

Three Rivers District Council

Three Rivers Site Allocations Document

Pre-Submission Preferred Options Additional Sites Sustainability Appraisal Note

July 2012

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1 Introduction

1.1 Background

- 1.1.1 In January 2012, consultation took place on the Site Allocations Pre-Submission (Preferred Options) document and associated Sustainability Appraisal Report. This document identified sites for housing, employment, education, retail, open space and for mixed use developments. It also provided the basis for proposed revisions to the Green Belt on certain sites.
- 1.1.2 Following this consultation, there are a limited number of new sites that the Council considers there may be merit in allocating and these are included in the current Pre-Submission Preferred Options Additional Sites Consultation. The purpose of the Site Allocations document is to support the Core Strategy in achieving the delivery of the Core Strategy objectives and it will form part of the local plan that will be a material consideration for planning matters in the District.
- 1.1.3 This document, the 'Site Allocations Pre-Submission Preferred Options Additional Sites SA Note' provides an assessment of the contribution of the identified additional sites to sustainable development and will inform further stages of the document production process.
- 1.1.4 As this additional note only assesses the new 'additional' sites, it should be read in conjunction with the Site Allocations Pre-Submission Sustainability Appraisal (January 2012).

1.2 Site Allocations Pre-Submission Preferred Options Additional Sites

- 1.2.1 The Site Allocations Pre-Submission Preferred Options Additional Sites document identifies one new housing site, four new open spaces and one proposed change to the Green Belt to enable delivery of the objectives for spatial development set out in the Core Strategy and the Community Strategy.
- 1.2.2 The Pre-Submission Preferred Options Additional Sites, which is the current stage is now subject to consultation with stakeholders and members of the public.
- 1.2.3 Information on previous stages is set out in the Site Allocations Pre-Submission Sustainability Appraisal (January 2012).

1.3 Strategic Environmental Assessment/Sustainability Appraisal

- 1.3.1 The Planning and Compulsory Purchase Act (2004) requires Sustainability Appraisals to be carried out for Local Planning Authority plans. In addition, the Environmental Assessment of Plans and Programmes Regulations (2004) (hereafter referred to as The Regulations) implement European Directive 2001/42/EC known as the Strategic Environmental Assessment (SEA) Directive and require Strategic Environmental

Assessments (SEA) and Sustainability Appraisals (SA) for a wide range of plans and programmes, including local plans.

- 1.3.2 Both the SA and SEA processes help planning authorities to fulfil the objective of contributing to the achievement of sustainable development in preparing their plans through a structured assessment against key sustainability issues.
- 1.3.3 Although the requirement to carry out both an SA and SEA is mandatory, it is possible to satisfy the requirements of both pieces of legislation through a single appraisal process. Government guidance for undertaking SEA and for SA of Development Plan Documents in particular details how the SA and SEA should be integrated into once process. The final output of the process is a combined Sustainability Appraisal/Environmental Report which will be published alongside the plan, This report will be referred to as the SA report.
- 1.3.4 Regulations require that the sustainability appraisal results of the Pre-Submission draft are consulted on with statutory bodies and with members of the public to obtain their views prior to adoption of the Site Allocations document.
- 1.3.5 In addition to declaring results of the assessment, the SA Report proposes mitigation measures/recommendations to enhance the sustainability contribution of the proposed sites. The SA Report also proposes a monitoring framework for all significant sustainability issues identified during the assessment.
- 1.3.6 For the Site Allocations document, in order to enable bespoke site analysis but to maintain continuity from the Core Strategy, the SA/SEA Framework of the Core Strategy SA Report has been adapted to suit site level analysis. The revised framework was circulated and views gathered from the four neighbouring Councils of Three Rivers District Council, St Albans City and District Council, Watford Borough Council and Dacorum Borough Council during December 2011.
- 1.3.7 The Site Allocations Pre-Submission Sustainability Appraisal (January 2012) sets out details of the findings of previous stages of the SA/SEA process and how the SEA Directive has been complied with. It discusses how SA has influenced the Site Allocations document, the scope of the assessment, the requirements for Habitat Regulations Assessment, the environmental and sustainability planning context, key sustainability issues and opportunities, details of the SA/SEA Framework and how sites have been assessed.

2 Site Allocations Pre-Submission Preferred Options Additional Sites

2.1 *Assessment Methodology*

2.1.1 Assessment of the Site Allocations Additional Sites involves prediction of the effects of each site against every sustainability objective. The assessment is expressed using the significance criteria outlined below.

Symbol	Description
++	Very sustainable - Option is likely to contribute significantly to the SA/SEA objective
+	Sustainable - Option is likely to contribute in some way to the SA/SEA objective
0	Neutral – Option is unlikely to impact on the SA/SEA objective
?	Uncertain – It is uncertain how or if the Option impacts on the SA/SEA objective
-	Unsustainable – Option is likely to have minor adverse impacts on the SA/SEA objective
--	Very unsustainable – Option is likely to have significant adverse impacts on the SA/SEA objective

Figure 2.1 Assessment Significance Criteria

2.1.2 Effects are typically local in nature, with a moderate likelihood of occurrence during the plan period i.e. short to medium term.

2.2 *Mitigation and Recommendations*

2.2.1 The SEA Regulations require the SA process to identify suitable mitigation measures for any significant adverse effects predicted for the policies. This is also an important component of the SA Report. Reference should be made to the Detailed Assessment matrices in Appendix 1 and the commentary relating to each predicted effect in order to gather any mitigation suggestions, and recommendations to improve the site contribution to achieving each sustainability objective.

2.3 *Summary of the Pre-Submission Preferred Options Additional Sites Appraisal Results*

2.3.1 Based on the above methodology, the sites in the Pre-Submission Preferred Options Additional Sites document have been assessed and the results presented as a detailed assessment matrix in Appendix 1. These results are summarised in Table 2.1.

2.3.2 In general, development at all sites should have regard to the Core Strategy policies (adopted October 2011) and to the Development Management policies, implying that cumulative and synergistic positive effects are likely to occur for many sustainable themes such as biodiversity, landscape character, cultural heritage asset and material efficiency in addition to the contribution of individual sites.

- 2.3.3 The Site Allocations Pre-Submission Sustainability Appraisal (January 2012) predicted effects against SA/SEA objectives of a do-nothing scenario.
- 2.3.4 The assessment considered that assuming future development will go ahead in the absence of proposed Site Allocation policies, but that other local, regional and national policies and plans that may influence future development remains, it is generally predicted that progressing the 'good quality housing', 'access to services', 'economic growth' and 'revitalising the town centres' SA objectives may not occur uniformly across all parishes of the District. A major concern in a do-nothing scenario will be an opportunity lost in the predictability of the location of future development for housing, education, open space and retail uses – thus having a risk of the Council being unable to meet Core Strategy objectives, including housing. In the absence of planned allocations, it will be difficult for the County to coordinate any educational provision, which may seriously affect meeting the infrastructure requirements of the District and of the sub-region. Environmental effects are also likely both from individual and cumulative site influence, thus a haphazard and unplanned development would be likely to occur in a do-nothing scenario.

Table 2.2 Site Allocations Pre-Submission Preferred Options Additional Sites Sustainability Assessment Summary Matrix

SEA Objective (abridged)															
Site name	SA1- Biodiversity	SA 2&3- Water	SA4- Soils	SA 5&6- Climate change	SA7- Air Quality	SA8&9- Resource efficiency	SA10- Cultural Heritage	SA11- Landscape & Townscape	SA12- Health	SA13- Sustainable locations	SA14,15&16- Good Quality Housing	SA17- Crime	SA18- Economic Growth	SA19- Fairer access to services	SA20- Revitalise Town centre
AH(1) Land Opposite Alpine Press, Kings Langley	0	0	-	0	0	0	0	-	0	0	+	0	-	0	0
AOS(a) South Way Playing Fields, Abbots Langley	0	0	0	0	0	0	0	0	+	0	0	0	0	+	0
AOS(b) The Green, Croxley Green	0	0	0	0	0	0	0	0	+	0	0	0	0	+	0
AOS(c) Harrocks Wood, Chandlers Cross	0	0	0	0	0	0	0	0	+	0	0	0	0	+	0
AOS(d) Hill Farm Avenue, Leavesden	0	0	+	0	0	0	0	0	+	0	0	0	0	+	0
AGB(1) Leavesden	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

- 2.3.5 The assessment found that overall positive or neutral effects are observed across most SA objectives. There are uncertain effects for additional site AH(1): Land opposite Alpine Press, Kings Langley against biodiversity and resource efficiency as the site is part greenfield and part previously developed. Impacts will depend on the location of development within the site so cannot be predicted without further details. Negative impacts on soils objectives would be minimised by limiting development to the previously developed part of the site.
- 2.3.6 The open space allocations are all predicted to bring benefits to the health of the local population (by providing access to walking and cycling that will lead to a healthy lifestyle). The proposals are all supportive of the SA19 objective-fairer access to services.
- 2.3.7 As the site AGB(1): Leavesden is already developed so the designation alteration i.e. removal of Green Belt is unlikely to have any impact on sustainability objectives.

2.4 ***Assessment of Alternative Sites***

- 2.4.1 The SEA guidance requires SA to assess realistic alternatives that may have been considered in the process of preparation of the document. The results of the SA will help inform the decision to take forward or to reject the alternatives.
- 2.4.2 As documented in the Site Allocations Pre-Submission Sustainability Appraisal January 2012, in the process of preparing the Site Allocations document, a number of alternative housing sites have been considered and appraised using the housing site selection criteria (Appendix 2 of the Core Strategy). The criteria were reviewed as part of the SA exercise and results are documented through a colour coding to highlight the negative and positive environmental and social features of each site in Appendix 2.

2.5 ***Cumulative, Synergistic and Secondary Effects***

- 2.5.1 The SA guidance requires that in addition to predicting the positive, negative, neutral or uncertain effects against the SEA/SA objectives, any cumulative, synergistic or secondary effects these policies will have whilst interacting with each other or with other local plan policies.
- 2.5.2 These effects were discussed in the Site Allocations Pre-Submission Sustainability Appraisal January 2012.

2.6 ***Difficulties Encountered***

- 2.6.1 Although a range of site level, local and regional information sources and studies were available to inform the assessment process, without sufficient detailed information it has not been possible to predict the effects of one site against certain SA objectives. These uncertainties are likely to be reduced as more detail is provided through individual planning applications.

3 Monitoring

- 3.1 The SEA Directive requires SA reports to identify monitoring measures for significant (adverse and positive) environmental effects of the plan. The SA of the Site Allocations document has identified a combination of effects and it is important to monitor these effects. There are likely to be several benefits in monitoring any environmental effects arising from the implementation of the Site Allocations including;
- Identifying when action should be taken to reduce or offset any potential environmental effects of the plan;
 - Enhancing understanding of how the environment is changing in the District; and
 - Tracking whether the site development has any unforeseen environmental effects.
- 3.2 The Site Allocations Pre-Submission Sustainability Appraisal January 2012 has recommended monitoring measures aligned with the measures developed for the adopted Core Strategy.

4 Next Steps

- 4.1 The Pre-Submission Preferred Options Additional Sites Sustainability Report accompanies the Site Allocations Pre-Submission Preferred Options Additional Sites Consultation. Both documents are put forward for consultation between 13 July and 24 August 2012.
- 4.2 Based on the consultation responses and other information that may become available, the SA Report will be finalised for submission to the Secretary of State.
- 4.3 Adoption of the Site Allocations document will be accompanied by a SA Adoption Statement.

Appendix 1: Site Allocations Pre-Submission Preferred Options Additional Sites Appraisal Matrices

Introduction

The Site Allocations Preferred Options Additional Sites consultation paper identifies one new housing site, four open spaces and one proposed change to the Green Belt to enable delivery of the objectives for spatial development set out in the Core Strategy and the Community Strategy.

Geographical Information Systems (GIS) and evidence provided in the evidence base documents have been used to assess the sites in terms of potential constraints and opportunities. The GIS layers and other criteria used to compare environmental designations, accessibility and key services and land use attributes are shown in matrices below.

In the majority of cases, the assessment identifies whether an attribute conflicts with the proposed site area (yes or no). Alternatively, distance buffers were used to the edge of the proposed site. This enabled the assessment to determine access to key facilities within a certain distance from the proposed site, for example, primary schools within 600m.

Appraisal Methodology

This appendix provides an assessment of the proposals against the SEA/SA objectives listed below.

Environmental objectives

1. To protect, maintain and enhance biodiversity and geodiversity at all levels, including the maintenance and enhancement of Biodiversity Action Plan habitats and species in line with local targets
2. To protect, maintain and enhance water resources (including water quality and quantity) while taking into account the impacts of climate change.
3. Ensure new developments do not increase flood risk and avoid areas which are at risk from flooding and natural flood storage areas
4. Minimise development of land with high quality soils and minimise the degradation/loss of soils due to new developments
5. Reduce the impacts of climate change, with a particular focus on reducing the consumption of fossil fuels and levels of CO₂
6. Ensure that developments are capable of withstanding the effects of climate change (adaptation to climate change)
7. Achieve good air quality, especially in urban areas
8. Maximise the use of previously developed land and buildings, and the efficient use of land
9. To use natural resources, both finite and renewable, as efficiently as possible, and re-use finite resources or recycled alternatives wherever possible
10. To identify, maintain and enhance the historic environment and cultural assets
11. To conserve and enhance landscape and townscape character and encourage local distinctiveness

Social objectives

12. To encourage healthier lifestyles and reduce adverse health impacts of new developments
13. To deliver more sustainable patterns of location of development
14. Promote equity and address social exclusion by closing the gap between the poorest communities and the rest
15. Ensure that everyone has access to good quality housing that meets their needs
16. Enhance community identity and participation
17. Reduce both crime and fear of crime

Economic objectives

18. Achieve sustainable levels of prosperity and economic growth
19. Achieve a more equitable sharing of the benefits of prosperity across all sectors of society and fairer access to services, focusing on deprived areas in the region
20. Revitalise town centres to promote a return to sustainable urban living

The implications of proposals against environmental, social and economic features of each site is predicted and discussed in this matrix. The prediction is guided by the set of SEA/SA Objectives listed above, and results presented using the following scoring method.

Score index

Symbol	Description
++	Very sustainable
+	Sustainable
0	Neutral
?	Uncertain
-	Unsustainable
--	Very unsustainable

THEME	ENVIRONMENTAL							SOCIAL				ECONOMIC					
SEA Objective (abridged)																	
Policy/ Site name	SA1- Biodiversity	SA 2&3- Water	SA4- Soils	SA 5&6- Climate change	SA7- Air Quality	SA8&9- Resource efficiency	SA10- Cultural Heritage	SA11- Landscape & Townscape	SA12- Health	SA13- Sustainable locations	SA14,15&16- Good Quality Housing	SA17- Crime	SA18- Economic Growth	SA19- Fairer access to services	SA20- Revitalise Town centre	Commentary	
AH(1) Land Opposite Alpine Press, Kings Langley	?	0	-	0	0	?	0	-	0	0	+	0	-	0	0		<p>Part of the site Greenfield meaning that habitats and species are likely to be affected. Appropriate mitigation will be needed to reduce any adverse impacts. The proposal will affect soil objective SA4 and brownfield objective SA8. Negative impacts would be minimised by limiting development to the previously developed part of the site. The development may lead to encroachment into the open countryside, affecting the Landscape character of the area.</p> <p>Loss of parking for employment area may impact on SA18. Connectivity to amenities and community facilities is mixed, however proximity to rail station and bus service may limit the potential negative effect against SA14.</p>
AOS(a) South Way Playing Fields, Abbots	0	0	0	0	0	0	0	0	+	0	0	0	0	+	0		<p>As the site is already used as an open space and the proposal makes no alteration to the landuse, or to the existing features neutral impact is predicted against all environmental objectives. Due to the official designation,</p>

THEME	ENVIRONMENTAL								SOCIAL				ECONOMIC			
SEA Objective (abridged)																Commentary
Policy/ Site name	SA1- Biodiversity	SA 2&3- Water	SA4- Soils	SA 5&6- Climate change	SA7- Air Quality	SA8&9- Resource efficiency	SA10- Cultural Heritage	SA11- Landscape & Townscape	SA12- Health	SA13- Sustainable locations	SA14, 15&16- Good Quality Housing	SA17- Crime	SA18- Economic Growth	SA19- Fairer access to services	SA20- Revitalise Town centre	
																site may be accessed by all equality groups and is likely to provide space for community interaction (SA19) and will encourage a healthy lifestyle for the residents (SA12).
AOS(d) Hill Farm Avenue, Leavesden	0	0	+	0	0	0	0	0	+	0	0	0	0	+	0	The open space likely to serve immediate neighbourhood, improving quality of housing and is likely to continue to contribute to health benefits, as well as contribute to community interaction, supporting SA12 and SA19.
AGB(1) Leavesden	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	As the area where Green Belt boundary removal is proposed is already developed, and no change in this landuse has been proposed, revision of the boundary is likely to have neutral impact against all SA objectives.

West of 10 Toms Lane, Kings Langley	4	6	0	10	9	9	10	10	2	10	7	2	2	10	10	1	10	9	10	10	5	1	0	4	6	3	0	8	0	3	3	1	0	0	0	2	5	2	8	9	4	2	2	
Killingdown Farm, Croxley Green	6	4	2	10	10	5	9	10	0	10	0	0	0	10	9	10	10	10	10	1	10	7	10	0	2	2	4	0	5	5	4	4	0	0	0	4	0	0	2	9	6	8	0	10
Twychells Farm, Bedmond	2	4	0	10	10	9	10	10	5	10	10	3	6	10	10	10	10	10	10	10	1	10	0	3	0	0	0	2	0	0	0	0	0	4	2	2	0	6	10	4	0	10		
East Lane, Bedmond	3	3	0	10	10	9	10	10	1	10	10	1	1	10	10	10	10	10	10	10	3	3	0	6	1	0	0	3	5	0	0	0	0	2	2	5	2	8	10	4	0	10		
Bluebell Drive (large site), Bedmond	2	3	0	10	10	9	10	10	1	10	10	2	3	10	10	10	8	10	10	10	1	9	0	4	2	0	0	3	5	0	0	0	0	6	3	6	2	5	10	4	0	6		
114-118 Toms Lane, Kings Langley	4	8	0	10	10	9	10	10	4	10	10	8	7	10	10	5	10	10	10	10	1	7	0	8	5	0	0	6	0	0	0	0	0	0	0	0	0	8	10	0	0	6		
Langleybury House/School, Langleybury	3	8	8	10	9	5	10	10	4	10	4	0	3	10	10	7	10	10	10	10	3	0	4	1	0	0	4	5	0	0	0	0	0	0	0	0	0	6	9	4	0	2		
Maple Lodge, Maple Cross	6	6	0	10	4	0	10	7	1	10	10	2	4	10	10	10	7	10	10	5	5	10	0	3	3	0	4	8	0	0	0	0	2	0	5	0	6	7	6	0	6			
Land at Croxley Business Park, Croxley Green	8	10	8	10	1	0	1	1	1	10	10	8	8	10	10	9	5	10	5	10	9	5	4	2	1	0	2	7	0	8	8	0	0	0	0	0	4	0	10	0	0	3	10	
Hilltop Road, Kings Langley	1	6	0	10	10	9	10	10	4	10	10	4	10	10	10	9	10	10	10	10	1	10	0	4	4	0	0	6	0	0	0	0	0	0	0	0	0	6	10	0	0	0		
Wearings Field, Stag Lane, Chorleywood	6	2	0	10	10	5	10	5	0	10	3	2	3	10	10	6	10	10	5	10	10	6	0	0	0	4	3	2	6	3	3	2	3	0	0	2	6	0	6	10	0	4	0	
Branksome Lodge, Loudwater Lane, Loudwater	3	8	2	10	9	5	10	10	3	10	0	3	6	10	10	10	10	10	10	10	1	10	0	4	4	0	0	2	0	4	4	0	0	0	0	0	0	0	10	6	0	0	0	
Hall Farm, Berry Lane, Chorleywood	5	6	0	10	10	5	10	1	1	10	1	3	1	10	10	10	10	10	10	1	10	1	2	0	2	2	2	0	2	0	3	3	1	2	0	0	2	10	0	7	10	0	3	0
Hall Farm, Shepherds Lane, Chorleywood	3	5	0	10	10	9	10	5	1	10	4	4	2	10	10	10	10	5	10	1	7	0	2	2	0	0	3	0	2	2	0	0	0	0	0	6	0	9	10	0	1	0		
Junction of Hampermill Lane and Sandy Lodge Lane	2	4	0	10	9	0	10	5	1	10	3	1	10	8	10	0	10	10	10	3	10	9	4	2	0	0	0	4	4	0	0	0	0	0	9	0	10	8	0	0	2			
East Green Street, Chorleywood	2	2	0	10	10	6	10	3	1	10	1	2	2	10	10	8	10	10	2	10	5	3	0	6	0	4	5	0	7	7	3	1	0	0	1	5	0	9	10	2	4	4		
Griggs Field, Batchworth	2	4	1	10	10	10	10	10	3	10	4	2	10	10	3	5	0	10	4	10	1	10	0	5	2	0	0	0	5	0	0	0	0	0	4	0	10	8	4	0	0			
South Tolpits Lane	6	4	2	10	4	0	3	3	0	10	6	3	3	5	6	0	10	10	3	10	9	5	3	1	0	0	0	10	0	0	0	0	0	0	0	0	0	10	7	0	1	6		
The Barn, Solesbridge Lane	5	4	0	1	5	5	10	1	2	10	2	1	1	10	10	2	10	1	7	10	1	1	0	1	1	0	0	0	0	4	4	0	0	0	0	0	0	2	8	10	0	0	0	