

Three Rivers District Council
Three Rivers Site Allocations LDD
Sustainability Appraisal Report Addendum
January 2014

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in association with
Centre for Sustainability at TRL Limited

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Contents Amendment Record

This report has been issued and amended as follows:

Issue	Revision	Description	Date	Signed	Verified
01	00	Site Allocations LDD SA Report Addendum to the Submission Version	27.01.14	KD	RG
01	01	Site Allocations LDD SA Report Addendum to the Submission Version	28.01.14	KD	RG

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1. Introduction

1.1

Background

Three Rivers District Council (TRDC) has already produced a Core Strategy, which was adopted in October 2011. Additional Local Development Documents (LDD), such as the Site Allocations LDD (SA LDD) and the Development Management Policies LDD will support the Core Strategy and form a material consideration to inform decisions on future planning applications. Once fully adopted, these documents will replace the existing Three Rivers Local Plan 1996-2011.

The Site Allocations LDD identifies sites throughout the District for development up to 2026 to support the delivery of the Core Strategy and the Community Strategy. Although the sites identified in the document must go through the planning application process, the document provides principles that a suitable form of development can be located on a particular site. Reference must be made to the Core Strategy and the Development Management Policies documents, as appropriate to get a holistic picture on what policies apply at each of the sites identified within this LDD.

The Submission Version of the document was presented before the Secretary of State in June 2013 and has been examined by the appointed Planning Inspector who has recommended modifications to the Plan. TRDC have subsequently produced Main Modifications and Additional Modifications to the Plan. The former mainly discusses deletion of some sites and addition of three new sites, in order to meet the housing target. The latter relates to changes to the development requirements at each site that may or may not have an impact on the Sustainability Assessment ratings. This Addendum to the SA Report has been prepared to present the findings on the additional assessments that have been undertaken on the proposed modifications and identify where appropriate how the previous findings of the SA have been updated.

1.1.1

Purpose of this Sustainability Report Addendum

A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.

This report has been prepared to report on the implications on the sustainability appraisal arising from the Main Modifications and Additional Modifications to the Submission Version of the Sites LDD. It does not repeat information provided in the Submission Version SA Report (June 2013) and should therefore be read alongside that earlier report.

Table 1.1 Stages in the SA/SEA and Three Rivers Site Allocations LDD

Three Rivers Site Allocations LDD	SA/SEA Stages	Dates
Begin Document Preparation	Stage A: Setting the context, establishing the baseline and deciding on the scope <ul style="list-style-type: none"> • A1: identify other relevant policies, plans and document programmes , and sustainability objectives. • A2: collecting baseline information. • A3: Identifying sustainability issues and problems. • A4: Developing the SA framework. • A5: Consulting on the scope of the SA (Scoping Report). 	Core Strategy SA Scoping Report (wholly applicable to the Site allocations LDD SA), prepared February 2006 Consultation on Scoping Report February 2006
Preparation of Issues and Options (I&O) paper and consultation Preparation of preferred options, including consultation on possible preferred option	Stage B: Developing and refining options and assessing of effects <ul style="list-style-type: none"> • B1: Testing the LDD objectives against the SA framework. • B2: Developing the LDD options. • B3: Predicting the effects of the LDD. • B4: Evaluating the effects of the LDD. • B5: Considering ways of mitigating adverse effects preferred and maximising beneficial effects. • B6: Proposing measures to monitor the significant effects of implementing the LDDs. 	Consultation on Core Strategy Issues & Options (I&O) paper (which contained the Site allocations principles), June 2006 As part of the Core Strategy Preferred Options Consultation, consulted on the Addendum to the Preferred Options SA, November 2009. This document appraised the Strategic and Non-strategic housing sites. Branching out from the Core Strategy, a Site allocations Issues & Options SA Working Note, was produced in November 2010. This document included sites put forward for Education, Retail, Open space and Recreation use.
Public consultation on Preferred options	Stage C: Preparing the Sustainability Appraisal Report. <ul style="list-style-type: none"> • C1 Preparing the SA Report. Stage D: Consulting on the preferred options of the LDD and SA Report. <ul style="list-style-type: none"> • D1: Public participation on the preferred options of the LDD and the SA Report. • D2 (i) Appraising significant changes. • D2 (ii) Appraising significant changes resulting from representations. • D3: Making decisions and providing Information. 	Preparation of the Core Strategy Preferred Options (which included the housing sites) and the SA Report, February 2009; the Core Strategy Preferred Options Addendum (further housing sites consulted), November 2010 Formal consultation on The Core Strategy Preferred Options (which included the housing sites) and the SA Report, February 2009; and consultation on the Core Strategy Preferred Options Addendum (further housing sites

Three Rivers Site Allocations LDD	SA/SEA Stages	Dates
		<p>consulted), November 2010 and the accompanying SA Report.</p> <p>Preparation of the Site Allocations Issues & Options LDD and preparation of the Site Allocations Issues and Options SA Working Note, November 2010.</p> <p>Formal consultation on the Site Allocations Issues & Options LDD and preparation of the Site Allocations Issues and Options SA Working Note, November 2010.</p> <p>Formal consultation on the Site Allocation LDD and the SA Report, Pre-Submission Version, January 2012.</p> <p>Formal consultation on the Site Allocations LDD Additional Sites and the relevant SA Report, Pre-Submission (Preferred Options) Version, July 2012 (conducted by TRDC)</p>
Submission of LDD to Secretary of State	<p>Stage E: Monitoring the significant effects of implementing the LDD</p> <ul style="list-style-type: none"> • E1: Finalising aims and methods for monitoring. • E2: Responding to adverse effects. • Preparing the SEA Statement.² 	<p>Publication of the Proposed Submission Site Allocations LDD and SA Report, November 2012</p> <p>Submission of the SA LDD: June 2013, along with the Proposed Submission Site Allocations LDD SA Report, November 2012)</p> <p><i>Addendum to the Submission Site Allocations LDD (this second SA Report Addendum January 2014).</i></p> <p>Final adoption of the Site Allocations LDD is scheduled for June 2014. An SA Statement will be produced at this stage.</p>

¹This output is not required by the SEA Regulations but was produced to assist in selecting the preferred options.

²The SEA Statement is required by the SEA Regulations.

³ This Addendum forms part of the SA Report at the Submission stage.

1.3

Habitat Regulations Assessment¹

A Habitat Regulations Assessment was conducted as an independent study alongside the SA/SEA for TRDC, sharing information with the SA/SEA where applicable. In November 2007, a Habitat Regulations Assessment (HRA) Screening Report was prepared to comply with the UK's Habitats Regulations². Screening is required where a plan, alone or 'in combination' with other plans, could affect Natura 2000 Sites (Special Protection Areas for birds – SPAs, Special Areas of Conservation for habitats - SACs) following Article 6(3) of the European Habitats Directive.

The HRA screening report, in agreement with Natural England, concluded that Three Rivers Core Strategy would not result in any significant effects on any Natura 2000 sites, either alone or in combination with other plans and programmes. It was therefore considered, in consultation with Natural England, the statutory consultee, that a full Appropriate Assessment was not necessary. This conclusion stands in relation to the Addendum to the Submission version of the Site Allocations LDD.

¹ Reproduced from the Core Strategy SA Report.

² These regulations have since been updated and are now termed the *Conservation of Habitats and Species Regulations 2010 (SI490)*.

2. Proposed Modifications to the LDD

Following an examination of the Submission document that was presented to the Secretary of State, the Planning Inspector has suggested some changes to the Site Allocations LDD. The changes, inter alia, relate to removal of some housing and education allocation; inclusion of housing sites to meet the housing targets, the allocation of an additional education allocation; allocation of additional open spaces; as well as the Green Belt designation being removed from all the allocated sites.. Small changes relating to inclusion of site information and strengthening policy wording for some sites are the additional modifications that have been proposed.

The Proposed Modifications are detailed in Appendix 1.

3. Methodology

3.1

Introduction

The aim of this post-Submission stage of the SA/SEA process is to determine whether there are likely to be any changes to the sustainability effects predicted in the Submission Stage Report due to the minor modifications proposed, as well as to present findings of the Sustainability Assessment conducted on the new sites proposed in the Main Modifications document.

In order to do this it is necessary to identify whether any of the Proposed Modifications to the LDD could result in changes to the original findings of the SA, as documented in the SA Report (June 2013), either through new significant sustainability effects being identified, or through originally identified significant effects no longer being considered likely.

The implications of the Proposed Modifications on the findings of the Habitats Regulations Assessment also need to be considered at this stage.

3.2

Screening methodology

Given that the the Proposed Modifications are minor in nature, it is not proportionate to undertake a full assessment of all of the proposed modifications against the SA Framework. Therefore, a screening process has been undertaken which considers the nature of each of the Proposed Modifications and determines whether it would be likely to result in a significant sustainability effect that would require an additional stage of sustainability appraisal to be undertaken.

The screening uses three levels of categorisation for the potential implications of each of the proposed modifications on the original sustainability appraisal as follows:

- No implications for the original findings of the SA (or HRA) and therefore no further consideration required;
- Implications (either positive or negative) for some SA objectives that require an update to the SA findings ; or
- Modification requires an additional SA (or HRA) assessment.

As for the new sites introduced, it is worth noting that some of these sites (housing and education) were already considered in the SA process at the Issues and Options Stage of the Core Strategy. At that stage the assessment was at a high level; therefore this report will include a detailed appraisal of the new sites, on the basis that they need to have the same level of assessment as those policies that are included in the Submission version of the Site Allocations LDD.

3.3

Assessment methodology

Where the screening process identifies that a proposed Modification requires an additional assessment this needs to be undertaken against the SA Objectives using the methodology utilised for all previous rounds of Sustainability Appraisal. Details of this methodology are provided in Section 6.1 of the SA Report (November 2012).

In addition to undertaking assessments of the individual Proposed Modifications that were screened in for additional assessment, consideration also needs to be given to the wider implications that the Modifications as a whole will have on the findings of the previous sustainability appraisal.

4. Assessment Findings

4.1 Screening

The results of the screening process are detailed in Appendix 1 and are summarised as follows:

- Six Proposed Modifications (new sites under Housing, Education, Open Space and Employment allocations) were judged as requiring a full assessment;
- 27 of the Proposed Modifications under Housing, Green Belt, Education and School Allocations were judged as having potential implications for one or more of the sustainability appraisal objectives, but did not warrant a full assessment to be undertaken. Minor revision to the ratings have been recorded in Appendix 1 and in Appendix 2 (Updated Detailed Assessment Matrix);
- The remaining Proposed Modifications have no implications for the original findings of the SA; and

- The SAs of seven Housing and one Education Allocation have been deleted, following removal of the sites from the LDD.

4.2 *Minor Implications*

The screening process identified 27 Proposed Modifications that are likely to help progress the achievement of certain SA Objectives for which minor revision to the ratings has been made. The SA Objectives that were identified to benefit from the Proposed Modifications are as follows:

- SA1: Biodiversity;
- SA2: Water resources (pollution prevention);
- SA3: Flood risk;
- SA7: Air Quality;
- SA9: Resource Efficiency;
- SA10: Historic & Cultural Assets;
- SA12: Health; and
- SA18: Economic Growth.

Reference must be made to Appendix 1 for summary of minor revisions to the allocated ratings and Appendix 2 for justification of the rating revision, as track changes to the Submission Version of the Detailed Assessment Matrix.

4.3 *Full Assessment*

The Six Proposed Modifications that were screened in for additional assessment are new allocations and therefore need to be subjected to the same level of assessment as all the other policies in the Sites Allocation LDD. The Detailed Assessment is presented in the table 4.1 below.

Score index

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

Table 4.1 Detailed Assessment Matrix of the New Sites Proposed Post-Submission of the Site Allocations LDD

THEME	ENVIRONMENTAL							SOCIAL				ECONOMIC			Commentary	
SEA Objective (abridged)	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
Policy/ Site name																
Land at Woodside Road, Abbots Langley (H 39)	-	0	-	-	-	-	?	-	+	+	+	0	+	+	0	<p>Site is located close to a wildlife site. Given the scale of this proposed development and proposed primary school adjacent to the site, cumulative negative effects on biodiversity (SA1) may occur- therefore minor negative rating is allocated.</p> <p>The site will be on a Greenfield site which does not support Soil (SA4) and PDL (SA8) objectives.</p> <p>Given the scale of the proposed development and potential cumulative effect of traffic related emissions (more short trips), air quality impacts may occur; therefore minor negative rating assigned against SA 5 and SA 7.</p> <p>As the site is in good proximity to schools and community amenities, it is likely to enjoy the benefits of good location (supporting SA13 and SA19). The greenspace access may help residents' lead healthy lifestyles (supporting SA12) and the critical mass from the development may support local economic growth (SA 18).</p> <p>Removal of the Green Belt designation and a development of the proposed scale could potentially affect the openness and landscape features around the site (SA11).</p>
Fairways Farm Bucknalls Lane,	-	?	-	-	-	-	0	0	+	0	+	0	+	+	0	<p>The site is within 1000m of a SSSI site (Bricket Wood Common designated for habitats and geology)- given</p>

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
Garston (H 40)																<p>the scale of the development, adverse effects on the designated site may occur negative. A detailed study on the effects on the SSSI features will be required. Part of the site is within flood zone 2, the flood risk assessment will help assess risks, but mitigation action cannot be established at this stage. For that reason an uncertain rating is allocated to SA2.</p> <p>The site will be on a Greenfield site /greenbelt (proposed for removal) which does not support Soil (SA4) and PDL (SA8) objectives.</p> <p>The site is well connected to Watford Town Centre and to local amenities, but it is unclear if severance as a result of the M1 and A405 will result in car travel for short trips, which may affect air quality. In any case, given the scale of the development, traffic is likely to increase in the area affecting SA7 (air quality) and SA 5 (Climate change causal factor) objectives.</p> <p>As the site is in good proximity to schools and community amenities, it is likely to enjoy the benefits of good location (supporting SA13 and SA19). The greenspace access may help residents' lead healthy lifestyles (supporting SA12) and the critical mass from the development may support local economic growth (SA 18).</p>
Woodside Road, Abbots Langley S(c)	-	0	-	-	-	-	?	-	0	0	0	0	0	+	0	<p>Development may negatively affect biodiversity features at the wildlife site 300m east of the site and is Greenfield and part Green Belt. Consider including a requirement to protect and enhance biodiversity in and</p>

THEME	ENVIRONMENTAL								SOCIAL				ECONOMIC			
SEA Objective (abridged)	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
Policy/ Site name																
																<p>around the site.</p> <p>Development of this greenfield site is not supportive of the Soils objectives SA4 and SA8. Traffic related impacts in the immediate vicinity is likely as a result of introducing a school in the area, implying minor negative rating under SA7 (Air Quality) and SA 5(Climate change causal factor).</p> <p>Conservation area and listed buildings are within the vicinity of the site, which may be affected during construction if not mitigated. It is assumed for this stage that no mitigation is considered, therefore an uncertain effect is assigned against SA 10 (Cultural Heritage). Removal of the Green Belt designation, combined with the proposed development and residential development adjacent to the site, may affect the openness and landscape character of the area. For this reason a minor negative rating is assigned against SA11.</p> <p>Local residents will have improved access to education amenities- supporting SA 19.</p>
OS (o) Leavesden Green Open Space	+	0	+	0	0	0	0	0	+	0	0	0	0	+	0	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 most environmental objectives.
OS (p)	?	0	0	0	0	0	0	0	+	0	0	0	0	+	0	The site has potential to support biodiversity, if an

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
Leavesden Aerodrome Open Space																<p>effort is made to maintain and enhance suitable habitats at the site. With more details that may become available in the future stages, the rating against SA1 may be determined.</p> <p>Assuming that the site will be accessible to members of the public, the allocation may help local residents, particularly at the adjacent site H(8), lead a healthy lifestyle- supporting SA12 and SA 19 for the locality.</p>
OS(q) Hill Farm Open Space	+	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 most environmental objectives.</p>

4.4 *Habitats Regulations Assessment*

The screening did not identify any Proposed Modifications that would have implications for the original findings of the Habitats Regulations Assessment.

5. Conclusion

None of the Proposed Modifications to the Site Allocations LDD significantly alter the original findings of the SA Report (November 2012) or of the Addendum to the Submission SA Report in June 2013. However, as identified in Section 4, there are some of proposed minor modifications that will help progress towards the achievement of several of the SA Objectives. No proposed minor modifications were identified which if implemented would result in a movement away from achieving one or more SA objectives.

In addition there are no implications for the original conclusions of the HRA screening process.