



# Sustainability Appraisal of the North Herts Submission Local Plan

ADDITIONAL MODIFICATIONS FOLLOWING PUBLIC  
EXAMINATION -SA REPORT ADDENDUM 2021

# North Herts District Council

Sustainability Appraisal of the North Herts Submission Local Plan

Additional Modifications following Public Examination - SA Report Addendum 2021

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# 1 Introduction

## The Local Plan

- 1.1 The North Hertfordshire Local Plan sets a strategic vision and spatial strategy for the District over the period 2011 to 2031. It includes strategic policies which provide the guidance on the main issues that the Plan seeks to address, and development management policies on the detailed requirements that must be met for planning permission to be granted. It also sets out the site allocations for each community with site-specific criteria for each local housing allocation.
- 1.2 The Plan was formally published in October 2016 and submitted for examination in June 2017. It was the subject of initial examination hearings from November 2017 to March 2018. Following the hearings, consultation was carried out on proposed Main Modifications between January and April 2019. Subsequent to that consultation, the Inspector identified a number of areas where further hearing sessions would be required. These were held between November 2020 and February 2021. Following these hearings, the Council drafted and submitted proposed further modifications to ensure the plan's soundness to the Inspector, for his consideration. These came from a number of sources including (but not limited to):
- The proposed modifications submitted by the Council in response to correspondence with the Inspector since April 2019 (Examination Library Reference ED176);
  - The Council's Matters statements submitted to the examination in advance of the hearing sessions; and
  - Changes discussed at the examination hearing sessions and recorded in the Action Lists on the Council's website.
- 1.3 The Inspector has now published his proposed Further Main Modifications for consultation.

## Sustainability Appraisal (SA)

- 1.4 A process of Sustainability Appraisal (SA) has been undertaken alongside the development of the Local Plan. As noted in Planning Practice Guidance<sup>1</sup> *"sustainability appraisal is a systematic process that must be carried out during the preparation of a Local Plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives."*
- 1.5 SA must also meet the requirements for Strategic Environmental Assessment (SEA) which are outlined in the SEA Regulations<sup>2</sup>. SEA is similar to SA; the most substantial difference is that it focuses on environmental protection objectives only.

## Nature and purpose of this SA report addendum

- 1.6 This report is an addendum to the SA report<sup>3</sup> which was published alongside the Proposed Submission Local Plan (Examination Library Reference LP4) (for clarity, this is referred to as 'the Main SA Report' in this Addendum). Its purpose is to review the Further Main Modifications which have been proposed to ensure that the final plan has been comprehensively appraised.

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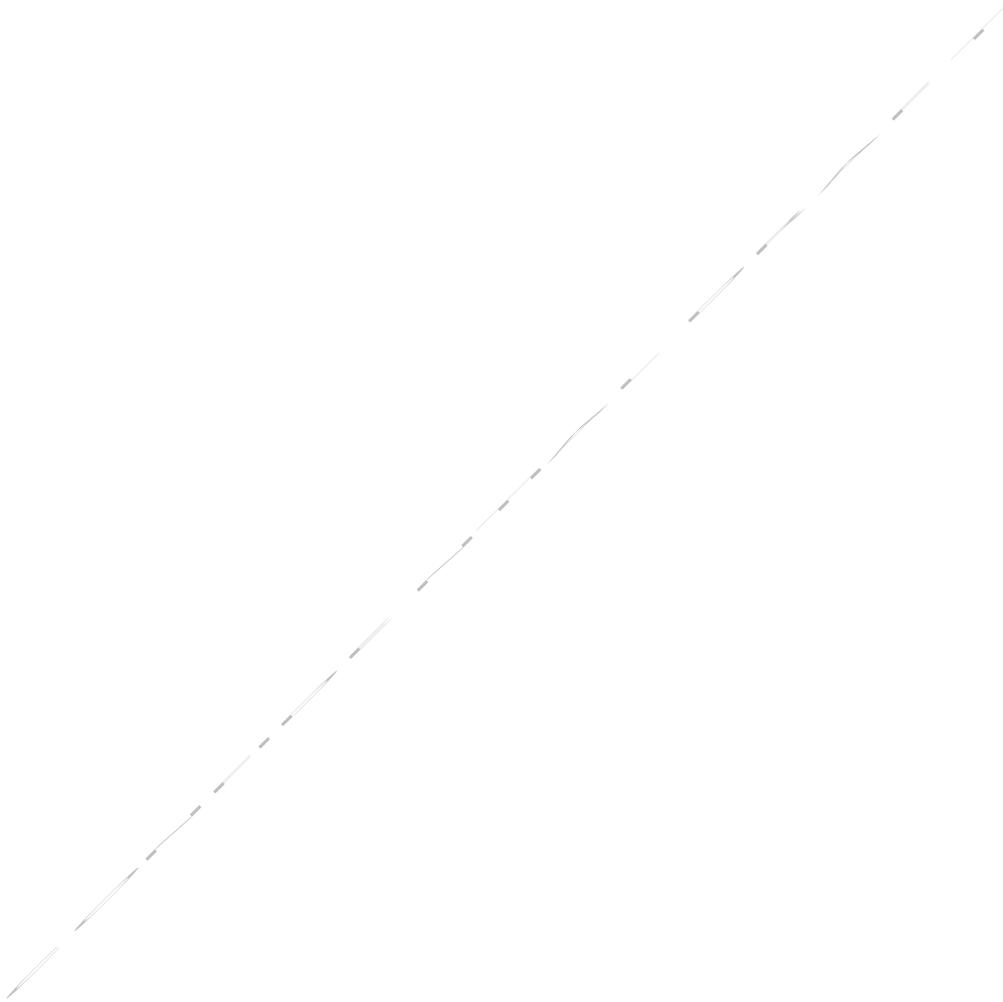
<sup>1</sup> Paragraph: 001 Reference ID: 11-001-20140306

<sup>2</sup> [The Environmental Assessment of Plans and Programmes Regulations 2004](#)

<sup>3</sup> [Draft Sustainability Appraisal of North Hertfordshire Proposed Submission Local Plan](#)

1.7 This report contains the following sections:

- Section 2, which outlines the sustainability appraisal framework which is used to test the sustainability of the Plan;
- Section 3, which describes the screening process used for the modifications;
- Section 4, which describes the assessment of the modifications, including the 'screened-in' policies, appraisal of policy options, changes to mitigation, and changes to cumulative effects. It also considers the overall effect of the modifications plus the Submitted Plan;
- Section 5 briefly describes next steps.



## 2 Sustainability appraisal framework

- 2.1 In the sustainability appraisal process, the potential effects of a plan are tested against a series of objectives for sustainable development. For example, for an objective *to use resources efficiently*, the appraisal asks whether the plan will have a positive or negative effect on this objective.
- 2.2 The objectives are combined into an appraisal framework. This framework was used in all the stages of the SA process to test the Plan. It is shown in the table below, along with the questions used in the testing process. A slightly modified version was used for testing proposed sites and site policies. The objectives which address the issues which are required to be covered by the SEA Regulations<sup>4</sup> are shown underlined. The SA objectives were drawn up using the themes from the review of other Policies, Plans and Programmes, and drawing on the baseline review, and specifically the key sustainability issues identified. The SA is reported against the objectives, with the sub-objectives used for guidance in conducting the appraisal.

**Table 1: Sustainability Appraisal framework**

SA Objective <sup>5</sup>	SA Sub Objective: <i>will the policy or proposal help to...</i>
<b>ECONOMIC ACTIVITY</b>	
1 Achieve sustainable levels of prosperity and economic growth	<ul style="list-style-type: none"> <li>maintain a diversified economy, with increased resilience to external shocks?</li> <li>encourage new business to start-up and thrive in the District?</li> <li>support and encourage the rural economy and diversification?</li> <li>support and promote sustainable tourism in towns and rural areas?</li> <li>improve the quality of local jobs available to people in the District?</li> <li>increase the skills base?</li> <li>make the cost of housing more affordable to those employed in the District?</li> </ul>
<b>LAND USE AND DEVELOPMENT PATTERNS</b>	
<u>2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?</u>	<ul style="list-style-type: none"> <li>promote the use of brownfield sites and if brownfield sites are not available, land of low environmental and amenity value?</li> <li>maximise reuse of vacant buildings and derelict land?</li> <li>minimise the loss of the best and most versatile agricultural land?</li> <li>reduce quantity of unremediated contaminated land?</li> </ul>
<u>2(b) Provide access to green spaces</u>	<ul style="list-style-type: none"> <li>provide/improve access for all residents of the District to green spaces?</li> <li>provide opportunities for people to come into contact with and appreciate wildlife and wild places?</li> <li>maintain/improve the public right of way network?</li> </ul>
<u>2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles</u>	<ul style="list-style-type: none"> <li>locate development so as to reduce the need to travel?</li> <li>reduce car reliance, encourage walking, cycle, bus, and train use?</li> <li>reduce road freight movements?</li> <li>avoid exacerbating local traffic congestion?</li> <li>provide affordable, accessible public transport in towns and in rural areas?</li> </ul>

<sup>4</sup> Listed in Schedule 2

<sup>5</sup> Those relevant to the SEA Regulations are shown underlined

SA Objective<sup>5</sup>SA Sub Objective: *will the policy or proposal help to...*

## ENVIRONMENTAL PROTECTION

3(a) Protect and enhance biodiversity

- protect habitats and species, especially those designated as being of importance, and provide opportunities for creation of new habitats?
- support and maintain extent of wetland habitat and river habitats?

3(b) Protect and enhance landscapes

- protect and enhance landscapes, especially those of historic, recreational or amenity value, and within the Chilterns AONB?

3(c) Conserve and where appropriate, enhance the historic environment

- conserve and enhance the historic built character of the District's town's and villages?
- protect sites of archaeological and historic importance, whether designated or not?

3(d) Reduce pollution from any source

- improve the water quality of rivers and groundwater supplies?
- achieve good air quality?
- reduce ambient noise, especially from traffic?
- reduce light pollution in the District?
- protect soil quality?

## CLIMATE CHANGE

4(a) Reduce greenhouse gas emissions

- minimise energy consumption by transport and in buildings?
- increase proportion of energy generated by renewable sources?
- encourage use of local suppliers and the consumption of local produce?

4(b) Improve the District's ability to adapt to climate change

- reduce vulnerability to climate change, exploit any benefits?
- avoid development in areas at risk from flooding?

## A JUST SOCIETY

## 5(a) Share benefits of prosperity fairly

- reduce disparities in income levels?
- contribute to regeneration of deprived areas (estates in Letchworth and Hitchin)?
- provide employment and other opportunities for unemployed, especially long term unemployed and the disabled?
- encourage entrepreneurial activity in deprived areas?

## 5(b) Provide access to services and facilities for all

- provide access to services and facilities without need to use a car?
- retain rural services, especially shops, post offices, schools, health centres and bus services?
- recognise the needs of specific groups such as minority ethnic groups, the young, the elderly and the disabled?

## 5(c) Promote community cohesion

- support development of voluntary sector?
- encourage development of community run business?
- encourage people's feelings of belonging, for example by providing community meeting places?
- recognise and value cultural and ethnic diversity?

## 5(d) Increase access to decent and affordable housing

- help improve the quality of the housing stock and reduce the number of unfit homes?
- increase access to affordable housing, particularly for the young, the disabled and key workers?

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

### 3 Screening of proposed modifications

#### Introduction

- 3.1 All the proposed further modifications have been through a through a review process, called screening, to assess whether they are likely to have significant sustainability effects.
- 3.2 The screening reviewed all the proposed modifications to the Plan to answer the following questions:
- Is the proposed modification a significant change which is likely to have significant effects?
  - Does the proposed modification constitute new Plan content which has not been appraised previously?
  - Do any of the proposed modifications in combination with each other or with existing Plan content, result in cumulative, secondary or synergistic effects which are significant?
- 3.3 If the answer to any of these questions was yes, the modification was 'screened in' for further SA assessment. In this process a precautionary approach was taken, i.e. if there was uncertainty about the significance of the proposed modifications, they were screened in for further appraisal.

#### 'Screened-in' modifications

- 3.4 The full findings of the screening process are included in Appendix A. This includes details of each modification, along with comment on the SA implications of the modification, and whether or not the modification was then screened in to the SA. Most of the proposed modifications were screened out as they do not materially alter the findings of the previous SA work. Table 2 includes all the modifications which were 'screened in' and the reasons for this.

**Table 2: 'Screened-in' modifications**

Ref.	Policy/para.	Modification	SA implications
MM010/ FM039	Policy SP2	A reduction in the overall number of homes provided for up to 2031. This involves lower housing provision on certain large sites in the period up to 2031, with the remaining total provision on these sites coming post-2031. Barkway is re-categorised as a Category A village.	Because the appraisal of this policy deals with the broad effects of the policy as a whole, the changes are not likely to impact on the appraisal outcomes for this policy. Nevertheless, the policy has been through several iterations, so it was considered that re-appraisal would be prudent.
MM014/ FM042	Policy SP3	Changes to wording to preserve the objectives and intended outcomes of the policy in the light of changes to the Use Classes Order	While these changes arise from changes to the Use Classes Order, they highlight the need to consider the effect of specific uses now clearly identified, in relation to SA Objective 2(c) regarding freight movements. There have also been changes to the employment sites provided for in the policy.
MM035/ FM057	Policy SP8	Details on the revised numbers and location for housing development up to 2031. This involves lower housing provision on certain large sites in the period up to 2031, with the remaining total provision on these sites coming post-2031.	The overall level of housing growth proposed up to 2031 is lower but the effects of the Plan must be considered beyond that date since it allocates sites which involve provision beyond that date. Because of the high-level of nature of the SA of policies, such changes are unlikely to significantly impact on overall appraisal outcomes, particularly as it mirrors a reduction in the level of Objectively Assessed Need (OAN). However, changes to

			the proposed timing of housing provision may, in turn, impact on the timing of SA outcomes so this needs to be checked.
MM045/ FM001	Policy SP9	Provision of detail on what masterplans and planning applications for significant development are expected to do.	The proposed further modifications represent a significant extension of the scope of the policy, with many of the additional criteria relating directly to SA criteria. The additional policy wording may also impact on the assessment of cumulative impacts of the Plan, potentially providing mitigation of some of these impacts. The mitigation table and cumulative effects tables need to be updated to reflect these modifications.
FM067	Policy SP10e	Provision for monitoring of projected future demand for secondary education provision for the Stevenage area.	May have an impact on cross-boundary cumulative effects.
MM050/ FM069	Policy SP12	Provision for projection of non-designated sites that include important habitats and species	This provides additional mitigation for biodiversity impacts, which needs to be reflected in the mitigation table and cumulative effects tables in the SA report.
MM166/ FM100	New policy NEx	Significant rewording of policy on biodiversity and geological sites	Although the changes made generally strengthen the policy requirements, this policy needs to be reappraised as it has gone through a number of iterations. The mitigation table and cumulative effects tables need to be updated to reflect these modifications.
MM372/ FM187	IMR1	Update on housing delivery until 2031	The overall level of housing growth proposed up to 2031 is lower but the effects of the Plan must be considered beyond that date since it allocates sites which involve provision beyond that date. Because of the high-level of nature of the SA of policies, such changes are unlikely to significantly impact on overall appraisal outcomes, particularly as it mirrors a reduction in the level of OAN. However, changes to the proposed timing of housing provision may, in turn, impact on the timing of SA outcomes so this needs to be checked.
FM190	New policy IMR2	New policy on local plan early review.	New policy which has not previously been appraised. Need to report what other options were considered, show appraisal of the options, and reasons for choosing this as the preferred option.

## 4 Appraisal of the modifications

### Appraisal of policy options

- 4.1 A key part of the process of producing the Local Plan has been to identify policy options for how the District should develop. Options development (known as alternatives in the language of the SEA Regulations, but referred to as options in this report to reflect common practice in planning in the UK) is also an important part of the SA/SEA process. In the Main SA report<sup>6</sup> which was published alongside the Proposed Submission Local Plan (Examination Library Reference LP4) policy options were identified and appraised for a range of policy issues.
- 4.2 The further modifications have proposed a new policy on local review. Two options were considered and appraised for this policy, as shown below.

#### Option (a) Review Plan after 2 years

##### Conclusions

- Because of current uncertainties in the short term, the review will ensure that the plan responds effectively to changes which may arise in this time scale, and continues to deliver housing and other services and support economic growth. This option will have a positive effect on the objectives of achieving sustainable economic growth and increasing access to affordable housing.
- Many of the other effects are uncertain, since a review may result in different levels or location of development provision.

#### Option (b) Follow statutory requirements and review Plan after 5 years

##### Conclusions

- This option will result in more uncertainty in the short term (up to 5 years) as it is unclear whether it will still be possible to effectively deliver housing and other services. It will have uncertain effects on impact on the objectives of achieving sustainable economic growth and increasing access to affordable housing.
- Many of the other effects are uncertain, for the medium and long term, since a review may result in different levels or location of development provision.

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

### Appraisal of the 'screened-in' policy modifications

- 4.4 Appraisals were undertaken of the screened-in modifications listed in the previous section. As described in section 2 above, this was done by testing them against the sustainability objectives contained in the SA Framework, as was done in all the earlier stages of the SA

<sup>6</sup> [Draft Sustainability Appraisal of North Hertfordshire Proposed Submission Local Plan](#)

process. The results of this process are presented in appraisal matrices, which can be seen in Appendix B.

4.5 The findings are summarised below:

**Table 3: Summary of appraisal of screened-in modifications**

Ref.	Policy/para.	Modification	Significant sustainability effects and uncertainties	Changes recommended
MM010/ FM039	Policy SP2	A reduction in the overall number of homes provided for up to 2031. This involves lower housing provision on certain large sites in the period up to 2031, with the remaining total provision on these sites coming post-2031. Barkway is re-categorised as a Category A village.	The changes to the delivery timetable in the modification has resulted in some of the short-term effects (whether positive or negative) becoming uncertain.	None
MM014/ FM042	Policy SP3	Changes to wording to preserve the objectives and intended outcomes of the policy in the light of changes to the Use Classes Order	A change to the sites included has resulted in the overall effect of the policy on development of greenfield land and on car reliance) being assessed as uncertain, as the two sites have opposite effects on these objectives.  In addition, the matrix has been updated to reflect a significant negative effect from this policy on road freight movements.	None
MM035/ FM057	Policy SP8	Details on the revised numbers and location for housing development up to 2031. This involves lower housing provision on certain large sites in the period up to 2031, with the remaining total provision on these sites coming post-2031.	As with SP2, the changes to the delivery timetable in the modification has resulted in some of the short-term effects (whether positive or negative) being assessed as uncertain.	None
MM045/ FM001	Policy SP9	Provision of detail on what masterplans and planning	The modification is likely to have a significant positive effect on promoting public transport, affordable	None

		applications for significant development are expected to do.	housing, reducing crime, and increasing access to leisure and recreation. It also may have positive effects on water quality, regeneration of deprived areas, community cohesion, retaining rural services, providing community meeting places, and encouraging synergy in land uses.	
MM166/ FM100	New policy NEx	Significant rewording of policy on biodiversity and geological sites to include protection for non-designated sites.	The modification addresses a recommendation made in an early iteration of the SA. However, as the policy was already assessed as having a significant positive effect on biodiversity, it has not resulted in any change to the assessment.	None
MM372/ FM187	IMR1	Update on housing delivery until 2031	As with SP2 and SP8, the changes to the delivery timetable in the modification has resulted in some of the short-term effects (whether positive or negative) being assessed as uncertain.	None
FM190	New policy IMR2	New policy on local plan early review.	This new policy is likely to have significant positive effects on sustainable economic growth and housing provision, as it will ensure that housing growth is appropriately provided for. Many of the other effects are uncertain, since a review may result in different levels or location of development provision.	None

### Update to mitigation identified

4.6 The SA process is required to identify mitigation for the significant negative effects and uncertainties that it identifies. In the Main SA report<sup>7</sup> which was published alongside the Proposed Submission Local Plan (Examination Library Reference LP4) this was done primarily through the production of two tables identifying mitigation (referred to as 'mitigation tables') for the identified negative effects and uncertainties for all the sites allocated. The mitigation table for strategic sites is in Appendix 8 of that document, and the mitigation table for other sites is in Appendix 9. They each show:

- all the significant negative effects and uncertainties for the sites in the Plan;

<sup>7</sup> [Draft Sustainability Appraisal of North Hertfordshire Proposed Submission Local Plan](#)

- the policies in the Plan which address these effects and uncertainties;
- any suggested further mitigation measures necessary; and
- any remaining residual effects.

In the SA Report Addendum published in 2018, these tables were updated.<sup>8</sup>

- 4.7 The SA process is also required to identify cumulative and synergistic effects of the Plan. Cumulative effects generally arise where several individual insignificant effects have a combined significant effect. Synergistic effects interact to produce a total effect greater than the sum of the individual effects. For simplicity, all cumulative and synergistic effects have been called 'cumulative effects'. In the main SA Report this was done by assessing potential cumulative effects on three levels; 'localised', 'strategic plan-wide' and 'strategic inter-plan'. The results were presented in three separate tables.<sup>9</sup> The tables for localised and plan-wide cumulative effects listed mitigation provided by policies within the plan.
- 4.8 As was noted in table 2 above, a number of the further modifications which improve plan policies provide additional mitigation for the significant negative effects and uncertainties of the plan, including for cumulative effects. This additional mitigation is shown in the table below.

**Table 4: Summary of additional mitigation provided by further modifications**

Relevant SA objective	Additional mitigation	Details
2(b) Provide access to green spaces	Rewording of SP9	Requiring strategic masterplans to be produced for Strategic Housing Sites and other significant development (which generally comprises residential development above 100 dwellings). The masterplans are required to create a green infrastructure network.
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	Rewording of SP9	Requiring strategic masterplans to be produced for Strategic Housing Sites and other significant development (which generally comprises residential development above 100 dwellings). The masterplans are required to create integrated, accessible, and sustainable transport systems and plan for walkable locally accessible facilities.
	Rewording of BK3	Providing for a contribution to sustainable transport between Barkway and Barley schools
3(a) Protect and enhance biodiversity	Rewording of SP9	Requiring strategic masterplans to be produced for Strategic Housing Sites and other significant development (which generally comprises residential development above 100 dwellings). The masterplans are required to create a green infrastructure network supporting biodiversity net gain
	Rewording of SP12 and NEx (Biodiversity and Geological sites)	Commitment to manage non-designated sites that include important habitats and species
3(b) Protect and enhance landscapes	Rewording of SP9	Requiring strategic masterplans to be produced for Strategic Housing Sites and other significant development (which generally comprises residential development above 100 dwellings). The masterplans are required to respond to local landscape.

<sup>8</sup> Sustainability Appraisal of the North Herts Submission Local Plan, Modifications following Public Examination-SA Report Addendum, Appendix D

<sup>9</sup> [Draft Sustainability Appraisal of North Hertfordshire Proposed Submission Local Plan](#) , tables 31,32 and 33

3(c) Conserve and where appropriate, enhance the historic environment	Rewording of SP9	Requiring strategic masterplans to be produced for Strategic Housing Sites and other significant development (which generally comprises residential development above 100 dwellings). The masterplans are required to respond to local townscape and historic character.
4(a) Reduce greenhouse gas emissions	Rewording of SP9	Requiring strategic masterplans to be produced for Strategic Housing Sites and other significant development (which generally comprises residential development above 100 dwellings). The masterplans are required to create a green infrastructure network that supports climate change mitigation and adaptation. Requiring the masterplans to identify opportunities for low and zero carbon
4(b) Improve the District's ability to adapt to climate change	Rewording of SP9	Requiring strategic masterplans to be produced for Strategic Housing Sites and other significant development (which generally comprises residential development above 100 dwellings). The masterplans are required to create a green infrastructure network that supports climate change mitigation and adaptation and to ensure effective use of SuDs and sustainable water management
5(b) Provide access to services and facilities for all	Rewording of SP9	Requiring strategic masterplans to be produced for Strategic Housing Sites and other significant development (which generally comprises residential development above 100 dwellings). The masterplans are required to provide walkable locally accessible facilities
5(c) Promote community cohesion	Rewording of SP9	Requiring strategic masterplans to be produced for Strategic Housing Sites and other significant development (which generally comprises residential development above 100 dwellings). The masterplans are required to ensure high quality public spaces and public realm that is safe, attractive and supports social interaction for all age groups
5(d) Increase access to decent and affordable housing	Rewording of SP9	Requiring strategic masterplans to be produced for Strategic Housing Sites and other significant development (which generally comprises residential development above 100 dwellings). The masterplans are required to provide house types, tenures and building forms to meet the differing needs of the population
5(e) Reduce crime rates and fear of crime	Rewording of SP9	Requiring strategic masterplans to be produced for Strategic Housing Sites and other significant development (which generally comprises residential development above 100 dwellings). The masterplans are required to ensure high quality public spaces and public realm that is safe, attractive and supports social interaction for all age groups
5(f) Improve conditions and services that engender good health and reduce health inequalities	Rewording of SP9	Requiring strategic masterplans to be produced for Strategic Housing Sites and other significant development (which generally comprises residential development above 100 dwellings). The masterplans are required to create a green infrastructure network that supports healthy lifestyles, sport, play and recreation
5(g) Increase participation in education and life-long learning	Rewording of SP10(e)	This will include monitoring of projected future demand to inform the review of this plan in relation to secondary education provision for the Stevenage area;

5(h) Maintain and improve culture, leisure and recreational activities that are available to all	Rewording of SP9	Requiring strategic masterplans to be produced for Strategic Housing Sites and other significant development (which generally comprises residential development above 100 dwellings). The masterplans are required to create a green infrastructure network that supports healthy lifestyles, sport, play and recreation
6(a) Use natural resources efficiently; reuse, use recycled where possible	Rewording of SP9	Requiring strategic masterplans to be produced for Strategic Housing Sites and other significant development (which generally comprises residential development above 100 dwellings). The masterplans are required to ensure effective use of SuDs and sustainable water management
7 Promote sustainable urban living	Rewording of SP9	Requiring strategic masterplans to be produced for Strategic Housing Sites and other significant development (which generally comprises residential development above 100 dwellings). The masterplans are required to positively integrate with adjacent rural and urban communities

4.9 For simplicity, the mitigation tables and cumulative effects tables will be updated to reflect this additional mitigation when a final SA Report is produced to accompany the final Local Plan. A number of other minor points identified in the screening process will also be addressed then (for example, removing references to sites which have now been delivered).

### Changes to cumulative effects

4.10 As noted above, the SA needs to be updated to reflect the fact that some sites included in the Submission Local Plan have now been developed. This means that they need to be considered part of the baseline, rather than an effect of the Plan. The cumulative effects tables discussed above have been reviewed to consider whether they need to be changed to reflect the new situation. This has resulted in the local cumulative effects table being updated, primarily to reflect the fact that several sites at Royston have now been developed. It also reflects comments received from Natural England on the impacts of development in Royston on Therfield Heath SSSI. The table also includes additional mitigation arising from changes to policies included in the previous modifications and these further modifications. The updated table is shown below.

**Table 5: Updated localised cumulative effects arising from further modifications**

Cumulative effect	Affected receptor	Sites contributing to the cumulative effect	SA objectives affected	Recommendations/mitigation	Residual effects
Access to open countryside	Royston	RY9, RY10, RY11 – together they infill much of the remaining open countryside on the western, northern and eastern edges of the town	2(b) Provide access to green spaces	Maintain existing rights of way. Policy D1 requires proposals to maximise accessibility, legibility and connectivity, which should help to ensure that through-routes are incorporated in new development.	Increased distance to open countryside from existing housing

Cumulative effect	Affected receptor	Sites contributing to the cumulative effect	SA objectives affected	Recommendations/mitigation	Residual effects
		inside the A505. The development of RY1 and RY2 has already exacerbated this issue.		Policy NE5 requires the provision of open space in new development in accordance with the Council's open space standards.  Requiring strategic masterplans to be produced for Strategic Housing Sites and other significant development (which generally comprises residential development above 100 dwellings). The masterplans are required to create a green infrastructure network.	
Landscape character	Royston	RY9, RY4, RY10, RY11 – all lie in areas of high or moderate sensitivity on the edge of the town	3(b) Protect and enhance landscapes	As noted above, SP9 requires strategic masterplans to be produced for Strategic Housing Sites and other significant development. Masterplans are required to respond to local landscape and to be informed by a technical and design evidence base which we understand would include landscape analysis. RY10 and RY4 are caught by this requirement, but it is noted that RY10 already has outline planning consent.	Likely to be some residual landscape impact (particularly as RY10 is included within the Plan)
Impact on Therfield Heath SSSI	Royston	RY4, RY7, RY10, RY11 – all have potential to add recreational pressure to SSSI. The development	3(a) Potential impact on sites designated for their ecological value or features of	Policy NE5 requires the provision of open space in new development in accordance with the Council's open space standards. Onsite open space should provide a more	Uncertain

Cumulative effect	Affected receptor	Sites contributing to the cumulative effect	SA objectives affected	Recommendations/ mitigation	Residual effects
		of RY1 and RY2 has already exacerbated this issue, though mitigation has been secured on s106 for RY1.	ecological interest	localised option for recreation. It is recommended that a Mitigation Strategy be developed in consultation with Natural England to ensure that developers of these sites contribute towards appropriate measures to protect the SSSI from recreational pressures. The mitigation strategy should include appropriate monitoring.	
Noise pollution	North of Letchworth Garden City	LG1, LG3, LG4, LG10 – all lie close together and adjacent to residential properties in the northern part of the town	5(c) Improve conditions and services that engender good health and reduce health inequalities	Policy D3 provides specific guidance on what may cause unacceptable harm. An assessment of whether the cumulative effects of development on these sites meet these policy requirements. In addition to the mitigation for individual sites, ensure the coordination of individual site construction management plans.	Likely to be some residual noise pollution
Historic character	Conservation areas and listed buildings in the north east corner of Letchworth Garden City	LG3, LG4, LG10, LG13, LG16, LG18	3(c) Conserve and, where appropriate, enhance the historic environment	Policy HE1 requires proposals to conserve and enhance designated heritage assets, and includes a number of related requirements, including production of a heritage assessment. As noted above, SP9 requires strategic masterplans to be produced for Strategic	None

Cumulative effect	Affected receptor	Sites contributing to the cumulative effect	SA objectives affected	Recommendations/mitigation	Residual effects
				<p>Housing Sites and other significant development. The masterplans are required to respond to local townscape and historic character.</p> <p>Only LG3 is over 100 dwellings, so consideration should be given to an area-wide assessment which takes account of cumulative effects (as also noted as a possibility in SP9).</p>	
Access to open countryside	Baldock	BA1, BA10, BA4, BA3, BA2 – all lie in open countryside on the northern and eastern edge of the town	2(b) Provide access to green spaces	<p>Maintain existing rights of way.</p> <p>Policy D1 requires proposals to maximise accessibility, legibility and connectivity, which should help to ensure that through-routes are incorporated in new development.</p> <p>Policy NE5 requires the provision of open space in new development in accordance with the Council's open space standards.</p> <p>As noted above, SP9 requires strategic masterplans to be produced for Strategic Housing Sites and other significant development (which generally comprises residential development above 100 dwellings). The masterplans are required to create a green infrastructure network. BA1 is a Strategic Housing site, and BA2 and</p>	Increased distance to open countryside from existing housing

Cumulative effect	Affected receptor	Sites contributing to the cumulative effect	SA objectives affected	Recommendations/mitigation	Residual effects
				BA3 are over 100 dwellings.	
Landscape character	Baldock	BA1, BA10, BA4, BA3, BA2 – all lie in areas of high or moderate sensitivity on the northern and eastern edge of the town	3(b) Protect and enhance landscapes	<p>As noted earlier, SP9 requires strategic masterplans to be produced for Strategic Housing Sites and other significant development. As noted above this applies to BA1, BA2 and BA3. The masterplans are required to respond to local landscape and be informed by a technical and design evidence base which we understand would include landscape analysis.</p> <p>In addition, site specific policies BA2, BA3 and BA4 require proposals to be informed by a site-specific landscape assessment. As suggested as a possibility in SP9, it is recommended that the masterplans for these sites are required to consider the cumulative impact of the other sites to support a co-ordinated and integrated approach to place-making and design.</p>	Likely to be some residual landscape impact
Surface water flooding	North and East of Baldock	BA1, BA10, BA4, BA3 – all sites lie within a linked area of high surface water flood risk	4(a) Reduce greenhouse gas emissions and improve the District's ability to adapt to	Policy SP11 requires the use of SUDS and other appropriate measures where necessary. Policy NE8 stipulates that the most sustainable drainage solutions will be sought for each development to	Some residual risk to property will inevitably remain, particularly when taking into account potential

Cumulative effect	Affected receptor	Sites contributing to the cumulative effect	SA objectives affected	Recommendations/mitigation	Residual effects
			climate change	<p>reduce the risk of surface water flooding and that sites should aim to mimic the drainage of an undeveloped greenfield site.</p> <p>As noted earlier, SP9 requires strategic masterplans to be produced for Strategic Housing Sites and other significant development. As noted above this applies to BA1, BA2 and BA3. The masterplans are required to create a green infrastructure network that supports climate change mitigation and adaptation and to ensure effective use of SuDs and sustainable water management. In addition site specific policies BA1, BA3, BA4 and BA10 require proposals to address existing surface water flood risk issues, including any run-off through SuDS or other appropriate solution.</p>	climate change impacts
Town centre competitiveness	Hitchin town centre	HT11, H12 – retail/missed-use sites in close proximity to each other in Hitchin town centre	7 Promote sustainable urban living	None necessary – positive cumulative effect.	N/A
Historic character	Conservation area and listed buildings in	HT11, HT12	3(c) Conserve and, where appropriate,	Policy HE1 requires proposals to conserve and enhance designated heritage	None

Cumulative effect	Affected receptor	Sites contributing to the cumulative effect	SA objectives affected	Recommendations/mitigation	Residual effects
	Hitchin town centre		enhance the historic environment	assets, and includes a number of related requirements, including production of a heritage assessment. The site specific policy for HT11 requires preservation and enhancement of heritage assets including Hitchin Conservation Area and listed buildings.	
Access to open countryside	Great Ashby	GA1, GA2 – the sites lie in close proximity on the edge of Great Ashby	2(b) Provide access to green spaces	<p>The site specific policies GA1 and GA2 provide for the integration of existing rights of way.</p> <p>Policy D1 requires proposals to maximise accessibility, legibility and connectivity, which should help to ensure that through-routes are incorporated in new development.</p> <p>Policy NE5 requires the provision of open space in new development in accordance with the Council's open space standards.</p> <p>As noted above, SP9 requires strategic masterplans to be produced for Strategic Housing Sites and other significant development. The masterplans are required to create a green infrastructure network. This applies to GA1 and GA2.</p>	Increased distance to open countryside from existing housing

Cumulative effect	Affected receptor	Sites contributing to the cumulative effect	SA objectives affected	Recommendations/mitigation	Residual effects
Landscape character	North of Stevenage	NS1, GA1, GA2 – lie on the northern edge of Stevenage. Development will result in the erosion of a significant portion of the green buffer between Stevenage and smaller settlements to the north	3(b) Protect and enhance landscapes	<p>As noted above, SP9 requires strategic masterplans to be produced for Strategic Housing Sites and other significant development. This applies to NS1, GA1 and GA2. The masterplans are required to respond to local landscape and be informed by a technical and design evidence base which we understand would include landscape analysis.</p> <p>In addition, site specific policy NS1 requires sensitive consideration of existing settlements, and landscape features.</p> <p>As suggested as a possibility in SP9, it is recommended that the masterplans for these sites are required to consider the cumulative impact of the other sites to support a co-ordinated and integrated approach to place-making and design.</p>	Likely to be some residual landscape impact
Access to open countryside	Knebworth	KB1, KB2, KB4 – development will result in the loss of much of the open countryside on the eastern and western boundaries of the town	2(b) Provide access to green spaces	<p>Maintain existing rights of way.</p> <p>Policy D1 requires proposals to maximise accessibility, legibility and connectivity, which should help to ensure that through-routes are incorporated in new development.</p>	Increased distance to open countryside from existing housing

Cumulative effect	Affected receptor	Sites contributing to the cumulative effect	SA objectives affected	Recommendations/mitigation	Residual effects
				<p>Policy NE5 requires the provision of open space in new development in accordance with the Council's open space standards.</p> <p>As noted above, SP9 requires strategic masterplans to be produced for Strategic Housing Sites and other significant development. The masterplans are required to create a green infrastructure network. This applies to KB1, KB2 and KB4.</p>	
Landscape and townscape character	Knebworth	KB1, KB2, KB4 – development along most of the western and eastern boundaries of the town will have a significant impact on the scale, setting and character of the town	3(b) Protect and enhance landscapes	<p>As noted earlier, SP9 requires strategic masterplans to be produced for Strategic Housing Sites and other significant development. As noted above, this applies to KB1, KB2 and KB4. The masterplans are required to respond to local landscape and be informed by a technical and design evidence base which we understand would include landscape analysis.</p> <p>The site specific policies for all three require structural landscaping and planting to provide and / or reinforce Green Belt boundary. The policy for KB4 requires the preservation of longer views from Knebworth to wider countryside</p>	Likely to be some residual landscape/townscape impact

Cumulative effect	Affected receptor	Sites contributing to the cumulative effect	SA objectives affected	Recommendations/ mitigation	Residual effects
				<p>along dry valley to south of Watton Road.</p> <p>As suggested as a possibility in SP9, it is recommended that the masterplans for these sites are required to consider the cumulative impact of the other sites to support a co-ordinated and integrated approach to place-making and design.</p>	
Potential impact on groundwater	Source Protection Zone 1 and 2	KB4 and KB1 lie in linked SPZs.	3(d) Reduce pollution from any source	<p>Policy SP11 includes general support for the principles of the Water Framework Directive and seeks improvements to the water environment.</p> <p>Policy NE10 stipulates that new development should not result in the deterioration of any watercourse in accordance with the Water Framework Directive.</p> <p>As noted earlier, SP9 requires strategic masterplans to be produced for Strategic Housing Sites and other significant development. As noted above, this applies to KB1 and KB4. The masterplans are required to provide a green infrastructure network and ensure the effective use of SuDs.</p> <p>The site-specific policies for the two sites also require a detailed drainage strategy. However, given the potential</p>	None

Cumulative effect	Affected receptor	Sites contributing to the cumulative effect	SA objectives affected	Recommendations/mitigation	Residual effects
				cumulative effects from the development of the two sites, the Environment Agency should be consulted regarding the need for site-specific risk assessments.	
Landscape and townscape character	Codicote	CD1, CD2, CD3, CD5 – development would represent a significant extension of the village and will have an impact on the scale, setting and character of the village	3(b) Protect and enhance landscapes	<p>As noted above, SP9 requires strategic masterplans to be produced for Strategic Housing Sites and other significant development. This applies to CD5. The masterplans are required to respond to local landscape and townscape and be informed by a technical and design evidence base which we understand would include landscape analysis.</p> <p>The site-specific policy for CD5, requires proposals to be informed by a site-specific landscape assessment. As is suggested as a possibility in SP9, this assessment should also consider the cumulative effects of the other developments in the village. The site-specific policy for CD1 requires sensitive integration into the village.</p>	Likely to be some residual landscape/ townscape impact on the scale, setting and character of the village
Potential impact on groundwater	Source Protection Zone 2	CD1, CD2, CD3, CD5 - lie in the same SPZ2	3(d) Reduce pollution from any source	Policy SP11 includes general support for the principles of the Water Framework Directive and seeks	None

Cumulative effect	Affected receptor	Sites contributing to the cumulative effect	SA objectives affected	Recommendations/mitigation	Residual effects
				<p>improvements to the water environment.</p> <p>Policy NE10 stipulates that new development should not result in the deterioration of any watercourse in accordance with the Water Framework Directive. As noted earlier, SP9 requires strategic masterplans to be produced for Strategic Housing Sites and other significant development. As noted above, this applies to CD5. The masterplans are required to provide a green infrastructure network and ensure the effective use of SuDs. The site-specific policies for the four sites also require a detailed drainage strategy.</p> <p>However, given the potential cumulative effects from the development of the four sites, the Environment Agency should be consulted regarding the need for site-specific risk assessments.</p>	

4.11 In addition a small number of addition positive cumulative effects have also been identified, as shown in the table below.

**Table 6: Additional cumulative effects arising from further modifications**

Level	Significant effect	Relevant SA objective	Arising from...
Plan-wide	Increased green infrastructure	2(b) Provide access to green spaces	Rewording of SP9

Inter-plan	Ensuring adequate secondary school provision	5(g) Increase participation in education and life-long learning	Rewording of SP12 (e)
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### Appraisal of the Submitted plan including modifications

- 4.12 The Main SA report identifies the likely significant effects and uncertainties of the Proposed Submission Local Plan. This includes local and District-wide cumulative effects and cumulative effects which are likely to arise in combination with other plans, programmes and strategies. It also identifies mitigation for significant negative effects and uncertainties. Finally, it identifies residual significant sustainability effects of the Plan after mitigation (table 35 in the Main SA report).
- 4.13 The appraisal of the proposed modifications identified some additional positive effects, primarily arising from the changes to SP9. In addition, there are some additional uncertainties resulting from the changed policies, primarily short-term uncertainties arising from the changes in the development timetable. As noted above, two additional positive cumulative effects have also been identified.
- 4.14 The main impact of the proposed modifications in sustainability terms is to improve the mitigation of the effects of site provision, but this will not change the significance of the residual effects identified in the Main SA Report.

## 5 Next steps

- 5.1 Following on from the current consultation, the Inspector will consider all the representations received and decide on whether the Plan is 'sound' (potentially with further modifications) or whether further examination hearings are required.
- 5.2 Once the Inspector has considered the issues arising from the Main Modifications consultation, he will issue his final report. Subject to his deciding that the Plan is sound, or is capable of being made sound with Modifications, it will be adopted by the Council and published alongside a Final SA Report. Once the Plan is adopted, a SA Statement will be produced.

