that '... use of sustainable building materials...' in second sub-objective covers this point.

Consultee	Comments	Response
	<b>6(a) - presume 'limit water consumption.....systems' includes the objective of fitting water saving devices in all new homes and retro-fitting wherever possible.</b>	The sub-objectives are questions which will be asked about each option or policy being appraised, i.e. will the policy or proposal help to limit water consumption ...? The sustainability objectives are at a higher level. The comment is a specific potential method of limiting water consumption, and not appropriate for the framework. However, the comment will be considered when policies are being developed on this matter.
	<b>6(a) - needs commitment to <u>encourage rainwater storage and greywater recycling wherever possible.</u></b>	See above
	Appendix 1 Key Sustainability Issues 3(d) water supply - section focuses on the wrong issues.	Water supply is covered in section 6 (a ) of the Appendix.
	<b>Appendix 2 Review of Plans, etc</b> - this section is too heavily weighted to national and regional documents and government policy. Concerned this will mean that the review does not focus on the real needs of the district.	Noted
	<b>Appendix 3 Baseline Data</b> - very difficult to follow in places. Does not appear to be formatted properly. Would appreciate a properly formatted version.	Noted
<b>Herts County Council Archaeology</b>	<b>p7</b> - Core Strategy should include Council's approach to historic environment conservation.	Those areas mentioned in this paragraph, such as nature conservation, are not all the areas to be addressed in the Core Strategy. They are only examples. Will re-consider this comment when the Core Strategy is being produced.

Consultee	Comments	Response
	p8 - Would be useful to include historic landscapes to plug the gap between towns and the rural settlements	The Scoping Report is simply re-iterating the objectives of the Council's Corporate Plan and Community Strategy. Not possible for the Scoping Report to amend these objectives as they are adopted in other Council documents.
	p18 - Should be remembered that many brownfield sites have potential for significant archaeological remains (high environmental value).	Noted
	p19 - Support inclusion of SA objective 3 under Environmental Protection and 2 sub objectives.	Noted
	SA objective 3(c) and 2 sub objectives - should be included as key sustainability issues. PPGs 16 & 15 should lead the Council to include protection, conservation and enhancement of the historic environment as key objectives in Sas and SEAs.	Conserving and enhancing the built environment is included as a sustainability objective. However, whilst important, do not consider it to be one of the key sustainability issues in the District.
	p15/16 Appendix 2 - strongly agree with statements relating to protecting or enhancing historic environment.	Noted
Codicote Parish Council	p1, para 4 - Agree with main sustainability issues. Please be aware of the Codicote Action Plan.	Noted
	p17, para 3 - Sub-objective may be <u>to research into use of the car.</u>	Sub objectives are questions which will be asked about each option or policy being appraised, e.g. will the policy or proposal help to .... Not considered appropriate that research into the use of the car should be a sub-objective.
	p21, Appendix 2(a) - Parish Council works to avoid the use of greenfield areas for building upon.	Noted

Consultee	Comments	Response
<b>Environment Agency</b>	<b>Flood Risk</b> - PPG25 requires that local planning authorities adopt a risk-based, sequential approach when making planning decisions. It requires a precautionary approach to ensure that any development is safe and not exposed unnecessarily to flooding. Guidance also requires that run-off from development should not increase flood risk elsewhere in the catchment and development must not constrain the natural function of the floodplain, either by impeding flood flow or reducing storage capacity. New development should therefore be located in zones of little or no flood risk wherever possible.	The comments relate to some of the strategic options for the forthcoming Local Development Documents (LDD). The comments will be considered and commented upon when the full Options document is produced later this year.
	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.	<b>Scope Water Framework Directive but other documents considered too specific and detailed to scope.</b>
	<b>Biodiversity</b> - Document needs to assess implications of Water Framework directive.	<b>Scope Water Framework Directive.</b>
	Impacts of the management of recreation and access on natural environment need to be assessed as part of the appraisal.	The comments relate to some of the strategic options for the forthcoming Local Development Documents (LDD). The comments will be considered and commented upon when the full Options document is produced later this year.
	Document should also identify if the plan will enhance and restore natural environment, habitats and species. This goes beyond protection of these features and LDF should recognise this as one of its key roles.	As above
	<b>Environmental Protection - Land Use and Development patterns</b> should read <u>Aim to reduce quantity of unremediated contaminated land</u>	<b>Add extra sub-objective under 2 (a) 'Reduce quantity of unremediated contaminated land'.</b>

Consultee	Comments	Response
	<b>Environmental Protection</b> - should read: Avoid detriment to existing water uses	Considered to be covered in 3 (d)
	Avoid increased risk of harm to the environment	This is very general comment and is covered in a number of objectives in the framework.
	<b>Climate Change</b> - should read: Encourage reduced risk of environmental emissions as a result of improved infrastructure design.	Considered to be covered in objectives 4 (a) and 6 (a).
	Advice was also provided on watercourses, flood risk assessments and SUDs and environmental protection.	Comments not specifically related to SA/SEA Scoping Report but noted for future reference.
<b>HCC Passenger Transport Unit</b>	<b>Strategic Options for the LDDs - Housing</b> - access by all modes of transport needs to be considered in early stages of development. NHDC should encourage potential developers to discuss passenger transport issues with PTU in early stages.	The comments relate to some of the strategic options for the forthcoming Local Development Documents (LDD). The comments will be considered and commented upon when the full Options document is produced later this year.
	<b>Employment - Reduction car bourne commuting</b> - Support in principle. Transport implications of development should be addressed early in process.	As above
	<b>Transport</b> - support <b>(d)</b> - could read <u>Make new large employers prepare Green Travel Plans and encourage smaller employers to consider preparing Green Travel Plans.</u>	As above
	<b>Developing Objectives for Appraising the North Hertfordshire LDF Town Centres p20</b> - should also include <u>encouraging all modes of transport, especially walking/cycling and passenger transport.</u>	This issue is dealt with under Objective 2 (c) and is not specific to town centres.

<b>Consultee</b>	<b>Comments</b>	<b>Response</b>
	<b>Appendix 1 Key Sustainability Issues Land Use &amp; Development Patterns</b> - PTU generally agree with statement "The high levels of journeys and complex settlement pattern mean that it is difficult to maintain a commercially viable passenger transport for journeys other than to London.	Noted
	<b>Climate Change (p23)</b> - comment that there is high use for the school run.	Noted
	Comments on some of the documents scoped in Appendix 2	Noted
<b>Kimpton Parish Council</b>	Generally support the document.	Noted
	Kimpton is mentioned as area that could have some development. Assume this is the Lloyd Way development and not something new?	The comments relate to some of the strategic options for the forthcoming Local Development Documents (LDD). The comments will be considered and commented upon when the full Options document is produced later this year.
	Certain conditions for development, i.e. residents' needs, facilities are mentioned, but does not mention services or surrounding infrastructure.	As above
	Public transport is covered and need to reduce personal transport. How is this to be achieved?	As above
	How does LDF fit with current planning applications.	As above
<b>Herts Fire &amp; Rescue (Stevenage, North Herts &amp; Welwyn District)</b>	Generally support the document.	Noted
<b>London Luton Airport Ltd</b>	Welcome the approach. Request to be given opportunity to take part in early consultation.	Noted

Consultee	Comments	Response
<b>East of England Regional Assembly</b>	Generally support the document. Could say more about hierarchy of plans and assessments/appraisals and what this means for the LDD and the SA/SEA, specifically that issues which have been assessed and approved higher up the hierarchy are taken as 'givens'.	<b>Amend to state more clearly in the introduction, where the LDD and SA/SEA sits in the hierarchy of plans.</b>
<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>	<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, amend 2 (b) by adding extra sub objective stating: 'maintain/improve the public right of way network'.</b>
	<b>2(b)</b> - Rights of Way unit could provide figures on the number of county wildlife sites, nature reserves, etc in North Herts.	Noted, will investigate these sources of data.
	Believe NHDC could help to fulfil their objectives towards sustainability by:	
	a) dedicating new public Rights of Way on their land across the District	Noted
	b) using powers under the Town & County Planning Act 1990 and Highways Act 1980 to best effect to increase access to non road networks.	Noted
	c) Promote access to the rights of way network, green spaces, wild spaces, etc.	Noted

<b>Consultee</b>	<b>Comments</b>	<b>Response</b>
<b>Hertfordshire Constabulary</b>	Important to include crime and disorder as one of the major influences when examining the term sustainability. All future Supplementary Planning documents should clearly include reference to NHDC's commitment to producing developments with community safety and crime and disorder prevention techniques addressed.	Objective 5(e) is to Reduce crime rates and fear of crime
	ODPM document ' <i>Safer Places-The Planning System and Crime Prevention</i> ' establishes all planning applications should demonstrate how crime prevention measures have been considered.	Comments not specifically related to SA/SEA Scoping Report but noted for future reference.
<b>Forestry Commission</b>	Following issues key to address in LDF:	
	- Reflect emerging Policy ENV4 of Regional Spatial Strategy 14.	Comments not specifically related to SA/SEA Scoping Report but noted for future reference.
	- Green infrastructure should be given equal weight/billing with other infrastructure needed to develop expanding & new sustainable communities.	As above
	- LDF should adopt standards for the targets for provision of green space for planned, urban extensions to meet English Nature's Accessible Natural Greenspace Standard and the Woodland Trust Woodland Access Standard.	As above
	- Ensure renewable energy policies include energy crops, wood from existing woodland, sawmill co-products and waste wood.	As above
	- Produce opportunity maps as means determining extent to which woodland could contribute to sustainable flood control.	As above
	- Highlight role of woodland in on-site containment for some contaminants on brownfield land RSS 14 Policy ENV4: woodlands.	As above
	- Policies in LDDs should require proposals for any woodland creation as a requirement of planning permission to accord with standards advised by the Forestry Commission.	As above

Consultee	Comments	Response
	<p>- Ancient semi-natural woodlands and other woodlands of acknowledged national, regional and local importance will be strongly protected, and there will be a general presumption against the conversion of any woodland to other land uses unless there are overriding public benefits. Woodland unavoidably lost to development should be replaced with new woodland of at least equivalent area and composition, preferably in the same landscape unit.</p>	As above
	<p>- LDDs will set targets to meet Woodland Trust Woodland Access Standard for the provision of wooded green space. Specifically woodland creation should be targeted on:</p> <p>(a) restored derelict, contaminated and former mineral or industrial land;</p>	As above
	<p>(b) expanding or new communities;</p>	As above
	<p>(c) urban areas and areas within 8 kilometres of urban areas with populations of more than 100,000;</p>	As above
	<p>(d) Social Regeneration Priority Areas;</p>	As above
	<p>(e) the Thames Chase, Watling Chase and Forest of Marston Vale Community Forests;</p>	As above
	<p>(f) The Green Arc - a broad arc around London in Essex and Hertfordshire transport corridors;</p>	As above
	<p>(g) to address biodiversity action plan targets identified in Policy ENV3</p>	As above

**Core Strategy and Development Control Policies Issues and Options (2005) SA consultation comments and how they were addressed**

<b>Consultee/comments</b>	<b>Response</b>
<p><b><u>Environment Agency</u></b>            Under the list of objectives which the policy papers are to be assessed against there is no mention of flood risk and a key objective of the sustainability appraisal should be "the reduction of flood risk".            Would welcome the inclusion of this in the SA document. It is recommended that the Council undertakes a strategic flood risk assessment (SFRA) as part of the sustainability appraisal.</p>	<p>"Avoid development in areas at risk from flooding" is included as a sub-objective in the SA Framework. A SFRA will be undertaken and referenced where relevant in land allocation SAs.</p>
<p><b><u>Hertfordshire County Council</u></b>            The Options paper appears to seek views on the appropriate approach to be adopted in the LDD in the event that the urban extensions at Stevenage within North Hertfordshire do not feature within the ultimately approved RSS, but that the overall dwelling total currently proposed broadly stays the same. Under these circumstances, the County Council considers that all the possible options raised in the Options Paper would need to be subject to detailed sustainability appraisal / Strategic Environmental Assessment processes.</p>	<p>Strategic site options, including urban extensions at Stevenage will be appraised at later stages of the options development process.</p>
<p><b><u>Moore</u></b>            The emphasis for Sustainability Appraisals should be to "minimise the development of all land with high environmental and amenity value", however, if there is a need to develop some greenfield land during the plan period to 2021, then only greenfield land which doesn't have a high environmental or high amenity value should be considered            This will also impact upon sustainable location patterns with the aim "to reduce the use of motor vehicles". Clearly there is a need to "increase access to decent and affordable housing", particularly for younger people in all settlements but with the highest possible emphasis on decent housing. Finally, the absolute priority should be to "use natural resources efficiently" particularly land.</p>	<p>Noted – these issues will be considered when appraising specific sites.</p>

Consultee/comments	Response
<p><b><u>Hertfordshire Gardens Trust</u></b>            Although agreeing in principle that development of brownfield sites should be encouraged, it is suggested that parks and gardens should not be developed preferentially but be considered as "land with high environmental and amenity value" (NHDC Sustainability Appraisal)</p>	<p>The specific value of parks and gardens will be taken into account when appraising individual sites.</p>

***Core Strategy and Development Control Policies DPD Preferred Options (2007) SA consultation comments and how they were addressed***

Consultee/comments	Response
<p><b><u>English Heritage</u></b>            The SEA report is rather unspecific in relation to the historic environment. Much more could be made of existing data sources, including data on grade II Buildings at Risk. Soft data on the historic environment, relating to the wider historic character of the settlements and landscape, could also be included. It may be that the rather thin coverage of the historic environment has led to the judgements on impacts being identified as uncertain.</p> <p>Given the importance of the historic environment in the district we consider it essential that potential impacts are identified as a key issue. The analysis of housing locations [pages 23 – 25], for instance, does not identify the historic environment among the considerations, or to the need for detailed research on the historic environment. At present recommendations for further work relate only to landscape, biodiversity and water. The Area Action Plans and Site Specific Allocation DPDs SEA/SA reports will also need to pay particular attention to the historic environment.</p>	<p>See Land Allocations DPD Scoping Report comments below.</p>
<p><b><u>Natural England</u></b>  <u>Sustainability Appraisal (SA) Comments</u>            Overall Natural England considers the SA to a very positive contribution to the</p>	<p>Noted – these issues will be considered in policy development. A Habitats Regulation screening determination will be undertaken.</p>

Consultee/comments	Response
<p>development of the plan documents. Appropriate methodologies and legislative requirements have been adhered to, and the SA is presented in an easy to follow way. Assessment work undertaken thus far is very detailed and includes important elements to be taken forward to the submission draft of the plan documents.</p> <p><u>Links to other policies, plans and programmes</u></p> <p>The consideration of other policies, plans and programmes, set out within Appendix 1 of the SA, incorporates a wide range of policies, plans and programmes and gives comprehensive coverage of the key elements of each. In most areas it is clear that the wider plans, policies and programmes have been taken into account in the development of the documents. This includes adherence to key aspects of the regional plan in relation to issues such as sustainable transport and improvements to public transport, the management strategy for the Chilterns AONB, the Hertfordshire guide to promoting sustainability in development, and importantly the Community Strategy for North Hertfordshire.</p> <p>Natural England notes a few areas where the review of a particular policy, plan or programme is not fully taken forward into the development plan documents at their current stage. These include:</p> <ul style="list-style-type: none"> <li>• EU Water Framework Directive – there is a need to consider the impacts on the natural environment from inadequate sewage treatment, relevant to development policy 9.</li> <li>• Working with the Grain of Nature, a Biodiversity Strategy for England – recognition of urban contribution to biodiversity and the need to protect species and habitats of biodiversity importance outside designated sites. This is relevant to suggested amendments to development policies 2 and 5.</li> <li>• Planning Policy Statement 25, Development and Flood Risk – this guidance could be more closely reflected in the emerging documents, particularly in terms of the need to take a long term approach to planning for climate change, and the focus on flood management rather than hard flood defences. The PPS also advises on the issue of safeguarding undeveloped land that can be used for flood management and flood water storage. This can also have a number of positive benefits for biodiversity.</li> </ul>	

Consultee/comments	Response
<ul style="list-style-type: none"> <li>• Local Biodiversity Action Plan – this is a key area for target setting and monitoring the achievement of the plans. Natural England would expect to see targets linked to the local biodiversity action plan as part of the monitoring proposals, as stated in comments above. There may also be further opportunities for direct reference to local biodiversity targets within the plan documents as they develop.</li> <li>• Various national documents on climate change – There is the opportunity to give greater regard to climate change throughout the plan documents, and Natural England would particularly welcome more specific policy reference and dedicated climate change policies.</li> </ul> <p><u>Baseline Review</u></p> <p>The review of the natural environment baseline is comprehensive and gives some important baseline information. The local biodiversity action plan is highlighted, and its future potential as a source of targets and monitoring information is very positive. Natural England would expect the LDF to assist with the achievement of targets and provision of monitoring information wherever possible. The habitat coverage data, and information on SSSI condition also provides useful contextual information. Baseline information of river quality highlights an area that could be included in LDF monitoring.</p> <p>It is appreciated that landscape assessments have recently been undertaken and it is therefore hoped that the baseline information on landscape character can be embellished with this more recent survey work.</p> <p><u>Appraisal of Options and Consideration of SA Objectives</u></p> <p>The appraisal of options and consideration of SA objectives are very thorough, and it is clear that this has contributed to a number of positive changes as the plan has developed to preferred options stage. Natural England hopes that this detailed approach and incorporation of SA findings will continue from the assessment of preferred options as the plan documents develop further and policies are refined.</p> <p><u>Habitats Regulations Assessment</u></p> <p>Natural England would like to take this opportunity to remind North Hertfordshire district</p>	

<b>Consultee/comments</b>	<b>Response</b>
<p>Council of the need to undertake a Habitats Regulations Assessment of the emerging plan documents. Natural England hopes that this can be discussed as the earliest opportunity.</p> <p>Until recently, the consideration of the effects of spatial and land use plans was not considered a requirement of the Habitats Directive. A judgment of the European Court of Justice now requires the UK to implement the requirements of Article 6(3) and (4) of the Directive fully, including the consideration of the potential effects of spatial and land use plans on European sites. The Habitats Regulations, which transpose the requirements of the European Habitats Directive into UK law, have now been amended to make clear the process for considering regional and local spatial and land use plans in terms of their potential impacts upon European sites in order to ensure that they will not have, or lead to an adverse effect on any European site.</p> <p>It is important to note that a plan can impact on sites both within and outside its spatial remit. In the case of local development frameworks, the assessment should consider impacts upon sites that may be outside the administrative boundary of the borough or district as well as any that may be within.</p> <p>It is necessary for all documents within the North Hertfordshire LDF to be assessed under the provisions of the amended Habitats Regulations. Natural England strongly advises that this process is commenced at the earliest opportunity in the development of a new plan. In the same way that a SA informs the development of a plan, the Habitats Regulations Assessment should progress alongside the plan, influencing the choices made in terms of potential options. The assessment ensures that potentially damaging options are amended, modified, or not perused further. In some cases it is clear that a plan will not result in adverse effects, but it is still considered best practice to make a full record of the assessment and justify any conclusions drawn.</p>	

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

<b>Consultee/comments made</b>	<b>Response</b>	<b>How the comments were addressed in subsequent reports</b>
<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>	Agreed. CFMP not available for Anglian Region.	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.
<b>Natural England</b>		
The Hertfordshire BAP has recently been revised, such that the scoping report should refer to the most recent revision by the Biodiversity Partnership of March 2006.	The review includes the North Hertfordshire BAP rather than the County one.	None necessary
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.	Noted	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 .
In our opinion, landscape character should be identified as a sustainability issue in the scoping report. Whilst we accept that the general locations for development have been identified through the Core Strategy, issues of landscape are considered to remain at the site allocations level.	Landscape issues have been included in the appraisal matrix and therefore in the appraisal of individual sites. In addition, the list of significant sustainability issues notes	No changes made

Consultee/comments made	Response	How the comments were addressed in subsequent reports
	the pressure on the District's environment (which includes its landscape) from housing and airport expansion.	
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.	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.	The historic environment has been included in the list of key sustainability issues in Appendix 2.
<b>English Heritage</b>		
<p>The baseline review in Appendix 2, however, is extremely thin. There is substantial existing information that could be included from the County Historic Environment Record. For instance, the Extensive Urban Survey Reports relating to Hitchin, Baldock, Royston, and Ashwell should be referred to. The county of Hertfordshire has a complete Historic Landscape Character GIS database which could be used to evaluate historic sensitivity of different areas. If there are conservation area appraisals, issues arising from these would helpfully inform the identification of current threats and trends. Commentary is needed, as well as numerical data, since the latter cannot capture the qualitative aspects of the historic environment.</p> <p>The use of listed buildings at risk as an indicator is a very narrow proxy, and should be expanded to include grade II listed buildings which are far more representative of the North Hertfordshire towns, villages and rural landscape. English Heritage has recently developed data on Scheduled Monuments at Risk which will be available through the County Historic Environment Record Centre. Other data could be gathered and indicators developed covering, for instance, planning applications that affect historic sites, and peoples' perception of their surroundings through survey information.</p> <p>There are some very significant developments coming forward in North Hertfordshire, in particular, the major urban extension to the west of Stevenage. The LDF, whether through the site allocations DPD or an Area Action Plan, will need to ensure that thorough appraisal of the historic buildings, landscape and archaeological issues is undertaken in the west of Stevenage and other areas of potential development. The environmental baseline in the SA will be a key part of the evidence base.</p>	<p>The importance of identifying specific threats to the historic environment as a result of development is agreed. However, it is considered that this is best done as part of the testing process, rather than in the baseline data.</p> <p>The comments on the specific indicators in the baseline data are noted. It has not been possible with the resources available to update the baseline data as part of this appraisal, but a full update will be undertaken prior to the Submission version of the Core Strategy/</p>	<p>Extensive information on the historic environment has been used in the appraisal of the sites identified . A GIS database has been used to identify all relevant sites and designations which are on or close to the sites in the DPD, as described in table 5. This covers Historic Parks and Gardens, Conservation Areas, Areas of Archaeological Significance and other archaeological areas, ancient monuments and listed buildings.</p>

<b>Consultee/comments made</b>	<b>Response</b>	<b>How the comments were addressed in subsequent reports</b>
	Development Policies.	
<b>Appraisal Framework</b>		
<b>Environment Agency</b>		
Section 2 needs to refer to water supply and sewerage infrastructure	The framework aims to avoid repetition where possible. These issues are already addressed in section 6 and it is not considered necessary to repeat them in section 2.	No changes made
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 framework
We suggest an additional sub-objective 3(d) ensure evidence of available water services infrastructure capacity (water resources, sewerage infrastructure) is provided for proposed developments before developments and their locations are approved.	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 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.	Full Rye Meads Water Cycle Strategy not currently available. 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	Included in section 6 of the 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	It is agreed that these are	Sub-objective on SUDS included

<b>Consultee/comments made</b>	<b>Response</b>	<b>How the comments were addressed in subsequent reports</b>
<p>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.</p>	<p>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).</p>	<p>in section 4 of the Framework.</p>

***Land Allocations Issues and Options SA Report (2008) consultation comments and how they were addressed***

<b>Consultee/comments made</b>	<b>Response</b>	<b>How the comments were addressed in subsequent reports</b>
<b>Stakeholders meeting 19/3/08</b>		
A number of suggestions were made for cumulative effects		Additional cumulative effects have been included in table 14.
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 will be included in the proposed submission local plan.
Measures to avoid pollution of groundwater need to be taken on all sites, not just those in Groundwater Protection Zones.	Agreed	Included in commentary in summary of impacts tables
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 summary of impacts tables
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 provided will be included in preferred options report
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 commentary in summary of impacts tables Site specific information provided will be included in preferred options report
<b>Comments on Draft Report</b>		
<b>English Heritage</b>		
we note that the baseline review in Appendix 2 has not been altered despite the comments we made in our letter on the Scoping Report dated 30 November 2007. The baseline review needs to establish the general issues and challenges facing the	See Scoping Report response above.	See Scoping Report response

Consultee/comments made	Response	How the comments were addressed in subsequent reports
<p>districts historic environment, which can then form the context for individual site allocation. We agree with the response made on pages 19-20 of the SA Report that testing process is the best way to identify specific threats to individual heritage features, but maintain that the baseline review needs to establish the context.</p> <p>As stated in our previous letter, there is substantial existing information that could be included within the baseline review from the County Historic Environment Record. For instance, the Extensive Urban Survey Reports relating to Hitchin, Baldock, Royston, and Ashwell should be referred to. The county of Hertfordshire has a complete Historic Landscape Character GIS database which could be used to evaluate historic sensitivity of different areas. If there are conservation area appraisals, issues arising from these would helpfully inform the identification of current threats and trends. Commentary is needed, as well as numerical data, since the latter cannot capture the qualitative aspects of the historic environment. We would be happy to discuss how the baseline could be strengthened if that would be helpful.</p> <p>We acknowledge the response made on page 20 regarding indicators and look forward to seeing how this work develops. We would be prepared to offer assistance on this work if required.</p>		
<p>The Site Options Appraisal outlined in Section 3 and Appendix 3 appears to be generally thorough with regards to the historic environment. Tables 11 (Mixed Use) and 12 (Greenfield Residential) on pages 35-38 only refer to archaeological sites and do not mention the other affected historic features including listed buildings, conservation areas and historic parks/gardens. Table 13 (Brownfield Residential) on pages 38-40 fails to mention listed buildings and historic parks/gardens. We would like to see the inclusion of a cumulative effect assessment relating to the historic environment in Table 14 on pages 40-41, such as the cumulative effect of development on the quality of a conservation area.</p>	<p>Point about the need to consider the cumulative impact on the historic environment is accepted.</p>	<p>Impact on historic environment is now covered in cumulative impact assessment.</p>
<p>The Site Appraisal Matrices in Appendix 4 appear to be generally thorough with regards to the historic environment and appear to have correctly identified possible negative impacts in various cases. The proposed mitigation measure to ensure that development does not impact on a specific historic feature is useful and needs to be applied to all of the sites where historic features have been identified. In terms of proposed mitigation with regards to archaeological remains, particularly scheduled ancient monuments (SAMs), an archaeological survey (such as that proposed for site</p>	<p>NHDC is developing a Conservation Strategy, which will be available as part of the evidence base of the Submission Core Strategy. Site profiles developed as part of the evidence base for the DPD</p>	<p>Site specific appraisal addresses this issue.</p>

Consultee/comments made	Response	How the comments were addressed in subsequent reports
<p>B/o1) would not necessarily be appropriate or sufficient to mitigate development. PPG16 outlines the approaches that should be undertaken and in some cases with SAMs, no development may be the only approach.</p>	<p>include a risk based approach to the historic environment. Site B/o1 is provision for open space and an archaeological survey would provide appropriate information to ensure its protection.</p>	
<p><b>JB Planning Associates on behalf of Beechwood Homes Ltd</b>  We are unclear as to the framework and the mechanism by which the Green Belt review would occur. We are aware of course that the Sustainability Appraisal sets out a list of criteria by which sites have been assessed to date, but the relative merits of sites in terms of their contribution to the Green Belt is not part of that assessment process. At the moment, there does not appear to be any link between the review of the Green Belt and the site assessment process.</p>	<p>Not relevant to the SA process</p>	<p>None needed</p>
<p><b>MGA Town Planning &amp; Development Consultants on behalf of Highfields Land Trust:</b> Land North of Lindsay Close, Royston</p> <p>The Trust concur with the conclusions set out in the testing matrix relating to the site reference R/r11, as indicated on pages 484 and 485 of the report prepared by CAG Consultants. While the site may comprise grade 2 agricultural land, its agricultural value and potential is restricted by the limited acreage and adjacent proximity with residential properties to the south.</p>	<p>Noted</p>	<p>Comment will be included in relevant appraisal matrix in proposed submission</p>
<p><b>RPS Planning on behalf of Fairview New Homes Ltd Sites</b> R/r03, R/r04 and R/r19  With regards to sustainability, we note that within the Sustainability Appraisal, the summary for each site concludes that the strengths of each site are the possibility of providing affordable housing and also a residential development within an area of close proximity to a school, surgery, supermarket and a frequent bus route.</p> <p>Whilst our client would support all of these factors, Fairview object to the weaknesses identified by the Sustainability Appraisal in respect of each site, being: the land itself (Grade II Agricultural Land); the proximity to the train station; and, the potential noise</p>	<p>Comments are noted on agricultural use, bus route, mitigation options for noise.</p>	<p>Comments on sites R/ro3 (and R/r19 will be addressed in relevant appraisal matrices and summaries as will Site R/r04.</p>

<b>Consultee/comments made</b>	<b>Response</b>	<b>How the comments were addressed in subsequent reports</b>
<p>contributed by the A505, for the following reasons.</p> <p>With regards to the land being identified as Grade II Agricultural Land, it should be noted that the sites are not used for agricultural purposes and will not likely to come forward for agricultural use in the future. Furthermore, it is also considered by the existing built environment (i.e residential development and infrastructure), resulting in the fragmentation and creation of irregular site areas, which creates access difficulties for agricultural vehicles to perform a function.</p> <p>Although the sites are not within 800m of a train station, as preferred by the Sustainability Appraisal, a frequent bus route is within walking distance of each site, providing services to and from the train station, as well as providing access to local amenities, addressed earlier under this cover.</p> <p>It is also considered that although there could be a potential noise issue, generated by the A505, the provision of adequate mitigation across the sites through the use of noise and landscaping buffering and noise attenuation measures, would significantly minimise any noise affecting the sites from the A505, and would not cause any adverse impact towards the future residents on the sites.</p> <p>To better understand the impacts generated by noise, we appointed an acoustic consultant to conduct a site assessment, who has concluded that the railway line produces minimal noise levels categorised within the NEC A contour, whilst the boundaries adjacent the A505 are within a NEC C contour. However, as previously stated, these constraints can be mitigated through the appropriate measures, such that would provide adequate attenuation to noise intrusion, together with a suitable acoustic buffering around the boundary adjacent to the A505.</p> <p>Given the reasons above, Fairview consider that the suggested weaknesses in the Sustainability Appraisal would not prevent the sites being developed for much needed housing and nor do they outweigh the identified benefits that could be delivered through detailed application.</p>		
<p><b>Palmer</b></p> <p>1. It states that an objective is to "minimise the development of greenfield land..." I object to the use of the word "minimise" - its not quantified, too loose and open to</p>	<p>Points are noted, but the purpose of the SA is to consider the impact of</p>	<p>These issues are addressed by the appraisal framework.</p>

Consultee/comments made	Response	How the comments were addressed in subsequent reports
<p>different interpretations. Objective must state: There will be no development of greenfield land. Use brownfield sites (this does not include gardens) only.</p> <p>2. Table 12 Residential Greenfield Sites: a significant number are high quality agricultural land. Britain cannot produce enough food to feed its population. Wheat prices are now more than double what they were a short while ago. The world, we are told, faces a very serious food shortage. China and India have suddenly become major importers of wheat. The soaring demand for biofuels has contributed to the increase in the price of cereals. it is therefore insane to build on farm land. I object extremely strongly to any building on agricultural land.</p> <p>3. For our sake NHDC must "protect the existing natural environment..." Protect means: "shield from danger, injury, change or loss". Talk of "minimise" or mitigation therefore goes against NHDC's objectives/strategy/whatever of protecting the existing natural environment.</p> <p>4. securing the Future - UK Government Sustainable Development Strategy March 2005 "Living within Environmental Limits: Respecting the limits of the planets environment, resources and biodiversity - to improve our environment and ensure that the natural resources needed for life are unimpaired and remain so for future generations". One 'natural resource needed for life' is soil to grow our food. NHDC must therefore not build on agricultural land. If the government ignores it's own strategy and insists that 10's of thousands of houses are built in Herts, the Council's have every right to tell the government where to stick its plans/proposals.</p>	<p>proposals on a range of objectives. No development on greenfield land or agricultural land would mean that the Council could not meet its objectives to provide affordable housing for local residents.</p>	
<p><b>Buchanan &amp; Yuille on behalf of Graham</b> (The SA) identifies some weaknesses of the site WH/r1 on page 42 of Appendix 3. With regard to the issue of commuting and pressure on the local road networks, the proposals for the development of this site will include live/work dwellings intended to minimise additional car usage in the village. The proposed development of this site is not a large scale development, but development proportionate to the size of the village. There would be no loss of informal or formal recreation area, as this site is not accessible by the general public at present as it is not crossed by any public rights of</p>	<p>It is accepted that there are no public rights of way across the site, and there would be no loss of a recreation area as it is not accessible to the public. The comments on providing live/work spaces, respecting local</p>	<p>Site matrix on access to green space and landscape impacts has been changed. Other comments have been included as potential mitigation.</p>

Consultee/comments made	Response	How the comments were addressed in subsequent reports
<p>way. Any development of the site would be similar to recent developments in the village and care would be taken to ensure the design of the houses would respect local distinctiveness and enhance the conservation area. As already indicated, this site is not agricultural land. As regards the observation that the landscape character includes a steep sided valley, adjacent land in the valley has already been developed showing what is possible. The scale of any development on this site would not be so large as to have an impact on the rural nature of the village.</p>	<p>distinctiveness and enhancing the conservation area are noted. The role of the SA is to identify potential impacts and all these points are ways of mitigating impacts. However, even with the live/work spaces, development is likely to result in additional car usage. It is accepted that a development of this scale is likely to be appropriate to the nature of the village.</p>	
<p><b>Natural England</b></p>		
<p>Natural England have considered the findings of the SA / SEA appraisal process and have given particular attention to the likely effects of the current allocations on biodiversity and nature conservation, as well as effects on landscape, access, and recreation. We are pleased to see that our previous comments at the SA / SEA scoping stage have been considered, however we would remind the Council that documents listed under the baseline review does include the County Biodiversity Action Plan, as well as the North Hertfordshire BAP. This document, listed as 'A 50 Year Vision for the Wildlife and Natural Habitats of Hertfordshire: BAP (1998)' has been updated such that the documents reviewed in section 2 should refer to the most recent revision by the Biodiversity Partnership of March 2006.</p>	<p>Point noted</p>	<p>List of programmes, plans and policies has been updated.</p>
<p><i>Biodiversity</i></p> <p>We are satisfied that the Sustainability Appraisal objectives used in the Appraisal Framework appropriately reflect the issues of biodiversity, landscape, access and recreation, and reiterate our support of the inclusion of SA Objective 4 related to climate change. We also note SA Objective 2(a) to 'minimise the development of greenfield land' and the SA Sub Objective relating to brownfield land, and would add that some brownfield sites support significant biodiversity and may be of high nature</p>	<p>The point about biodiversity on brownfield sites is accepted.</p>	<p>Appraisal summaries note this point under the general comments at the beginning. Also dealt with in individual site appraisals where relevant.</p>

<b>Consultee/comments made</b>	<b>Response</b>	<b>How the comments were addressed in subsequent reports</b>
<p>conservation value, and should therefore be conserved where possible. The presumption for development on brownfield rather than greenfield land should therefore be approached with some caution.</p>		
<p>Without wishing to repeat site specific comments made via the consultation website, we highlight a number of allocations which overlap with County Wildlife Sites. This appears to have been overlooked in the Site Options Appraisal, which advises that none of the allocated sites are designated wildlife sites. The sites of concern include H/o2, H/r33, H/e02, and R/r19. Out records indicate that these sites are subject of local wildlife site designations, however the Council is referred to the Herts &amp; Middlesex Wildlife Trust, which may be able to offer additional information. We also highlight allocation NH112, which may result in adverse impacts on nearby Blagrove Common SSSI.</p>		<p>Matrices and summaries for site have been changed to reflect presence of County Wildlife Sites</p>
<p>We have not assessed the implications of the site allocations against potential landscape impacts, however it is considered appropriate to summarise some of Natural England's planning principles with respect to landscape. We would support a policy of urban concentration, with the proviso that sites within the urban areas were identified for development in a sensitive and logical manner, respecting both local character, biodiversity interest and the needs of the local community for access to greenspace. We are not in a position to advise on preferred locations for future housing growth that cannot be accommodated on previously developed land. However, we do advocate some general principles which should form the basis of good planning. We urge that decisions on the location and form of new development should be taken in the light of Landscape Character Assessment. A central theme of Natural England's approach to planning policy is that the character of all landscapes should be respected when considering development proposals. The character and diversity of the whole landscape is important in an increasingly standardised landscape. Retaining and enhancing countryside character is an important element of sustainable development, and understanding and acknowledging the diversity of character - its landscape, wildlife and natural features - is an essential part of all decisions that influence landscape change and the degree of protection that can be offered.</p> <p>While much of the additional greenfield development will take the form of market town and urban extensions, there may also be a need for some limited development at village locations to meet identified local requirements. We accept that many forms of</p>	<p>Information is noted, these issues are addressed in the Evidence Base for the DPD.</p>	<p>Considered in individual site appraisals.</p>

Consultee/comments made	Response	How the comments were addressed in subsequent reports
<p>development are important to the social and economic needs of a vibrant countryside. This should be based on an understanding of how settlements and groups of settlements in rural areas function, what their needs are, and what benefits development can bring. It is important to consider what development is needed to sustain the countryside as well as where it should go. One of our particular concerns is on the role of such development in enhancing the landscape through its design and setting and in improving access to the countryside. An important locational consideration is the requirement to reduce the need to travel and its associated issues, including climate change implications which in turn have serious implications for landscape.</p> <p>Good quality access to greenspace will become more important to urban people as brownfield sites are redeveloped. It will be important to be clear on the quantity and type of open space to be available and to be provided with new development. We would support approaches that encourage the protection and provision of 'natural' open space to meet the needs of a community for informal areas that everyone can use and enjoy. We advocate an approach which looks beyond any set quota as might be set for formal recreation/sports facilities and thinks more in terms of providing a coherent network of open spaces and greenways within a settlement to meet the community's needs for informal greenspace, which closely relates to the form, structure and character of a settlement within the broader landscape and provides safe access to the surrounding countryside.</p> <p>We promote the Accessible Natural Greenspace Standard (ANGSt) model that requires: that no person should live more than 300m from their nearest area of natural greenspace of at least 2ha in size;  provision of at least 1ha of Local Nature Reserve per 1,000 population;  that there should be at least one accessible 20ha site within 2km from home;  that there should be one accessible 100ha site within 5km;  that there should be one accessible 500ha site within 10km.</p> <p>DPD policies should seek to protect and enhance the network of footpaths, bridleways, cycleways and National Trails. These should be protected from obstructive development and non-compatible neighbouring uses. New development must provide for the diversion of existing rights of way where necessary and should be expected to contribute to the improvement of the condition and extension of the network wherever appropriate. Every effort should be made to integrate access from and to new development with the rights of way network and with public transport and to identify the potential for new and improved multi-access recreational routes in the countryside.</p>		

***Land Allocations Additional Suggested Sites SA Report (2009) consultation comments and how they were addressed***

<b>Consultee/comments made</b>	<b>Response</b>	<b>How the comments were addressed in subsequent reports</b>
English Heritage		
<p>As with last year's Issues and Options document, the historic environment is generally well addressed by the current consultation document and supporting Sustainability Appraisal. We welcome the identification of historic environment features in the SA summary, although on occasion the summaries do not pick up on conservation areas (e.g. Sites 20 and 23), scheduled monuments or park &amp; gardens (e.g. Site 19). It would be helpful if the identified features were shown on the accompanying maps. As with last year's document, we have not been able to assess each site in great detail. Our comments on specific sites have been based mainly on desk-top analysis and we have not been able to judge the potential impacts more accurately on the ground. We have focussed on those sites with the potential for the greatest historic environment impact. This does not mean there are no issues with any other site and we reserve the right to comment further on any site as and when proposals develop. Notwithstanding this, the comments made in this letter should be taken in consideration when reviewing the Land Allocations document.</p>	<p>Site comments noted. The issue of showing features on the maps has been considered. Although this would be useful, if constraints are included on the maps it would take the focus away from the site in question and cause confusion.</p>	<p>Comments noted.</p>
<p>Table 8 and Appendix 1. The European Landscape Convention and the government's Heritage White Paper should be shown PPG15s and 16 were published in 1990 and 1994 respectively. The draft PPS15 is now available and should be considered by the SA.</p>	<p>The review of programmes, plans and policies has been updated to reflect changes in national policy</p>	<p>Appendix 1 has been updated appropriately.</p>
<p>Table 13: It is concerning that the historic environment is not mentioned in the review of cumulative effects, given the large number of proposed sites that contain or adjoin historic features in any one location (e.g. Preston or St Ippolyts). The cumulative impact of all of these sites being developed could be highly significant.</p>	<p>Point accepted</p>	<p>Addressed in cumulative impact tables where relevant</p>

Consultee/comments made	Response	How the comments were addressed in subsequent reports
<p>Appendix 2: For a similar reason to Table 13, it is concerning that the historic environment is not shown as a Key Sustainability Issue (SA Objective 3c), particularly when biodiversity and landscape issues are included.</p>	<p>The historic environment was included as a key sustainability issue in the 2008 Issues and Options Report, and was excluded in error from the 2009 report.</p>	<p>The historic environment has been included in the list in appendix 2.</p>
<p>As stated in our previous two letters, there is substantial existing information that could be included within the baseline review from the County Historic Environment Record. For instance, the Extensive Urban Survey Reports relating to Hitchin, Baldock, Royston, and Ashwell should be referred to. The county of Hertfordshire has a complete Historic Landscape Character GIS database which could be used to evaluate historic sensitivity of different areas. If there are conservation area appraisals, issues arising from these would helpfully inform the identification of current threats and trends. Although Building at Risk data is shown, this has now been expanded by English Heritage to include all designated features as part of the replacement 'Heritage at Risk' campaign. There is at least one registered park and garden in North Hertfordshire that is 'At Risk' (Putteridge Bury).</p>	<p>NHDC is developing a Conservation Strategy, which will be available as part of the evidence base of the Submission Core Strategy. Site profiles developed as part of the evidence base for the DPD include a risk based approach to the historic environment, and individual site profiles will include an assessment of development on the setting.</p>	<p>Issue is addressed in individual site appraisals.</p>

<b>Consultee/comments made</b>	<b>Response</b>	<b>How the comments were addressed in subsequent reports</b>
<p>Appendix 3  Sites that have been suggested as village boundary amendments appear to receive a detailed sustainability appraisal that is not reflected in the main consultation document. This reinforces our view that these sites will have development implications and need to be carefully considered.  A few of the site appraisals fail to mention historic environment issues, including Sites 13, 16, 23 and 104.  The appraisal for Site 28 suggests mitigation in the form of an archaeological survey, when a large part of the site includes a scheduled monument that should not be developed at all.  The appraisal should be suggesting that this part of the site be rejected for the scheduled monument issues alone. As a general observation, the suggested mitigation options throughout this appendix are very generalised and basic and do not appear to have been carefully thought through.</p>	<p>It is accepted that site 16 is the site of a scheduled ancient monument.</p>	<p>The matrices for and site summary includes reference to the scheduled ancient monument where relevant.</p>
<p><b>Environment Agency</b>  Overall we are happy with the scope of the sites chosen. There is however, a general lack of reference to environmental issues, specifically flood risk in the strengths and weaknesses derived from the summary of the Sustainability Appraisal for each site.</p>	<p>Comments on individual site summaries will be included in detailed site profiles at proposed submission stage.</p>	<p>Environmental issues are addressed in individual site appraisals</p>
<p><b>Hitchin Society:</b> objection against sites 37, 94 and 103 and the conclusions of the SA of these sites.</p>		<p>comments noted, sites form strategic site south west Hitchin, which has been assessed as a strategic option in this document.</p>
<p><b>Rogers: site 2</b>  This has an existing use as residential garden land and yet in the Council's Sustainability Appraisal summary documents is categorised as 'a Greenfield site and is Grade 2 or 3  Agricultural land, surrounded by established hedgerows. This is incorrect and misleading.</p>	<p>It is accepted that the site is not a greenfield site. Although it is recorded as grade 2 agriculture land, it is accepted that it is not</p>	<p>SA matrix has been amended to reflect current use.</p>

Consultee/comments made	Response	How the comments were addressed in subsequent reports
The site is on the border of an area of archaeological interest.	used for agriculture, though it is surrounded by established hedgerows. The fact that it borders an area of archaeological interest is already noted in the SA matrix.	
<b>Price:</b> objection against site 6 and comment on SA conclusions	Comments noted	
<b>McAlonan</b> objection against sites 9,10 and 11 and SA conclusions	Comments noted	
<b>Hitchin Forum</b> Objection to the inclusion of site 36 and the SA conclusions	Comments noted	
<b>Testa:</b> objection to site 64 and conclusions of the SA	Comments noted	Comments have been incorporated in SA matrix
<b>Parker Lane Developments;</b> site 98		
<i>Site location</i> The SA states that the site is located 'on the outskirts of village close to the town of Hitchin'. This is an inaccurate and misleading description of the site, as it is located immediately adjacent to the urban area of Hitchin, but is separated from the villages of Gosmore and St Ippollitts by a significant gap of around 500 ĳ 700m, consisting of several fields. A more accurate description would be to say that the site is located on the urban edge of Hitchin. The landscape evidence mentioned below reinforces this point.	It is agreed that the current description is inaccurate	SA matrix and summary changed to reflect this point
<i>Agricultural Land Quality</i> Indicator 2(a) of the SA states that the site is designated as Grade 3 agricultural land. Our Client has been in correspondence with Natural England, who have confirmed that the site is predominantly Grade 3b, with only a small area of Grade 3a at it south-eastern corner. PPS7 defines the 'best and most versatile' agricultural land as being Grades 1, 2 and 3a. Grade 3b is defined as 'poorer quality land', and little weight should be accorded to	Noted	SA matrix and summary changed to reflect this point.

Consultee/comments made	Response	How the comments were addressed in subsequent reports
its loss. Much of the Grade 3a land is likely to remain undeveloped, and will contain new structured landscaping..		
<p><i>Access to Green Space</i></p> <p>The SA table is inaccurate at criteria 2(b) in its assertion that the development of this site would reduce the amount of green space available for public access. There is no justification for this assumption, as the publically accessible open space to which the SA refers is to the immediate north of the site. This area is currently accessed from London Road and Larch Avenue, but not from the proposed development site itself. It is proposed to enhance and extend this space, adding a complimentary landscaped green space adjacent to it on the proposed development site.</p> <p>Any reference to reducing access to the County Wildlife Site is also inaccurate, as this area is not currently accessed through the London Road site. It is not intended to open up any new access to this area, in order to protect the nature conservation interests</p>	<p>The SA notes that this land is green space which is easily accessible to a large proportion of residents. In other words the site itself provides informal green space for local residents. There is no reference in the SA to providing access to the wildlife site. The proposal to add an additional greenspace is noted.</p>	<p>Provision of additional green space included as a potential mitigation option in the matrix.</p>
<p><i>Sustainable Travel</i></p> <p>We can confirm that our Client would look to enhance existing footpaths and also to encourage and promote sustainable transport initiatives through this development.</p>	<p>Noted.</p>	<p>Already included as mitigation options.</p>
<p><i>Environmental Protection</i></p> <p>The SA report is incorrect in its assertion at criteria 3(a) that there are trees and hedges within the site; it is an open arable field.</p> <p>This report is accompanied by a Habitat and Protected Species Site Assessment Report by Amphibian, Reptile and Mammal Conservation Ltd (ARM Conservation Ltd). This report details an assessment of the site's ecological value, and a search of the surrounding area for records of protected species.</p> <p>It concludes that there are no habitats of ecological value on the site, and that the field is also of no botanical interest. The report notes the trees and hedges that border the site, and while no important species are found to be present, it is intended to retain and enhance these features in the event of the site's future development.</p> <p>This Assessment also notes that the site is adjacent to a County Wildlife Site, which is a wet woodland habitat: ' While development on the Pound Fields site would not adversely affect any of the species known to be present on the development footprint, further surveys would be required to ensure that there would be no adverse effect on</p>	<p>It is accepted that there are only trees and hedges that border the site.</p> <p>Results of ecological survey are noted, as are comments on the need to monitor impact on the adjacent CWS.</p>	<p>SA matrix and summary altered to reflect this.</p>

Consultee/comments made	Response	How the comments were addressed in subsequent reports
<p>any protected species present in the CWS. It would also be necessary to ensure that the site's development did not affect the hydrology of the CWS in a way which could adversely impact on its habitat or protected species.' The development of this site would not have an adverse impact on the habitat within the County Wildlife Site, and indeed it would be designed specifically to protect this habitat. It is anticipated that all surface water run-off could be attenuated through appropriate SUDS mitigation measures to avoid any adverse affect on the CWS (see letter at Appendix 3 for further details). Similarly, all other potential sources of pollution would be carefully controlled. The Ecological Assessment of the site has already demonstrated that it is not currently a habitat for any protected species. The wildlife value of the site will actually be enhanced, through additional structured landscaped areas within the site and at its boundaries. It should also be noted that the report of the site assessment held at the Hertfordshire Biological Records Centre recorded evidence of trespassing, which had caused fire damage to an oak tree and litter. This assessment recommended that it would be important to limit access to the site in future. The proposed development would play an important part in limiting access to the CWS through the creation of a suitable barrier to prevent further damage by trespassers. The Landscape and Capacity Assessment by Cooper Partnership, which accompanies this report, recommends that the site's eastern boundary, which borders the CWS, should be protected by a farm fence with animal proof netting and the planting of dense thorny vegetation, for this purpose.</p>		
<p><i>Flood Risk</i> Indicator 3(d) of the Sustainability Appraisal incorrectly notes that the site is within flood zone 3. Our Client has been in correspondence with the Environment Agency, who have confirmed that the entire site is within flood zone 1, which is defined as land outside the flood plain. The EA have also confirmed that they are not aware of any flooding in the area. The flood map included at Appendix 4 demonstrates that the site is outside all defined flood plains, including the 1 in 1,000 year plus climate change flood zone. It is therefore not considered necessary to undertake any further research into flood</p>	<p>It is accepted that the statement was an error.</p>	<p>SA matrix and summary has been altered to reflect this.</p>

Consultee/comments made	Response	How the comments were addressed in subsequent reports
<p>risk at this stage.</p>		
<p><i>Health of Local Residents</i>  The proposed development includes enhancement of local open space, which would improve facilities for local residents. It would therefore have a beneficial effect on indicator 5(c) of the SA.  Any noise and disturbance generated during the initial construction phase would be no greater than development on any other site. Given the context of the need for housing on a number of sites throughout the District in the coming years, it seems unfair to score the site negatively with regard to this indicator. Resource Use and Waste  As above, it seems incorrect to score this site negatively with regard to a criteria which will affect any new development.  With regard to energy use, the options for local energy generation will be explored as part of any future development.  With regard to water use, Three Valleys Water have indicated in their Water Resource Management Plan that they are able to service this part of the County. While additional pressure boosters may be required, given the strategic importance of locating development around Hitchin, as outlined above, we do not consider this to be a serious issue against development in this location. In addition, it should be noted that the Water Resource Management Plan anticipates that a combination of the expected reduction in water use as a result of metering with long-term leak reduction will mean that no new water resources are required until after 2035.  Following an initial desk-based study, it is not anticipated that there would be any difficulty in connecting a development on the site to all necessary services, including foul water drainage, electricity, gas and drinking water (see letter at Appendix 3 for further details).</p>		
<p><i>Sustainable Transport</i>  The Council's SA has already noted that the site is located on a bus route, within 400m of a bus stop. The Highways Statement by Singleton Clamp &amp; Partners which accompanies this report (a copy is included at Appendix 5) expands on this, and notes that the site is within a very convenient 2km cycling distance of the centre of Hitchin. Further to this, Hitchin railway station enjoys a regular and speedy service direct to Central London. There are therefore viable alternative means of transport available to commuters, adding to the site's sustainability credentials.</p>	<p>Comments are noted.</p>	<p>Comments have been incorporated in SA matrix</p>

Consultee/comments made	Response	How the comments were addressed in subsequent reports
<p><i>Technical Evidence, development principles and conclusions</i>  Details of this element of the response are not included here as they do not relate directly to the SA process, or repeat previously made points.</p>		Material has been reviewed in updating the SA for this report.

### ***Housing Growth Targets SA (2012) consultation comments and how they were addressed***

Consultee/comments made	Response	How the comments were addressed in subsequent reports
<p><b>Savills on behalf of St John Spencer Estates and Development Ltd</b> We note water supply and treatment is identified as a negative effect of the scenarios tested. We would expect the Sustainability Appraisal to consider wastewater infrastructure pressures which will be experienced for the scenarios tested. In particular should the growth drive more energy intensive processes at the Sewage Treatment Works, the implications should be assessed.  We welcome engagement with North Hertfordshire on the growth proposals and are committed to working with all partners to enable development within environmental capacity.</p>	Noted	Addressed in site specific assessments.
<p><b>English Heritage</b>  We do not have a particular view on the exact dwelling numbers for North Hertfordshire, but note the different options presented by the consultation. The appropriate distribution of housing across the district will be a key challenge, and the identification of individual sites should avoid harming the historic environment and specific heritage assets (including their settings). As the Sustainability Appraisal (SA) notes, the higher the number of dwellings that need to be found, the greater the likelihood of negative impacts on the historic environment and heritage assets of the district (although the SA seems to only focus on the historic environment around Stevenage, rather than looking at the wider district). However, even limited growth on brownfield sites (Option H) could have significant implications for heritage assets within urban areas depending on specific sites.   We would be happy to comment on the suitability of potential housing locations across the district and look forward to future consultations. Our comments on the Stevenage and North Herts Area Action Plan in December 2007 and the Land Allocations Plan in</p>	NHDC is developing a Conservation Strategy, which will be available as part of the evidence base of the Proposed Submission Local Plan .	The final version of the SA will take account of this.

<b>Consultee/comments made</b>	<b>Response</b>	<b>How the comments were addressed in subsequent reports</b>
<p>March 2008 and September 2009 provide our views on a number of sites across the district and should be of use in determining suitable locations.</p> <p>In terms of the wider Local Development Framework (LDF) for North Hertfordshire, we hope that the historic environment forms a key part of the Core Strategy and other documents. Paragraph 126 of the National Planning Policy Framework states that: 'local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment'. The NPPF also states that local plans should include strategic policies to deliver the protection and enhancement of the historic environment (paragraph 156) and should identify land where development is inappropriate because of its environmental or historic significance (paragraph 157).</p> <p>Paragraph 169 of the NPPF calls for an evidence base on the historic environment to inform local plan-making. This should involve an audit of existing sources of evidence relating to the historic environment, which could range from data on designated heritage assets to characterisation reports such as conservation area appraisals. Such an audit would identify gaps in the evidence base that may need to be filled, while discussions with archaeology and conservation colleagues may reveal further areas of evidence needed. English Heritage would also be happy to comment and advise on this issue. We have guidance on historic characterisation and its role in the plan-making process available on our HELM website at <a href="http://www.helm.org.uk/server/show/nav.19604">www.helm.org.uk/server/show/nav.19604</a>.</p>		
<b>Natural England</b>		
<p>Thank you for consulting Natural England on the above document. Our statutory purpose is to ensure that the natural environment is conserved, enhanced and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England is responding to the Housing Growth Targets 2011 . 2031 document and the accompanying Sustainability Appraisal. As the key points from the sustainability appraisal of each option are included within the Housing Growth Targets Document, the comments in section 1 relate to both documents. Comments which are specific to the Sustainability Appraisal methods and procedures are set out in section 2. Comments on the Habitats Regulations Assessment are provided as Section 3. The Housing Growth Targets 2011 . 2031 document and the accompanying Sustainability Appraisal of Growth Options report. Comments applicable to all growth options. The summary of key points from the sustainability appraisal within the Housing Growth Targets 2011 . 2031 document.</p>	Noted	None required

Consultee/comments made	Response	How the comments were addressed in subsequent reports
<p>The document includes a text box under each option to summarise the positive and negative effects of the Sustainability Appraisal. It is useful to integrate the findings of the Sustainability Appraisal into the consultation document, however there appear to be some disparities between conclusions drawn in the main text and the summaries given in the boxes. For example, for Option F 'Delivering Affordable Housing' the only negative effect listed in the summary box is 'still needs some development of green field and green belt land'. However the Sustainability Appraisal Report identifies a significant negative effect on 'providing access to green spaces' and 'reducing pollution from any source'. This reduces the transparency and apparent objectivity of the report.</p>	<p>The summaries are designed to be indicative rather than exhaustive. The access to green spaces and pollution issues are not explicitly mentioned as they are mostly common throughout the assessment. However it is accepted that it would have been sensible to state this at the start.</p>	<p>Points which cover all or many sites are noted in impact summaries.</p>
<p><i>Impacts on biodiversity</i></p> <p>With the exception of option H (Brownfield only), all the housing options are assessed as having a negative or significant negative impact on biodiversity. Whilst we commend the use of the precautionary principle in the assessment, it is important for the Council to recognise the additional efforts that will be needed to mitigate against the negative environmental effects of the proposed development on biodiversity. The sustainability appraisal recommends that mitigation would be required to avoid any significant impacts, but more could be included on actions the Council intends to take. Rather than simply mitigating for negative effects, Natural England considers that new development offers a potential delivery mechanism for enhancing biodiversity. DEFRA's Natural Environment White Paper (DEFRA, 2011) supports this and emphasises the importance of enhancing biodiversity wherever there is the opportunity. The Council should integrate the objective of (at least) no net loss of biodiversity as part of sustainable development into the early stages of plan production.</p>	<p>These issues have formed the evidence for developing the Core Strategy policies. However, the Council will investigate this issue and consider whether more needs to be done to address it in Local Plan policy.</p>	<p>Individual site appraisals address mitigation and opportunities as appropriate.</p>
<p>When considering these matters, it is important to investigate the current baseline situation and ecological character of the District. The predominant land use at the district scale is arable agriculture. In common with many counties further to the east, semi-natural habitats are present mainly as relatively small fragments in this matrix of intensive agricultural land use. In terms of statutory nature conservation sites, there are only three SSSIs in the district: Knebworth Woods SSSI and Wain Wood SSSI (oak/hornbeam woodlands) and Therfield Heath SSSI which is the most important herb rich chalk grassland in the county. Isolated areas of acid grassland persist in the south western part of the district. Collectively the three sites occupy a small fraction of the district and all three are widely spaced from one another. Habitat isolation is therefore an issue. Opportunities should be sought to link and consolidate these semi-natural</p>	<p>This has been done as part of the Scoping document and update of baseline information. Habitat isolation has been noted as a significant sustainability issue.</p>	<p>Already addressed</p>

Consultee/comments made	Response	How the comments were addressed in subsequent reports
habitats.		
<p>With reference to the North Hertfordshire Green Infrastructure Plan (2009), two of the key GI issues and opportunities listed include: . Connectivity: Semi-natural habitats are highly fragmented across the district. This limits the success of ecological restoration work as plants and animals may not be able to colonise new habitats; . There is the potential for grassland re-creation and restoration to link grassland sites such as Therfield Heath, near Royston, and also to link acid grassland areas to the south west, as part of a series of enhanced links which also respond to wildlife connectivity and sense of place.</p>	<p>These issues have formed the evidence for developing the Core Strategy policies. However, the Council will investigate this issue and consider whether more needs to be done to address it in Core Strategy policy.</p>	<p>Individual site appraisals address opportunities as appropriate.</p>
<p>The .Key Biodiversity Areas. map produced for the Hertfordshire Biodiversity Action Plan (BAP) provides a broad characterisation of North Hertfordshire in terms of semi natural habitats. This approach targets conservation action towards nine areas in the district where concentrations of semi-natural habitats occur. The information is available for the council to build in landscape scale biodiversity enhancements as part of the growth of the District.</p>	<p>See previous response</p>	<p>This map has been used as one of the sources of information in undertaking assessments on individual sites.</p>
<p><i>Access to green spaces</i> All of the growth options presented, with the exception of option H (Brownfield only) are assessed as having a significant negative or negative impact on SA Objective 2b "Provide access to green spaces". However, this conclusion is not reflected in the summary of key points from the Sustainability Appraisal provided in the Housing Growth Targets document. This should be amended.</p>	<p>The summary intended to draw out issues which were specific to particular options, but it is accepted this could have been made clear.</p>	<p>Points which cover all or many sites are noted in impact summaries.</p>

Consultee/comments made	Response	How the comments were addressed in subsequent reports
<p>Natural England have concerns regarding this conclusion, particularly as the comments provided in the SA on "recommendations for mitigation" suggest that, despite the negative assessment, access to green space may or may not be included or provided by new development. In 2009, the council produced a North Hertfordshire Green Space Standards Report and Green Infrastructure Plan. It is not clear whether or not these standards will be adhered to, or whether the SA is suggesting that this can no longer be delivered. The Council should make clear the current and future baseline against which this prediction has been made and what mitigation will be required.</p>	<p>The standards in the 2009 report have been amended to reflect deliverability issues. These are included in the Infrastructure Delivery Plan.</p>	<p>Opportunities for access to green space are noted in individual site appraisals where relevant.</p>
<p>New development is a potential delivery mechanism for green infrastructure and some of its benefits (which include amenity, climate change mitigation and adaptation, water and pollution management and biodiversity enhancement) will potentially help to mitigate for some of the negative features common to these Growth Options.</p> <p>Natural England's Strategic Directions document (2008) outlines four major strategic outcomes, all of which can be partly delivered through high quality green infrastructure. In respect of the natural environment, green infrastructure contributes to the responsibilities of local authorities; for example, the statutory duty conferred on local authorities with regard to biodiversity (through the Natural Environment and Rural Communities Act, or NERC). As such the green infrastructure approach is useful in joining up with a variety of other environmental management and control processes.</p> <p>Natural England has produced comprehensive guidance to facilitate a co-ordinated and consistent approach to green infrastructure, which is available from our website at: <a href="http://naturalengland.etraderstores.com/NaturalEnglandShop/NE176">http://naturalengland.etraderstores.com/NaturalEnglandShop/NE176</a></p>	<p>The Local Plan includes has policies on Green Infrastructure. The Infrastructure Delivery Plan includes standards for green infrastructure in new development.</p>	<p>Opportunities for green infrastructure are noted in individual site appraisals where relevant.</p>
<p><i>Reduction of pollution and improving the district's ability to adapt to climate change</i></p> <p>All options have received significant negative scores for Objective 3d on reduction of pollution. The information provided states this is largely the result of the impact of housing growth on the Royston Sewage Treatment Works. In comparing the options it would be useful to know how they differ in relation to other sub objectives previously used in the SA framework. The commentary provided against each option on Objective 3d is largely the same, regardless of growth target. Mitigation measures such as use of SUDS and water efficiency measures are recommended in the SA to address the negative effects. It is important to state within the SA report, what the residual effects will be. If the residual effect is considered to be significantly adverse following mitigation then Natural England questions whether the growth targets and the preferred option is acceptable in regard to legal standards.</p>	<p>This stage of the appraisal is a broad strategic assessment.</p>	<p>Individual site appraisals address mitigation measures.</p>

Consultee/comments made	Response	How the comments were addressed in subsequent reports
<p><i>Improving the district's ability to adapt to climate change</i></p> <p>All of the options score negatively against Objective 4b "Improving the district's ability to adapt to climate change". This is of concern particularly with reference to objective 3d on "reduce pollution" against which all of the options also have significant negative effects. Together this suggests a worsening situation in the District with a reduction in ability and resilience to manage this change.</p> <p>Local Authorities have a duty to consider how they can, through their planning functions, adapt to the effects of climate change and the Local Plan should address this issue.</p> <p>As noted in the Council's Green Infrastructure Plan (2009), ecosystems fulfil many roles, including the potential for control of air pollution, climate change and local climate management, flood risk management and regulation of water quality. To ensure that these services are sustainable, the vision for the District and growth targets should embrace the sub objective i°reduce vulnerability to climate change, and exploit any benefits. Considering the challenges facing the District in delivering sustainable development, the generation of housing growth options cannot be devolved from the consideration of associated green infrastructure.</p>	<p>The Council takes the need to address seriously and the Local Plan addresses this issue.</p>	<p>Addressed within individual site appraisals.</p>
<p><i>Comments on the preferred option</i></p> <p>The information provided within the Housing Growth Targets document, suggests that this is the Council's preferred option because it will enable the District to meet affordable housing needs whilst having a more limited impact on infrastructure.</p> <p>This choice may be based on a rather limited consideration of the multiple factors involved with the delivery of each growth option. It does not appear to take account of the suite of challenges facing the district over the next 20 years and the potential gains that may be delivered in regard to the areas discussed above. Natural England believes a more comprehensive assessment, is required to inform this important strategic conclusion, taking into account the many environmental problems and opportunities which the district currently face. As stated in DEFRA's Natural Environment White Paper (DEFRA, 2011) - a healthy, properly functioning natural environment is the foundation of sustained economic growth, prospering communities and personal wellbeing. The SA should be used to develop and refine options as effects are assessed and mitigation possibilities are considered for the full suite of SA objectives. Natural England hopes there will be an iterative process of option development, with the alternatives being revised as part of the SA, to enhance positive effects and reduce negative ones.</p>	<p>The Growth Options SA is part of an iterative SA approach which commenced with the Scoping Report produced in 2007, then continued with the Issues and Options SA 2008 and the Additional Suggested Sites SA 2009. Options have been further refined in the Preferred Options DPD and its SA/SEA.</p>	<p>The options chosen by the Council have been designed to minimise negative impacts and maximise social, economic and environmental benefits.</p>

Consultee/comments made	Response	How the comments were addressed in subsequent reports
<p><i>Specific Comments on other options</i></p> <p>Based on the information provided, it is difficult to understand how the significance of impacts might vary between options, particularly between options A and D. All of these housing growth options list negative effects including negative impacts on biodiversity and access to green space and will result in increasing pollution "from any source".</p> <p>Some additional quantitative information on expected land-take, additional waste production, water use and potential resources that might be made available to provide environmental improvements, would help Natural England to provide specific responses to each of the options. However, in lieu of this, our comments on the options are as above. We stress the need to seek positive outcomes regardless of the option chosen.</p>	<p>The purpose of this stage of the appraisal was to consider broad strategic options.</p>	<p>Where possible, quantitative information will be included in appraisals of individual sites.</p>
<p><i>Sustainability Appraisal of Growth Options</i> <i>Requirements of the SEA Directive</i></p> <p>The EU Strategic Environmental Assessment (SEA) Directive (2001) requires that authorities must determine whether or not any plans or programmes they are producing require a Strategic Environmental Assessment to be carried out.</p> <p>Natural England is aware that North Hertfordshire District Council undertook a sustainability appraisal and SEA of the Core Strategy and Development Policies Development Plan Documents in 2007. However, it is not clear whether the requirements of the SEA Directive are being met in undertaking the sustainability appraisal of these Growth Options. The Growth Options are being presented as strategic alternatives that form the basis for the development of a Development Plan Document. As such the requirements of the SEA Directive and the transposing regulations need to be met.</p> <p>The Sustainability Appraisal demonstrates that, at this stage, the assessment of reasonable alternatives is being undertaken to some degree. This is a legal requirement under the EU Strategic Environmental Assessment Directive. What is not clear is the approach being taken to meet other procedural and legal requirements. These steps inform the assessment process, the consultation with statutory authorities and ultimately feed into the development of the Environment Report. Further details regarding this are provided in the subsequent sections.</p> <p>The council should make their approach clear in the Sustainability Appraisal of Growth Options Report, to show how it intends to meet the requirements of the SEA Directive.</p>	<p>The appraisal of Growth Options is the strategic options appraisal for the Core Strategy and the Land Allocations DPD.</p>	<p>This will be made clear in the reports for the SA/SEA of the two DPDs.</p>

Consultee/comments made	Response	How the comments were addressed in subsequent reports
<p><i>Baseline</i></p> <p>The SEA Directive requires that in the environmental report, information is given on "the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme". This information is used in the assessment of alternatives to understand and explain the "likely significant effects on the environment".</p> <p>In addition the Planning Advisor Service guidance "Local development frameworks, Guidance on options generation and appraisal"(2009) states that, in order to generate reasonable options, the evidence base for a core strategy should ideally contain four elements:</p> <ul style="list-style-type: none"> <li>. a comprehensive review of the policy context;</li> <li>. a district or borough-wide analysis of opportunities and constraints;</li> <li>. area-by-area profiles; and</li> <li>. an analysis of what might happen.</li> </ul> <p>However, no information is provided in the "Sustainability Appraisal of Growth Options" to explain what baseline information was collected and used in the assessment, and whether the policy context has been reviewed. As the introductory text states that "sustainability appraisal framework is the same as was used previously" for the appraisal of the Core Strategy Issues and Options (2005) and Preferred Options (2007) and Land Allocations consultations Issues and Options (2008) and Additional Suggested Sites (2009) this suggests that the same baseline information is being used. If so, this should be updated to reflect the current state of the information and provide clarity to the appraisal scores given for the various options. This information would normally be collected as part of the scoping process.</p>	<p>See comment above</p>	<p>See comment above</p>
<p><i>SA objectives</i></p> <p>The sustainability appraisal framework is the same as was used previously for the appraisal of the Core Strategy Issues and Options (2005) and Preferred Options (2007) and Land Allocations consultations Issues and Options (2008) and Additional Suggested Sites (2009).</p> <p>In line with the comments on the baseline and the policy context, Natural England recommends that a review of this SA framework is undertaken. In particular, the Council may want to revisit the list of sub objectives and consider what indicators may be useful once the baseline has been updated. An understanding of current trends and whether issues are getting better or worse since the SA framework was adopted in</p>	<p>The framework has been reviewed in light of the review of programmes, plans and policies and of sustainability issues. No changes were considered necessary as a result of this review.</p>	<p>The issues referred to have been included in the key sustainability issues listed at the beginning of Appendix 2.</p>

<b>Consultee/comments made</b>	<b>Response</b>	<b>How the comments were addressed in subsequent reports</b>
2005 is particularly important. The SA Growth Options Report identified that there are some particularly challenging issues for the District such as constraints on future water resources and dealing with waste water. Reflecting upon these important issues and the difficulties of remedying any damage to particularly sensitive environmental assets, it appears necessary to re-examine the SA framework.		
<i>Development of a scoping report</i> The council have not indicated whether they are producing an SA scoping report at this stage. Responsible Authorities must seek the views of the Consultation Bodies on the scope and level of detail of the Environmental Report.	The appraisal of Growth Options is the strategic options appraisal for the Core Strategy and the Land Allocations DPD. The Scoping Reports for these appraisals were undertaken in 2005 and 2007.	The status of the Growth Options SA/SEA will be made clear in the appraisal reports for these two documents.

### ***Housing Options Growth Levels and Locations 2011-2031 SA (Feb 2013) consultation comments and how they were addressed***

<b>Consultee/comments made</b>	<b>Response</b>	<b>How the comments were addressed in subsequent reports</b>
<b>English Heritage</b>		
We have few comments to make on the SA. We note the assessment of the strategic sites, which picks up a number of our concerns in terms of heritage impacts. We assume that the appraisal of the non-strategic sites can still be found in earlier versions of the SA. We note that the current SA document refers to a number of sites not covered by the main consultation document (see Appendices 3 and 4). It is not clear whether these sites should have been consulted on, but in the absence of any details, including identification on sites on maps, we have not looked at them in terms of heritage impacts. Clarification on these sites would be welcomed.	Both Strategic and non-strategic sites formed part of the Housing Options consultation. Additional sites were those from the SHLAA that had not been consulted on previously	No action required
<b>Natural England</b>		
We have made a number of comments with respect to the Sustainability Appraisal, which is a critical piece of evidence informing this consultation. In particular we do not	A positive approach had been adopted in the	Subsequently a more precautionary approach has been

Consultee/comments made	Response	How the comments were addressed in subsequent reports
<p>feel that the issue of access to greenspace (and loss thereof) successfully differentiates between sites, nor flags the need for mitigation over and above merely relying on meeting greenspace standards. We advise that more thoughts is given to this matter both in terms of allocation policies but also in terms of development specifications and potential offsite measures to enhance access to greenspace such that there is no net detriment to recreational amenity.</p>	<p>Housing Options document, especially for the larger strategic sites where we knew provision would be provided onsite, although we didn't necessarily have the detailed information to support these conclusions. This may not have been articulated particularly clearly and consistently in certain circumstances.</p>	<p>taken for the issue in this document and identification of onsite specific issues and a greater emphasis on consistency has been taken.</p>
<p>The Sustainability Appraisal has clearly tried to incorporate access to greenspaces in its appraisal. However, it is unclear how reducing access to existing green spaces has been considered. For example, appendix 4 option 4 row 2b concludes that the allocation will have a minor positive score with respect to providing access to greenspaces. This seems unlikely given the good existing public right of way network on the site (which is likely to be degraded by the allocation) serving a population with little alternative access to greenspace. Whilst there is a Local Nature reserve within 400m of the site, it is within 400m of only a small portion of the site, and may be being used at capacity already. The proposed bypass will further degrade the network. We assume that the score is worked out pre mitigation. However, even if it is not, the proposed mitigation (apply greenspace standard) may not be sufficient to change the score (but without hyperlinks to the greenspace standard this is impossible to judge). We therefore advise that this issue is reconsidered, because, at least superficially, the conclusions do not seem reasonable in a number of cases.</p> <p>We are also concerned that the Sustainability Appraisal is unclear where certain issues are considered. In particular, in table 7, objective 2a makes reference to land of least environment and amenity value, but some aspects of amenity value are picked up under 2b (access to green spaces) and many if not all aspects of environmental value will be picked up under 3 a, b and c. For example, Appendix 4 option 5, there seems to be confusion as to whether access to the countryside falls under 2a or 2b. Similarly option 4 row 2a includes landscape. This double counting and or inconsistent placing of issues makes it hard to rely on the appraisal. We therefore advise that table 7 is amended to make it clearer where issues are considered. Indeed we would question whether preservation of greenfield land in and of itself is an appropriate objective, given landscape, biodiversity, and recreational amenity are covered elsewhere. As a result,</p>	<p>Appendix 3 provides the scoring assessment and rational for the scores.</p> <p>The negative scoring for greenspace is "Reduces distance or accessibility to open space from existing residential properties or that the housing Housing further than 800 metres from green space"</p> <p>A positive approach had been adopted in the Housing Options document, especially for the larger strategic sites where we knew provision would be provided onsite, although we didn't necessarily have the detailed information to support these claims. This</p>	<p>Subsequently a more precautionary approach has been placed on the issue in this document and identification of onsite specific issues and a greater emphasis on consistency has been taken.</p>

<b>Consultee/comments made</b>	<b>Response</b>	<b>How the comments were addressed in subsequent reports</b>
<p>appendix 4 should be reviewed for consistency.</p> <p>We have not reviewed the natural environment cells in appendix 4 systematically, in part due to the inconsistency point made above. However, we note that there are some questionable conclusions. For example, for option 5, row 3a, has a minor positive for biodiversity, but the supporting text does not suggest any positive impact.</p>	<p>may not have been articulated particularly clearly.</p>	
<b>LandProp Holdings BV – Bidwells</b>		
<p>It is understood that NHDC has not yet produced a robust Sustainability Appraisal to consider strategic development options. It is critical that such a document is prepared, if a future Local Plan is to be both sound and legally compliant.</p>	<p>A SA has been produced and consulted on at every stage of the Local Plan Preparation process</p>	
<b>Numerous responses to site 40</b>		
<p>The site comprises approximately 2.4ha of land, the main part of which consists of paddock land adjoining the existing dwelling and its curtilage. It is not, therefore, "previously developed" in terms of the definition contained in PPS3 or "brownfield land" as indicated in the Council's Sustainability Appraisal summary. The site is not "residential, being a house with extensive grounds" and whilst the dwelling and its immediate curtilage may constitute brownfield land, the very large paddock area, which is separately fenced, is definitely greenfield in nature</p>	<p>Summary will be changed to reflect comments.</p>	<p>SA matrix and summary changed to reflect this issue.</p>

### ***Housing Additional Locations Options SA (July 2013) consultation comments and how they were addressed***

<b>Consultee</b>	<b>Comment</b>	<b>Response</b>
<p><b>LDF/0396</b></p> <p><b>28, 29, 30</b></p> <p><b>Welwyn Hatfield Borough</b></p>	<p>It is noted that none of these new sites have been prioritised through the Strategic Housing Land assessment and that they have not gone through a Sustainability Appraisal and Strategic Environmental Assessment.</p>	<p>No response required, SA was produced alongside consultation document.</p>

<b>Council</b>		
<b>LDF/0102</b> <b>72</b> <b>Smith</b>	<p>Quoting from "sustainability appraisal and SEA of the north Hertfordshire housing options" document, appendix 4: housing additional locations options matrices 2c suggests mitigation would be "inclusion of sustainable transport measures", but there is no possibility of a dedicated cycle path to the town centre, and the roads would not support a cycle lane.</p> <p>3a The suggestion that the loss of biodiversity on this site could be mitigated is complete nonsense.</p> <p>3c The matrix fails to note that the site is 200 metres from Maydencroft Manor.</p>	<p>Sustainable transport measures can include a number of different measures, such as bus stops – not only cycle paths..</p> <p>The site scores a "X X" for biodiversity, recognising that loss of biodiversity would be hard to mitigate.</p> <p>The criterion doesn't list specific listed buildings as they would be too numerous, but it recognises the need for sensitive design based on the high level of historic features in the proximate area.</p>
<b>LDF/0524</b> <b>11</b> <b>Robson</b>	<p>The report "Sustainability Appraisal and SEA of the North Hertfordshire Local Plan" referred to the fact that the abstraction from the River Hiz is over-licensed. This being the case, how would sufficient water be available to meet the needs of the proposed large development?</p>	<p>Whilst this is identified as a sustainability issue. Veolia Water has confirmed that there is capacity to accommodate additional housing across the district.</p>
<b>LDF/0940</b> <b>1</b> <b>Rodell</b>	<p>Open space - the Knebworth Parish Plan has consistently stated that it wishes to keep the village separate from Stevenage. With plans to extend Stevenage southwards, it is vitally important that Knebworth is not extended northwards to create one large urbanisation. This also mentioned as a likely effect in your "reduction in community cohesion" section of your sustainability appraisal.</p> <p>There are going to be significant effects on biodiversity and landscape should this plan proceed. The North Hertfordshire District Councils own Sustainability Report confirms that 2 new housing would significantly increase water use in the District, and put</p>	<p>Noted</p> <p>Whilst this is identified as a sustainability issue. Veolia Water has confirmed that there is capacity to accommodate additional housing across the district.</p>

	<p>significant pressure on water infrastructure. Demand for water is therefore one the most critical effects of the new housing;</p> <p>Travel from and to this area would increase to an unacceptable level for the surrounding road network and provide daily periods of gridlock to east Luton and surrounding areas. Again the North Hertfordshire District Councils own Sustainability Report confirms this It therefore implies that all these options would result in increased car travel and the resultant noise and air pollution and production of greenhouse gases.</p>	<p>Whilst this is identified as an issue, it isn't something that would necessarily preclude development.</p>
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