

# Sustainability Appraisal (SA) of the Dacorum Local Plan

Interim SA Report (Revised Growth Strategy)

Non-technical Summary

October 2023



## Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Dacorum Local Plan, which is being prepared by Dacorum Borough Council (DBC). Once adopted, the Local Plan will establish a strategy for growth and change up to 2040, allocate sites to deliver the strategy and policies used to determine planning applications.

SA is a mechanism for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. Central to the SA process is preparation of an SA Report for publication alongside the draft plan, with a view to informing the consultation and subsequent plan finalisation.

At the current time an 'Interim' SA Report is published as part of a consultation on a Revised Strategy for Growth (following the Emerging Growth Strategy consultation held in 2020).

This is the Non-Technical Summary (NTS) of the Interim SA Report.

### Structure of the Interim SA Report / this NTS

SA reporting essentially involves answering the following questions in turn:

- 1) What has the SA process involved **up to this point**?  
- including in relation to 'reasonable alternatives'.
- 2) What are the SA findings **at this stage**?  
- i.e. in relation to the draft plan.
- 3) What happens **next**?

Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by considering the SA 'scope'.

### What's the scope of the SA?

The scope of the SA is reflected in a list of topics, objectives and key issues/opportunities. Taken together, this list indicates the parameters of SA, providing a methodological 'framework' for assessment.

The topics at the core of the SA framework are as follows:

- Accessibility
- Air quality
- Biodiversity
- Climate change adaptation
- Climate change mitigation
- Communities
- Economy and employment
- Health and wellbeing
- Historic environment
- Homes
- Land and soils
- Landscape
- Resources
- Transport
- Water

## The SA process up to this point

A key element of the required SA process involves assessing 'reasonable alternatives' in time to inform the draft plan, and then publishing information on reasonable alternatives for consultation alongside the draft plan.

As such, Part 1 of the main report explains work undertaken to develop and appraise a 'reasonable' range of alternative approaches to the allocation of land for development, or '**growth scenarios**'.

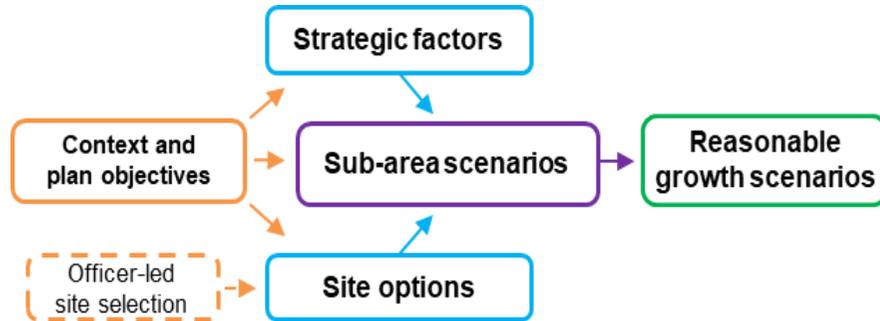
Specifically, Part 1 of the report presents–

- 1) work (by AECOM and DBC officers) to **define** the growth scenarios;
- 2) work (by AECOM) to **appraise** the growth scenarios; and
- 3) a statement (by DBC officers) that aims to **respond** to the appraisal.

## Defining growth scenarios

Section 5 of the main report explains a process that led to the definition of growth scenarios. The figure below presents a summary.

**Figure A: Defining growth scenarios**



Section 5.2 of the report gives consideration to ‘strategic factors’, with sub-sections for: A) development quantum; and B) broad distribution.

- **Development quantum** – the Government standard method defines Dacorum’s Local Housing Need (LHN) as 1,018 dwellings per annum (dpa), or 16,288 homes in total over the plan period (2024-40). However, there are high level arguments for setting the housing requirement at both higher and lower figures.
- **Broad distribution** – the main report presents a review of high level factors with a bearing on the distribution of growth, including:
  - **Hemel Garden Communities (HGC)** – work on the HGC programme has been ongoing for several years, and HGC features within the recently published Draft St Albans Local Plan.
  - **Chilterns Beechwoods SAC** – recreational pressure on the Ashridge SSSI component of the SAC is perhaps the primary matter driving spatial strategy and site selection locally. Specifically, there is a need to support sites / growth locations for which there is a Suitable Alternative Greenspace (SANG) solution.

- **Mix of sites** – aside from HGC, there is a need to ensure a balanced strategy involving a good mix of site sizes, locations and types. Strategic sites can deliver key benefits, but small sites are also important and support a robust delivery trajectory.
- **Settlement hierarchy** – a key concern raised through consultation in 2020 related to the proportion of growth directed to Berkhamsted and Tring (29%), hence there is now a case for exploring growth scenarios involving an increased proportion of growth directed to Hemel Hempstead. There is also an important question regarding distribution of growth to and between the villages within the third tier of the settlement hierarchy: Bovingdon, Kings Langley, Markyate.
- **Urban supply** – another key message received through consultation in 2020 related to maximising housing growth within urban areas, and the opportunities for doing so are almost exclusively found within Hemel Hempstead. In particular, the two key regeneration areas are: 1) Hemel town centre, guided by an adopted [Vision](#); and 2) the Two Waters Opportunity Area, guided by the findings of a [consultation](#) held in 2022.
- **AONB and Green Belt** – following the consultation in 2020 there is a renewed focus on minimising harm to the Green Belt, and it remains the case that there is very limited or no case to be made for allocating in the Chilterns AONB.”
- **Transport connectivity** – has implications for wide-ranging sustainability objectives, including around decarbonisation. The option of focusing growth along transport corridors was found to perform strongly through the recent SW Herts JSP [consultation](#), and the option of ‘growing the best-connected places’ also performed well (linked to aligning growth with the settlement hierarchy).

Section 5.3 of the main report then gives consideration to the site options that are feasibly in contention for allocation. A key starting point is the 37 shortlisted site options that were examined in detail within the DBC Site Selection Topic Paper published in 2020, plus a small number of additional sites submitted to the Council through the consultation in 2020.

Section 5.4 of the report then draws upon the preceding two stages of work to give consideration to growth scenarios for seven **sub-areas**.

For each sub-area, consideration is given to potential ways of allocating site options in combination in order to deliver a reasonable number of homes (accounting for strategic factors). The conclusion is a need to progress three scenarios for each of the three higher tier settlements (Hemel Hempstead, Berkhamsted and Tring), but just one growth scenario for the three lower tier settlement (Bovingdon, Kings Langley and Markyate).

Finally, with regards to defining growth scenarios, Section 5.5 considers how to combine the sub-area scenarios in order to form **reasonable growth scenarios** for Dacorum as a whole. Ultimately 12 scenarios were defined:

1. Higher growth at Berkhamsted and Tring
2. Higher growth at Hemel Hempstead
3. Higher growth at Hemel Hempstead and Tring
4. Higher growth at Hemel Hempstead and Berkhamsted
5. Higher growth at Hemel Hempstead, Tring and Berkhamsted
6. Highest growth at Hemel Hempstead
7. Highest growth at Hemel Hempstead, higher growth at Tring
8. Highest growth at Hemel Hempstead, higher growth at Berkhamsted
9. Highest growth at Hemel H'stead, higher growth at Tring & B'hamsted
10. Highest growth at Hemel Hempstead and Berkhamsted
11. Highest growth at Hemel Hempstead and Tring
12. Highest growth at Hemel Hempstead, Berkhamsted and Tring

## Appraising growth scenarios

Section 6 of the main report presents the appraisal of reasonable alternative growth scenarios, including within an appraisal 'matrix'.

The appraisal serves to suggest that Scenario 1 performs quite poorly overall. This is a low growth scenario whereby the housing requirement might be set at a figure at least 15% below LHN, but is also notably the only scenario whereby the Local Plan is assumed to omit HGC. For the other scenarios the appraisal shows a mixed picture. Key considerations include:

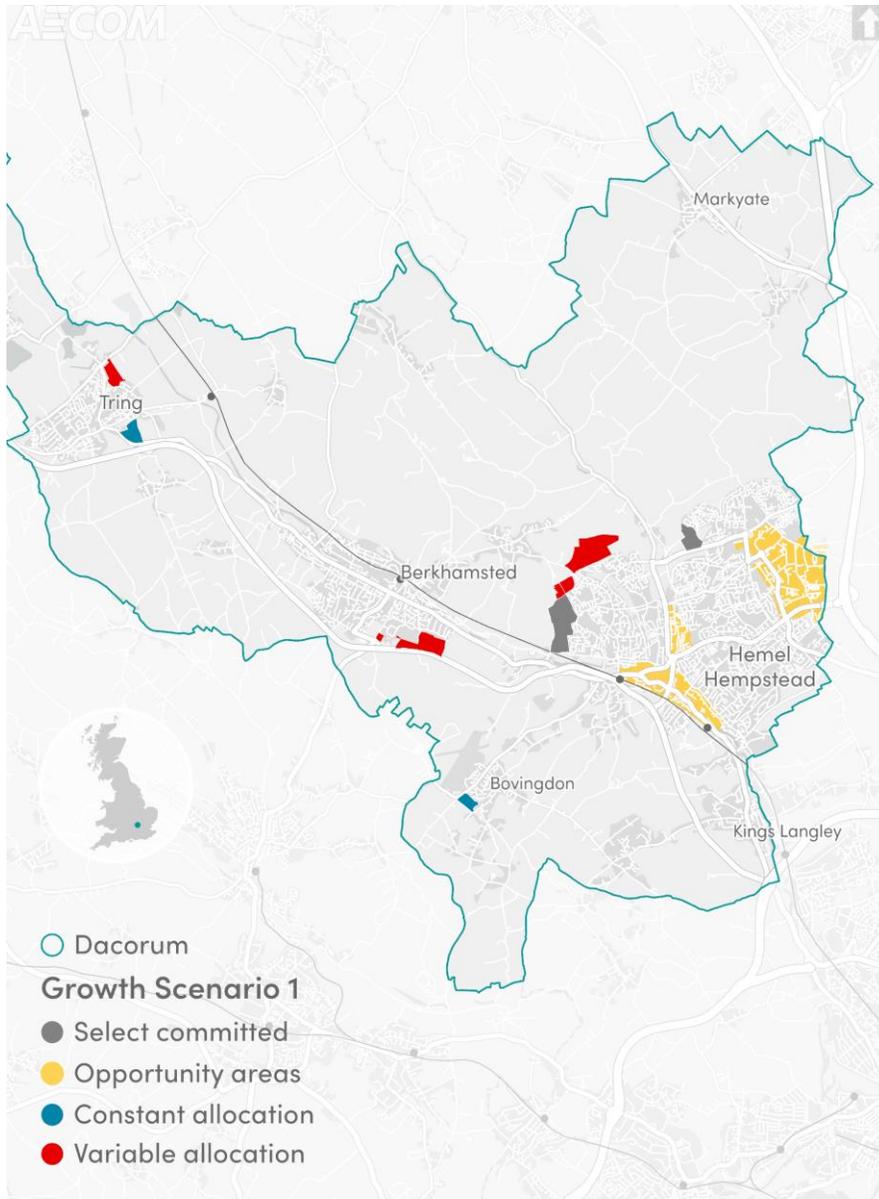
- Accessibility – as well as HGC, at several other variable growth locations there is an opportunity to deliver community infrastructure alongside new homes (East of Tring; South B'sted; Shendish Manor).
- Air quality – Berkhamsted is potentially the key consideration, with the ranking of the alternative scenarios reflecting support for those scenarios involving allocation of only South Berkhamsted.
- Biodiversity – Scenario 4 involves only sites with a likely SANG solution. SANG for the additional site under Scenario 3 might feasibly be identified and the site is otherwise subject to limited constraint.
- Climate change mitigation – it is not clear that any of the scenarios would lead to a particular built environment decarbonisation opportunity, in the context of ambitious local and national targets.
- Communities – there are wide-ranging factors, but the appraisal reflects a view that there is a case for avoiding the highest growth scenario at both Berkhamsted and Tring.
- Economy and employment – in addition to a clear concern with Scenario 1, which omits HGC, the order of preference reflects support for higher growth at Hemel Hempstead given Herts IQ ambitions.
- Historic environment – Scenarios 4 and 5 perform well because: HGC represents something of an opportunity; Shendish Manor / Fairfield (Hemel) is subject to a degree of constraint; South Berkhamsted is supported; and there is a degree of concern with Land East of Tring.
- Homes – Scenario 12 would enable the housing requirement to be set at LHN along with a robust supply. Meeting Gypsy and Traveller accommodation needs would be a clear issue in the absence of HGC.
- Land and soils – agricultural land quality is a constraint to any eastwards expansion of Tring. There is not necessarily a preference for lower growth as neighbouring areas are subject to similar constraint.
- Landscape – there are concerns across the board, but concerns are highest under scenarios that omit HGC (Scenario 1) or that involve a strategic urban expansion to the east of Tring (Scenarios 11 and 12).
- Transport – the ranking aims to reflect: support for HGC; support for providing for LHN as far as possible; support for South Berkhamsted; and pros and cons in respect of Shendish Manor / Fairfields (Hemel).

**Table A:** The reasonable alternative growth scenarios with supply broken down only by settlement only

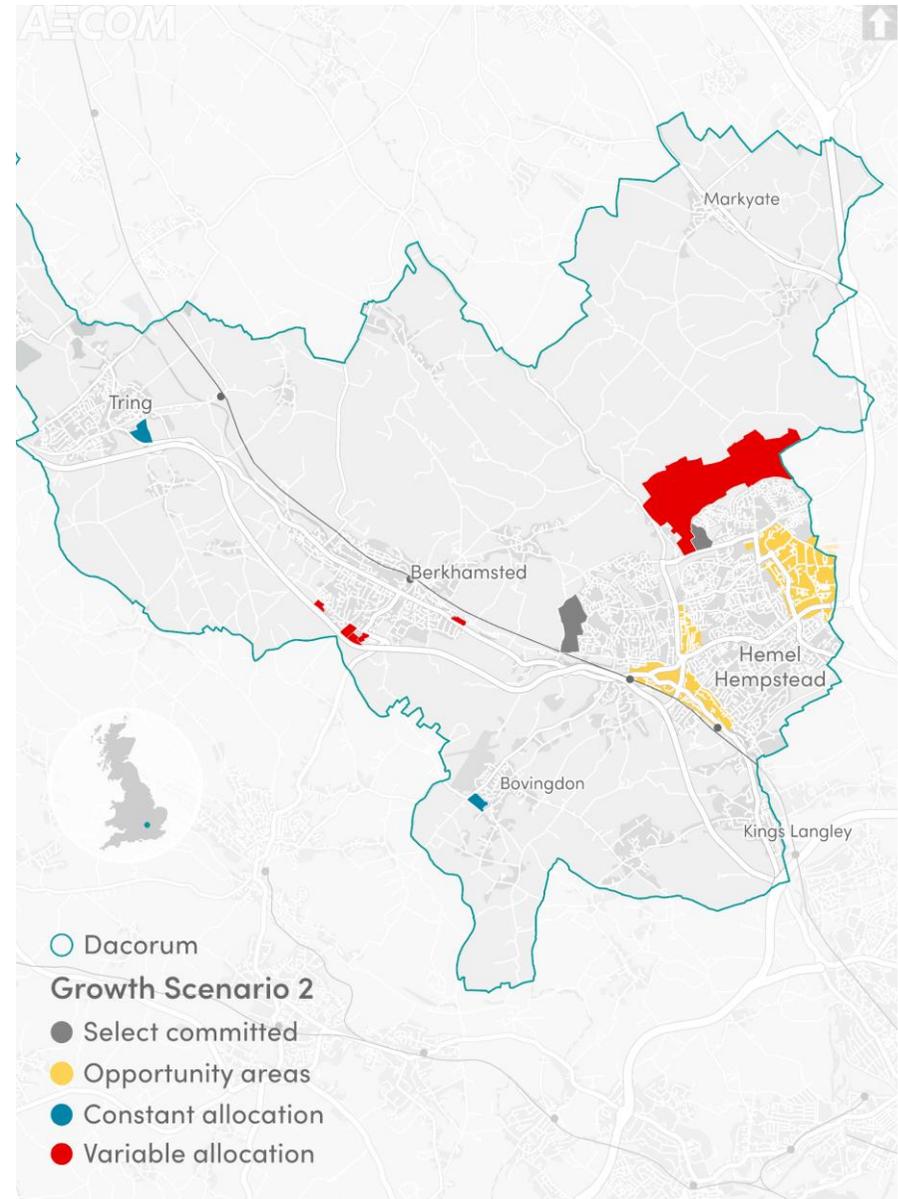
Supply component	1	2	3	4	5	6	7	8	9	10	11	12
Hemel Hempstead	10,996	11,746	11,746	11,746	11,746	12,496	12,496	12,496	12,496	12,496	12,496	12,496
Berkhamsted	1,264	854	854	1,264	1,264	854	854	1,264	1,264	1,704	854	1,704
Tring	922	522	922	522	922	522	922	522	922	522	2322	2322
Kings Langley	68	68	68	68	68	68	68	68	68	68	68	68
Bovingdon	230	230	230	230	230	230	230	230	230	230	230	230
Markyate	53	53	53	53	53	53	53	53	53	53	53	53
Countryside	466	466	466	466	466	466	466	466	466	466	466	466
<b>Total supply</b>	<b>13,994</b>	<b>13,934</b>	<b>14,334</b>	<b>14,344</b>	<b>14,744</b>	<b>14,684</b>	<b>15,084</b>	<b>15,094</b>	<b>15,494</b>	<b>15,534</b>	<b>16,484</b>	<b>17,334</b>

**Table B:** The reasonable alternative growth scenarios with supply broken down further

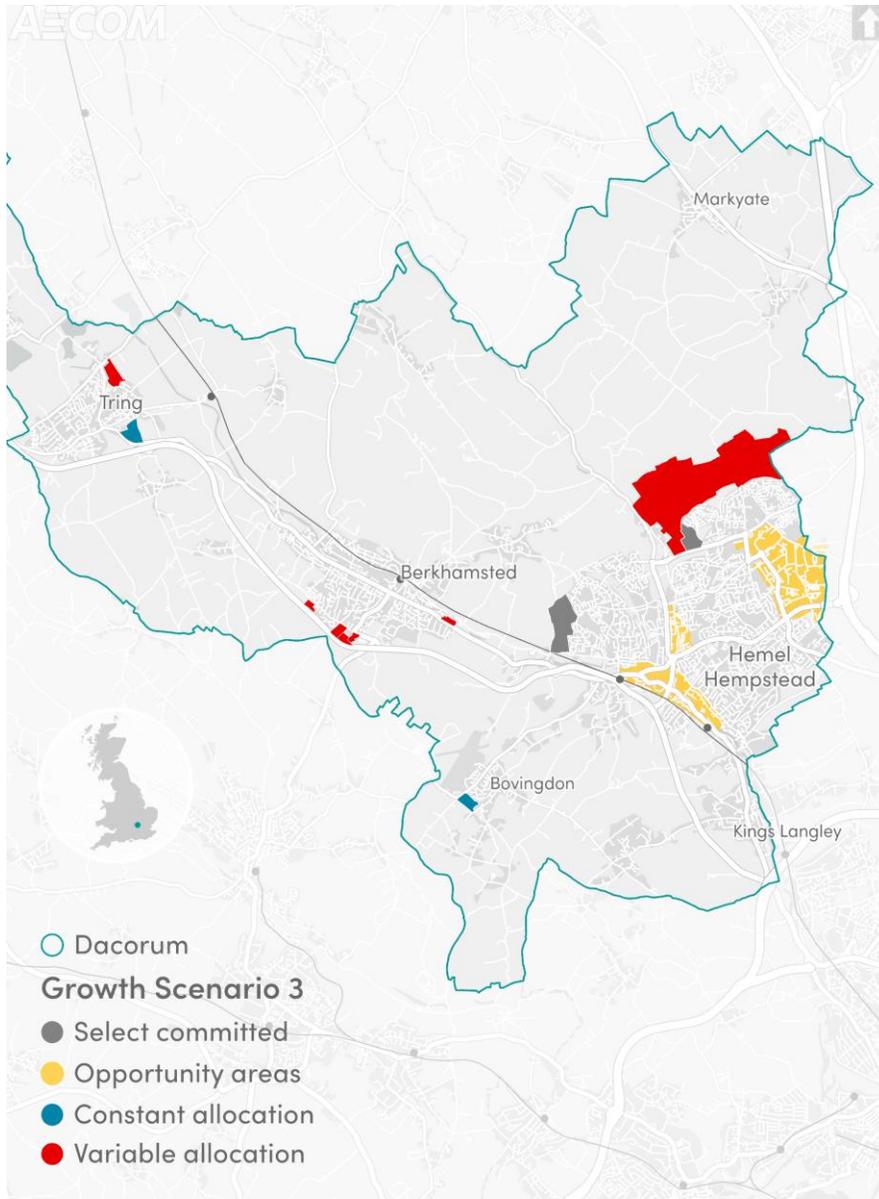
Supply component	1	2	3	4	5	6	7	8	9	10	11	12		
Permissions	2390	2390	2390	2390	2390	2390	2390	2390	2390	2390	2390	2390		
Windfall	3053	3053	3053	3053	3053	3053	3053	3053	3053	3053	3053	3053		
Allocations	Non Green Belt	Existing allocations	732	732	732	732	732	732	732	732	732	732	732	
		Urban allocations	590	590	590	590	590	590	590	590	590	590	590	
		Greenfield allocation	80	80	80	80	80	80	80	80	80	80	80	
		Hemel Town Centre OA	1750	1750	1750	1750	1750	1750	1750	1750	1750	1750	1750	
		Hemel Two Waters OA	2000	2000	2000	2000	2000	2250	2250	2250	2250	2250	2250	2250
	Green Belt	Hemel Hempstead	1500	2500	2500	2500	2500	3000	3000	3000	3000	3000	3000	
		Berkhamsted	850	440	440	850	850	440	440	850	850	1290	440	1290
		Tring	650	250	650	250	650	250	650	250	650	2050	2050	
		Bovingdon	150	150	150	150	150	150	150	150	150	150	150	
	<b>Total supply</b>	<b>13,994</b>	<b>13,934</b>	<b>14,334</b>	<b>14,344</b>	<b>14,744</b>	<b>14,684</b>	<b>15,084</b>	<b>15,094</b>	<b>15,494</b>	<b>15,534</b>	<b>16,484</b>	<b>17,334</b>	
<b>% above/below LHN (16,288 homes)</b>	<b>-14%</b>	<b>-14%</b>	<b>-12%</b>	<b>-12%</b>	<b>-9%</b>	<b>-10%</b>	<b>-7%</b>	<b>-7%</b>	<b>-5%</b>	<b>-5%</b>	<b>1%</b>	<b>6%</b>		



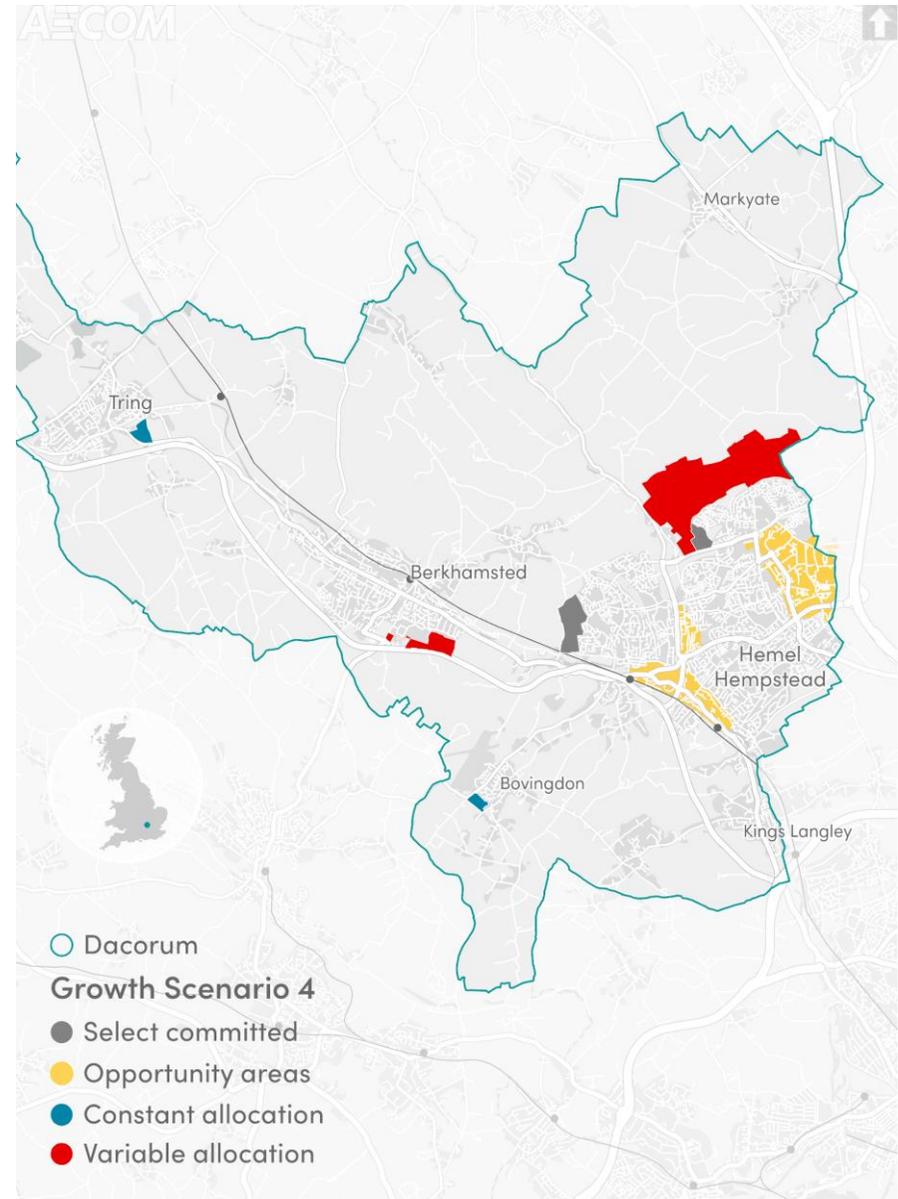
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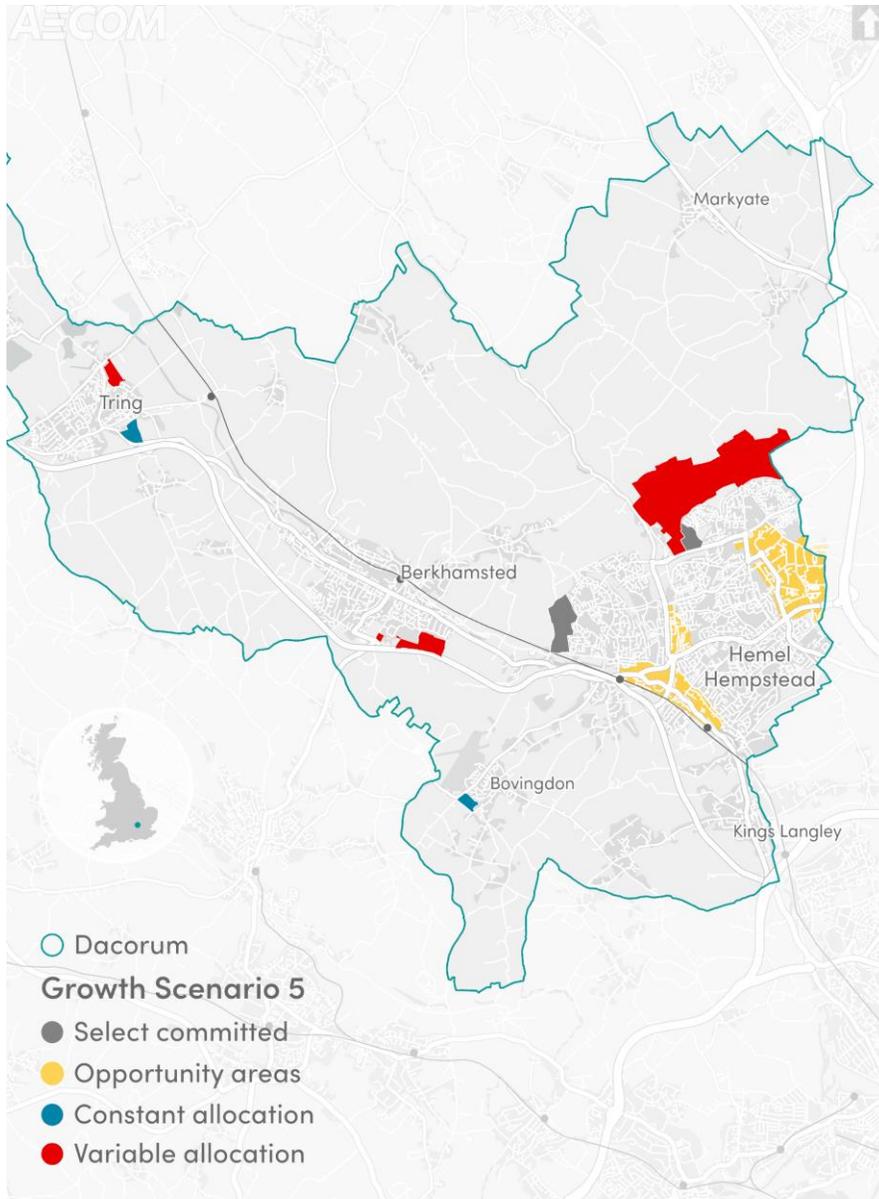
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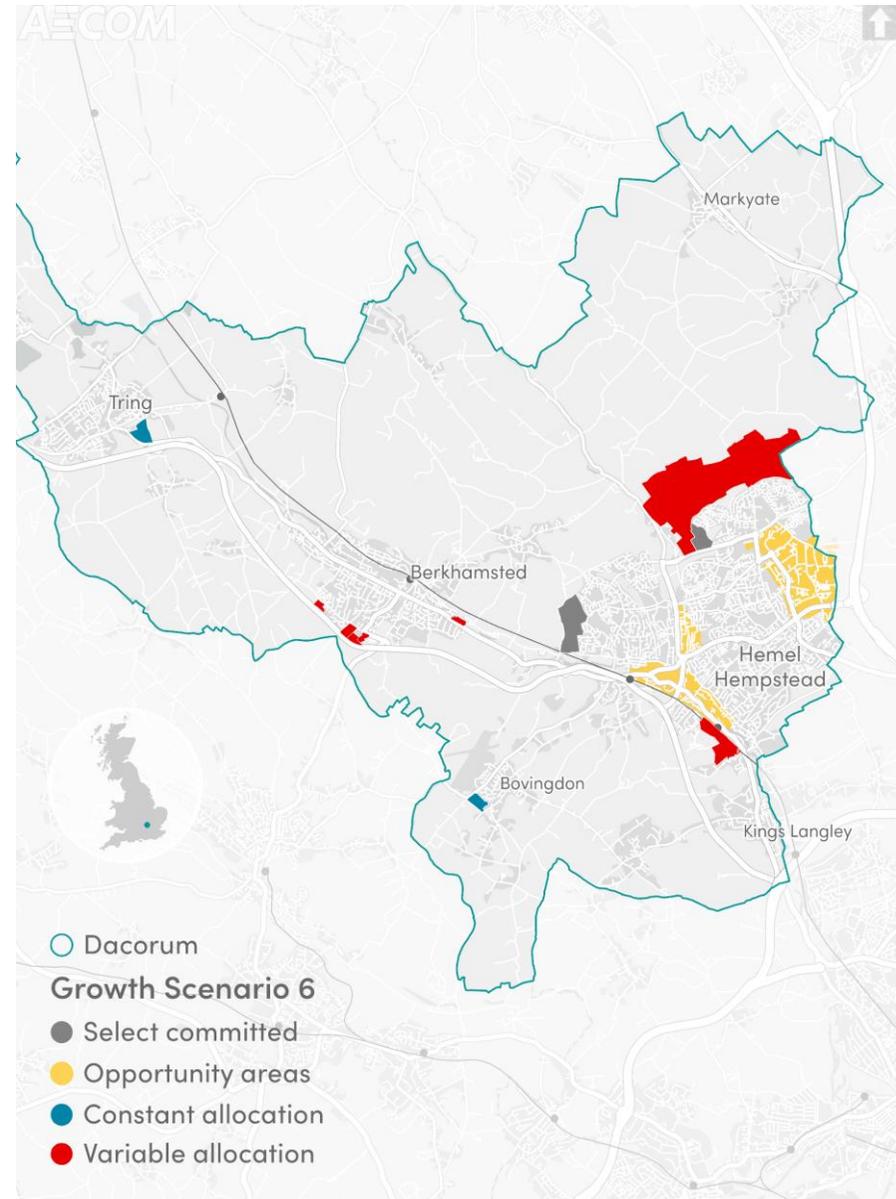
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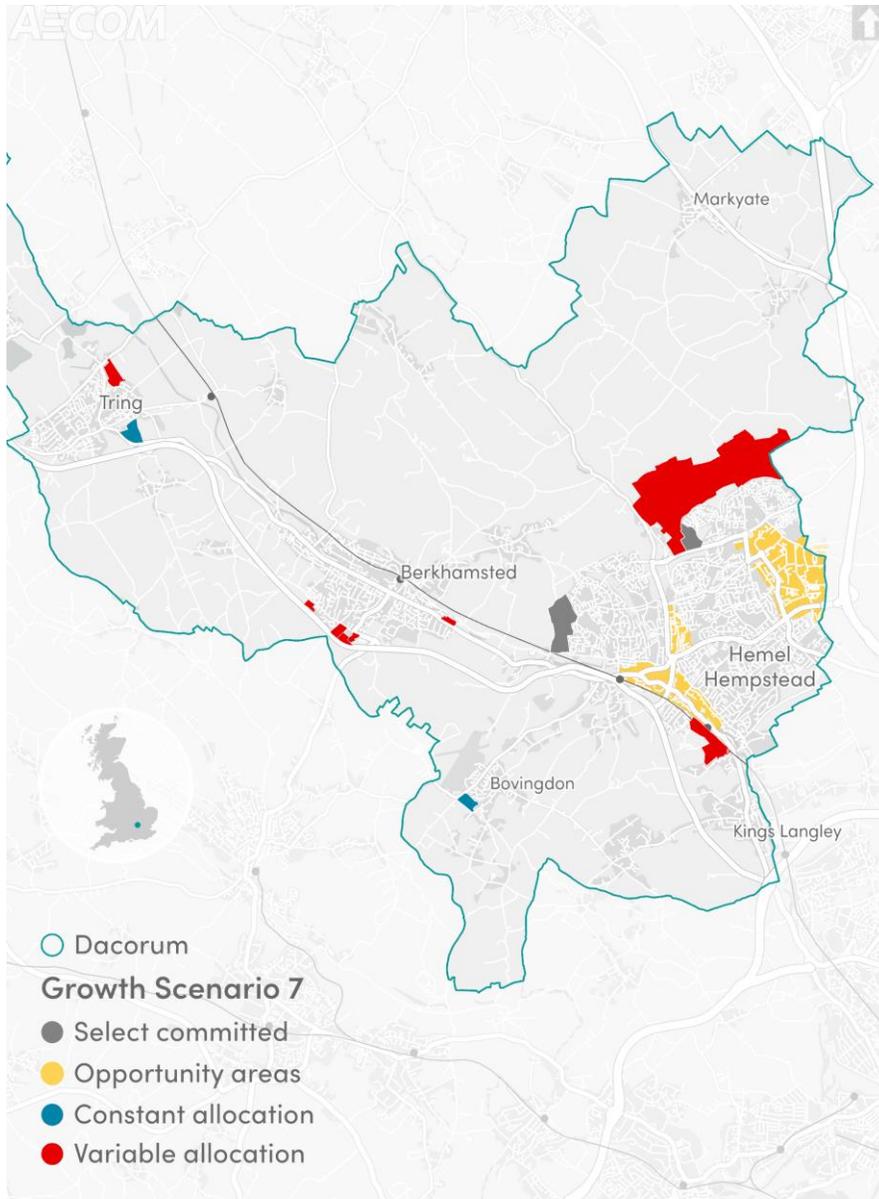
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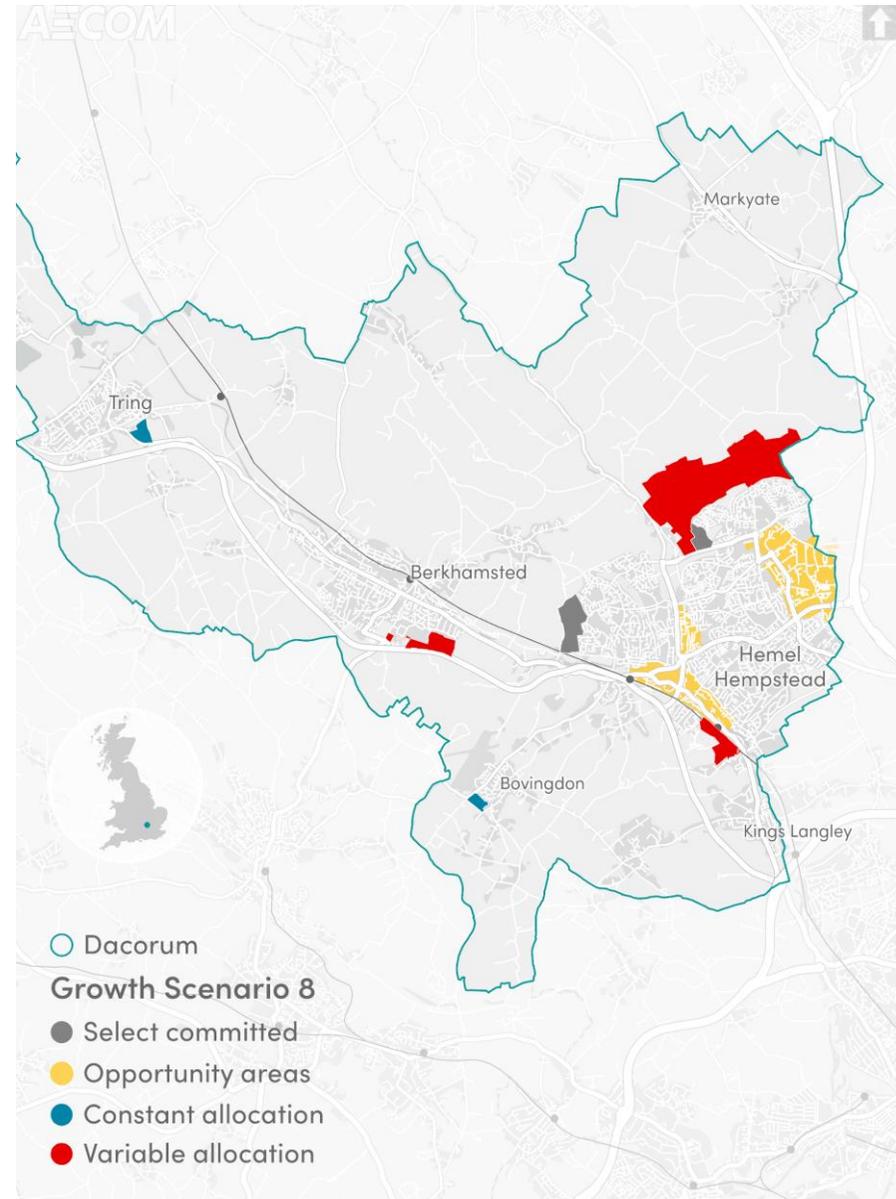
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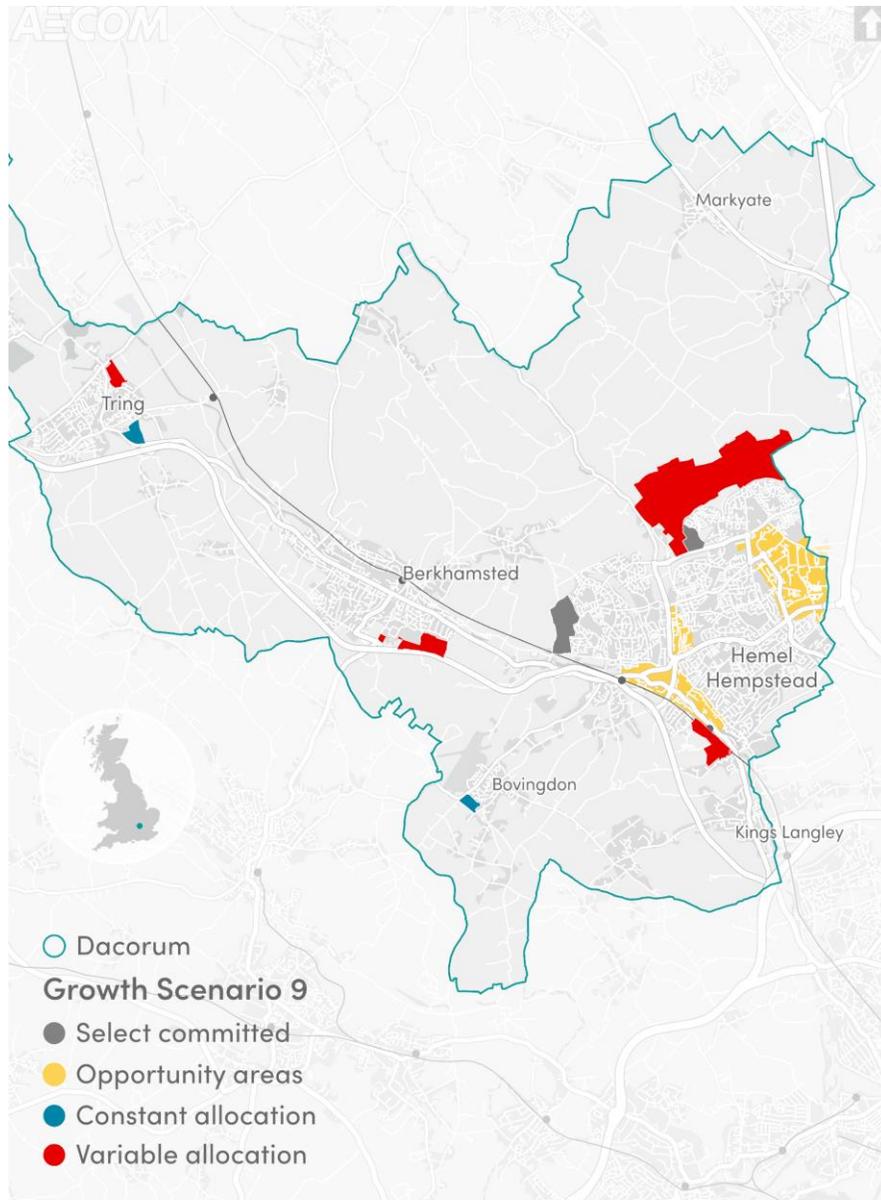
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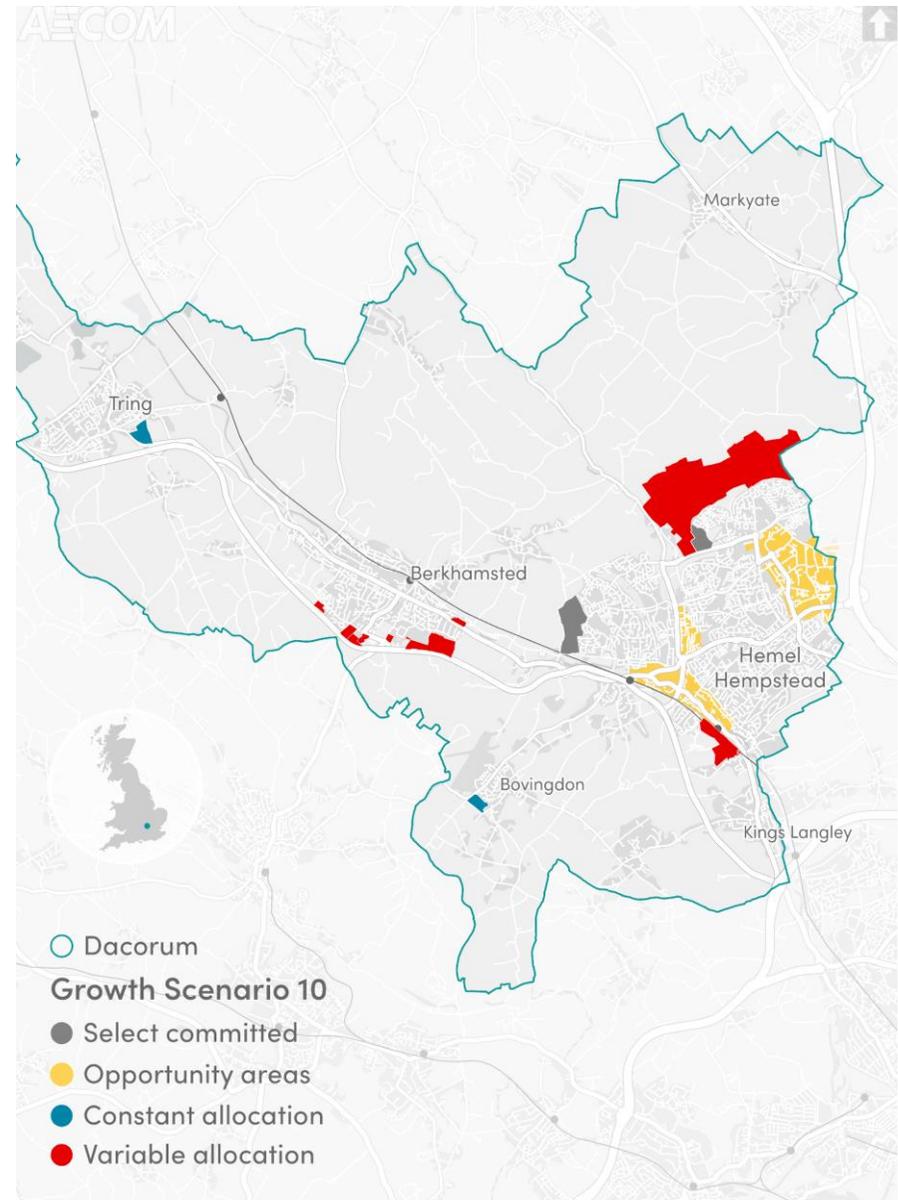
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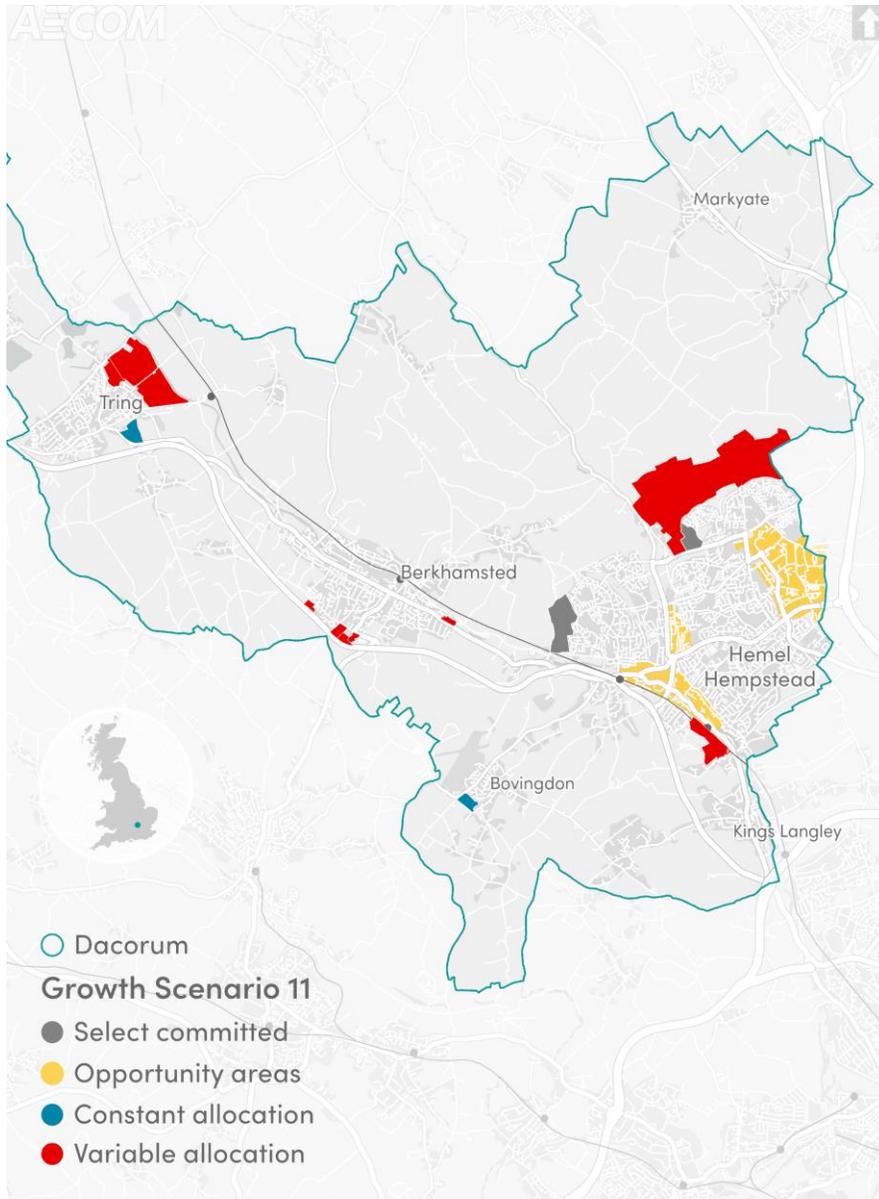
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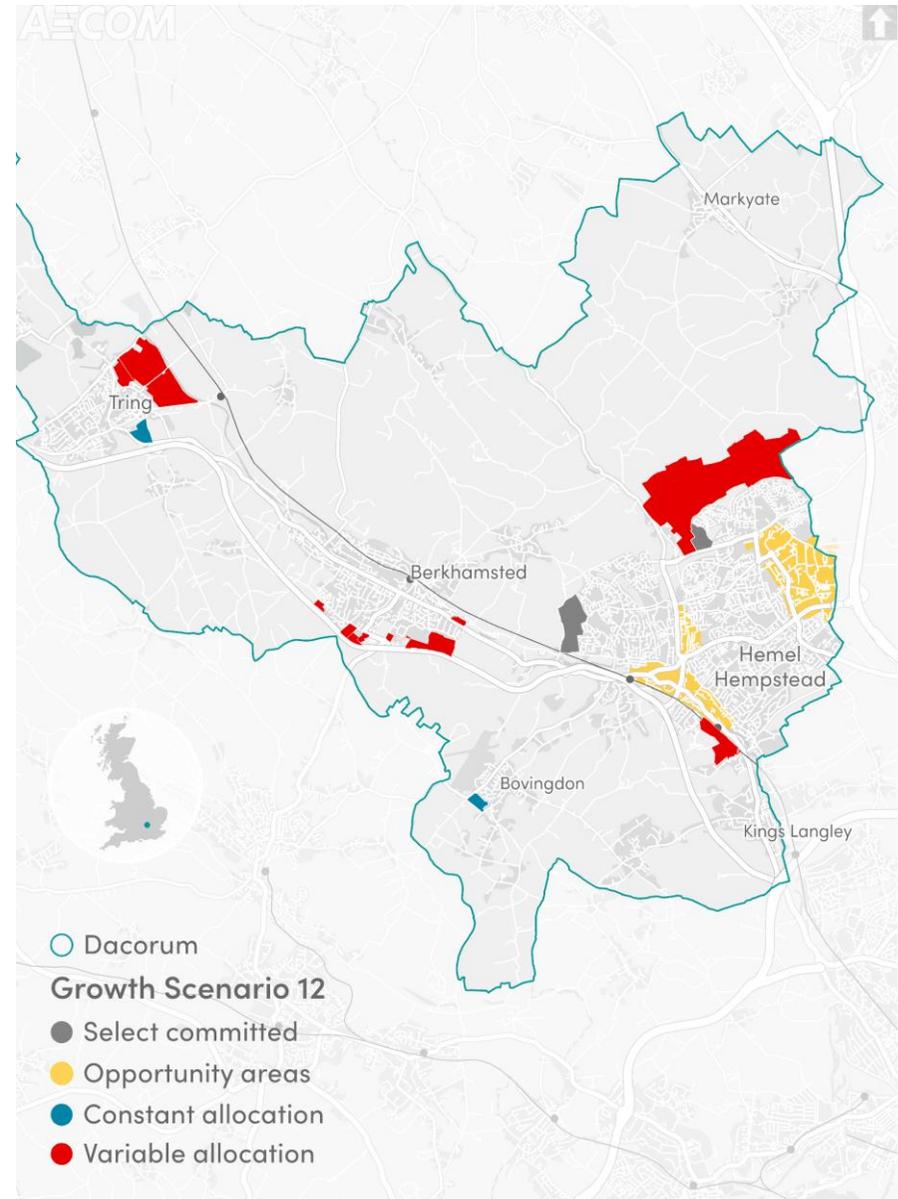
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## The preferred growth scenario (text provided by CDC)

The preferred scenario is **Scenario 4**, which the appraisal shows to perform reasonably well relative to the alternatives. Scenario 4 gives rise to a degree of tension with certain sustainability objectives, as is inevitable in the context of any local plan, and it is recognised that there are certain arguments in favour of supporting an alternative approach, but Scenario 4 is judged to represent sustainable development on balance. There is good potential to address the identified tensions through policy (see the Draft Plan appraisal below), and adjustments can also be made to the spatial strategy / package of proposed site allocations subsequent to the current consultation, taking into account consultation responses received.

The Council notes that Scenario 4 ranks highest under eight of the sustainability topics, and also performs relatively well under a further two of three topic headings. The Council accepts that the preferred option ranks relatively poorly (albeit comfortably not the worst) in terms of “Homes”.

Officers consider the borough to be highly constrained, sufficient to trigger Paragraph 11 (b) of the NPPF. The application of the Habitats Regulations on the Chilterns Beechwoods SAC requires every new dwelling to be supported by appropriate mitigation. Through the preferred strategy, the Council is able to meet c.90% of the standard method for calculating housing need, with a reliance on a combination of Council-led “Strategic SANG” alongside third party bespoke SANG solutions. The appraisal correctly recognises that most of the sites that do not feature within Scenario 4, but feature in other scenarios, currently are unable to identify or secure the necessary mitigation. The Council is equally unable to identify a Council-led Strategic SANG at key locations such as Berkhamsted and Tring. The Council could choose to delay the plan-making process while it seeks to secure additional Strategic SANG solutions in these areas, but timescales for this are unknown as well as any certainty that such SANGs would be secured. The Council notes that continued delay to the plan-making process only serves to stifle housing delivery further, and with that the delivery of other infrastructure considered necessary to unlock growth.

Alternatively the Council could look at one of the few locations where additional bespoke SANG is identified, notably Land East of Tring (considered under Scenario 11 and 12), but this ultimately results in negative effects on the area’s valued landscape, including the setting of the Chilterns AONB. Such a scenario would also deliver a disproportionate level of growth at Tring - a key issue that the Council is seeking to respond to in light of the 2020 Emerging Strategy for Growth consultation.

Another reasonable growth scenario that might be considered, in light of the appraisal, is Scenario 8, which seeks to deliver higher growth at Hemel Hempstead. In particular, Scenario 8 performs better than Scenario 4 in relation to “Accessibility”. The Council accepts the reasoned justification for this, but notes that growth to the south would be in addition to significant growth to the west (existing allocation with permission), north (via HGC and the north Hemel allocation for 5,500 homes up to 2050) and east (via further allocations proposed through the St. Albans draft Local Plan).

To the south of Hemel, additional growth is already identified in the Two Waters/Apsley area, on brownfield land in close proximity to the train stations and which benefits from frequent buses to key settlements in Dacorum and beyond. Officers remain concerned about the potential for growth at Shendish Manor and the impacts that this could have on the existing junctions with London Road (including via Rucklers Lane and Featherbed Lane), which has a designated Air Quality Management Area.

Officers consider that Scenario 4 represents a balanced approach that will deliver significant new housing alongside key infrastructure while still protecting the borough’s most important natural assets.

## Appraisal of the emerging plan

Part 2 of the Interim SA report aims to: 1) summarise the appraisal of the revised growth strategy discussed above as Scenario 4; 2) summarise the appraisal from 2020 in respect of development management policy; and then 3) bring together these two appraisals the aim is to conclude on the emerging plan as a whole. Conclusions are presented below.

### Accessibility (to community infrastructure)

After having taken account of the emerging development management (DM) policy framework it is fair to predict a **moderate or uncertain positive effect** on the baseline, including recalling that the baseline situation is one whereby housing growth would continue to come forward in a relatively unplanned way. There is a need to account for consultation responses from key organisations, including the County Council, and undertake further work including in collaboration with landowners.

### Air quality

A broadly **neutral effect** is predicted. Whilst air quality is improving it is set to remain an issue, including due to particulate pollution associated with

electric vehicles. There are some significant constraints to growth locally, but there is also a need to avoid exporting unmet need. It is important to emphasise the importance of proactive local plan-making to enable effective strategic transport planning.

### Biodiversity

There is a clear support for proactively directing growth to sites with an identified SANG solution, and the proposed allocations are otherwise subject to limited biodiversity constraint. As such, it is appropriate to predict a **moderate or uncertain positive effect** on the baseline. There is a need for further collaboration with key partner organisations, such as Natural England and the local Wildlife Trust, not only in respect of SANG but also, more widely, to ensure that the spatial strategy supports biodiversity net gain as measured at landscape scales and with a long term perspective.

### Climate change adaptation

A **neutral effect** is predicted. Flood risk can be a key issue for some local plans but is not a major issue for the current proposed local plan (subject to consultation with the Environment Agency, who might also alert the Council to any potential opportunities for strategic flood water attenuation).

### Climate change mitigation

A **moderate or uncertain negative effect** is predicted on the baseline, accounting for established objectives and targets. The emerging plan would likely see an improvement on the baseline, but there is also a need to reach conclusions taking account of established objectives and targets. In particular, whilst the Borough's net zero target date is 2050 there is a need to account for the clear commitment within the Draft Local Plan (2020) to ensure that all development comes forward as 'net zero development' by 2030. In this light, predicting positive effects of any significance involves a high bar. It is hoped that it will be possible to predict significant positive effects at the next stage (Regulation 19); however, at this current stage there is insufficient evidence of built environment decarbonisation being integrated as a key factor with a bearing on spatial strategy and site selection to the extent that there can be confidence in respect of achieving net zero development. There is a need for further work to confirm particular spatial strategy, site and scheme-specific decarbonisation opportunities.

### Communities

A **moderate or uncertain positive effect** is predicted. HGC is supported as is the reduced growth strategy for Berkhamsted and Tring relative to the

proposal in 2020. Also, there is simply the need to adopt a Local Plan in order to prevent sub-optimal piecemeal growth with likely infrastructure deficiencies. However, there are wide ranging issues that will require further consideration ahead of plan finalisation, including issues to be addressed by DM policy informed by whole plan viability work.

### Economy and employment

A **moderate or uncertain positive effect** on the baseline is predicted, having accounted for the proposed DM policies framework. There is strong support for HGC; however, there is a need for further work in respect of employment allocations in order to close the gap to the identified need.

### Health and wellbeing

A **moderate or uncertain positive effect** on the baseline is predicted, having accounted for the proposed DM policies framework.

### Historic environment

Whilst there are unavoidably tensions with historic environment objectives, a broadly **neutral effect** is predicted, including because: HGC represents something of an opportunity in respect of minimising tensions between growth and the historic environment (subject to ongoing work on the Gade valley); and there is support for the proposed allocations at both Berkhamsted and Tring. It is recognised that there will be a need to revisit conclusions following consultation with Historic England, as well as following detailed work to develop site specific policy.

### Homes

There is an unavoidable need to predict a **significant negative effect** under this topic, given the proposal to set the housing requirement below LHN and so generate unmet need, and given little certainty regarding where, when or even if unmet need will be provided for within a constrained sub-region.

### Land, soils and other resources

A broadly neutral effect is predicted. There is an argument for suggesting a negative effect given the potential scale of best and most versatile agricultural land loss. However, it is difficult to judge significance.

### Landscape

It is appropriate to flag a **moderate or uncertain negative effect** at this stage in the process, given the sensitivities and the need for further work on

site specific policy prior to plan finalisation, e.g. in respect of development densities, scheme layouts and integration of green infrastructure. Perhaps most notably, there is understood to be a need for further work to look at the Gade Valley area within HGC.

## Resources

The appraisal in Section 6 does not flag any significant issues, although there is a need for further discussion with the County Council regarding minerals safeguarding areas. A **neutral effect** is predicted.

## Transport

The proposed strategy is encouraging - other than in terms of exporting unmet need – and overall the emerging Local Plan would deliver a positive effect on the baseline (a situation whereby development continues to come forward but in a less well planned way, and without HGC sub-regional transport planning is severely set back). However, there is a need for a considerable amount of further work, hence a **neutral effect** is predicted.

## Water

It is appropriate to flag a **moderate or uncertain negative effect** at this stage, ahead of receiving consultation responses from key agencies.

## Overall conclusions

The appraisal presented above seeks to build upon the appraisal of Growth Scenario 4. After having accounted for the proposed growth strategy alongside draft development management policy from 2020, the appraisal predicts moderate or uncertain **positive effects** under five headings (Accessibility, Biodiversity, Communities, Economy/employment and Health), but predicts a significant **negative effect** under the Homes topic heading and also flags a moderate or uncertain **negative effect** under three headings (Climate change mitigation, Landscape and Water). Under the remaining topic headings the appraisal concludes broadly neutral effects.

Issues and tensions with sustainability objectives identified through the appraisal should be taken into account as part of the process of revising the plan (and reasonable alternatives) subsequent to the current consultation, alongside consultation responses received and other latest evidence.

## Cumulative effects

Section 9 of the main report also presents a discussion of larger-than-local effects resulting from the Dacorum Local Plan in combination with others.

Key considerations include:

- Housing needs – there is currently little certainty regarding where, when or even if unmet need will be provided for within a constrained sub-region where unmet need is already an issue.
- Hemel Garden Communities (HGC) - support for HGC is likely to be of crucial importance for the St Albans Local Plan, and if both the Dacorum and St Albans Local Plans are able to progress then the South West Herts JSP will be well placed to progress and plan for longer term needs alongside infrastructure strategic infrastructure.
- The economy – there is a need to support HGC and, in turn, the expansion of Maylands Business Park, which is a central component of Herts IQ and, in turn, of key importance to the SW Herts sub-region.
- Transport corridors – the A414 is a particular focus, from a larger-than-local perspective. There are aspirations for transformational change.
- Landscape scale nature recovery – planning for Ashridge is clearly a larger-than-local consideration, but there are numerous other cross-border landscape scale priority areas, including the Bulbourne / Gade corridor. The Hertfordshire Local Nature Recovery Strategy (LNRS) may provide important evidence to inform plan finalisation.

## Next steps

Subsequent to the current consultation it is the intention to prepare the proposed submission version of the Local Plan. This will be a version that the Council believes is ‘sound’ and intends to submit for Examination.

The proposed submission version of the Local Plan will be published alongside the formal SA Report, with the intention of subsequently submitting the Local Plan for examination alongside representations received. At Examination, the Inspector will then consider representations before concluding on necessary modifications.

Once found to be ‘sound’ the Local Plan can be adopted by the Council. At that time a ‘Statement’ must be published that sets out certain information including ‘the measures decided concerning monitoring’.