



Three Rivers Regulation 18 Local Plan

Interim Sustainability Appraisal Report

Non-Technical Summary

June 2021

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Non-Technical Summary

1 Background

Three Rivers District Council (TRDC) are preparing a single Local Plan which will replace the Core Strategy (adopted on 17th October 2011), the Development Management Policies Local Development Document (adopted on 26th July 2013) and the Site Allocations Local Development Document (adopted on 25th November 2014). The Core Strategy was developed and adopted prior to the introduction of the National Planning Policy Framework (NPPF) and the update will therefore need to take account of the new policy landscape introduced by the NPPF in March 2012 and subsequently updated in 2018.

The new Local Plan will incorporate strategic policies, development management policies and site allocations into a single document.

During its preparation this Local Plan must be subject to both Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) under the 'Planning and Compulsory Purchase Act' (2004) and 'The Environmental Assessment of Plans and Programmes Regulations' (2004) respectively. Independent consultants TRL Ltd have been appointed by Three Rivers District Council to undertake SA and Strategic Environmental Assessment SEA in support of the new Local Plan.

Both the SA and the 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 of the Plan against key sustainability issues. Hereinafter in this report this combined process will be referred to as 'SA'.

Independent consultants TRL Ltd have been appointed by the Council to undertake Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) in support of the new Local Plan.

This document is the Non-Technical Summary of the Interim Sustainability Appraisal Report (Interim SA Report) that has been prepared to accompany the consultation of the Three Rivers Regulation 18 Local Plan. It provides a summary in non-technical language of the Sustainability Appraisal (SA) undertaken to date during the preparation of the Local Plan.

The Interim SA Report documents the findings of the assessment of the Regulation 18 Local Plan in order to give stakeholders and the public an opportunity to comment on the findings, at the same time as making any comments on the plan itself.

2 The SA and Local Plan Process

2.1 SA Process

The SA has guided the development of the plan from the beginning of the Local Plan process. The SA process is made up of 5 stages which are briefly described below and summarised in Figure 1. This report forms part of Stage B of the process.

Stage A - After documenting the baseline sustainability characteristics of the area, and identifying any trends (i.e. is the situation getting better or worse?), the wider policy context of the Local Plan was reviewed. From the outputs of these two initial tasks the key environmental issues and opportunities that exist in the District were identified, on which the

assessment should focus. A series of SA Objectives were developed to concentrate the subsequent assessment process on these key issues. This work was undertaken in 2017 and has subsequently been updated to reflect the current situation.

Stage B - This stage involves predicting the effects that would result if the Local Plan were implemented and then assessing whether any of these effects would be significant. Where potential adverse effects against the SA Objectives are identified measures to mitigate these effects are proposed. The SA undertaken at Stage B has involved the preparation of an SA Working Note in 2017 to accompany the consultations on the Three Rivers Local Plan Issues and Options.

This Interim SA Report represents a second phase of SA Stage B work to contribute to the additional round of Regulation 18 Local Plan consultation that is being undertaken by the Council.

Stage C (a future stage) - The Sustainability Appraisal Report pulls together the results of all the assessment activities that have been undertaken by consultants TRL and identifies monitoring activities that will check the accuracy of the assessment once the Local Plan is adopted.

Stage D (a future stage) – This stage involves consultation on the SA Report with environmental bodies, key stakeholders and the public. The SA will then assess any significant changes to the Local Plan that are made after the consultation.

At plan adoption, an SA Adoption Statement will be published which explains how the SA has influenced the plan making process and which finalises the monitoring arrangements.

Stage E (a future stage) – This stage will take place after the Local Plan is adopted and covers the monitoring of the predicted effects.

2.2 The Regulation 18 Local Plan

As part of the new Local Plan process, Three Rivers District Council has drafted a new Vision and Objectives for the new Local Plan. The Vision forms the critical starting point for the new Local Plan. It encompasses the aims and aspirations for the District up to the end of the plan period, whilst the 15 strategic objectives set out how the Vision should be achieved.

As well as the Vision and Objectives, Part 1 of the Regulation 18 Local Plan also includes 30 Preferred Policy Options which cover the following themes:

- Sustainable Development
- Employment
- Social and Community Facilities / Health and Wellbeing
- Climate Change
- Green Belt
- Environment
- Green Infrastructure
- Design and Heritage; and
- Transport and Connections.

It should be noted that whilst this section of the Regulation 18 Local Plan does not include specific preferred policy options in relation to the spatial strategy (i.e. distribution of development) or the level of housing growth to be required, these two issues are both discussed in the supporting text of the document (in Section 2 Background and Context). For completeness the SA has provided assessments of these two topic areas, under the following headings:

- ‘Potential Housing Distribution’; and
- ‘Housing Growth Level’.

Part 2 of the Regulation 18 Local Plan includes sites for potential allocation as well as supporting policies relating to following topics:

- Housing
- Gypsies and Travellers & Travelling Showpeople
- Employment
- Warner Bros. Studios at Leavesden
- Town Centres & Retail
- Open Space
- Education
- Green Belt
- Langleybury & The Grove
- Maple Lodge Wastewater Treatment Works

2.3 Three Rivers Local Plan Development

Development of the Local Plan and the accompanying SA involves a series of stages of plan making and consultation as summarised in Figure 1. This includes the work undertaken to date as well as the future stages which will be undertaken prior to the adoption of the Local Plan. The dates include in Figure 1 are based on the dates in the Three Rivers Local Development Scheme (adopted 2020).

Date	Local Plan	Sustainability Appraisal
2017	Commencement of Local Plan Development	<u>Stage A</u> SA Scoping Report, May 2017
July 2017	Consultation on Issues & Options	<u>Stage B</u> SA Working Note, July 2017
October 2018 & April 2019	Potential Sites for Consultation, including Call for Sites	SA Working Note, October 2018 (updated July 2019)
2018 - 2020	Development of Regulation 18 Local Plan policies Consideration of proposals and sites to include in the Regulation 18 Local Plan	Ongoing SA input into the plan-making process
June 2021	Consultation on Regulation 18 Local Plan	Interim SA Report, June 2021 (<i>this report</i>)
Winter 2021	Preparation and Publication of the Local Plan for consultation	<u>Stage C</u> SA Report
Aug/Sept 2022	Submission of Local Plan to Secretary of State	<u>Stage D</u> SA Report Addendum
Late 2022/early 2023	Examination of the Local Plan	SA Report Addendum
Summer 2023	Adoption of the Local Plan	<u>Stage E</u> SA Adoption Statement

Figure 1: Stages of the Local Plan and SA processes for Three Rivers Local Plan

2.4 Sustainability Issues and Objectives

Guidance on how to undertake SA recommends that objectives are developed that relate to the key issues, so that the assessment can use these objectives to focus on the prediction and assessment of the effects that are most important in an area.

The first stage of the SA therefore focused on the identification of the sustainability issues in the District and then developing a series of SA objectives to make up an 'SA Framework'.

These objectives were developed as part of the Scoping Report (2017) and updated following consultation on that report, and also at later stages, in order to take account of consultation comments. The broad objectives that have been incorporated into the SA Framework are listed in Table 1. These broad objectives are supported by a more detailed series of sub-objectives which act as assessment criteria.

See the main Interim SA Report for further details on the issues that were identified and the sub-objectives.

Table 1: SA Framework Objectives

SA Objectives	
1	To protect, maintain and enhance biodiversity and geodiversity at all levels
2	To protect, maintain and enhance water resources (including water quality and quantity)
3	To reduce flood risk
4	Reduce greenhouse gas emissions and adapt to the effects of climate
5	Achieve good air quality, especially in urban areas
6	Make efficient use of land and protect soils
7	To use natural resources, both finite and renewable, as efficiently as possible, and re-use finite resources or recycled alternatives wherever possible
8	To identify, conserve and enhance the historic environment and heritage assets
9	To conserve and enhance landscape and townscape character and encourage local distinctiveness
10	To improve the health and wellbeing of the local population
11	To develop in sustainable locations
12	To improve community cohesion through reducing inequalities, promoting social inclusion and reducing crime and the fear of crime
13	Ensure that everyone has access to good quality housing that meets their needs
14	Achieve sustainable levels of prosperity and economic growth
15	To ensure local residents have employment opportunities and access to training

3 Consideration of Local Plan Options

3.1 Introduction

The consideration and appraisal of alternative options is an integral part of the plan making and SA processes. The SA needs to consider reasonable alternatives for delivering the objectives of a plan and provide information to the plan makers to be used in the decision making process when selecting the preferred alternatives. It is not the purpose of the SA to decide the alternative to be chosen for the plan. SA is a ‘decision aiding’ tool rather than a ‘decision making’ one and the contents of this report should therefore be considered in this light.

In developing the Regulation 18 Local Plan a range of options have been considered. The Interim SA Report provides detailed information on the various stages at which options have been considered, but for the purposes of this Non-Technical Summary a short summary of the stages is provided.

3.2 Issues and Options – July 2017

In summer 2017 the Council undertook a consultation on their Issues & Options and Call for Sites Consultation Document. This identified some of the issues and challenges facing the District and the possible options that could help to address them.

The Council sought views on the content of the document and how best to balance the delivery of growth across the District, in order to meet the future needs of the community, whilst at the same time protecting the District’s historic and natural environment.

Alongside this consultation, and again in 2018, the Council invited land owners, agents and developers to submit new sites that could be developed to meet future demand for homes and jobs.

A Sustainability Appraisal Working Note was produced in July 2017 to accompany the Issues and Options and Call for Sites Consultation in order to provide an assessment of the likely environmental, social and economic effects of the various options being considered. The findings of the SA at that stage are summarised in Appendix D. The full SA Working Note is available at the following weblink:

<https://www.threerivers.gov.uk/download?id=40507>

Many of the options that were included in the Issues and Options consultation were high level ‘principles’ and none of the options provide any location specifics. This meant that a lot of uncertainty was identified in the assessments.

3.3 Site Allocation Options

To deliver the level of housing growth proposed in the Regulation 18 Local Plan Spatial Strategy the Council has considered a wide range of sites in existing settlements and sites in the Green Belt. Through the SHELAA¹ process the Council have undertaken detailed assessments of all these sites to inform the selection process.

¹ Strategic Housing and Employment Land Availability Assessment

Each of the sites considered as being a ‘reasonable alternative’ for inclusion in the Local Plan has been assessed against the SA objectives, with all sites being assessed to the same level of detail.

The findings of the individual site assessments are provided in Appendix F to the Interim SA Report (for sites included in the Regulation 18 Local Plan) and Appendix G to the Interim SA Report (for sites not included in the Regulation 18 Local Plan), ordered by settlement. Section 6.3 of the Interim SA Report provides summaries of the assessments.

3.4 Other alternatives considered during the development of the Regulation 18 Local Plan

In addition to the consideration of options for site allocations, alternative approaches have been considered for many of the preferred policy options where it was considered that there were reasonable alternatives to the preferred option.

Some of these alternatives were considered at the Issues and Options stage (see Section 3.2) and had therefore already undergone SA. Others however have been considered since that stage and therefore it has been necessary to undertake SA assessments on those alternative approaches. Appendix D provides details of the options considered, along with the findings of any SA work carried out.

For some of the policy topics the Council considered that there were no reasonable alternatives in relation to that policy and therefore no SA was undertaken.

4 Assessment of the Regulation 18 Local Plan

The Regulation 18 Local Plan has now been prepared for consultation. This includes the Council’s proposed approach to accommodating growth across Three Rivers, the sites that have been suggested as well as some of the specific planning policies that will deliver this.

The policies and proposals which are included in the Regulation 18 Local Plan have been assessed in order to identify the likely effects which would result were the policies to be adopted in a new Local Plan. The findings of the SA undertaken at this stage will be used to inform the next stage of the planning process, that being the development of the Publication Local Plan.

Each option was assessed against the SA objectives using the following ‘scoring’ system:

Significance Assessment	Description
✓✓	The option is likely to have a significant positive effect
✓	The option is likely to have a positive effect which is not significant
?	Uncertain – It is uncertain how or if the option impacts on the SA objective
✓/x	The option is likely to have some positive and some negative effects, none of which are significant
–	Neutral – The option is unlikely to impact on the SA objective
x	The option is likely to have a negative effect which is not significant
xx	The option is likely to have a significant negative effect

4.1 Assessment findings

Each of the Preferred Policies in Part 1 of the Regulation 18 Local Plan have been assessed against the SA objectives using the methodology described above. A summary of the findings of this assessment can be seen in Table 2. The table is split into sub-tables which are based on the Local Plan themes. The full assessments are provided in Appendix E to the main Interim SA Report.

Table 2: Summary of assessment of policies in the Regulation 18 Local Plan

Policy/Theme	SA Objectives														
	Biodiversity	Water	Flood Risk	Climate Change	Air Quality	Soils	Resource Efficiency	Historic Environment	Landscape and Townscape	Health and Wellbeing	Sustainable Location	Community Cohesion	Housing	Sustainable Prosperity	Employment and Skills
Sustainable Development															
Potential Housing Distribution	✓	-	-	✓	✓	✓	-	-	✓	✓	✓✓	✓	✓	✓	✓
Housing Growth Level	x	x	-	x	x	x	x	?	x	✓	-	?	✓/x	✓	✓
Preferred Policy Option 1: Strategic Policy: Overarching Policy on Sustainable Development	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Preferred Policy Option 2: Housing Mix and Type Preferred Policy Option 3: Housing Density Preferred Policy Option 4: Affordable Housing	-	-	-	✓	✓	✓	-	✓	x	?	✓	✓	✓✓	-	-
Preferred Policy Option 5: Provision for Gypsies, Travellers and Travelling Showpeople	✓	-	✓	-	-	-	-	✓	✓	-	✓	✓	✓	-	-
Preferred Policy Option 6: Residential Design and Layout and Accessible and Adaptable Buildings	-	-	-	-	-	-	-	-	?	✓	-	✓	✓	-	-
Employment															
Preferred Policy Option 7: Employment and Economic Development Preferred Policy Option 8: Warner Bros. Studios at Leavesden	?	-	-	x	x	✓ x	-	?	x	-	✓	-	-	✓✓	✓✓
Preferred Policy Option 9: Retail and Leisure	-	-	-	✓	✓	-	-	✓	✓	?	✓	✓	-	✓	✓
Social and Community Facilities/ Health and Wellbeing															
Preferred Policy Option 10: Social and Community Facilities Preferred Policy Option 11: Health and Wellbeing	✓	-	-	-	-	-	-	-	✓	✓✓	✓	✓✓	-	-	-

Climate Change															
Preferred Policy Option 12: Carbon Dioxide Emissions and On-site Renewable Energy	✓	✓✓	✓✓	✓✓	-	-	✓	✓	✓	-	-	-	-	-	-
Preferred Policy Option 13: Adapting to Climate Change and Sustainable Construction															
Preferred Policy Option 14: Renewable and Low Carbon Energy Developments															
Preferred Policy Option 15: Flood Risk and Water Resources															
Green Belt															
Preferred Policy Option 16: Green Belt	?	-	-	-	-	✓	-	-	✓	✓	?	-	✓	-	-
Environment															
Preferred Policy Option 17: Ground Conditions, Contamination and Pollution	✓	✓	-	-	✓✓	✓	-	-	✓	✓	-	-	-	-	-
Preferred Policy Option 18: Waste Management and Recycling	-	-	-	-	-	✓	✓✓	-	✓	✓	-	-	-	-	-
Green Infrastructure															
Preferred Policy Option 19: Green and Blue Infrastructure	✓✓	✓✓	✓	-	-	-	-	✓	✓	✓	✓	-	-	-	-
Preferred Policy Option 20: Landscape Character	✓	-	-	-	-	✓	-	-	✓✓	✓	-	-	-	-	-
Preferred Policy Option 21: Biodiversity, Trees, Woodlands and Landscaping	✓✓	✓	✓	-	✓	✓	-	-	✓	✓	-	-	-	-	-
Preferred Policy Option 22: Open Space, Play Space, Sport and Recreation	-	-	-	-	-	-	-	✓	✓	✓✓	-	✓	-	-	-
Design and Heritage															
Preferred Policy Option 23: Local Distinctiveness and Place Shaping	✓	-	-	✓	-	-	-	✓	✓✓	✓	-	✓	✓	-	-
Preferred Policy Option 24: Advertisements															
Preferred Policy Option 25: Heritage and Historic Environment	✓	-	-	✓	-	-	-	✓✓	✓✓	-	-	-	-	✓	✓
Transport and Connections															
Preferred Policy Option 26: Sustainable Transport and Travel															
Preferred Policy Option 27: Parking															
Preferred Policy Option 28: Deliveries, Servicing and Construction	✓	?	✓	✓✓	✓✓	-	-	✓	✓	✓	✓	-	-	✓	✓
Preferred Policy Option 29: Waterways															
Preferred Policy Option 30: Broadband and Electronic Communications															

The assessment of the Regulation 18 Local Plan generally found that the policies are likely to have overall positive effects across the range of sustainability topics, with a number of significant positive effects having been identified, as shown in Table 3. No significant adverse effects were identified in relation the elements of Part 1.

Table 3: Significant Effects Identified in the SA for Part 1 Regulation 18 Local Plan

	SA Objective	Significant effects identified
1	To protect, maintain and enhance biodiversity and geodiversity at all levels.	✓✓ in relation to Preferred Policy Option 19: Green and Blue Infrastructure and Preferred Policy Option 21: Biodiversity, Trees, Woodlands and Landscaping which seek to conserve and enhance the Local Nature Reserves, Wildlife Sites, Sites of Special Scientific Interest and other important habitats in the District, which would have significant positive effects for biodiversity.
2	To protect, maintain and enhance water resources (including water quality and quantity)	✓✓ in relation to Preferred Policy Option 15: Flood Risk and Water Resources which seeks to protect and increase efficiency of groundwater resources. Preferred Policy Option 19: Green and Blue Infrastructure seeks to conserve and enhance the District's rivers and the canal. These policies would have significant positive effects against the water objective.
3	To reduce flood risk	✓✓ in relation to Preferred Policy Option 15: Flood Risk and Water Resources which would ensure that development is located away from high risk flood zones.
4	Reduce greenhouse gas emissions and adapt to the effects of climate	✓✓ in relation to Preferred Policy Option 12: Carbon Dioxide Emissions and On-site Renewable Energy, Preferred Policy Option 13: Adapting to Climate Change and Sustainable Construction and Preferred Policy Option 14: Renewable and Low Carbon Energy Developments which contain measures to increase energy efficiency and support low carbon and renewable energy sources. Preferred Policy Option 26: Sustainable Transport and Travel contains measures to support sustainable modes of transport, reduce freight activity and reduce private car usage, which would have significant positive effects for the climate change objective.
5	Achieve good air quality, especially in urban areas	✓✓ in relation to Preferred Policy Option 17: Ground Conditions, Contamination and Pollution which requires developments to minimise air pollution and be located in areas which will not cause more pollution in Air Quality Management Areas. Preferred Policy Option 26: Sustainable Transport and Travel contains measures to support sustainable modes of transport, reduce freight activity and reduce private car usage, which would have significant positive effects for the air quality objective.
6	Make efficient use of land and protect soils	No significant effects identified.

	SA Objective	Significant effects identified
7	To use natural resources, both finite and renewable, as efficiently as possible, and re-use finite resources or recycled alternatives wherever possible	✓✓ in relation to Preferred Policy Option 18: Waste Management and Recycling which significantly benefits resource efficiency by encouraging and enabling re-use and recycling of materials right from the point of construction.
8	To identify, conserve and enhance the historic environment and cultural assets	✓✓ in relation to Preferred Policy Option 25: Heritage and Historic Environment which aims to protect and enhance all aspects of the historic environment in the District, including heritage assets, listed or locally important buildings, conservation areas, historic parks and gardens and archaeological assets, which would have a significant positive effect against this objective.
9	To conserve and enhance landscape and townscape character and encourage local distinctiveness	✓✓ in relation to Preferred Policy Option 20: Landscape Character which protects against development in the Chilterns AONB and requires that all developments make a positive contribution to the landscape. Preferred Policy Option 23: Local Distinctiveness and Place Shaping which seeks to enhance the local townscape through high quality design and Preferred Policy Option 25: Heritage and Historic Environment would reserve local character by protecting heritage assets and landscape features.
10	To improve the health and wellbeing of the local population	✓✓ in relation to Preferred Policy Option 10: Social and Community Facilities and Preferred Policy Option 11: Health and Wellbeing . These policies support the provision of new open space, sport and recreation facilities and active travel infrastructure which will make a significant positive contribution to residents' health and wellbeing.
11	To develop in sustainable locations	✓✓ in relation to the Potential Housing Distribution , as indicated in paragraph 2.49 of the Part 1 Regulation 18 Local Plan which prioritises developments in the most sustainable locations close to key services and facilities.
12	To improve community cohesion through reducing inequalities, promoting social inclusion and reducing crime and the fear of crime	✓✓ in relation to Preferred Policy Option 10: Social and Community Facilities and Preferred Policy Option 11: Health and Wellbeing . These policies seek to protect existing social, cultural and community facilities, alongside the provision of enhanced facilities which will be significantly positive for community cohesion.
13	Ensure that everyone has access to good quality housing that meets their needs	✓✓ in relation to Preferred Policy Option 2: Housing Mix and Type , Preferred Policy Option 3: Housing Density and Preferred Policy Option 4: Affordable Housing which ensure that there is a suitable range of types, styles, design and tenure mix to support needs of different groups. Preferred Policy Option 6: Residential Design and Layout and Accessible and Adaptable Buildings contributes toward meeting the District's affordable and accessible housing need.

	SA Objective	Significant effects identified
14	Achieve sustainable levels of prosperity and economic growth	✓✓ in relation to Preferred Policy Option 7: Employment and Economic Development and Preferred Policy Option 8: Warner Bros. Studios at Leavesden as these policies contribute to overall employment levels in a diverse range of jobs, in areas accessible to public transport and with mixed use development which would have a significant positive effect on economic growth in the area.
15	To ensure local residents have employment opportunities and access to training	✓✓ in relation to Preferred Policy Option 7: Employment and Economic Development and Preferred Policy Option 8: Warner Bros. Studios at Leavesden as these policies seek to safeguard existing employment sites (including land for Warner Bros Studios which is of national importance) and would provide new employment space. This would have a significant positive effect on employment opportunities for the District.

4.2 Identification of other effects

In addition to the significant effects described above the assessment identified a wide range of minor positive and minor negative effects.

In general, adverse effects have been identified against the environmental objectives in relation to the ‘development enabling’ policies and potential site allocations, whilst positive effects have been identified for those same policies/allocations against the social and economic objectives.

For the ‘development controlling’ policies under the themes of ‘Social and Community Facilities/Health and Wellbeing’; ‘Climate Change’; ‘Green Belt’; ‘Environment’; ‘Green Infrastructure’; ‘Design and Heritage’; and ‘Transport and Connections’ the assessments are generally positive against the SA objectives related to each of those policy themes, with there being no predicted effects against the non-related objectives and a few uncertainties where impacts would depend on specific site characteristics.

In addition to the positive and negative effects that were identified, there were areas where there is uncertainty as to how some SA objectives would be influenced by the Local Plan policies. For example it is uncertain what the effect will be on community infrastructure from the provision of new housing. It could result in a cumulative impact by adding pressure on community infrastructure across the District. Conversely, the level of housing growth should result in increased levels of developer contributions which could result in an increased provision of health, education, recreation and community facilities, as well as supporting the viability of existing services and facilities. Effects will vary between area and will also depend on the levels of new infrastructure provided as part of new developments.

4.3 Assessment of Proposal and Sites

As described in Section 3.3 above, the proposals and sites and their associated policies which are included in the Regulation 18 Local Plan Part 2 have been subject to assessment during

the development of the Plan. This process and a summary of its findings are described and presented in Section 6.3 of the main Interim SA Report.

As mentioned in that section the detailed assessments for the proposals and sites and their associated policies that have been selected for inclusion in the Regulation 18 Local Plan Part 2 are provided in Appendix F to the report.

The assessments for the sites which have not been taken forward for inclusion in the Regulation 18 Local Plan are included in Appendix G to the report.

For the sites and their associated policies which have been selected for inclusion in the Regulation 18 Local Plan the following significant effects were identified .

Table 4: Significant Effects Identified for Proposals and Sites

	SA Objective	Significant effects identified
1	To protect, maintain and enhance biodiversity and geodiversity at all levels.	No significant effects identified
2	To protect, maintain and enhance water resources (including water quality and quantity)	No significant effects identified
3	To reduce flood risk	xx in relation to housing allocation site CFS60 Affinity Water Depot as the River Colne flows through this site which is entirely within Flood Zone 2 and has a large area within Flood Zone 3a and 3b, posing a significant risk of flooding.
4	Reduce greenhouse gas emissions and adapt to the effects of climate	No significant effects identified
5	Achieve good air quality, especially in urban areas	No significant effects identified
6	Make efficient use of land and protect soils	No significant effects identified
7	To use natural resources, both finite and renewable, as efficiently as possible, and re-use finite resources or recycled alternatives wherever possible	No significant effects identified
8	To identify, conserve and enhance the historic environment and cultural assets	No significant effects identified
9	To conserve and enhance landscape and townscape character and encourage local distinctiveness	No significant effects identified
10	To improve the health and wellbeing of the local population	No significant effects identified
11	To develop in sustainable locations	No significant effects identified

	SA Objective	Significant effects identified
12	To improve community cohesion through reducing inequalities, promoting social inclusion and reducing crime and the fear of crime	No significant effects identified
13	Ensure that everyone has access to good quality housing that meets their needs	<p>✓✓ in relation to housing allocation sites CFS26c Land to the west of the Kings Langley Estate, OSPF22 Batchworth Park Golf Course, EOS7.0 Land to the south of Shepherds Lane and west of M25, EOS12.2 Land to the west and south of Maple Cross, and PCS47 South of Little Oxhey Lane. All of these sites have a capacity to support 500 or more dwellings and make a significant contribution towards providing housing in the District.</p> <p>The proposed policy on housing allocations is also identified as having a significant positive effect on the housing objective.</p>
14	Achieve sustainable levels of prosperity and economic growth	<p>✓✓ in relation to Warner Bros Studio at Leavesden expansion sites CFS28 Land at Gypsy Lane, Hunton Bridge and OSPF6 Land west of Leavesden Aerodrome given the importance of the studio to the local and national economy. These sites would allow expansion of the studio which would contribute significantly to the growth of the creative industry in the District.</p> <p>The existing employment site E(d) Maple Cross/Maple Lodge is also identified as having significant positive effects against this objective, as the site is contributing to meeting demand for industrial floorspace in the District due to its spare capacity of approx. 18,000sqm/5ha.</p>
15	To ensure local residents have employment opportunities and access to training	<p>✓✓ in relation to Warner Bros Studio at Leavesden expansion sites CFS28 Land at Gypsy Lane, Hunton Bridge and OSPF6 Land west of Leavesden Aerodrome given the importance of the studio to the local and national economy as an employer and a visitor site. These sites would allow expansion of the studio which would contribute significantly to the growth of the creative industry in the District.</p> <p>The existing employment site E(d) Maple Cross/Maple Lodge is also identified as having significant positive effects against this objective, as the site is contributing to meeting demand for industrial floorspace in the District due to its spare capacity of approx. 18,000sqm/5ha.</p>

Where significant adverse effects have been identified the Council will consider mitigation measures to reduce the effects. This will be through the requirements of other policies in the Local Plan, as well as any additional site specific measures.

4.4 Assessment of Whole Plan Effects

In addition to identifying the potential effects associated with the individual policies, or specific locations for development, it is important to develop an understanding of the overall effects of the plan as a whole. Consideration has therefore been given to how the policies within the plan interact with each other and the potential cumulative effects that could result from these interactions. Summaries of the assessments against the various SA topic areas are provided below. This includes the consideration of cumulative, synergistic and secondary effects.

4.4.1 Biodiversity (SA Objective 1)

The level of development proposed in the Regulation 18 Local Plan, along with the potential site allocations for housing, education and employment uses, will inevitably result in the need to develop on some greenfield sites in the District, with resulting effects on the biodiversity associated with those development sites taken forward and the green networks of which they may form a part. Also, once the new houses are occupied there will be increased pressure on the natural environment associated with recreational activities of new residents, as well as impacts from increased numbers of domestic pets. The recreational pressures could affect important sites for nature conservation both within and outside the District. In addition, there could be some adverse secondary effects on biodiversity as a result of increased pressure on water resources that would result from additional dwellings and enterprises in the District, when considered alongside new developments in neighbouring local authorities.

However, to act as a counter to these potential adverse effects, the proposed Potential Housing Distribution approach which is aimed at the prioritising of new development on previously developed land and in the urban areas will help to limit the amount of greenfield land required for new development and thereby reduce potential effects on biodiversity.

In addition, within-plan mitigation of any adverse effects associated with new developments (housing, employment etc.) will be provided by the development control type policies, in particular 'Preferred Policy Option 19: Green and Blue Infrastructure' and 'Preferred Policy Option 21: Biodiversity, Trees, Woodlands and Landscaping' for both of which significant positive effects have been identified against the biodiversity objective. The latter of these policies requires that development should result in a net-gain for biodiversity.

At a development site level none of the Sites for Potential Allocation have been identified as having any significant effects (either positive or negative) against the biodiversity objective. Minor adverse effects have been identified for many of the sites, mainly in relation to their current greenfield status, however these assessments do not take into account the mitigation which will be provided by the Local Plan policies, in particular the requirement for a net-gain for biodiversity.

4.4.2 Water (SA Objective 2)

Over abstraction of water resources is an issue in the region, therefore providing for nearly 9,000 new dwellings over the Local Plan period would increase this pressure on water resources. The effect is likely to become more significant over time as more dwellings are built and the risk of periodic water shortages increases. New development could also result in the pollution of water courses both during construction and when developments are occupied, as well as affecting groundwater resources, particularly if the development is in a Groundwater Source Protection Zone (GSPZ). New development increases the potential for water pollution, associated with increased run-off from impermeable surfaces and the potential for sewer flooding in high rainfall events. The likelihood and level of such effects will be dependent on the specific development locations.

As a result, the SA has identified minor adverse effects against SA2: Water in relation to the proposed Housing Growth Level.

However, within-plan mitigation of any adverse effects associated with new developments (housing, employment etc.) will be provided by the development control type policies, in particular 'Preferred Policy Option 15: Flood Risk and Water Resources' and 'Preferred Policy Option 19: Green and Blue Infrastructure' for both of which significant positive effects have been identified against the water objective.

At a development site level none of the Sites for Potential Allocation have been identified as having any significant effects (either positive or negative) against the water objective, or any minor effects. Uncertain effects have been identified for many of the sites, mainly in relation to their location within Groundwater Source Protection Zones.

4.4.3 Flood Risk (SA Objective 3)

At a Local Plan-wide level the SA has found 'no predicted effects' against this objective because the level of growth proposed in the Local Plan should be able to be provided without the need to develop in areas of higher flood risk.

Where potential flood risk issues could result, within-plan mitigation of any adverse effects associated with new developments (housing, employment etc.) will be provided by the development control type policies, in particular 'Preferred Policy Option 15: Flood Risk and Water Resources' for which significant positive effects have been identified against the flood risk objective. To support this, several other Preferred Policy Options have been assessed as having minor positive effects against this objective.

At a site specific level potential significant adverse effects have been identified in relation to potential housing allocation site CFS60 (Affinity Water Depot, Church Street) as the River Colne flows through this site which is entirely within Flood Zone 2 and has a large area within Flood Zone 3a and 3b, posing a significant risk of flooding. A number of other housing and potential employment sites have been identified as having minor adverse effects or uncertain effects given their location partly in, or adjacent to, flood risk areas.

4.4.4 Greenhouse gas emissions (SA Objective 4)

Making provision for nearly 9,000 new homes and 5.5ha of employment land over the Local Plan period would inevitably result in an increase in greenhouse gas emissions from energy used in the construction and occupation of new housing / employment uses and the

associated activities including increases in traffic. This is recognised in the SA, with negative effects against this objective being identified for the elements which include potential proposals for housing and employment growth.

However, the prioritising of new development within the built-up urban areas as far as possible should help to reduce the need to travel and reduce the average distances travelled to access facilities. This should have a positive effect on reducing the growth of greenhouse gas (GHG) emissions from transport.

Mitigation will be provided through the policies under 'Climate Change' theme (Preferred Policy Options: 12 Carbon Dioxide Emissions and On-site Renewable Energy; 13 Adapting to Climate Change and Sustainable Construction; 14: Renewable and Low Carbon Energy Developments; and 15: Flood Risk and Water Resources), for which significant positive effects have been identified, as well as for policies under the 'Transport and Connections' theme, in particular Preferred Policy Option 26: Sustainable Transport and Travel for which significant positive effects have also been identified.

Other positive effects relating to climate change mitigation and adaptation could arise as a result of the policies under the 'Sustainable Development' theme.

At a site specific level no significant effects (either positive or negative) have been identified for the Sites for Potential Allocation, although some minor adverse effects have been identified for housing sites which are at a distance from services and facilities. Conversely, minor positive effects have been identified for sites which are in close proximity to services and facilities.

4.4.5 Air Quality (SA Objective 5)

Transport is a key source of air pollution and so inevitably making provision for nearly 9,000 new homes and 5.5ha of employment land over the Local Plan period would contribute to background emissions through an increase in the number of vehicles on the road. This is recognised in the SA, with negative effects against this objective being identified for the elements which include potential proposals for housing and employment growth.

However, as is the case for greenhouse gas emissions, the prioritising of new development in the urban areas and at the most sustainable edge of settlement locations should help to reduce the need to travel and reduce the average distances travelled to access facilities. This should have a positive effect on reducing the growth of greenhouse gas (GHG) emissions from transport.

Mitigation will be provided through the policies under 'Environment', 'Climate Change', and 'Transport and Connections' themes, in particular 'Preferred Policy Option 17: Ground Conditions, Contamination and Pollution' and 'Preferred Policy Option 26: Sustainable Transport and Travel' for both of which significant positive effects have also been identified – with minor positive effects from several other policies under these themes.

Minor positive effects relating to air quality could also arise as a result of policies in other plan elements, for example the 'Sustainable Development' theme, with the exception of the proposed Housing Growth Level.

At a site specific level no significant effects (either positive or negative) or minor effects have been predicted for the Sites for Potential Allocation. Some uncertain effects have been

identified for housing sites which are in close proximity to major roads, in particular the M25 as their location could result in air quality issues for new residents.

4.4.6 Soil (SA Objective 6)

Making provision for nearly 9,000 new homes and 5.5ha of employment land over the Local Plan period would inevitably require development on some greenfield sites – with associated adverse effects on soils.

However, to act as a counter to these potential adverse effects, the Potential Housing Distribution approach, which is aimed at the prioritising of new development on previously developed land and in the urban areas will help to limit the level of soil sealing and degradation resulting from new development.

No significant effects (either positive or negative) have been identified against the soil objective, however minor positive effects have been identified for some of the development controlling policies.

At a development site level none of the Sites for Potential Allocation have been identified as having a potential significant effect (either positive or negative) against the soil objective. Minor adverse effects have been identified for many of the sites, mainly in relation to their current greenfield status and the loss of soil and agricultural land that would result. Conversely, minor positive effects have been identified for those sites which would utilise previously developed land.

4.4.7 Resource Efficiency (SA Objective 7)

The level of new development proposed in the Local Plan will inevitably place demands on natural resources and create additional waste, both during the construction and operation/occupancy stages.

Mitigation will be provided through the policies under ‘Environment’ and ‘Climate Change’ themes, in particular ‘Preferred Policy Option 18: Waste Management and Recycling’ for which significant positive effects have been identified – with minor positive effects from policies under the ‘Climate Change’ theme (e.g. ‘Preferred Policy Option 13: Adapting to Climate Change and Sustainable Construction’).

At a development site level none of the Sites for Potential Allocation have been identified as having any potential effects (positive or negative) against the resource efficiency objective.

4.4.8 Historic environment (SA Objectives 8)

The potential new development proposed in the Regulation 18 Local Plan could result in adverse effects on heritage assets and their settings and the District’s wider historic environment. The significance of the effects on the historic environment of delivering the new development and associated infrastructure will be largely dependent on the nature of any heritage assets and their settings that are associated with the sites, as well as the scale and design of the new developments relative to these. As a result, the SA has identified uncertain effects in relation to the plan elements covering housing and employment growth.

Policy Options under the ‘Design and Heritage’ theme will provide within-plan mitigation, particularly ‘Preferred Policy Option 25: Heritage and Historic Environment’ for which

significant positive effects have been identified as this policy aims to protect and enhance all aspects of the historic environment in the District, including heritage assets, listed or locally important buildings, conservation areas, historic parks and gardens and archaeological assets. Other plan policies will support this through minor positive effects that have been identified (e.g. 'Preferred Policy Option 14: Renewable and Low Carbon Energy Developments' which requires that the impact on the local historic environment be taken into consideration for applications for renewable energy developments).

At a site specific level, none of the Sites for Potential Allocation have been identified to have any potential significant effects (either positive or negative), but many have some associated or nearby heritage assets that will need to be taken into consideration during the planning application process – as a result minor adverse effects or uncertain effects have been identified for many of the sites.

4.4.9 Landscape & Townscape (SA Objective 9)

Making provision for nearly 9,000 new homes and 5.5ha of employment land over the Local Plan period would inevitably result in effects on the local landscapes and townscapes in those areas where new development takes place. This could have the potential to result in adverse effects on the local and wider landscapes, such as the setting of the Chilterns AONB. This is recognised in the SA, with negative effects against this objective being identified for the plan elements which include proposals for the housing and employment growth.

However, to act as a counter to these potential adverse effects, the Potential Housing Distribution approach, which is aimed at the prioritising of new development on previously developed land and in the urban areas will help to limit the amount of open land which will be required to meet the housing and employment targets, thereby reducing levels of adverse effects on local landscapes.

Significant positive effects have been identified in relation to this objective for 'Preferred Policy Option 20: Landscape Character' which protects against development in the Chilterns AONB and requires that all developments make a positive contribution to the landscape and for 'Preferred Policy Option 23: Local Distinctiveness and Place Shaping' which seeks to enhance the local townscape through high quality design. Significant positive effects have also been identified for 'Preferred Policy Option 25: Heritage and Historic Environment' as it would reserve local character by protecting heritage assets and landscape features. A range of minor positive effects have also been identified for policies across a wide range of the Regulation 18 Local Plan themes.

At a site specific level, none of the Sites for Potential Allocation have been identified to have any significant effects on landscape/townscape (either positive or negative), however minor adverse effects have been identified for the sites on open land, particularly where development would encroach into open countryside or erode gaps between settlements. Uncertain effects have been identified for many of the sites on previously developed land, where redevelopment may improve the local landscape/townscape.

4.4.10 Health and wellbeing (SA Objective 10)

Overall, the predicted impacts of the plan should have positive impacts against the objective to improve the health and wellbeing of the local population. This is achieved through policies

which support the provision and improvements to housing, healthcare, education, the environment and facilities for leisure and recreation.

Significant positive effects have been identified in relation to ‘Preferred Policy Option 10: Social and Community Facilities’ and ‘Preferred Policy Option 11: Health and Wellbeing’ as these policies support the provision of new open space, sport and recreation facilities and active travel infrastructure which will make a significant positive contribution to residents’ health and wellbeing. Significant positive effects have also been identified in relation to ‘Preferred Policy Option 22: Open Space, Play Space, Sport and Recreation’ which would protect against the loss of facilities and support the provision of new facilities to aid sport and recreation activities which support a healthy lifestyle.

In addition, minor positive effects have been identified for other policies which would improve the built and natural environments, as well as access to the natural environment, or which would enable/improve the use of healthy travel modes (i.e. walking and cycling), although on the latter the effects will be dependent on the behavioural change necessary to result in a take-up of active travel modes.

At a site-specific level, none of the Sites for Potential Allocation have been identified to have any significant effects (either adverse or positive) against the Health & Wellbeing objective. Minor positive effects have been predicted for those sites which are in close proximity to open space or which would provide new open space, whilst uncertain effects have been identified for sites which could suffer from noise or air quality issues due to their proximity to major roads.

4.4.11 Sustainable locations (SA Objective 11)

Significant positive effects against the Sustainable Locations objective have been forecast in relation to the Potential Housing Distribution approach as the prioritising of new development in built-up urban areas should reduce the need to travel, as a large proportion of residents would be close to key services and facilities.

Additional minor positive effects have also been predicted for a wide range of other policies, including, amongst others: ‘Preferred Policy Option 3: Housing Density’ which supports highest density housing at sites which are well served by public transport and close to services and facilities; ‘Preferred Policy Option 7: Employment and Economic Development’ which gives priority to developments in sustainable locations, accessible by foot or public transport from existing settlements; and ‘Preferred Policy Option 26: Sustainable Transport and Travel’ as improving provision of public transport and sustainable travel infrastructure will make developments in the District more accessible.

No adverse effects have been identified in relation to the proposed policies.

For ‘Preferred Policy Option 16: Green Belt’ the effects are uncertain given that residential developments in land removed from the Green Belt will result in people travelling further for work and leisure purposes which could increase reliance on the car. The impact is dependent on a public transport system being in place to connect new developments to the main settlements.

At a site-specific level, none of the Sites for Potential Allocation have been identified to have any significant effects (either positive or negative) in relation to the Sustainable Location objectives. As was the case for SA4 Climate Change some minor adverse effects have been

identified for housing and employment sites which are at a distance from services and facilities. Conversely, minor positive effects have been identified for housing sites which are in close proximity to services and facilities.

4.4.12 Communities (SA Objective 12)

The predicted effects of the plan against the community cohesion objective are largely positive. The plan includes policies which would improve access to housing, education, facilities, public transport and would improve quality of life in the District whilst helping to reduce deprivation, where it exists.

Significant positive effects have been identified for ‘Preferred Policy Option 10: Social and Community Facilities’ and ‘Preferred Policy Option 11: Health and Wellbeing’ as these policies seek to protect existing social, cultural and community facilities, alongside the provision of enhanced facilities which will be significantly positive for community cohesion.

Additional minor positive effects have also been predicted for a wide range of other policies, including, amongst others: ‘Preferred Policy Option 2: Housing Mix and Type’ which aims to build mixed communities by providing a mix of affordable, specialist and supported accommodation in addition to a mix of tenures and types of housing; and ‘Preferred Policy Option 22: Open Space, Play Space, Sport and Recreation’ as the provision of new open space and play space at new developments would be beneficial to local communities.

No adverse effects have been identified in relation to the proposed policies.

For the housing growth element of the plan the effects are uncertain given that making provision for nearly 9,000 new homes over the Local Plan period could result in a cumulative impact by adding pressure on community infrastructure across the District. Conversely, the level of housing growth should result in increased levels of developer contributions which could result in an increased provision of health, education, recreation and community facilities, as well as supporting the viability of existing services and facilities. Effects will vary between area and will also depend on the levels of new infrastructure provided as part of new developments.

At a site specific level, none of the Sites for Potential Allocation have been identified to have any significant effects (either positive or negative) against the Community Cohesion objective, however minor positive effects have been identified for sites close to community facilities and for sites which would provide new community facilities. No minor adverse effects were identified at a site level.

4.4.13 Housing (SA Objective 13)

Significant positive effects have been predicted in relation to ‘Preferred Policy Option 2: Housing Mix and Type’, ‘Preferred Policy Option 3: Housing Density’ and ‘Preferred Policy Option 4: Affordable Housing’ which ensure that there is a suitable range of types, styles, design and tenure mix to support needs of different groups.

In addition, minor positive effects have been identified for some other policies, including: Preferred Policy Option 5: Provision for Gypsies, Travellers and Travelling Showpeople’ as allocation of additional traveller sites and safeguarding of existing sites will ensure that the needs of the travelling community are met; ‘Preferred Policy Option 6: Residential Design and Layout and Accessible and Adaptable Buildings’ which contributes towards providing

affordable and accessible housing in the District; 'Preferred Policy Option 16: Green Belt' which, in special circumstances, would allow residential development to support agricultural and forestry workers; and 'Preferred Policy Option 23: Local Distinctiveness and Place Shaping' which supports high quality design of housing.

The proposed Housing Growth Level is identified as having mixed effects against the housing objective. Whilst this policy supports the provision of nearly 9,000 new homes which will contribute to the District's housing need, the level of housing proposed does not fulfil the District's Objectively Assessed Need for housing over the plan period.

At a site specific level, significant positive effects have been identified in relation to those potential housing allocation sites which have a capacity to support 500 or more dwellings and therefore make a significant contribution towards providing new housing for the District. Minor positive effects have been identified for all housing sites with a dwelling capacity below 500.

The proposed policy on housing allocations in Part 2 of the Regulation 18 Local Plan is also identified as having a significant positive effect on the housing objective.

4.4.14 Economy and Employment (SA Objectives 14 & 15)

The SA has predicted that the Regulation 18 Local Plan would have positive cumulative effects on economic factors. The plan supports the objectives to achieve sustainable levels of prosperity and economic growth and to ensure local residents have access to employment opportunities and training. The plan would enable economic growth in the District by retaining and adding to dedicated employment sites and by enabling appropriate retail and leisure developments in accessible locations which will stimulate the local economy and ensure the viability and vitality of local centres within the District are maintained.

Significant positive effects have been predicted for both of the economic related SA objectives (SA14 and SA15) in relation to 'Preferred Policy Option 7: Employment and Economic Development' and 'Preferred Policy Option 8: Warner Bros. Studios at Leavesden' as these policies contribute to overall employment levels in a diverse range of jobs, in areas accessible to public transport and with mixed use development which would have a significant positive effect on economic growth in the area.

In addition, minor positive effects have been against SA14 and SA15 for other policies, including: 'Preferred Policy Option 9: Retail and Leisure', as through the protection and enhancement of town, district and local centres the policy will help to encourage retail and associated development uses which are appropriate to the scale and function of these centres and which will help to support the vitality of the local economy. Increased development in centrally located and accessible areas will allow the District to grow sustainably. Increasing retail and leisure options within the settlements will help the viability and vitality of local centres; and the policies under the 'Transport and Connections' theme, as measures to maximise the use of active travel modes and public transport should improve the quality of the urban environment thereby supporting the local economy. Reducing congestion should also be beneficial for local businesses as deliveries, customers and employees are less likely to face transport delays. 'Policy Option 28: Deliveries, Servicing and Construction' requires that delivery and servicing arrangements be made for all new developments. This will allow for efficient movement of goods and will increase business efficiency for companies making deliveries.

At a site-specific level, significant positive effects have been identified in relation to Warner Bros Studio at Leavesden expansion sites CFS28 and OSPF6 given the importance of the studio to the local and national economy. These sites would allow expansion of the studio which would contribute significantly to the growth of the creative industry in the District. The existing employment site E(d) Maple Cross/Maple Lodge is also identified as having significant positive effects against these objectives due to its spare capacity of approx. 18,000sqm/5ha of industrial floorspace.

5 Mitigation and Recommendations

A key role of the SA is to provide recommendations as to how the sustainability performance of a plan can be improved. The Regulation 18 Local Plan includes a range of policies that seek to prevent and where possible enhance the environment and overall sustainability of development.

The SA has built on this by identifying a range of recommendations as to how the Local Plan can maximise its performance against the range of sustainability topics. Some of these recommendations seek to mitigate potential adverse effects, whilst others look to build on some of the opportunities that are provided by the District's natural environment.

5.1.1 Mitigation

The assessments of the Regulation 18 Local Plan Part 1 as summarised in Section 4 have been undertaken on a 'policy by policy' basis, seeking to identify the effects of each policy in isolation – i.e. without considering the potential mitigation and/or enhancements of effects that are included in other policies. As a result many of the potential adverse effects identified in the 'development enabling' plan elements such as the proposed level of housing growth and 'Preferred Policy Option 7: Employment and Economic Development' should be avoided or mitigated by the requirements set out in Preferred Policy Options under the plan themes of 'Sustainable Development'; 'Housing'; 'Employment'; 'Social and Community Facilities / Health and Wellbeing'; 'Climate Change'; 'Green Belt'; 'Environment'; 'Green Infrastructure'; 'Design and Heritage'; and 'Transport and Connections'.

The specific policies which will mitigate potential adverse effects by SA topic area are identified in the relevant sections of the 'Whole Plan Assessment by SA Topic' which is provided in Section 4.4.

5.1.2 Recommendations

During the development of the Regulation 18 Local Plan the SA team have provided a wide range of suggestions and recommendations as to how the policies and supporting text for the Plan could be updated to fill some gaps and to improve the robustness and clarity of the Plan's requirements. This has taken place at various stages, from initial policy development through to finalisation of the Regulation 18 Local Plan for consultation.

In addition there are some further recommendations which have been identified for the Council's consideration when the Plan is being updated for the Publication stage. These are in relation to the Local Plan's objectives and preferred policy options and are detailed in Section 6.7.3. of the main Interim SA Report.

6 Conclusions at this stage of the SA

The Preferred Policy Options and Sites for Potential Allocation in Parts 1 and 2 of the Regulation 18 Local Plan have been assessed against the SA Objectives that were developed during the scoping stage of the SA process. In addition, the proposed Local Plan Vision and Objectives have been assessed for their compatibility with the SA objectives.

The SA has found that overall the Regulation 18 Local Plan performs well in relation to the SA objectives, particularly the social and economic objectives through the provision of new homes and employment development although the level of housing growth proposed falls short of meeting the District's objectively assessed needs, thereby reducing the level of positive effects against the housing objective (SA13) than if the need were to be fully met.

Whilst the level of growth proposed in the Local Plan will inevitably require new development on greenfield sites in the Green Belt, with associated adverse effects and pressures on the natural and historic environment, by maximising the levels of development in the existing urban areas the amount of greenfield land needed will be minimised, thereby reducing the scale of these effects. The Sites for Potential Allocation which are located within or at the edge of existing sustainable settlements and which may come forward for development in the future would also help to reduce adverse effects, particularly those relating to transport related issues.

The requirements of the topic specific proposed policies in the Regulation 18 Local Plan (e.g. Preferred Policy Option 21: Biodiversity, Trees, Woodlands and Landscaping) will provide many of the mitigation and enhancement measures to improve the overall sustainability performance of the Local Plan.

7 Next Steps

Following the Regulation 18 consultation the SA will provide input during the development of the Preferred Options document further work will be undertaken by the Council to develop the Regulation 19 Publication version of the Local Plan, taking into account feedback received through the Regulation 18 consultation. As with all previous stages this process will be informed by the ongoing SA.

When the Local Plan is published at the Regulation 19 stage, planned for late-2021, it will be accompanied by a full SA Report (with a Non-Technical Summary) which will provide a detailed assessment of all the proposed policies and sites in the Publication document and which will fully meet the requirements for an Environmental Report as specified by the SEA Regulations. The SA Report will build on feedback received through the Regulation 18 consultation as well as the additional evidence base studies that are currently being undertaken.