

Three Rivers District Council

Three Rivers Site Allocations DPD

Issues and Options Sustainability Appraisal

Working note

November 2010

**This document is presented as Appendix 5 to the Site
Allocations Proposed Submission SA Report, November
2012**

**Halcrow Group Limited in association
with TRL**

Three Rivers District Council
Three Rivers Site Allocations DPD
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Appendix

Detailed Assessment Matrix

1 Introduction

1.1 *Background*

1.1.1 Three Rivers District Council (TRDC) have commissioned Halcrow Group Ltd to conduct a Strategic Environment Assessment and a Sustainability Appraisal for the 'Site Allocations Issues & Options' Development Plan Document (SAIO DPD). This DPD will support the Core Strategy DPD and form part of the Local Development Documents that will be material considerations for planning matters in the district.

1.1.2 This document, 'the Issues and Options SA Working Note', provides an assessment of the contribution of the options developed in the Site Allocations DPD to sustainable development and will inform further stages of the DPD production process, i.e., to choose the Preferred Site Options.

1.2 *Issues and options sites allocation*

1.2.1 The Site Allocations DPD identifies sites throughout the district for various land use purposes such as schools, employment, retail, open spaces and cemeteries, to achieve the objectives set out in the Core Strategy DPD.

1.2.2 The Initial Issues and Options stage, which is the current stage, proposes sites considered suitable for land uses listed above, and these proposals are now subject to a consultation with relevant stakeholders and members of the public. It is to note that the housing sites were already consulted as part of the Core Strategy preparation process, and the next preferred option stage will include all the above mentioned issues and housing. Based on the consultation responses, and further information, appropriate preferred sites will be identified in the later stages of the DPD preparation process.

1.3 *Strategic Environment Assessment/ Sustainability Appraisal*

1.3.1 The Planning and Compulsory Purchase Act 2004 and the Town Planning Act (amended) 2008, and the EU SEA Directive require that all Development Planning Documents should undergo a Strategic Environment Assessment and a Sustainability Appraisal to inform the document preparation process. As the SEA and the SA processes described in the relevant DCLG Guidance are similar, and given that the requirements to conduct a SA and SEA may be fulfilled in an integrated way, we have adopted this approach in producing this document.

1.4

1.4.1

Report structure

This Issues and Options SA Working Note, which will accompany the Site Allocations Issues and Options DPD document, in November 2010 is set out as described below:

Chapter 2 Appraisal approach- a method statement of the sustainability appraisal of the Issues and Options (sites) based on the SEA/SA objectives and criteria of the Core Strategy DPD SA Framework

Chapter 3 Assessment results- discusses the appraisal results for each issue type, under the sustainable development triple bottom line headings i.e., social, economic and environmental factors

Chapter 4 Recommendations- a key outcome of this appraisal stage is to make recommendations to improve the sustainability contribution of the options, and this chapter fulfils this requirement

Chapter 5 Next steps- provides an outline of what to expect in further stages of the DPD development and the SA process

2 Appraisal approach

2.1 **Baseline and Scoping stage**

2.1.1 In accordance with the DCLG SEA/SA Guidance for Local Development Documents, a typical DPD SEA is required to go through the following stages:

- Scoping Report stage
- Initial Options Appraisal Stage
- Preferred Options Appraisal Stage and
- Environment Report/ Sustainability Report for publication and further submission to the Secretary of the State

At the time of preparation of this report, the Three Rivers Core Strategy DPD SEA/SA had progressed to the publication stage, and contains baseline information of the local and regional economic, social and environmental features. The Plans, Policy and Programme Review were comprehensive and updated in November 2010. In order not to duplicate these tasks it is proposed to refer to the Core Strategy DPD SEA/SA, and adapt the SEA/SA Framework, but with economic, social and environmental information most relevant to local site conditions being reported as part of the assessment matrix set out in the Appendix.

2.2 **SEA/SA Framework**

2.2.1 The assessment of the SAIO DPD was undertaken using the SEA/SA Appraisal Framework of the Three Rivers Core Strategy DPD SA, but includes the relevant objectives suitable to assess the impact of development on sustainability at a local site level.

2.2.2 The SEA/SA Framework objectives are as follows:

1. To protect and enhance biodiversity
2. Maintain/enhance water quality and limit water consumption

3. Ensure new developments do not increase flood risk
4. Minimise the loss of valuable soils and maximise the use of previously developed land
5. Reduce the emissions of CO₂ and other greenhouse gases; achieve good air quality and enhance sustainable transport options
6. Ensure development is 'climate change proof'
7. To use natural resources efficiently and increase material efficiency
8. To maintain and enhance historic and cultural assets
9. Conserve and enhance the landscape and townscape
10. Promote equity & address social exclusion, including provision of fairer access to services
11. Ensure that everyone has access to good quality open spaces, contributing to healthy lifestyle
12. Enhance community identity and participation
13. Reduce both crime and fear of crime
14. Contribute to local economic prosperity and growth

2.2.3 The appraisal follows the DCLG SA Guidance on policy assessments, however in order to understand the sustainability effects on those specific sites proposed for housing, a more detailed localised assessment is considered to be the most appropriate methodology. For this reason, the sites are assessed for their overall contribution to the SEA/SA objectives, and their suitability against a series of environmental, social, economic and land use criteria and constraints are evaluated rather than predicting the effects of the proposed development against every SEA/SA objective. The assessment detail is presented in the Appendix.

2.2.4 The assessment recognises that the proposals at this stage are location specific, however in order to further sustainability at all the sites, it is recommended that future stages include a set of policies that will be applicable to all the chosen sites. A list of policy recommendations is given in Chapter 4.

2.2.5 The overall approach is that of a qualitative assessment of the options and where appropriate quantitative data was drawn upon. The results of the appraisal are summarised for each site under the key themes of economic, social and environmental issues.

2.2.6

The performance of the SAIO DPD against the broad SEA/SA objectives was scored using the following six point scale:

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

2.2.7

It should be noted that the scoring was based on available information in respect of each of the options and has been based on the SEA/SA team's judgment, substantiated by quantitative data where possible. Reference is made to the environmental baseline where appropriate but the options being considered are at an initial stage, and further details may be available in the future phases when the appraisal of the preferred options is undertaken.

3 Assessment results

3.1

Issues

The SAIO DPD (November 2010) identifies potential sites to address specific provision like secondary schools, employment, retail, open spaces and cemeteries. These proposals are in response to issues relating to these theme areas, and are based on information from sources such as:

- Sites previously submitted to the Council
- Sites proposed within other LDF documents
- A review of land allocations within the adopted Three Rivers Local Plan

The potential sites were assessed for their sustainability performance, and results are presented under each theme that the sites were classified as in the SAIO DPD.

Although the SAIO consultation paper mentions the need for provision of sites for cemeteries, no sites have been proposed; therefore this issue is not assessed in this exercise.

3.1.1

Education

Following studies undertaken by Hertfordshire County Council in collaboration with TRDC the need for further secondary school provision from 2010-11 and beyond 2014-15 has been identified. The County Council and TRDC have identified five potential sites for developing a new secondary school-

- Site S(a) Mill End/Maple Cross - Land east of A405 (North Orbital)/north of A412 (19.64ha)
- Site S(c) Croxley Green - Land to the north of Little Green Lane (17.4ha)
- Site S(d) Croxley Green - Land off Baldwins Lane (12.26ha)
- Site S(b) Mill End/Maple Cross – Froghall Farm and adjoining land (20.65ha)
- Site S(e) Croxley Green – Land west and north of Little Green JMI.

Summary sustainability score matrix (Secondary schools)

Site	Environment	Social	Economic
Site S(a)	--	+	0
Site S(b)	--	+	0
Site S(c)	-	?	0
Site S(d)	?	+	0
Site S(e)	?	?	0

Environment: In general sites S(a), (b) and (c) are perceived to have significant or a minor negative effect on environmental features, due to combination of negative effects perceived against various environmental SEA objectives such as Soils (loss of agriculture grade 2 land), Biodiversity, Landscape, Air quality and Climate change factors (GHG emissions). By comparison site S(c) scores minor negative and this may be adjusted to a neutral or a positive score if further information on the development proposals become available in the future stages. In general, Site S(c)'s design layout should respect the surrounding landscape.

Similarly, the effect of Sites S(d) and (e) on Landscape SEA objective can be determined with further information on how the proposal designs will respond to the surrounding landscape views. These sites are considered to have a neutral impact on most of other environmental SEA objectives.

Social: Sites S (a), (b) and (d) will serve the local population as well as students from neighbouring wards and the wider county. Site S(d), due to proximity to rail transport has an added advantage of good accessibility. Although sites S(c) and (e) also will contribute to the neighbourhood and the wider catchment, the presence of another secondary school within 2000m raises the question of the need for developing this option. Further information on the projected future demand will be required to justify the actual social contribution of these sites. For this reason, they are scored uncertain.

Economic: All the sites are likely to have a marginal positive impact on the local economy, but a proposal for a secondary school is unlikely to significantly impact economic objectives.

3.1.2

Employment

Summary sustainability score matrix (Employment)

Site	Environment	Social	Economic
Site E(a)	?	?	+
Site E(b)	-	?	+
Site E(c)	0	?	?
Site E(d)	0	?	?
Site E(e)	-	?	+
Site E(f)	0	?	?

The DPD proposes new sites and modification to already identified employment sites in order to address two issues i.e., oversupply of office space and undersupply of warehouse provision. Of the total employment site proposals, parts of sites E(c), (d) and (f) are proposed to be removed and site E(e) is put forward for alteration.

Environmental:

The assessment considers sites E(b) and (e) to score a minor negative mostly owing to anticipated increase in traffic (cars and HGVs) that will serve the proposed sites, and which are therefore likely to contribute to deteriorating air quality. This argument is particularly valid for site E(e) which is close to a congestion hotspot. Sites E (b) suffer from limited access through residential streets and there is therefore a likely increase in traffic and noise. The assessment concludes that no notable impact is perceived against environmental objectives from development at Sites E(c), (d) and (f).

Site E(a) proposal indicates retention of the employment activity. This may have a neutral or a negative impact on the future environmental baseline, as the site is surrounded by natural features and appears to have site access constraints. Without detailed information on the actual impact of the operations at site on the environmental factors, the effect is predicted to be neutral at this stage.

Social: No conclusion could be drawn on the impact of the proposed employment sites (including proposed removal) on social objectives. The reasons being that without detailed information on the percentage of local workforce employed at these sites which will have implication on the local economy it is difficult to

comment on the socio-economic implication. . Additionally sites E(a) and (b) are not sufficiently served by public transport, therefore restricting access to car owners only- an accessibility and social equity issue.

Economic: Sites E(a), (b) and (e) are likely to contribute positively to the improvement of the local economy.

By removing parts of the employment sites at Sites E(c), (d) and (f), the potential contribution to the local economy could be taken away. Conversely, it could be a continuation of the business as usual scenario into the future (planning period). As uncertainty remains over the possible positive or neutral impact and with further information an assessment score may be assigned, at this stage an unknown score is allocated.

3.1.3

Retail

The SAIO DPD identifies retail units in the district (all of which are existing), and proposes or reconfirms their function such as primary frontages (A1 use), secondary frontages (restaurants etc) and local shopping centres.

Site R(a) Abbots Langley

Site R(b) Chorleywood

Site R(c) Croxley Green

Site R(d) Maple Cross

Site R(e) Rickmansworth

Site R(f) –Moneyhill Parade

Site R(g)- South Oxhey

Summary sustainability score matrix (Retail)

Site	Environment	Social	Economic
Site R(a)	0	+	+
Site R(b)	0	+	+
Site R(c)	0	0	+
Site R(d)	0	0	+
Site R(e)	-	+	+
Site R (f)	0	0	++
Site R (g)	0	0	+

Environmental: As all the proposed retail units, except for site R(e) (Rickmansworth) are not very close to natural features such as greenspaces, water bodies, and no significant effect is likely on any environmental objectives due to advancement of these proposals, the assessment predicts neutral effects. Site R(e) is located very close to a congestion hotspot and is surrounded by car parks. The traffic and related emissions are likely to be exacerbated if the retail units with primary and secondary frontages are accessed by cars. For this a minor negative score is allocated for this site, against environmental objectives.

Social: Sites R(a), (b), (e), and (g) due to their proposed function (i.e., primary and secondary frontages) and location (i.e., close to a town centre) are likely to facilitate places for community interaction, therefore a positive effect is envisaged against social objectives. Although likely to be positive the local shopping centres at the proposed sites R(c) and (f), due to their size and function are unlikely to have a significant effect on social objectives. However it is acknowledged that they contribute to fulfilling local amenity requirements.

Economic: All the proposed sites are found to contribute positively to the improvement of the local economy. Site R(f) at Moneyhill Parade, due to its proximity to the river frontage, with an appropriate use (such as restaurant) this site is likely to be more viable.

3.1.4

Open spaces

The DPD proposes revisions to some open space sites, as well as proposing two new sites. The sites are:

Site OS(a): The Grove Woodland (Plaitford Close/The Byeway), Rickmansworth

OS(b) Chorleywood House Estate

Site OS(c): Land north of South Way (Horsefield/Furtherfield), Leavesden

OS(d) Middleton Road

Site OS(e): South Oxhey Playing Fields

Summary sustainability score matrix (Open spaces)

Site	Environment	Social	Economic
Site OS(a)	?	+	0
Site OS(b)	?	0	0
Site OS(c)	?	+	0
Site OS(d)	0	0	0
Site OS(e)	0	+	0

Environmental: The extensions proposed at Sites OS(a), (b) and (c) contribute positively against most environmental objectives such as water, air quality, climate change and soil and possibly will be beneficial to the existing habitats. However habitats behave differently to change, and the behaviour varies depending on species and context. At this stage, without detailed information on the sites, the effects cannot be predicted.

As the alteration to Site OS(d) is limited, and is unlikely to make any alteration to the environmental features, the effect against environmental objectives is considered neutral. As the current use near Site OS(e) will not be altered much with the proposed extension, no significant change in the environmental features is envisaged. For this reason, the environmental objectives score for this site is also neutral.

Social: The proposed Open spaces sites are likely to encourage healthy lifestyle and continue to facilitate space for potential community interaction-making a positive contribution to achieving the population and health objective. Despite this contribution, Site OS(b) suffers from severance from almost all directions, therefore it is unlikely that the population catchment this open space can serve will be more than the current trend. This implies under social objectives this site may have a business as usual scenario in the future. For this reason, performance of Site OS(b) against the social objectives is considered neutral.

Economic: The proposals are not considered to have any direct impact on the economic objectives.

4 Recommendations

- 4.1.1 The purpose of this chapter is to make recommendations to improve the sustainability contribution of some sites through specific measures, as well as to identify pointers to bear in mind whilst progressing to the preferred options stage, but not to identify or recommend sites for the preferred option DPD.
- 4.1.2 To help improve its sustainability performance there are a number of recommendations and mitigation measures which should be incorporated into the future stages of the Site Allocations DPD. These are summarised below under issue areas. In addition to these specific sites, a number of these recommendations could also be incorporated into later development plan stages in order to ensure that the plan secures a position to achieve sustainable development in any site proposed.
- 4.2 ***Secondary schools***
- 4.2.1 If progressed, further stages for Sites S(c), (d) and (e) should consider interaction with the surrounding landscape features which will determine their performance against environmental SEA objectives.
- 4.3 ***Retail***
- 4.3.1 Further stages for Site R(e) should look at options to reduce congestion near the site, or at least ensure that the proposed development does not add to the existing congestion. Options such as parking restrictions, or improved public transport and suitable context specific ideas should be explored.
- 4.3.2 Site R(f) – Moneyhill Parade has good access to water frontage, if this is accessible from the proposed retail units, subject to viability at the location these sites may be put forward for secondary frontage to maximise the benefit to the local economy.

4.4 ***Recommendations applicable to all issue topics***

4.4.1 Developers should be encouraged from the outset to incorporate habitats into their developments

4.4.2 Attention to design of the development should be given such that new developments layouts are complementary to the existing urban fabric

4.4.3 Encourage buildings to use Secure by Design code to address crime

4.4.4 Policy support for sustainable design, demolition and construction techniques; maximise material and resource efficiency, through adoption of standards such as BREEAM (equivalent to the Code for Sustainable Homes) for the employment, and other non-residential built environment uses.

4.4.5 Include policies which support and enforce the minimisation of waste, and the re-use of materials on and off site

4.4.6 Consideration should be given to include measures to reduce per capita water and water saving technology in layout and design of development.

5 Next steps

5.1 **Future stages**

5.1.1 The results of this sustainability appraisal is expected to contribute to the decision making process of choosing the preferred sites in the next stage of the DPD production i.e., preferred options. The preferred options will be finalised based on consultation responses, and stakeholder information.

5.1.2 Once finalised, the preferred options will undergo another set of sustainability appraisal to establish their contribution to sustainable development. The assessments should also identify appropriate mitigation measure for any adverse impact predicted at this stage.

5.1.3 Future stages will involve refining the preferred option DPD to produce a draft Site Allocations DPD for publication and submission to the Secretary of State.