

NORTH HERTFORDSHIRE DISTRICT COUNCIL



**Sustainability Appraisal and Strategic
Environmental Assessment of
Letchworth Garden City Town Centre
Strategy Draft Supplementary
Planning Document**

Main Report

October 2006

Sustainability Appraisal and Strategic Environmental Appraisal of North Hertfordshire Letchworth Garden City Town Centre Strategy Draft Supplementary Planning Document

Main Report

A report by North Hertfordshire District Council

October 2006

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2. Introduction

2.1. Background

This report describes the results of the appraisal of the aims and strategic options, for the Letchworth Garden City Town Centre Strategy draft Supplementary Planning Document.

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

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

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

The Government has published Guidance¹ (referred to as "the Guidance" in this report) on undertaking SA of the Local Development Documents which comprise the Local Development Framework. The approach in the Guidance is to incorporate the requirements of the SEA Directive into a wider Sustainability Appraisal process.

¹ *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents: Guidance for Regional Planning Bodies and Local Planning Authorities* November 2005 ODPM

2.2. What is Sustainability Appraisal?

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

Planning Policy Statement 12 – Local Development Frameworks

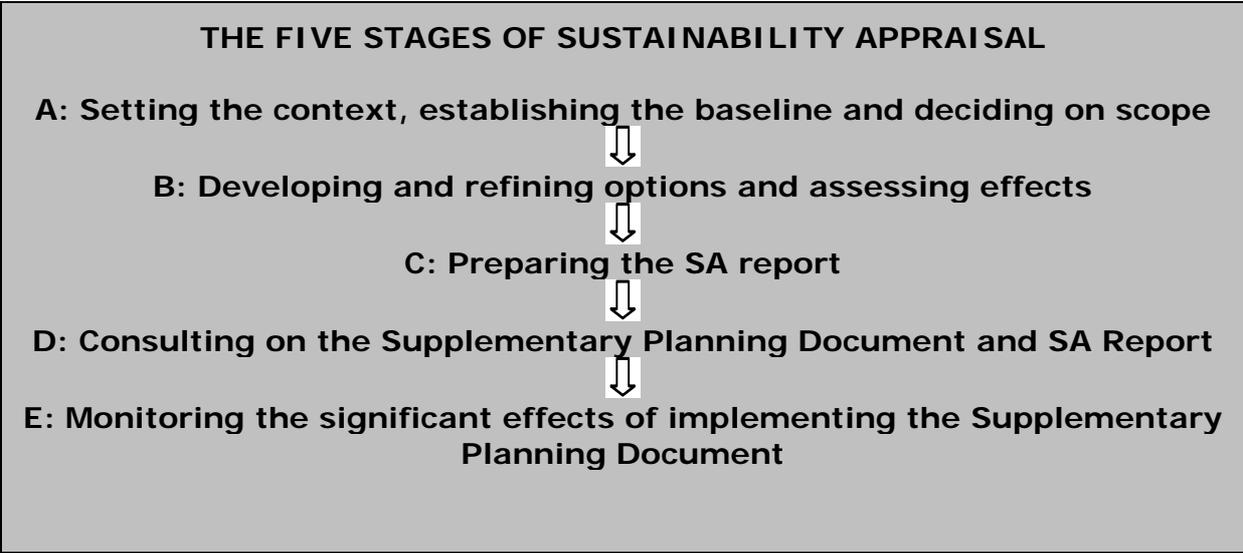
The aim of Sustainability Appraisal is to make sure that plans are doing as much as they can to support the delivery of social, economic and environmental objectives at the same time. Although planning authorities do their best to address these issues, it is easy to miss opportunities for better supporting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

Ideally, as a result of the appraisal, conflicts with sustainability objectives will be removed, but this is not always possible. The conflicts and the decisions made must be explained in reports on the SA, and in consultations on the plan. As a result the public and other stakeholders will find it easier to appreciate the pros and cons of the plan and to make up their own minds about whether the planning authority has made the right decisions.

2.3. The Five Stages of Appraisal

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

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



The Guidance outlines the following steps to the first two parts of the process.

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope

- A1. Identify and review other relevant plans, programmes and policies, and sustainable development objectives that will affect or influence the DPD/SPD. **(Context Review)**
- A2. Collect relevant social, environmental and economic baseline information and produce a characterisation of North Hertfordshire **(Baseline)**
- A3. Identify key **sustainability issues** and problems for the SA to address.
- A4. Develop the **SA framework**, consisting of the sustainability objectives, indicators and targets.
- A5. Produce a **Scoping Report** and consult relevant authorities, the public and other key stakeholders on the scope of the appraisal and the key issues and possible options for solutions.

Stage B: Developing and refining options and assessing effects

- B1. **Test the DPD or SPD** objectives against the SA framework.
- B2. **Develop the DPD or SPD options**
- B3. **Predict the effects of the draft DPD or SPD (preferred options)** against the sustainability objectives using any available research information
- B4. **Evaluate the effects of the draft DPD or SPD**
- B5. **Consider ways of mitigating adverse effects and maximising beneficial effects** of the draft DPD or SPD
- B6. Develop proposals for **monitoring** the significant effects of implementing the DPD or SPD.

3. Appraising the Draft

3.1. How the Supplementary Planning Document fits into the Local Development Framework

North Hertfordshire is in the process of developing its Local Development Framework (LDF). The Council has published, and is in the process of revising, the Local Development Scheme which describes the documents that will make up the LDF and when they will be developed. A Scoping report and a report on appraisal of options for the initial DPDs have already been produced².

A Supplementary Planning Document (SPD) on a Town Centre Strategy for Letchworth Garden City is proposed in a forthcoming revision to the Local Development Scheme to be one of the local development documents in the Local Development Framework. The purpose of SPDs is to provide further details of policies in a DPD, or policies in an existing development plan (called a “saved plan³”). In this case, the Supplementary Planning Document will provide further guidance and policy on the existing policy on Letchworth Town Centre contained in the adopted North Hertfordshire District Local Plan no. 2 with Alterations. Policy 58 Letchworth Garden City Design Principles - which requires that in Letchworth development takes into account Garden City design principles. This policy will be carried forward in an amended form within a local development plan document. Secondly Policy 42 part (i), which seeks to support and maintain shopping as the main activity in town centres, providing it safeguards and enhances the environment of towns such as the World’s first Garden City Letchworth. Structure plan policies 4, 16, and 17 are also relevant. In due course these will be replaced by Regional Spatial Strategy policy SS5 in the draft East of England Plan, which requires town centre strategies to be prepared as local development documents.

Over time precisely what the town centre strategy will be supplementary to will change and the strategy may require amendment. For example the overall

² See <http://www.north-herts.gov.uk/council/default.asp?step=4&pid=1074>

retail strategy, policies for change of use in town centres and allocation of sites for retail and other uses are proposed to be included in various development plan documents and examination of these documents may require changes to this strategy. These underlying development plan documents will in themselves require SA/SEA; the SA/SEA for this Supplementary Planning document may require amendment if there are any consequential amendments to the town centre strategy to maintain general conformity and these have significant environmental effects. This will not, in line with government advice on implementation of the directive, require re-appraisal of the higher level policies.

3.2. Further Guidance on Appraisal of Supplementary Planning Documents

The Guidance says that an appraisal of a SPD should follow the same steps as the appraisal of a DPD (listed in the previous section).

The Guidance recognises that where appraisals of the DPD have already been undertaken, the need for new work in appraising a SPD may be limited in some cases. However, it clarifies that in cases (such as this) where the SPD has been prepared on the basis of a DPD or saved plan, and where policy or policies have not been subject to a SA, then the authority will need to carry out a SA of that policy or policies and report on those⁴.

In reference to stage B2 (development of options) the Guidance states that it is essential for it to set out to improve on the situation which would exist if there were no SPD. It should also aim to improve on the effects of implementing the existing parent DPD policy or 'saved plan policy'. To test this, options considered often include scenarios termed 'no plan' and 'business as usual'.

³ The policies of an existing Local Plan continue to have effect for a minimum of 3 years from the enactment of the Planning & Compulsory Purchase Act (September 2004) or the adoption of replacement documents under the new system, whichever is sooner.

⁴ *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents: Guidance for Regional Planning Bodies and Local Planning Authorities, November 2005 ODPM.*

3.3. The Appraisal Process to be used

The appraisal process has taken account of the ODPM Guidance and, in doing so, also meets the requirements of the SEA Directive.

The steps of the process were the same as used for the appraisal of the initial Development Plan Documents. These are described on page 4 above. This appraisal drew on the work already undertaken for the appraisal of the Core Strategy and Development Control Policies (contained in the Scoping Report for that appraisal⁴). The elements of this work are:

- The Appraisal Framework (step A4): the same framework was used (apart from the addition of one sub-objective);
- Sustainability Issues (step A3): the same broad issues apply, however the scoping has revealed specific issues relevant to Letchworth, in particular its international importance;
- Context Review (A1): the documents previously reviewed for the Initial Development Plan documents have been scoped, and those relevant to this SPD have been retained in the review. In addition a number of additional new or area specific documents have been reviewed;
- Baseline Review (A2): three additional indicators have been used.

Each of these elements is described in the separate Scoping Report. However, details are also included in appendices to this report as follows:

- Sustainability Issues: Appendix 1
- Context Review: Appendix 2
- Baseline Review Appendix 3

In stage B2 of the process, four alternative options have been appraised. This includes the “business as usual” option of not having a SPD. In addition, as a

⁴ Available on <http://www.north-herts.gov.uk/council/default.asp?step=4&pid=1074>

consequence of the advice quoted above, existing policies 42 and 58, the parent policies to the draft SPD, have been appraised at this stage.

3.4. Appraisal Documents

There are two formal documents required:

1. **Scoping Report and a**
2. **Sustainability Appraisal Report**

The *Scoping Report* is the formal report on the first part (Stage A) of the process. It gives an overview of the scope of the appraisal process. It must also include the objectives of the plans to be appraised, the broad strategic options, which will be considered, and the methodology that will be used. A Scoping Report for the Letchworth Garden City Town Centre Strategy draft SPD was produced in July 2006 and sent to a range of consultees, who were given a four week period to respond with comments. The comments of the consultees have been taken into account and have not resulted in the need to revise the Scoping report. The Scoping Report is available as a separate document and is available to view on the Council's website on: www.north-herts.gov.uk. The information from the Scoping report has also been incorporated in this document.

The *Sustainability Appraisal Report* will also meet the requirements of the SEA Directive to produce an Environmental Report. The report will describe the results of the second part of the appraisal process (Stage B, shown in the table in the previous section). The appraisal of the objectives and options contained in this report forms part of the final Sustainability Appraisal Report. It includes a non-technical summary, a summary of the results of each element of the appraisal process (including information on Stage A) and proposals for monitoring the impacts of the plan. The testing matrices from Stages B1 –B5 are available in separate technical appendices 4 and 5.

The level of detail will be appropriate to an appraisal of a SPD. This means that the policy and guidance in the draft SPD will be tested in order to assess its significant environmental and sustainability impacts within the District. Of course some of these impacts, for example climate change, will relate to a wider area than just the District itself. A list of the contents of the SA report is shown in the table below.

Contents of the Sustainability Appraisal Report
<p>Components making up the Environmental Report Table sign-posting the components of the SA Report which make up the Environmental Report for the purposes of the SEA Directive</p>
<p>1. Summary and outcomes</p> <ul style="list-style-type: none"> • Non-technical summary • A statement of the likely significant effects • Statement on the difference the process has made • How to comment on the report •
<p>2. Appraisal Methodology</p> <ul style="list-style-type: none"> • Approach adopted to the SA • When the SA was carried out • Who carried out the SA • Who was consulted, when and how • Difficulties encountered in compiling information or carrying out the assessment
<p>3. Background</p> <ul style="list-style-type: none"> • Purpose of the SA and the SA Report • Plan objectives and outline of contents • Compliance with the SEA Directive/Regulations
<p>4. Sustainability objectives, baseline and context This section will be the information in the Scoping Report:</p> <ul style="list-style-type: none"> • Links to other policies, plans and programmes and sustainability objectives and how these have been taken into account • Description of the social, environmental and economic baseline characteristics and the predicted future baseline (i.e. trend information, where it is available) • Main social, environmental and economic issues and problems identified • Limitations of the data, assumptions made etc. • The SA framework, including objectives, targets and indicators
<p>5. Plan issues and options</p> <ul style="list-style-type: none"> • Main strategic options considered and how they were identified • Comparison of the social, environmental and economic effects of the options (summary of testing matrices) • How social, environmental and economic issues were considered in choosing the preferred options • Other options considered, and why these were rejected <p>Proposed mitigation measures (summary of testing matrices)</p>

6. Plan policies

- Significant social, environmental and economic effects of the preferred policies (summary of the information in the matrices)
- How social, environmental and economic problems were considered in developing the policies and proposals
- Proposed mitigation measures (summary of the information in the matrices)
- Uncertainties and risks (summary of the information in the matrices relating to limitations in the assessment arising out of lack of information)

7. Implementation

- Links to other tiers of plans and programmes and the project level (EIA, design guidance etc.)
- Proposals for monitoring

4. Appraisal of Saved Letchworth and Town Centre Policy

4.1. Purpose of Appraising Saved Policy

This SPD is being prepared to provide details on the existing policy on design and development in Letchworth Town Centre contained in the adopted Local Plan No.2⁵.

The Guidance says that *the SA of the SPD of a saved plan will however need to set out the likely significant social, environmental and economic effects of the DPD policy or that saved policy it is helping to implement. This will provide the baseline against which the effects of the SPD itself can be considered*⁶.

The Guidance advises that this be undertaken in Stage B of the process. The Council has therefore undertaken an appraisal of existing policies 42(i) and 58 the parent policies to the draft SPD. The policies and conclusions from the appraisal are shown below:

4.2. Appraisal of Existing Policies

Local Plan No. 2. Policy 58 Letchworth Garden City Design Principles:

The Council will only consider development proposals in Letchworth if they are in sympathy with the traditional buildings of Letchworth and if they clearly show that the Garden City Design Principles below have been taken into account.

Conclusions:

- The policy has mainly positive impacts, but could be improved in wording and the supporting text clarified, possibly in the form of an expanded SPD, which would elaborate on how Garden City Design Principles can be reconciled with sustainable principles of construction and design.

⁵ Policy 58 in North Hertfordshire District Local Plan No 2 April 1996

⁶ Para 4.1.11

- Development of strategy in other areas than the town centre should be considered to improve public transport and social cohesion in the town and improve facilities in accessible locations to residents.

Local Plan no. 2. Policy 42 part (i) Town Centres:

For retail uses, the Council will permit development proposals:

(i) which support and maintain shopping as the main activity in town centres, but only if these safeguard and enhance the environment of the three historic towns of Baldock, Hitchin and Royston and the World's First Garden City, Letchworth;...

Conclusions:

- The assessment is positive overall but the policy does not meet all current requirements for town centre policy in its current wording in not promoting town centre development merely permitting them, and also not promoting residential and other uses as part of retail led mixed use schemes. These matters should be considered in drafting the LDF.
- Maintenance of the requirement for retail development in Letchworth to protect its character as the world's first garden city should be retained in any replacement policy.

4.3. Results of the Appraisal

The appraisal shows that the existing policies are likely to have a positive significant impact on a number of objectives, by leading to improve design in the Garden City and retail development in town centres.

The detailed results and conclusions from the appraisal of the policies are contained in appendix 5. As noted above, there are no recommendations for changes to the policies because they are historic saved policies which can not be changed.

5. Testing the SPD Aims

The SPD objectives have been divided into three categories following the testing:

- Objective does not conflict with any sustainability appraisal objectives and actively supports some of them. No changes recommended.
- Objective does not conflict with any sustainability appraisal objectives, but could better support the objectives with some rephrasing.
- Objective both supports and potentially conflicts with some sustainability appraisal objectives. No changes recommended.

The conclusions under each heading are summarised below.

5.1. Aims that do not conflict with SA objectives

The following aims were assessed as not conflicting with any sustainability appraisal objectives and actively supports some of them. No changes are recommended.

SPD Aim 1

Letchworth Town Centre will be preserved and enhanced to protect its special character as the town centre of the world's first Garden City, including providing, on appropriate sites, the quality buildings and facilities it deserves.

SPD Aim 2

To promote the vitality and viability of Letchworth Garden City Town Centre through planning for its growth and development.

5.2. Aims that do not conflict but rephrasing recommended

The following aim was assessed as not conflicting with any sustainability appraisal objectives, but could better support the objectives by being made clearer with some rephrasing.

<p>SPD Aim 3</p> <p>To develop the town centre’s role as the focus for civic and social life and public transport networks in Letchworth Garden City and as a place which is pleasant, safe and inviting to visit and shop in.</p>
<p>Conclusions:</p> <p>This objective does not conflict with any of the SA objectives and supports several. The aim has no direct impact on resource use and a recommendation is made to ensure that this issue is covered through the use of ‘sustainable’ measures.</p> <p>Recommendations for changes to this objective include to:</p> <p>Amend to read ‘To develop the town centre’s role as the <u>sustainable</u> focus for civic and social life and public transport networks in Letchworth Garden City and as a place which is pleasant, safe and inviting to visit, live and shop in.’</p>

5.3. Purpose of testing the SPD Aims

The purpose of testing the draft SPD Aims is to determine if there are any significant conflicts between the SPD Aims and the appraisal objectives. The SPD Aims will inform the choice of options and the type of guidance provided in the draft SPD. Therefore, wherever possible any conflicts should be avoided between the SDP Aims and sustainability objectives. Reducing conflicts should improve the sustainability of the SDP. However, there are occasions when it is impossible to avoid conflict.

5.4. Results of the Appraisal

These aims are compatible with sustainability objectives, providing one small amendment is made, and the LDF as a whole has a firm definition of sustainability, possibly linked to sustainability objectives.

The detailed results and conclusions from the appraisal of the SPD aims are contained in appendix 4.

6. Appraisal of Strategic Options

6.1. Strategic Options for the SPD

In developing the draft SPD, the Council has considered four broad strategic options to deliver these objectives. Each of these options has been appraised. These are:

- A) Do not produce a SPD, but rely on the current policy (this is the "business as usual option"):
- B) Produce a SPD based upon minimal change to the town centre;
- C) Produce a SPD based upon improving the character and appearance of the town centre and a moderate increase in retail provision;
- D) Produce a SPD based upon major change in the town centre and on maximising retail potential.

6.2. Purpose of appraising the options

The appraisal process:

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

The SEA Directive requires the appraisal to identify significant impacts. In this appraisal, major positive, positive, major negative and negative impacts are all defined as "significant". Significance is assessed in terms of the **size** of the impact (e.g. whether a development would use a large or small amount of land) and the **importance** (e.g. will it take place on a site recognised as an important environmental resource). The third factor is the **cumulative** affect of a number of small impacts, which when taken together can produce a significant impact (e.g. the effect on a number of smaller developments on traffic levels).

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

For the appraisal of each option, the conclusions, concentrating on the significant impacts are summarised in the matrices, along with recommendations for changes (discussed further below). The full matrices with conclusions and recommendations are contained in appendix 5.

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

Uncertainties in the appraisal:

The SEA Directive requires that the body undertaking the appraisal identify uncertainties in the appraisal. Where there was insufficient information to predict important sustainability impacts of an option, this has been noted in the matrices. (See appendix 5) In these cases the report specifies in the recommendations the additional data, or the need for more information on how the option would be applied, that would help to predict the impact of the option.

6.3 Summary of appraisal results for the options

The conclusions from the appraisal of the options are outlined below. The detailed results are available in appendix 5.

Option A

Do not produce a SPD, but rely on the current policy (this is the "business as usual option")

Conclusions:

- It should be noted that this is the same as appraising the saved policies and reference should be made to the appraisal tables in section 5 of this report and the matrices in appendix 5. The key issue is comparison with the other scenarios. The 'business as usual' option has the disadvantage of lacking tailored and specific policy and guidance for the town centre. Each individual case would be negotiated on a site by site basis with no clear overall framework for how sites should relate to each other, be accessed or over how cumulative impacts will be assessed. It would be an example of development control without planning. It would have the disadvantage of not providing a clear framework over planning obligations or how or where facilities servicing the whole town centre or town would be provided. It would also share the disadvantages of the two saved policies without providing an opportunity to provide clarification on how these disadvantages could be mitigated in the circumstances of this specific area. Key issues concerning the town centre would remain unresolved.

Option B

Produce a SPD based upon minimal change to the town centre.

Conclusions:

- This option performs poorly overall, with the only beneficial impacts being short term social equity gains, and even these are eroded over the medium to long term. The main problem with this option being 'no change' to the centre would occur alongside a pattern of expansion by competing centres, leading to the centre declining over time and people travelling further to shop.

Recommendations:

- This option performs poorly and should not be pursued.

Option C

Produce a SPD based upon improving the character and appearance of the town centre and a moderate increase in retail provision

Conclusions:

- This option performs well overall in sustainability terms and is the best of the four options. It performs very well in terms of economic activity and land use and transport patterns. It does produce short term negative impacts on social justice issues because of impacts on existing shopkeepers, these are balanced by positive impacts in the longer term. These impacts might be mitigated by a balanced approach to development, which saw development of units for lower rent and specialist tenants occurring alongside growth for higher rent tenants. There are a number of uncertainties over the impacts of these options and how sustainability gains can be achieved and negative impacts mitigated. Firstly any demolition will need to be selective to avoid harm to the historic environment, and replacement buildings will need to be of outstanding quality appropriate to the Garden City. Secondly there needs to be a step change in the use and quality of public transport in the town to reduce its car dependence.

Option D

Produce a SPD based upon major change in the town centre and on maximising retail potential

Conclusions:

- This option performs relatively well in many regards in sustainability terms and has similar outcomes to option C. It performs very well in terms of economic activity and land use and transport patterns. It similarly produces short term negative impacts on social justice issues because of impacts on existing shopkeepers, these are balanced by positive impacts in the longer term. These impacts might be mitigated by a balanced approach to development, which saw development of units for lower rent, and specialist tenants occurring alongside growth for higher rent tenants.

- The main negative impact with this option is that potentially on the historic environment in that demolition is not highly selective and carefully controlled. Replacement buildings will need to be of outstanding quality appropriate to the Garden City.
- This option would require a step change in the use and quality of public transport in the town to reduce its car dependence.

Recommendations for changes and need for additional data:

- This option does not perform as well as option C and should not be pursued, however if it is pursued careful control over the extent of demolition will significantly reduce negative impacts as would improvements to public transport.

6.4 Conclusions on the Preferred Option

Options C and D present the best outcomes. The option B 'minimal change' option performs very poorly. It is recommended that option C is pursued because it has the best outcomes in terms of the historic environment, the more radical option D involving greater retail provision could be pursued sustainably if demolition was highly selective and if replacement buildings were of a suitable quality.

Options C and D do produce short term negative impacts on social justice issues because of impacts on existing shopkeepers, these are balanced by positive social justice impacts in the longer term. These impacts might be mitigated by a balanced approach to development, which saw the development of units at lower rent and specialist tenants occurring alongside growth for higher rent tenants. It should be noted however that the extent to which these matters are material within the British Planning system is very limited. There are a number of uncertainties over the impacts of these options and how sustainability gains can be achieved and negative impacts mitigated. Firstly any demolition will need to be selective to avoid harm to the historic environment, and replacement buildings will need to be of outstanding quality

appropriate to the Garden City. Secondly there needs to be a step change in the use and quality of public transport in the town to reduce its car dependence.

6.5 The Preferred Option

Following appraisal of the strategic options the Council decided on its preferred option, option C, and this was developed as the Letchworth Garden City Town Centre Strategy draft Supplementary Planning Document.

6.6 Why this Option was chosen

This option has been chosen because it is the Council's view that it performed best in sustainability terms, producing economic development for the town, better retail choice for residents, improvements to the environment of the town centre and improvements to public transport, walking and cycling.

7. Appraisal of the Draft SPD

7.1. The Appraisal Process

The appraisal process was divided into two stages:

1. Appraising the policies and opportunity sites separately.
2. Appraising the cumulative impact of all of the policies and opportunity sites.

Each policy and opportunity site was appraised against each of the sustainability objectives. This was done using a formal matrix. The impact of the policies and opportunity sites on the SA objectives was scored as follows: Major positive √ √; positive √; major negative **XX**; negative **X**; uncertain **?**; or neutral **O**. The SEA Directive requires the appraisal to identify significant impacts. In this appraisal, major positive, positive, major negative and negative impacts are all defined as “significant”.

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

For the appraisal of each policy and opportunity site, the conclusions, concentrating on the significant impacts are summarised at the end of the formal matrix, along with recommendations for changes (discussed further below). The full matrices with conclusions and recommendations are contained in appendix 6.

Uncertainties in the appraisal

The SEA Directive requires that uncertainties in the appraisal be identified. Where there was insufficient information to predict important sustainability impacts of an option, these are noted in the matrices. (See appendix 6) In these cases the Council has usually specified in their recommendations the additional data, or the need for more information on how the option would be applied, that would help to predict the impact of the option.

7.2 Appraisal of the Preferred Option

Note: In order to make the appraisal process more manageable and to ensure it focuses on the strategic issues rather than minor points of detail the preferred option has been appraised in sections consisting of similar policies, with a very similar impact.

Section 5: The Town Centre Strategy Boundary

- Policy 1 defines the Town Centre Strategy Boundary

Conclusions:

- This policy simply defines a boundary within which other policies in the draft strategy apply – it is not therefore meaningful to appraise it by itself, as its impact is neutral.

Section 6: Garden City Conservation and Urban Design

- Policy 2 - Protects the Letchworth Conservation Area
- Policy 3 - Sets down Garden City Urban Design Principles
- Policy 4 - Defines a series of character areas
- Policy 5- Covers urban design principles around Broadway Gardens/ the Town Square
- Policy 6 - Covers urban design principles around the northern part of the Broadway
- Policy 7- Covers urban design principles around the classical part of the retail area.
- Policy 8 -Covers urban design principles around the village type shopping streets.
- Policy 9 -Covers urban design principles around the late 20th Century part of the retail area.
- Policy 10 - Covers shopfront design

Conclusions:

- The impacts are generally positive, especially on the historic environment.

Uncertainties:

- The policies do not cover issues such as resource use – hence the neutral impact.

Recommendations:

- It is recommended that:
Either issues such as sustainable design and construction are covered within the policy, or more practically, these matters are dealt with in the LDF framework core policies and or/SPD so they do not have to be repeated within individual SPDs.

Section 7: Retail and Change of Use – Development Principles – Retail Policies

- Policy 11 - Sets down the priority sites for meeting retail need.
- Policy 12 - Provides for additional convenience goods retailing.
- Policy 13 - Sets down the strategy for linking up retail areas.
- Policy 14- Sets down principles for the primary shopping frontage
- Policy 15 - Sets down principles for the secondary shopping frontage
- Policy 16 - Sets down principles for the sites outside the primary and secondary areas shopping frontage
- Policy 17 - Sets down principals over Evening and Night-time Economy uses

Conclusions:

- These policies perform well overall in sustainability terms. They perform very well in terms of economic activity and land use and transport patterns. It does produce short term negative impacts on social justice issues because of impacts on existing shopkeepers, these are balanced by positive impacts in the longer term. These impacts might be mitigated by a balanced approach to development, which saw development of units for

lower rent and specialist tenants occurring alongside growth for higher rent tenants.

Uncertainties:

- There are a number of uncertainties over the impacts of these policies and how sustainability gains can be achieved and negative impacts mitigated. Firstly any demolition will need to be selective to avoid harm to the historic environment, and replacement buildings will need to be of outstanding architectural quality appropriate to the Garden City. Secondly there needs to be a step change in the use and quality of public transport in the town to reduce its car dependence. Thirdly there needs to be implementation of wider policies concerning matters such as sustainable construction and use of renewable energy facilities on buildings.

Recommendations:

- No suggested changes as these matters are covered in other policy areas.

Section 7: Retail and Change of Use – Development Principles – Other Policies

- Policy 18 - Concerns Arts, culture and assembly uses in and around the town centre
- Policy 19 - Concerns Library, Museum and Heritage Provision
- Policy 20 - Concerns Business uses
- Policy 21 - Concerns Residential uses
- Policy 22 - Covers Civic Accommodation
- Policy 23 - Covers Youth and other community facilities

Conclusions:

- These policies perform well overall in sustainability terms. They perform very well in terms of economic activity and land use and transport patterns. It does produce short term negative impacts on social justice issues because of impacts on existing tenants, these are balanced by positive impacts in the medium-longer term. These impacts might be mitigated by

a balanced approach to development, which saw development of units for lower rent, and specialist tenants occurring alongside growth for higher rent tenants. There are also positive benefits to youth facilities, education and health facilities.

Uncertainties :

- There are a number of uncertainties over the impacts of these policies and how sustainability gains can be achieved and negative impacts mitigated. Firstly any demolition will need to be selective to avoid harm to the historic environment, and replacement buildings will need to be of outstanding architectural quality appropriate to the Garden City. Secondly there needs to be a step change in the use and quality of public transport in the town to reduce its car dependence.

Recommendations:

- No suggested changes as these matters are covered in other policy areas.

Section 8: Transport and The Public Realm

- Policy 24 - Covers the transport impact of development proposals
- Policy 25 - Covers the road network
- Policy 26 - Covers the cycle network
- Policy 27 - Covers public transport and interchange
- Policy 28 - Covers pedestrian priority
- Policy 29 - Covers disabled access
- Policy 30 - Covers off street car parking management and provision
- Policy 31 - Covers on street car parking
- Policy 32 - Concerns protection of open space
- Policy 33 - Concerns public realm improvements
- Policy 34 - Concerns community safety

Conclusions:

- These policies have an almost wholly positive impact.

Uncertainties :

- There are a number of uncertainties over the impacts of these policies and how sustainability gains can be achieved and negative impacts mitigated. Firstly there needs to be a step change in the use and quality of public transport in the town to reduce its car dependence. Secondly the amount and cost of parking should not make it an overly attractive alternative to public transport to adversely affect modal shift.

Recommendations:

- No suggested changes – however the impact of additional off street parking should be carefully monitored, and the price/control regime for parking altered accordingly over time.
- Whether it is practical or feasible to mitigate the impacts on Icknield Way should also be investigated.

7.3 Appraisal of Opportunity Sites

Note: In order to make the appraisal process more manageable and to ensure it focuses on the strategic issues rather than minor points of detail, the Opportunity Sites have been sifted to remove the smallest sites not making a significant impact on the environment. These sites are likely to fall under the principles of the 'small sites and areas' exemption. Only those aspects of each opportunity site likely to have a significant environmental impact have been appraised – not localised aspects of design guidance. Finally where sites are adjoining/linked and likely to have similar impacts these have been appraised together.

Opportunity Site LTC 1: Arena Parade Eastcheap/ Broadway Old Town Hall and yard adjoining the Post Office

Conclusions:

- This opportunity site performs well overall in sustainability terms. It performs very well in terms of economic activity and land use and transport patterns. It does produce short term negative impacts on social justice issues because of impacts on existing shop tenants, these are balanced by positive impacts in the longer term. These impacts might be mitigated by a balanced approach to development, which saw development of units for lower rent and specialist tenants occurring elsewhere alongside growth for higher rent tenants.

Uncertainties:

- There are a number of uncertainties over the impacts of this proposal and how sustainability gains can be achieved and negative impacts mitigated. Firstly any demolition will need to be selective to avoid harm to the historic environment. It should be noted that the Arena Parade itself has already been assessed as making a negative contribution in the Conservation Area Character Statement, and replacement buildings will need to be of outstanding quality appropriate to the Garden City. Secondly there needs to be a step change in the use and quality of public transport in the town to reduce its car dependence. Issues such as resource use and waste, will depend upon the implementation of upper level policies within the local development framework.

Recommendations:

- No suggested changes as these matters are covered elsewhere.

Opportunity Sites LTC2: The Wynd, Openshaw Way and adjoining lands including St Michael's House, Norton Way South

Conclusions:

- This opportunity site performs well overall in sustainability terms. It performs very well in terms of economic activity and land use and transport patterns. It does produce short term negative impacts on social justice issues because of impacts on existing Wynd tenants, these are balanced by positive impacts in the longer term. These impacts might be mitigated by a balanced approach to development, which saw development of units for lower rent and specialist tenants occurring elsewhere alongside growth for higher rent tenants.

Uncertainties:

- There are a number of uncertainties over the impacts of this proposal and how sustainability gains can be achieved and negative impacts mitigated. Firstly any demolition will need to be selective to avoid harm to the historic environment. It should be noted that parts of the Wynd itself has already been assessed as making a negative contribution in the Conservation Area Character Statement, and replacement buildings will need to be of outstanding quality appropriate to the Garden City. Secondly there needs to be a step change in the use and quality of public transport in the town to reduce its car dependence. Issues such as resource use and waste will depend upon the implementation of upper level policies within the local development framework.

Recommendations:

- No suggested changes as these matters are covered elsewhere.

Opportunity Site LTC3: Garden Square Shopping Centre, adjoining car park. Council Offices and public house Gernon Road and 28-74 (evens) Eastcheap

Conclusions:

- This opportunity site performs well overall in sustainability terms. It performs very well in terms of economic activity and land use and transport patterns. It does produce short term negative impacts on social justice issues because of impacts on existing Garden Square tenants, these are balanced by positive impacts in the longer term. These impacts might be mitigated by a balanced approach to development, which saw development of units for lower rent and specialist tenants occurring elsewhere alongside growth for higher rent tenants.

Uncertainties:

- There are a number of uncertainties over the impacts of this proposal and how sustainability gains can be achieved and negative impacts mitigated. Firstly any demolition will need to be selective to avoid harm to the historic environment. It should be noted that Garden Square itself has already been assessed as making a negative or neutral contribution in the Conservation Area Character Statement, and replacement buildings will need to be of outstanding architectural quality appropriate to the Garden City. Secondly there needs to be a step change in the use and quality of public transport in the town to reduce its car dependence. Issues such as resource use and waste, will depend upon the implementation of upper level policies within the local development framework.

Recommendations:

- No suggested changes as these matters are covered elsewhere.

Opportunity Site LTC4: Site at Junction of Gernon Road/Broadway

Conclusions:

- This opportunity site performs well overall in sustainability terms. It performs very well in terms of economic activity and land use and transport patterns.

Uncertainties:

- There are a number of uncertainties over the impacts of this proposal and how sustainability gains can be achieved and negative impacts mitigated. Firstly any proposed demolition will need to be selective in terms of not demolishing buildings making a positive contribution to the character or appearance of the conservation area to avoid harm to the historic environment. Any replacement buildings will need to be of outstanding architectural quality appropriate to the Garden City. Secondly there needs to be a step change in the use and quality of public transport in the town to reduce its car dependence. Issues such as resource use and waste, will depend upon the implementation of upper level policies within the local development framework.

Recommendations:

- No suggested changes as these matters are covered elsewhere.

Opportunity Site LTC5: Former Grammar School, and medical centre and Plinston Hall, Broadway/Town Square

Conclusions:

- This opportunity site performs well overall in sustainability terms. It performs very well in terms of economic activity and land use and transport patterns. The potential negative impact is the lost opportunity to provide housing/affordable housing.

Uncertainties:

- There are a number of uncertainties over the impacts of this proposal and how sustainability gains can be achieved and negative impacts mitigated. In particular, related to any consequential impact if the Gernon Road Council office site is chosen as the civic accommodation option and the impact of any (as yet unknown) design on the conservation area. Firstly any demolition will need to be selective to avoid harm to the historic environment. It should be noted that some of these buildings have been assessed as making a negative or neutral contribution to the character of the conservation area, and replacement buildings will need to be of outstanding quality appropriate to the Garden City. Secondly there needs to be a step change in the use and quality of public transport in the town to reduce its car dependence. Issues such as resource use and waste depend upon the implementation of upper level policies within the local development framework.

Recommendations:

- The Council should consider whether or not the opportunity costs of not providing housing are outweighed by other environmental/planning matters.

Opportunity Site LTC6: Site at corner of South View and Town Square/Broadway and Site LTC7 at corner of South View/Meadow Way and Town Square/Broadway Gardens**Conclusions:**

- These opportunity sites perform fairly well in sustainability terms. They perform very well in terms of economic activity and land use and transport patterns. The potential negative impact is the lost opportunity to provide housing/affordable housing.

Uncertainties:

- There are a number of uncertainties over the impacts of this proposal and how sustainability gains can be achieved and negative impacts mitigated.

Firstly the impact on the conservation area will depend on the final design, secondly there needs to be a step change in the use and quality of public transport in the town to reduce its car dependence. Issues such as resource use and waste will depend upon the implementation of upper level policies within the local development framework.

Recommendations:

- The Council should consider whether or not the opportunity costs of not providing housing are outweighed by other environmental/planning matters.

Opportunity Site LTC8: Letchworth Garden City Station, Station Forecourt, car parks and war memorial area, Station Parade/Dorchester House

Conclusions:

- This opportunity site performs well in sustainability terms. It performs very well in terms of economic activity and land use and transport patterns.

Uncertainties:

- There is an uncertainty over the impact on the conservation area of the loss of the war memorial, and the design of the transport interchange. Issues such as resource use and waste will depend upon the implementation of upper level policies within the local development framework.

Recommendations:

- No changes proposed, however at application stage the design issues will need careful consideration.

Opportunity Site LTC9: Garage 20 Station Road (Bennetts Garage - Ford Dealership) and LTC11 Railway land to the north of Station Road

Conclusions:

- This opportunity site performs well in sustainability terms. It performs very well in terms of economic activity and land use and transport patterns.

Uncertainties:

- There are some uncertainties over the impacts of this proposal and how sustainability gains can be achieved and negative impacts mitigated. The impact on the conservation area will depend on the final design. Secondly there needs to be a step change in the use and quality of public transport in the town to reduce its car dependence. Issues such as resource use and waste will depend upon the implementation of upper level policies within the local development framework.

Recommendations:

- No changes proposed.

7.4 Summary of the Appraisal Results

The conclusions from the appraisal of the draft SPD, also known as the preferred option are outlined below. The detailed results are available in appendix 6.

The draft SPD with the preferred option performs well in sustainability terms. Overall it performs very well in terms of economic activity and land use and transport patterns, by encouraging economic development, particularly retail sector growth, and through improving public transport, cycling and the pedestrian environment in the town.

There are a number of uncertainties over the cumulative impacts of opportunity site development and how sustainability gains can be achieved and negative impacts mitigated. Firstly any proposed demolition will need to be selective to avoid harm to the historic environment and very vigilant in ensuring outstanding architectural quality for replacement buildings. Secondly there needs to be a step change in the use and quality of public transport in the town to reduce its car dependence. It is recommended that these matters be subject to close monitoring and planning obligations are used to ensure that the balanced approach that the SPD seeks towards development and environmental/transport improvements is achieved.

There are also uncertainties over the cumulative impact of the parking proposals. Improvement to off street car parking could lead to more people visiting the town centre who currently shop elsewhere and hence not increase overall car use, however if taken to excess it could lead to an undesirable modal shift. The District Council should very carefully monitor the overall supply and demand of parking spaces of different types over time and adjust levels and charging regimes to ensure sustainability objectives are met, an approach set out in the Council's parking strategy.

Finally there are uncertainties over matters such as sustainable design and construction and renewable energy use. These are not matters which are directly covered by the strategy itself as in the modular spirit of the new Local Development Framework system it is expected that these district wide matters will be covered elsewhere to avoid repetition at an area specific level. The Council will ensure that these matters are properly covered either somewhere within an LDD or SPD.

8. Appendix 1 Key Sustainability Issues

SA Objective ⁷	Issues	Source
ECONOMIC ACTIVITY		
1 Achieve sustainable levels of prosperity and economic growth	Difficulties in competing with large urban centres for provision of employment, shopping and other facilities	Discussion with Officer Steering Group
	Promotion of tourism. Visitors can be important, but the District is not seen as a prime tourist location.	Discussion with Officer Steering Group
	Need to provide more high quality employment in the District. This will help reduce the disparity between local income and that of commuters, and to reduce the environmental impacts of commuting. One cause of this is the high cost of housing; employers don't see the District as a location of choice.	Herts Rural Innovation Strategy (p30) North Herts Learning Forum Action Plan LSC Action Plan
	Recruitment of skilled workers: within rural Hertfordshire 15% of employers report difficulty in recruiting the skills they need. This compares with a 10% average for Hertfordshire and as little as 2% in the south of the County. Equally 19% of Hertfordshire firms report that a lack of skilled labour is a limiting factor in increasing output.	NHDC Corporate Plan (p6) Discussion with Officer Steering Group
LAND USE AND DEVELOPMENT PATTERNS		
<u>2(a) Minimise the development of greenfield land and other land with high environmental and amenity value</u>	The need to provide additional housing for local needs and to meet additional regional requirements will require the use of greenfield sites and put significant pressure on the environment and quality of life in the District. Although no strategic review of greenbelt is proposed for around Letchworth (which has the oldest green belt in the world) in the regional spatial strategy the more capacity that can be found within the town including the town centre will reduce pressure for greenfield development throughout the district.	Draft East of England Regional Spatial Strategy.
<u>2(b) Provide access to green spaces</u>	The inclusion of open spaces was a key part of the Parker/Unwin masterplan for the town, notably within Letchworth Town Centre Broadway Gardens/Town Square	Letchworth Conservation Area Character Appraisal Discussion with Officer Steering Group

⁷ Those relevant to the SEA Directive are shown underlined

SA Objective ⁷	Issues	Source
<u>2 (c) deliver more sustainable location patterns and reduce the use of motor vehicles</u>	Population and mobility factors have changed the function of villages and small towns from employment service centres increasingly towards dormitory/residential functions reducing their social and physical diversity. An increasing proportion of retail expenditure is going out of the town.	Herts Rural Innovation Strategy (p31) Discussion with Officer Steering Group NLP Retail and Town Centre Studies
	The complex settlement pattern and distribution of shopping and employment facilities means that it is sometimes difficult to maintain commercially viable passenger transport for journeys other than to London.	Herts Rural Innovation Strategy (p31) Hertfordshire Local Transport Plan
ENVIRONMENTAL PROTECTION		
<u>3(c) Conserve and where appropriate, enhance the historic environment</u>	Letchworth is the world's first Garden City – making it of international conservation importance. It is being put forward for inclusion on the Unesco list of World Heritage sites. Most of the town development before 1918, and some high quality areas developed since that date, have been declared a conservation area. The town has many listed buildings but only 6 listed buildings in the town centre itself.	Letchworth Conservation Area Character Appraisal Discussion with officer steering group
<u>3(d) Reduce pollution from any source</u>	Quality of surface and ground water is threatened by the water supply needs and drainage from future developments. Adequate supply for future developments is also an issue: see 6a below.	Herts Environmental Forum Strategy Discussion with Officer Steering Group
CLIMATE CHANGE		
<u>4(a) Reduce greenhouse gas emissions</u>	Transport use is a significant contributor to global warming. Journey lengths are above the county average for work and leisure journeys in North Hertfordshire/Stevenage, and there is a high car use for the school run. Car use is above the National Average in Letchworth.	North Herts Area Transport Plan (NHATP) Table 7 Issues and problems identified through consultation. NHDC Rural Strategy (Annex 4 – Priority 7 – transport) County Transport Plan
	Domestic and commercial energy use is also a significant contributor to global warming.	Discussion with Officer Steering Group
A JUST SOCIETY		
<u>5(a) Share access to services</u>	Whilst the District is relatively prosperous there are pockets of income and/ or multiple	NHDC Corporate Plan (p4)

SA Objective ⁷	Issues	Source
and benefits of prosperity fairly	deprivation in relation to national standards. This occurs in Letchworth (South East).	Anti-Poverty Strategy 1998, summarised in Appendix to NHDC Social Inclusion Strategy. Herts Rural Innovation Strategy (p31) Community Legal Service Strategy 2003
5(b) Provide access to services and facilities for all	The number of households in the district with an elderly person in it is higher than the national average at 34%. There is a lack of facilities for young people in the town.	Herts Rural Innovation Strategy (p31) Older Peoples Strategy
5(d). Increase access to decent and affordable housing	There is a need to improve supply of high-quality affordable housing. The need for affordable housing has been exacerbated by insufficient development of affordable units over the last decade. Coupled with significant inflation in the housing market the gap has widened between the 'haves' and 'have-nots'. Specific issues on affordable housing include key worker housing, housing for young people and the disabled.	NHDC Corporate Plan (p6) Housing Strategy 2004 Affordable housing programme
5(e) Reduce crime rates and fear of crime	NHDC is generally very safe, but fear of crime is an issue in the District. The crime survey showed that areas of concern about crime and disorder are spread throughout the District. A particular issue is street crime, theft from cars and antisocial behaviour in the town centre.	NHDC Corporate Plan (p7) North Herts CDRP Strategy 2005-08 Crime Audit 2004 Fear of Crime Survey 2004 Discussion with Officer Steering Group
5(f) Improve conditions and services that engender good health and reduce health inequalities	Generally speaking across all age groups the population of North Hertfordshire and Stevenage enjoys good health compared with national averages. This however masks some areas at ward or sub-ward level of significant deprivation and poorer health status. The incidence of age-related poor health, including fuel poverty (hypothermia related) and senility are higher in North Hertfordshire.	Health Improvement and Modernisation Programme, North Herts and Stevenage PCT 2005 (p6) Director of Public Health Report 2005 Discussion with Officer Steering Group.
	Noise from air and road transport has a significant effect on quality of life in the District. Some proposed developments may have significant additional impacts.	Discussion with Officer Steering Group

SA Objective ⁷	Issues	Source
	There are also important local issues regarding the need to integrate and co-ordinate transport services and arrangements to improve access to health facilities.	Health Improvement and Modernisation Programme, North Herts and Stevenage PCT. (p35) Health Scrutiny report
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	Letchworth Town Centre is the main cultural area for the town.	Discussion with Officer Steering Group
RESOURCE USE AND WASTE		
6 (a). Use natural resources efficiently; reuse, use recycled where possible	Hertfordshire has the highest domestic water use in the country. The proposed new developments will put some pressure on water supply infrastructure, and may require water to be piped in from outside the District, further abstraction with associated environmental impacts and/or water conservation measures in new developments	Draft East of England Regional Spatial Strategy and associated panel report (June 2006)
	The most recent figures available (1997) show that Hertfordshire was a net importer of sand and gravel with consumption exceeding sales by 0.356mt.	Herts Minerals Local Plan Second Deposit Draft (para 1.4.3)
6(b) Reduce waste	Need to reduce waste and increase recycling rates, particularly because waste sites within the County will be full by 2008.	NHDC Corporate Plan (p6) Herts Waste Strategy (p5) Discussion with Officer Steering Group

