



Dacorum Borough Council

Local Plan

Dacorum Local Plan (2020-2038) Emerging Strategy for Growth Interim Sustainability Appraisal Report Non-Technical Summary

November 2020

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Non-Technical Summary

1 Background

Dacorum Borough Council is preparing a new Local Plan which will provide a planning strategy for the Borough up to 2038. The new Local Plan will incorporate strategic policies, development management policies and site allocations into a single document, replacing those in the Core Strategy (adopted September 2013), the Site Allocations DPD (adopted July 2017) and the 'saved' parts of the Dacorum Borough Local Plan 1991-2011 (adopted May 2004).

During its preparation this new Local Plan must be subject to both Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) under the 'Town and Country Planning, England Regulations (2012)' and 'The Environmental Assessment of Plans and Programmes Regulations' (2004) respectively.

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.

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 Dacorum Draft Local Plan (2020 - 2038) Emerging Strategy for Growth. 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 Draft 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 **Error! Reference source not found.** 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 Borough 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 two SA Working Notes in 2017 to accompany the consultations on the Dacorum Local Plan Issues and Options and the Schedule of Site Appraisals.

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 Draft Local Plan

The Draft Local Plan includes a Borough Vision to 2038 which the plan will seek to enable. The Vision is made up of an ‘Overarching Vision for Dacorum’s Growth’, which considers the provision of new development in the Borough, Environmental Sustainability, Economic Growth and Health and Wellbeing, and ‘The Vision for Dacorum’s Places’ which outlines what the different settlements and categories of settlements will look like in 2038.

The Vision is supported by eight Strategic Objectives, each of which as a series of more detailed sub-objectives. The Strategic Objectives are as follows:

- Delivering Dacorum’s future with homes for everyone;
- Generating a vibrant economy with opportunities for all;
- Mitigating and adapting to climate change;
- Conserving and protecting the natural environment;
- Ensuring an attractive and valued built and historic environment;
- Promoting and facilitating sustainable transport and connectivity;
- Supporting community health, wellbeing and cohesion; and
- Enabling the delivery of infrastructure.

2.3 Dacorum 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 **Error! Reference source not found.**. 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 **Error! Reference source not found.** are based on the dates in the Dacorum Local Development Scheme (July 2020).

Date	Local Plan	Sustainability Appraisal
2017	Commencement of Local Plan Development	<u>Stage A</u> SA Scoping Report, March 2017
November 2017	Consultation on Issues & Options	<u>Stage B</u> SA Working Note, November 2017
November 2017	Consultation on Schedule of Site Appraisals	SA Working Note, November 2017
2018 - 2020	Consideration of representations for the Issues & Options and the Schedule of Site Appraisals Consideration of further options for the Spatial Strategy and levels of housing growth Development of Draft Local Plan policies Consideration of proposals and sites to include in the Draft Local Plan	Ongoing SA input into the plan-making process
November 2020	Consultation on Draft Local Plan	Interim SA Report, November 2020 (this report)
Spring 2021	Preparation and Publication of the Local Plan for consultation	<u>Stage C</u> SA Report
Autumn 2021	Submission of Local Plan to Secretary of State	<u>Stage D</u> SA Report Addendum
Winter 2021	Examination of the Local Plan	SA Report Addendum
Autumn 2022	Adoption of the Local Plan	<u>Stage E</u> SA Adoption Statement

Figure 1: Stages of the Local Plan and SA processes for Dacorum 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 Borough 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 cultural 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 Draft 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 – November 2017

As part of the consultation on Issues and Options in November 2017 the Council considered a range of options relating to the level of housing growth over the Local Plan period and the spatial strategy for how future growth in the Borough could be accommodated.

Three different levels of housing growth were considered (602 dwellings per annum (dpa); 756 dpa; and 1,000-1,100 dpa), along with three spatial strategies for distributing that growth ('Focus on three towns'; 'Hemel Hempstead focus'; and 'Spread more evenly across the Borough').

The SA Working Note (October 2017) which accompanied the Issues and Options consultation provided assessments of the growth and spatial strategy options (reasonable alternatives) against each of the SA objectives. Summaries of these assessments are provided in Appendix C1 to the Interim SA Report.

3.3 Additional Spatial Strategy and Growth Options Considered

Following on from the Issues and Options stage the Council has considered additional / modified options to take account of changes to the Objectively Assessed Housing Need (OAN) of the Borough, as well to consider revised / additional spatial strategies. The options considered were as follows:

- Option A - Focus growth on the 3 main towns (Hemel Hempstead, Berkhamsted, and Tring);
- Option B - Focus growth on Hemel Hempstead;
- Option C (i & ii) - Spread growth across the six main settlements;
 - Option Ci: Spread across the six main settlements (low growth at villages);
 - Option Cii: Spread across the six main settlements (high growth at Bovingdon and Kings Langley);
- Option D (i & ii) - New settlement alongside growth at the 3 main towns;
 - Option Di: New settlement in the north-west of Borough
 - Option Dii: New settlement at Bovingdon airfield; and
- Option E - Higher growth option. This option would require the delivery of 1,100 dwellings per annum (dpa) as opposed to Options A—D which are based on 922 dpa, this being Dacorum's emerging objectively assessed housing need (OAN).

NB: Option E does not specify a particular spatial strategy for delivery.

Common to all options are the c.10,900 new homes inside settlement boundaries (the Urban Capacity sites). The options are therefore limited to how to distribute additional housing in the Green Belt, and not how to distribute all the proposed new housing.

Full details of the options, including explanatory figures and narratives providing the rationale behind each option are provided in Appendix C2 to the Interim SA Report.

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

Significance Assessment	Description
✓✓	Very sustainable - Option is likely to contribute significantly to the SA objective
✓	Sustainable - Option is likely to contribute in some way to the SA objective
?	Uncertain – It is uncertain how or if the Option impacts on the SA objective
-	Neutral – Option is unlikely to impact on the SA objective
x	Unsustainable – Option is likely to have minor adverse impacts on the SA objective
x.x	Very unsustainable – Option is likely to have significant adverse impacts on the SA objective

The findings of the option assessments are summarised in Table 2. The detailed assessment for each option is provided in Appendix C2 to the Interim SA Report.

Table 2: Summary of Assessment of Spatial Strategy and Growth Options

Option	SA Objectives														
	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Economy	SA15 Employment
Option A	x/?	x	-	x	x	x	x	?	x	✓	✓✓	✓/?	✓/✓✓	✓	✓
	✓			?						?					
Option B	x/?	x	-	x	x	x	x	?	x	✓	✓✓	✓/?	✓/✓✓	✓	✓
	✓			✓						?					
Option Ci	x/?	x	-	x	x	x	x	?	x	✓	✓✓	✓/?	✓/✓✓	✓	✓
	✓			?						?					
Option Cii	x/?	x	-	x	x	x	x	?	x	✓	✓	✓/?	✓/✓✓	✓	✓
	✓			?						?					
Option Di	x/?	x	-	x	x	x	x	?	x	✓	✓/?	✓/?	✓/✓✓	✓	✓
	✓		?	?						?					
Option Dii	x/?	x	-	x	x	x	x	?	x	✓	✓/?	✓/?	✓/✓✓	✓	✓
	✓			?	✓					?					
Option E	x/?	x	-	x	x	x/xx	x	?	x/xx	✓	✓/?	✓/?	✓✓	✓	✓
	✓		?	?						?					

3.3.1 Levels of growth

Under all the options any development that takes place on greenfield sites, including that in areas currently in the Green Belt has the potential for adverse effects including amongst

others those relating to habitat loss, increased water consumption, impacts on local landscapes, soil sealing, natural resource use, increased waste, and increased emissions of both greenhouse gases and airborne pollutants. Option E, which would require a higher level of growth than Options A-D, has been predicted to result in the greatest level of such adverse effects due to the larger amount of land that would be required to deliver the development and the greater level of ‘human activity’ that would result.

NB: It should be noted that the effects will be very dependent on the location and characteristics of the sites selected to deliver the housing growth, as well as the controls provided by the other policies in the Local Plan, in particular the development management policies.

New development, which in some cases would be through redevelopment of current sites within the settlements and in others developing outside current settlement boundaries, need not however always result in adverse effects on the environment. For example, new large greenfield developments could provide opportunities for biodiversity enhancements and make use of district heating systems, whilst redeveloped sites within settlements could result in remediation of contaminated land, improvements to local townscapes and improvements to the energy efficiency of the building stock. Such effects will be site dependent and the Policies proposed for the new Local Plan should help to maximise any such opportunities where they exist. The ‘Mitigation’ section for each SA topic identifies the relevant Local Plan policies which would provide such policy led mitigation.

In terms of the social and economic SA objectives, in general terms the higher level of growth (Option E) performs the best as it would result in housing levels that would provide a number and range of homes to meet future needs of the Borough, particularly in relation to affordable housing. As a result significant positive effects have been identified for Option E in relation to the ‘housing’ SA objective as the provision of 1,100 dwellings per annum (dpa) would exceed the objectively assessed need of the Borough (922 dpa) and would provide additional affordable housing.

3.3.1.1 Spatial distribution of growth

All the options require the delivery of the c.10,900 homes on existing and planned sites within settlement boundaries that are consistent with existing planning policies (the Urban Capacity sites). In terms of the SA/SEA, given that the Urban Capacity sites account for approx. 65% of the housing under Options A-D and approx. 55% under Option E, this means that there are a range of effects against each SA/SEA objective that are consistent/constant across all options.

Given this fixed element common to all options, it was challenging for the SA/SEA to differentiate the effects predicted for each ‘Option v. SA Objective’ relationship using the ‘scoring’ system alone. The assessment therefore relies on the narratives provided in the assessment tables to identify how the different options perform in relationship to the objective and to each other, picking out the many nuances associated with the effects associated with the different options.

One major differentiator is that Options A, B and Ci, which would require the higher levels of growth in the three main towns were found to be the most sustainable in terms of reducing the need to travel to access services and facilities, as well as through their greater accessibility to public transport.

3.3.2 Selected Option for Draft Local Plan

Of the six Spatial Strategy options considered the Council has chosen Option Ci as the preferred option on which to base the Spatial Strategy for the Draft Local Plan. That option requires a high percentage of the Borough's growth to take place in the three main towns, albeit not as high as for Options A and B, but at the same time enabling some growth in the three large villages thereby allowing the ability to deliver proportionate improvements such as new public open spaces to serve existing and new communities, while not significantly impacting the ability of existing infrastructure to cope. The SA identified that locating the vast majority of the development in the Borough's most sustainable settlements was a key differentiator for Option Ci (and Options A and B) when compared to Options Cii, Di and Dii.

The option is based on the growth level of 922 dpa and not the alternative of 1,100 dpa which was also considered (in Option E). The 922 dpa figure was chosen as it will meet the Objectively Assessed Need for the Borough, whilst at the same time not placing unnecessary burden on infrastructure such as schools, health facilities, transport, water treatment etc. – which would probably have been the case if the figure of 1,100 dpa had been selected.

The Council's reasons for taking Option Ci forward into the Draft Local Plan are provided by the Council in Section 5.5 of the Interim SA Report.

3.4 Site Allocation Options

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

In addition to that work, each of the sites considered as being a 'reasonable alternative' for inclusion in the Local Plan has been assessed against the SA objectives using the same methodology as was used in the SA for the Schedule of Site Appraisals in 2017, with all sites being assessed to the same level of detail.

The findings of the individual site assessments are provided in Appendix E to the Interim SA Report (for sites included in the Draft Local Plan) and Appendix F to the Interim SA Report (for sites not included in the Draft Local Plan), ordered by settlement. Section 5.4 of the Interim SA Report provides summaries of the assessments.

4 Assessment of the Draft Local Plan

A Draft Local Plan (the Emerging Strategy for Growth for Dacorum) has now been prepared for consultation. This includes the Council's approach to accommodating growth across Dacorum, 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 Draft 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.

4.1 Assessment findings

Each of the Strategic Policies and associated Development Management Policies has been assessed against the SA objectives using the methodology described above. A summary of the findings of this assessment can be seen in Table 3. The table is split into sub-tables which are based on the Draft Local Plan chapters. The full assessments are provided in Appendix D to the main Interim SA Report.

Table 3: Summary of assessment of policies in the Local Plan

The Sustainable Development Strategy

Policy	SA Objectives														
	Biodiversity	Water	Flood risk	Climate Change	Air Quality	Soils	Resource Efficiency	Historic Environment	Landscape and Townscape	Health and Wellbeing	Sustainable Location	Community	Housing	Sustainable Prosperity	Employment and Skills
SP1 Sustainable Development	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SP2 Spatial Strategy for Growth	✓	✗	-	✓	✓	✗	✗	?	✗	✓	✓	✓	✓	✓	✓
	✗	✗	-	✗	✗	✓	✗	?	✓	✓	?	✓	✓	✓	✓
SP3 The Settlement Hierarchy	-	-	-	✓	-	-	-	-	-	-	✓	✓	-	-	-
SP4 The Housing Strategy	✗	✗	-	✗	✗	✗	✗	?	✗	✓	✓	✓	✓	✓	✓
	?	✗	-	✓	?	✓	✗	?	?	?	✓	✓	✓	✓	✓
SP5 Delivering the Employment Strategy	?	-	-	✗	✗	✗	✓	?	?	✓	✓	✓	-	✓	✓
	?	-	-	✓	✓	✗	✓	?	?	✓	✓	✓	-	✓	✓
SP6 Delivering the Retail and Leisure Strategy	?	-	-	✗	✓	?	-	?	?	✓	✓	✓	-	✓	✓
	?	-	-	✓	✓	?	-	?	?	✓	✓	✓	-	✓	✓
SP7 Delivering Infrastructure	?	?	?	?	?	-	-	?	?	?	?	?	-	?	?
SP8 Neighbourhood Planning	-	-	-	-	-	-	-	-	-	✓	-	✓	✓	✓	✓
SP9 Monitoring and Review	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Guiding Development

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	Housing	Sustainable Prosperity	Employment and Skills
SP10 Climate Change Mitigation and Adaptation	✓	✓	✓	✓	✓	✓	✓	?	?	✓	✓	-	-	-	-
Environment and Biodiversity policies	✓	✓	✓	✓	✓	✓	-	-	✓	✓	-	✓	-	-	-
SP11 Development in the Green Belt	?	?	?	✓	-	✗	-	?	✓	-	✓	✓	✓	✓	✓
SP12 Development in Rural Area	-	-	-	✓	-	-	-	?	?	✓	-	✓	✓	✓	✓
SP13 Delivering High Quality Design	✓	-	-	?	?	-	-	✓	✓	✓	✓	✓	-	✓	✓
Sustainable Transport and Connectivity	?	-	?	✓	✓	?	-	✓	?	✓	✓	✓	-	✓	✓
Healthy Communities	✓	-	-	-	-	-	-	-	✓	✓	✓	✓	-	✓	✓

Delivery Strategies

Delivery Strategy	SA Objectives														
	Biodiversity	Water	Flood risk	Climate Change	Air Quality	Soils	Resource Efficiency	Historic Environment	Landscape and Townscape	Health and Wellbeing	Sustainable Location	Community	Housing	Sustainable Prosperity	Employment and Skills
Hemel Hempstead Delivery Strategy: Policies SP14, SP15, SP16, SP17, SP18, SP19	?	-	?	✓	?	✓	✓	?	✗	✓	✓	✓	✓	✓	✓
Berkhamsted Delivery Strategy: Policies SP20, SP21, SP22	?	-	-	✓	?	✗	✓	?	✗	✓	✓	✓	✓	✓	✓
Tring Delivery Strategy: Policies SP23, SP24, SP25	?	-	-	✓	?	✗	✓	?	✗	✓	✓	✓	✓	✓	✓
Kings Langley Delivery Strategy: Policy SP26	?	✓	?	?	?	✗	-	-	✗	✓	✓	✓	✓	✓	✓
Bovingdon Delivery Strategy: Policy SP27	?	-	-	-	-	✗	-	-	✗	✓	✓	✓	✓	✓	✓
Markyate Delivery Strategy: Policy SP28	?	?	?	?	?	✗	-	-	✗	?	✓	✓	✓	✓	✓
The Countryside Delivery Strategy: Policy SP29	?	?	?	✓	-	✗	-	✓	✓	?	✓	✓	✓	✓	✓

The assessment of the Draft 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 4. No significant adverse effects were identified in relation the strategies and policies.

Table 4: Significant Effects Identified in the SA for Strategies and Policies

	SA Objective	Significant effects identified
1	To protect, maintain and enhance biodiversity and geodiversity at all levels.	✓✓ in relation to the 'Environment and Biodiversity' policies
2	To protect, maintain and enhance water resources (including water quality and quantity)	✓✓ in relation to the 'Environment and Biodiversity' policies
3	To reduce flood risk	✓✓ in relation to the 'Environment and Biodiversity' policies
4	Reduce greenhouse gas emissions and adapt to the effects of climate	✓✓ in relation to ' SP10 Climate Change Mitigation and Adaptation' and associated DM policies, the 'Sustainable Transport and Connectivity' policies and Hemel Hempstead Delivery Strategy: Policies SP14, SP15, SP16, SP17, SP18 and SP19 .
5	Achieve good air quality, especially in urban areas	✓✓ in relation to the 'Environment and Biodiversity' policies
6	Make efficient use of land and protect soils	✓✓ in relation to the 'Environment and Biodiversity' policies
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 ' SP10 Climate Change Mitigation and Adaptation' and associated DM policies
8	To identify, conserve and enhance the historic environment and cultural assets	✓✓ in relation to ' SP13 Delivering High Quality Design' and associated DM policies
9	To conserve and enhance landscape and townscape character and encourage local distinctiveness	✓✓ in relation to the 'Environment and Biodiversity' policies and ' SP13 Delivering High Quality Design' and associated DM policies
10	To improve the health and wellbeing of the local population	✓✓ in relation to the 'Healthy Communities' policies
11	To develop in sustainable locations	✓✓ in relation to policy ' SP2 Spatial Strategy for Growth', ' SP3 The Settlement Hierarchy', ' SP4 The Housing Strategy' and Hemel Hempstead Delivery Strategy: Policies SP14, SP15, SP16, SP17, SP18 and SP19 .
12	To improve community cohesion through reducing inequalities, promoting social inclusion and reducing crime and the fear of crime	✓✓ in relation to ' SP13 Delivering High Quality Design' and associated DM policies

	SA Objective	Significant effects identified
13	Ensure that everyone has access to good quality housing that meets their needs	✓✓ in relation to policy 'SP2 Spatial Strategy for Growth', 'SP4 The Housing Strategy', 'Hemel Hempstead Delivery Strategy: Policies SP14, SP15, SP16, SP17, SP18 and SP19', 'Berkhamsted Delivery Strategy: Policies SP20, SP21 and SP22' and 'Tring Delivery Strategy: Policies SP23, SP24, SP25'.
14	Achieve sustainable levels of prosperity and economic growth	✓✓ in relation to policy 'SP2 Spatial Strategy for Growth', 'SP4 The Housing Strategy', 'SP6 Delivering the Retail and Leisure Strategy', 'Hemel Hempstead Delivery Strategy: Policies SP14, SP15, SP16, SP17, SP18 and SP19' and 'Tring Delivery Strategy: Policies SP23, SP24, SP25'.
15	To ensure local residents have employment opportunities and access to training	✓✓ in relation to policy 'SP2 Spatial Strategy for Growth', 'SP4 The Housing Strategy', 'SP6 Delivering the Retail and Leisure Strategy', 'Hemel Hempstead Delivery Strategy: Policies SP14, SP15, SP16, SP17, SP18 and SP19' and 'Tring Delivery Strategy: Policies SP23, SP24, SP25'.

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 (such as 'SP2 - Spatial Strategy for Growth' and 'SP4 - The Housing Strategy') whilst positive effects have been identified for those policies against the social and economic objectives. Minor adverse effects are identified against the soil objective for all the delivery strategies given that some development would take place on greenfield land to enable the level of growth the strategies outline.

For the 'development controlling' policies ('SP10 - Climate Change Mitigation and Adaptation', the 'Environment and Biodiversity' policies, 'SP13 - Delivering High Quality Design' and the 'Healthy Communities' policies) the assessments are generally positive against the SA objectives related to that policy, 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, where development is proposed but without specific sites being identified, the effects will be dependent on the individual characteristics of the area affected and therefore remain uncertain at this stage of the planning process.

4.3 Assessment of Proposal and Sites

As described in Section 3.4 above, the proposals and sites which are included in the Draft Local Plan 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 5.4 of the main Interim SA Report.

As mentioned in that section the detailed assessments for the proposals and sites that have been selected for inclusion in the Draft Local Plan are provided in Appendix E to the report.

The assessments for the sites which have not been included in the Draft Local Plan are included in Appendix F to the report.

For the sites which have been selected for inclusion in the Draft Local Plan the following significant effects were identified .

Table 5: 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	×× in relation to Land South of London Road, Markyate due to a considerable area the site being within Flood Zones 3a or 3b.
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	×× in relation to 'East of Tring' and 'Grange Farm, Bovingdon' as a large part of these sites is Grade 2 agricultural land.
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

	SA Objective	Significant effects identified
11	To develop in sustainable locations	✓✓ for many of the urban sites in Hemel Hempstead which is considered to be the most sustainable location in the Borough. These sites are close to facilities and services and are well connected by transport infrastructure.
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	✓✓ for the strategic sites which can provide in excess of 500 new dwellings; 'North Hemel Hempstead', 'West Hemel Hempstead', 'South of Berkhamsted' and East of Tring.
14	Achieve sustainable levels of prosperity and economic growth	✓✓ for the sites which would contribute considerable amounts of employment space which would support the local economy – 'Two Waters Road/A41 Junction' and 'Breakspear Way/ Green Lane/ Boundary Way', Hemel Hempstead and 'Bourne End Mills GEA' extension and 'Bovingdon Brickworks' Countryside sites.
15	To ensure local residents have employment opportunities and access to training	✓✓ for the sites which would contribute considerable amounts of employment space which would provide new employment opportunities – 'Two Waters Road/A41 Junction' and 'Breakspear Way/ Green Lane/ Boundary Way', Hemel Hempstead and 'Bourne End Mills GEA extension' and 'Bovingdon Brickworks', Countryside sites.

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 Draft Local Plan will inevitably result in the need to develop on some greenfield sites, with associated 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 Borough. 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 in the Borough, when considered alongside new developments in neighbouring local authorities.

However, to act as a counter, policies in the Draft Local Plan aimed at concentrating housing and employment development in the urban areas and away from greenfield sites should help to protect, maintain and enhance designated sites and their buffer zones and should reduce the loss of agricultural land which may have biodiversity value.

All new developments will be required to provide a net-gain for biodiversity and through development at the larger sites there are opportunities for more strategic biodiversity gains through the integration of green infrastructure into the new developments.

For several of the policies the SA has a finding of ‘uncertain effects’ given that the effects which will result are dependent on a variety of factors, such as how developments are delivered on a site and the effectiveness of mitigation and enhancement measures.

4.4.2 Water (SA Objective 2)

The Catchment Abstraction Management Strategy (CAMS) for the Colne catchment identified that the underlying chalk aquifer is assessed as being ‘over-abstracted’. Therefore, providing for a minimum of 16,596 new dwellings in 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 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 Source Protection Zone (SPZ). 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.

Local Plan policies under the Environment and Biodiversity theme will mitigate against adverse effects on water quality, over-abstraction and will direct development away from watercourses.

4.4.3 Flood Risk (SA Objective 3)

At a strategic 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. Policies in the plan support this by requiring that development is directed away from flood risk zones.

4.4.4 Greenhouse gas emissions (SA Objective 4)

Making provision for 16,596 new homes and 116,500 sqm of industrial floorspace 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 policies and delivery strategies which include proposals for housing and employment growth.

In relation to increased traffic, the levels of increased vehicle usage and miles travelled would be dependent of how close new developments are to existing services and facilities, as well as the type and level of new services and facilities provided by new developments, either on-site or through CIL and S106.

Growth in and around the Borough would place increased strain on the existing transport infrastructure. Traffic congestion is a problem, particularly in Hemel Hempstead and in order to reduce carbon emissions, there is a need to encourage walking, cycling and public transport as alternatives to the car.

The plan policies which support sustainable transport infrastructure to be delivered in the Borough at the earliest point of development will mitigate against these negative impacts by reducing reliance on car use. Concentrating growth in the most sustainable locations further supports this.

The plan also includes a wide range of requirements which are directly related to the reduction in greenhouse gas emissions and the adaptation to climate change. Other positive effects relating to climate change mitigation and adaptation could arise as a result of the policies under the 'Environment and Biodiversity' theme. The Masterplans for delivering the Place Strategies will require the provision of comprehensive green infrastructure networks and in so doing will help support this objective.

4.4.5 Air Quality (SA Objective 5)

Transport is a key source of air pollution and so inevitably making provision for 16,596 new homes and 116,500 sqm of industrial floorspace 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 policies and delivery strategies which include proposals for housing and employment growth.

However, as was the case for greenhouse gas emissions, the strategy to concentrate the majority of development in the Borough's most sustainable locations would help to reduce the need to travel to access facilities and the average distances travelled which would have a positive effect on reducing the growth of airborne emissions from transport. This would also be the case for the economic and retail policies which should also reduce the need to travel to access jobs and services.

The plan policies which support sustainable transport infrastructure to be delivered in the Borough at the earliest point of development will mitigate against these negative impacts by reducing reliance on car use. Concentrating growth in the most sustainable locations further supports this.

4.4.6 Soil (SA Objective 6)

Making provision for 16,596 new homes and 116,500 sqm of industrial floorspace over the Local Plan period would inevitably require development on greenfield sites – with associated adverse effects on soils. However, concentrating the majority of development in the Borough's most sustainable settlements and the intensification of sites within Hemel

Hempstead through increased heights and densities would help to reduce the amount of greenfield land required to deliver the levels of growth in the Local Plan. This should minimise levels of soil sealing and the degradation/loss of soils.

The Borough contains some agricultural land which is classified as the ‘best and most versatile’ including areas to the east of Tring and the west of Bovingdon in which new development has been proposed. As a result, some significant adverse effects have been identified.

Policies aimed at protecting open spaces and limiting development in the countryside and on open land should help to preserve the natural environment and biodiversity. This could lead to indirect positive effects on soils.

The plan requires that soil quality standards would be maintained and opportunities would be taken to remediate contaminated land and it prioritises the development of previously developed land which would help to protect the Borough’s soil resource, which in addition to providing agricultural function acts as an important carbon store.

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.

The Local Plan includes policies which aim to reduce these adverse effects including a wide range of requirements that are directly related to the efficient use of resources and minimisation of waste, both during the construction and operation phases of new developments.

4.4.8 Historic environment (SA Objectives 8)

New development proposed in the Draft Local Plan has the potential to result in adverse effects on heritage assets and their settings and the wider historic environment. The significance of the effects on the historic environment of delivering the new development 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 for many of the Draft Local Plan policies and topic areas.

New development may also result in significant loss or erosion of the landscape or townscape character or quality, which is likely to also have an impact (direct and or indirect) upon the historic environment and people’s enjoyment of it. Again, these effects will be dependent of the setting of the new development, as well as the type and scale of development.

For several of the policies the SA has a finding of ‘uncertain effects’ given that the effects which will result are dependent on a variety of factors, such as how developments are delivered on a site and the effectiveness of mitigation and enhancement measures.

None of the site allocations have been identified to have any significant heritage-related constraints but the majority have some associated or nearby heritage assets that will need to be taken into consideration during the planning application process.

Policies in the plan directly seek to protect the historic environment through consideration of design, character and the protection of both designated and non-designated heritage assets.

4.4.9 Landscape & Townscape (SA Objective 9)

Making provision for 16,596 new homes and 116,500 sqm of industrial floorspace 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 policies and delivery strategies which include proposals for the housing and employment growth.

However concentrating the majority of development in the Borough's most sustainable settlements and the intensification of sites within Hemel Hempstead through increased heights and densities would help to reduce the amount of greenfield land required to deliver the levels of growth in the Local Plan, thereby reducing levels of adverse effects on local landscapes.

For several of the policies the SA has a finding of 'uncertain effects' given that the effects which will result are dependent on a variety of factors, such as how developments are delivered on a site and the effectiveness of mitigation and enhancement measures.

None of the site allocations have been identified to have any significant landscape or townscape related constraints but many have the potential to result in localised adverse effects which will need to be taken into consideration during the planning application process.

Policies in the plan directly seek to protect the local landscape and townscape through protecting the natural environment and ensuring high quality design of new development.

4.4.10 Health and wellbeing (SA Objective 10)

Overall, the predicted impacts of the plan should have positive cumulative impacts against the objective to improve the health and wellbeing of the local population. This is achieved through policies which support the improvements to housing, healthcare, education, the environment and facilities for leisure and recreation. However, uncertainties do exist, arising from the pressure which would be placed on existing facilities as a result of increased housing and population; the unknown nature of the infrastructure that will be delivered to support growth; and the relocation of existing sports facilities to accommodate housing in Berkhamsted.

The plan includes policies which encourage healthy lifestyles through the provision or protection of facilities, open space and active travel infrastructure. The plan also supports residents' wellbeing through the provision of sufficient, safe accommodation, access to facilities and jobs, and minimising environmental pollution. However, the realisation of these potential health benefits is dependent on individuals' behavioural choices to adopt healthy lifestyles, and the actual infrastructure identified in the Council's Infrastructure Delivery Plan to facilitate healthy choices.

4.4.11 Sustainable locations (SA Objective 11)

Positive effects have been forecast overall in relation to the objective to develop in sustainable locations. This is achieved by policies which focus new development in the main settlements, reduce the need to travel, encourage sustainable travel and encourage mixed developments within settlements. Some uncertainties have been identified given the limited capacity to locate all developments in urban areas. Given the level of growth required by the plan, it is proposed that some development must take place on the edge of existing settlements which would be at a distance from facilities and services. It is unclear what infrastructure would be delivered to mitigate against negative effects in the absence of the Infrastructure Delivery Plan.

Concentrating development within existing settlements where possible, encouraging the mixed use of local centres and providing sustainable transport options to access those facilities which may be located at a distance, would result in closer integration of homes, jobs and services.

4.4.12 Communities (SA Objective 12)

The predicted impacts of the plan against the community cohesion objective are positive. The plan includes policies which would improve access to education, facilities, public transport and would improve quality of life in the Borough whilst helping to reduce crime and deprivation. There is uncertainty about what infrastructure will be provided to support this objective and whether the infrastructure will be sufficient to mitigate against pressure on existing services and facilities.

Policies which support high quality design and liveable neighbourhoods, good access to transport and connectivity between services, and the provision of those services, when combined create an overall positive assessment against the objective for community cohesion through reducing inequalities, promoting social inclusion and reducing crime and the fear of crime. Significant positive effects have therefore been predicted in relation to these policies.

4.4.13 Housing (SA Objective 13)

Significant positive effects have been predicted against this objective as the plan requires the provision of 16,595 homes across the plan period. This meets the Borough's Objectively Assessed Need (OAN) and includes a mix of housing tenures, types and sizes of home (a minimum of 35% to be affordable housing) as well as specialist accommodation to support the elderly and the protection of authorised sites for gypsies, travellers and travelling showpeople. The plan supports the sub-objectives of providing a range of housing types, size and tenure, including high quality affordable and key worker housing that meet the needs of all communities with the Borough, meeting the needs of the gypsy and traveller communities, and helping to reduce homelessness.

4.4.14 Economy and Employment (SA Objectives 14 & 15)

The plan is predicted to 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 employment opportunities and access to training. The plan enables economic growth in the Borough 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 Borough is maintained.

In combination, the policies would support the economic objectives by providing the housing and employment options necessary to live there, and by providing the infrastructure to enable transport around the Borough. The vitality and viability of the Borough is helped by the numerous policies which ensure retail, leisure and employment space is retained.

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 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 Borough's natural environment.

5.1.1 Mitigation

The assessments of the Local Plan in Appendix D 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' policies such as 'SP4 – The Housing Strategy'; 'SP6 - Delivering the Employment Strategy'; and the settlement specific 'Delivery Strategies' and associated 'Proposals and 'Sites', will be avoided or mitigated by the requirements set out in the strategic policies and development management policies under the other Local Plan themes, such as 'Climate Change & Sustainability', 'Environment & Biodiversity', 'Delivering Great Places', 'Sustainable Transport & Connectivity' and 'Healthy Communities'.

The 'within-plan' mitigation identified in relation to Policy SP2 'Spatial Strategy for Growth', which includes provisions for housing an employment growth as well as the strategy for how this would be delivered, is as follows:

The 'Environment and Biodiversity' policies provide the policy framework to help to mitigate the potential adverse effects associated with the potentially high levels of housing and employment development, as well as seeking opportunities for enhancements

Policy DM35 'Protection from Environmental Pollution' should minimise negative impacts on soil by preventing development which would result in harmful soil pollution though this would not prevent soil sealing. However, concentrating the majority of development in the Borough's most sustainable settlements and the intensification of sites within Hemel Hempstead through increased heights and densities would help to reduce the amount of greenfield land required to deliver the levels of growth in the Local Plan. This should minimise levels of soil sealing and the degradation/loss of soils.

A Habitats Regulations Assessment is being undertaken to examine whether the Local Plan would have adverse effects on any European sites, most notably the

Chilterns Beechwoods SAC. If likely significant effects are identified there will be a need to develop mitigation measures to reduce or avoid such effects. This could include the provision of SANGs. These mitigation measures would be included in Local Plan policies. Whilst this mitigation will be focused on effects on the SAC it could also help to mitigate wider effects, such as those on SSSIs within the Borough and other designated and non-designated sites which are important for biodiversity.

In relation to potential adverse effects identified against the Landscape objective (SA9), particularly those relating to the setting of the Chilterns AONB, the requirements of Policy DM27 'Landscape Character and Chilterns Area of Outstanding Natural Beauty' provide a robust framework for mitigation and should prevent any development from disrupting the quality, character and condition of the landscape in Dacorum.

The policies covering 'Protection and Enhancement of the River Character and Water Environment' would provide the policy framework to help to mitigate the potential adverse effects on water quality and the availability of water resources that may arise from new development, whilst Policy DM35 Protection from Environmental Pollution should help to address air quality issues.

The policies covering 'Delivering Great Places' would help towards minimising the effects on the landscape, townscape and historic environment, including on designated and non-designated heritage assets and their settings, as well as seeking to provide enhancements.

The policies under 'Transport and Connectivity' would help mitigate against increased transport emissions by helping to enable sustainable transport options such as access to public transport and active travel modes.

The policies covering 'Climate Change and Sustainability' will help to minimise growth in greenhouse gas emissions resulting from the growth proposed in the Spatial Strategy. The policies under 'Sustainable Design and Construction' and 'Carbon Offsetting' would help towards minimising the resources required to deliver new development and reducing the waste generated by the new development, as well as ensuring that there is sufficient infrastructure in place to cope with the increases associated with the potential levels of growth, mitigating the negative effects against Resource Efficiency.

In relation to the uncertainty as to whether growth would impact on infrastructure, Policy SP7 'Delivering Infrastructure' should ensure that the necessary infrastructure requirements are provided in a timely manner.

5.1.2 Recommendations

During the development of the Draft Local Plan the SA team provided a 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 clarity of the Plan's requirements. Amongst others, this input covered the following topics/issues:

- Under the climate change theme and objectives, providing greater distinction between the greenhouse gas emissions and the adaptation aspects of this topic;

- Give greater emphasis to how the Historic Environment is covered in the Strategic Objectives;
- Greater recognition of how noise pollution can impact on wildlife;
- Requirements for electric vehicle charging points in new developments;
- Recognition that electric bikes are an important element for future sustainable travel, particularly in settlements with steep gradients;
- Improved coverage of active travel modes; and
- Providing greater emphasis on leisure, recreation and open space within the ‘Healthy Communities’ section.

In undertaking the SA of the Draft Local Plan the SA has identified some further recommendations for the Council’s consideration when the Plan is being updated for Publication. These are as follows:

- Providing greater emphasis on the importance of the Borough’s soil resource, in particular areas of best and most versatile agricultural land – both at a strategic level and in relation to settlements and sites (as appropriate);
- Inclusion of Strategic Policies for those Plan sections/themes which currently do not have an “SP” policy, for example Environment and Biodiversity and Sustainable Transport and Movement;
- Give greater emphasis to how the Historic Environment is covered by inclusion of a strategic policy; and
- Provision of ‘leisure related’ supporting text for ‘Policy SP6 - Delivering the Retail and Leisure Strategy’

It is anticipated that further input and recommendations are provided through the SA process following the consultation on the Draft Local Plan, through further assessment work and by taking into consideration response received to the consultation on the Draft Local Plan.

6 Conclusions at this stage of the SA

The SA has found that overall the Draft 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 which should meet the Borough’s needs. Whilst the 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. In addition, allocating sites in the most sustainable edge of settlement locations will also help to reduce adverse effects, particularly those relating to transport issues.

The requirements of the thematic strategic policies and development management policies in the Draft Local Plan will provide many of the mitigation and enhancement measures to improve the sustainability performance of the Local Plan.

7 Next Steps

Following the Regulation 18 consultation on the Dacorum Draft Local Plan (2020 - 2038) Emerging Strategy for Growth, further work will be undertaken by the Council to develop the Publication version of the Local Plan. 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 mid-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.

At the Regulation 19 stage the SA Report will also provide details of the monitoring which will be required to monitor the significant environmental effects and wider sustainability effects of implementing the Local Plan. This will enable any unforeseen adverse effects to be identified at an early stage and to enable appropriate remedial actions.