Dacorum Local Planning Framework
Pre Submission Site Allocations DPD

Sustainability Appraisal Report

Non-Technical Summary

September 2014
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Non-Technical Summary

Background
A Strategic Environmental Assessment (SEA) has been carried out on the Dacorum Pre-Submission Site Allocations DPD to meet regulations, because it has the potential to produce significant environmental effects.

The main purpose of SEA is to improve the environmental performance of a plan by assessing whether it is likely to result in any significant environmental effects (positive or negative). Recommendations as to how adverse effects can be avoided, offset or reduced, as well as how improvements can be made, should be suggested. A programme to monitor significant effects is required in order to check whether the SEA has been accurate in its predictions.

Sustainability Appraisal (SA) is required under other legislation relating to the Local Plans prepared by local planning authorities. This is in addition to SEA. The guidance merges the SA and SEA elements into a single process and therefore a joint SA/SEA process is being undertaken for the Site Allocations DPD.

This Sustainability Appraisal Report (SA Report) documents the findings of the assessment of the Pre-Submission Site Allocations DPD 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.

The Pre-Submission Site Allocations DPD
Dacorum Borough Council adopted a Core Strategy in 2013. That planning document includes the spatial vision and objectives for the Borough and also contains the proposed spatial strategy, planning policies and strategic and local site allocations that are needed to achieve the strategy’s objectives.

The Site Allocations DPD sets the Council’s detailed proposals and requirements for particular sites and areas that will be allocated to deliver the policies of the Core Strategy. The DPD:

- Allocates sites for future development in the Borough for various land use purposes such as residential, schools, employment, retail, open spaces and mixed use developments;
- Defines the boundaries of planning designations; and
- Ensures appropriate infrastructure is identified and delivered alongside new development.

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1 Environmental Assessment of Plans and Programmes (Wales) Regulations (2004)
The SA/SEA Process

The assessment process is briefly described below and summarised in Figure NTS 1. The SEA Regulations require that the following topics are investigated: Air; Biodiversity; Climatic factors; Cultural heritage; Human health; Landscape; Material assets; Population; Soil; Water; and the interrelationship between these factors. The Sustainability Appraisal element of the process widens this to include consideration of additional social and economic issues.

Stage A - After documenting the sustainability characteristics of the area, and identifying any trends (i.e. is the situation getting better or worse?), the policy context for developing the Dacorum 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/SEA Objectives were developed to concentrate the subsequent assessment process on these key issues.

The bulk of this Stage A work was undertaken for the SA/SEA of the Core Strategy and is relevant to be carried forward to the SA/SEA of the Site Allocations DPD. However some additional work has been undertaken in order to update the baseline and policy context and to establish issues relating to individual sites.

Stage B - This stage involved predicting the effects that would result if the Site Allocations DPD were implemented and then assessing whether any of these effects would be significant. Where potential adverse effects were identified measures to mitigate these effects were proposed.

Stage C - The Sustainability Appraisal Report pulls together the results of all the assessment activities that have been undertaken by consultants Centre for Sustainability (C4S) and identifies monitoring activities that will check the accuracy of the assessment once the Site Allocations DPD is adopted.

Stage D – 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 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 – This stage takes place after the Site Allocations DPD is adopted and covers the monitoring of the predicted effects.
Figure NTS 1: Summary of the SA/SEA Process (Source: UK Government Planning Practice Guidance, 2014)\(^3\)

**Sustainability Issues and Objectives**

The first stage of the SA/SEA focused on the identification of the sustainability issues in the Borough. A few of the issues identified are:

- There are some areas in the Borough where annual mean nitrogen dioxide concentrations continue to exceed the relevant Air Quality Objectives;
- Carbon emissions per capita for Dacorum are above the regional average;
- Light pollution is rapidly increasing and tranquillity is rapidly decreasing in the East of England;
- The percentage of houses built on previously developed land is high. However, previously developed land is a finite resource and might not be as readily available in the future, thus leading to greater pressure to build on greenfield sites;
- There are some issues with river water quality. In addition, over abstraction of water resources is an issue in the region;
- Some areas of Dacorum are at risk from flooding;
- An ageing population means that there are fewer economically active people to support an increasing number of people coming up to retirement age;
- There is some social inequality within Dacorum. For example, life expectancy for men living in the least deprived areas is over 6 years longer than for men living in the most deprived areas;
- The 2013 Health profile for Dacorum shows that 13.6% of children in Year 6 are obese and 22.5% of adults are classified as obese;
- The price of housing compared to earnings is an issue within the Borough, while additional population growth is likely to increase the pressure on affordable housing; and
- The unemployment rate (persons aged 16-64) was 5.7% in Apr12-Mar13, compared to 7.8% in England.

Further detail can be found in the main SA Report and its accompanying appendices.

Government guidance on how to undertake SEA 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.

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These objectives were developed to cover all the Planning documents that make up Dacorum BC's new Local Planning Framework as part of the Scoping Report and updated following consultation on that report in order to take account of consultation comments.

The broad objectives that have been used in this SA/SEA are:

1. To protect and enhance biodiversity
2. Maintain/enhance water quality and limit water consumption
3. Ensure new developments do not increase flood risk
4. Minimise the loss of valuable soils
5. Reduce the emissions of CO2 and other greenhouse gases
6. Ensure development is 'climate change proof'
7. Achieve good air quality, especially in urban areas
8. Maximise the use of previously developed land
9. To use natural resources efficiently
10. To maintain and enhance historic and cultural assets
11. Conserve and enhance the landscape and townscape
12. Encourage healthy lifestyles
13. To deliver more sustainable patterns of development
14. Promote equity & address social exclusion
15. Ensure that everyone has access to good quality housing that meets their needs
16. Enhance community identity and participation
17. Reduce both crime and fear of crime
18. Achieve sustainable levels of prosperity and growth
19. Promote wider prosperity and fairer access to services
20. Revitalise town centres

For undertaking the assessment of the individual site allocations and area specific policies in the Site Allocations DPD, a more detailed framework which includes site specific criteria was developed.

Assessment of Issues and Options

The Council consulted on Site Allocations Issues and Options and a large number of potential sites in November 2006 and October 2008. These consultations were accompanied by Sustainability Appraisal Working notes that identified any key environmental constraints and issues associated with the sites.

During the preparation of the Core Strategy the Council also considered specific strategic sites and local allocations across the Borough for delivering the growth set out in the Core Strategy. Whilst they have been adopted in the Core Strategy, the local allocations also form part of the Site Allocations DPD as the latter planning document provides more
detailed proposals for how the individual allocations will be developed. All the sites considered during the development of the Core Strategy were subject to Sustainability Appraisal.

**Assessment of the Pre-Submission DPD**

A Pre-Submission Site Allocations DPD has now been prepared taking into consideration all the work undertaken previously. Based on the methodology used in the early rounds of the SA, the assessment used the following ‘scoring’ system:

<table>
<thead>
<tr>
<th>Significance Assessment</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓ ✓</td>
<td>Very sustainable - Option is likely to contribute significantly to the SA/SEA objective</td>
</tr>
<tr>
<td>✓</td>
<td>Sustainable - Option is likely to contribute in some way to the SA/SEA objective</td>
</tr>
<tr>
<td>?</td>
<td>Uncertain – It is uncertain how or if the Option impacts on the SA/SEA objective</td>
</tr>
<tr>
<td>-</td>
<td>Neutral – Option is unlikely to impact on the SA/SEA objective</td>
</tr>
<tr>
<td>✗</td>
<td>Unsustainable – Option is likely to have minor adverse impacts on the SA/SEA objective</td>
</tr>
<tr>
<td>✗ ✗</td>
<td>Very unsustainable – Option is likely to have significant adverse impacts on the SA/SEA objective</td>
</tr>
</tbody>
</table>

**Assessment of Sites and Policies**

At an individual site level, the assessment of the Pre Submission Site Allocations DPD identified a range of minor positive and negative effects against the environmental, social and economic SA Objectives. These effects are dependent on the particular site’s location, its associated constraints/opportunities and the type of development proposed (i.e. housing, mixed-use, employment etc.). The summary of the findings of this assessment can be seen in Table NTS 1, with the SA Report and its Appendix providing the full details.

Only one significant effect was predicted, this being for Proposal H/2: National Grid land, London Road, where the remediation of any contaminated land prior to house building has been identified as having significant positive effects against the ‘soil’ SA Objective.
The following section summarises the assessment of the Site Allocations DPD against the SA/SEA objective topics.

**Biodiversity**

Development of some of the sites allocated within the plan will result in loss of greenfield land which could have some adverse impacts on habitats and species due to landtake, NTS7
habitat fragmentation and urban pollution issues. The significance of the effect will be
dependent on the biodiversity value at individual sites. Several of the sites are part if
adjacent to wildlife sites and increased usage of these sites by the new residents could
have adverse effects. The sites proposed are generally well distributed within and
between the main settlements of the Borough. This means that there should not be any
significant adverse cumulative effects on individual wildlife sites – which might have
been the case if development sites were clustered close to a site of nature conservation
importance.

Provision of new or maintaining existing open spaces, retaining trees and hedgerows and
use of native species in planting are some of the mitigation measures proposed and
these could help to minimise the effects at some of the sites where such measures are
proposed. The requirements of Core Strategy Policy CS26: Green Infrastructure will also
help to ensure that adverse effects are mitigated and gains realised. Some of the
potential environmental improvements outlined within policies SA5 (General Employment
Areas) and SA6 (Employment Areas in the Green Belt) may have positive effects on
biodiversity, depending on the improvements made.

Water, flood risk, soil

A number of the sites are located adjacent to watercourses, including the River Gade,
the Grand Union Canal and the River Bulbourne and development of the sites could give
rise to an adverse effect. Water quality of these water courses will need to be controlled
and monitored. Some of the potential environmental improvements outlined within policy
SA5 (General Employment Areas) may have positive effects on water quality of the River
Gade and Grand Union Canal, depending on the improvements made. The requirements
of Core Strategy Policy CS31: Water Management will also help to mitigate effects.
Where there are effects on local water quality, there could be associated effects on
biodiversity, these being two closely inter-related topics.

In relation to flood risk, several of the sites are within, partly within or adjacent to flood
zones 2 or 3. Development of these sites would result in an increase in impermeable
surfaces that may have the potential to increase risk of localised flooding. Flood risk
assessments are therefore likely to be required for these sites and uncertain effects have
been identified for this objective in some cases. As for water quality, the requirements of
Core Strategy Policy CS31: Water Management will help mitigate effects.

Development of some of the sites allocated within the plan will result in loss of greenfield
land which could have adverse impacts on soils due to soil sealing and soil loss. In some
cases development of the site will require the remediation of contaminated land before
any construction activity commences. This will have localised positive effects in relation to the SA soil objective.

**Climatic factors and air quality**

A number of the proposed sites are located within or close to town or local centres, which could encourage use of sustainable modes of travel to access facilities. This could decrease the growth in greenhouse gas and airborne emissions of other pollutants. For some of the sites, which are located further away from local or town centres and/or have poor public transport links, and that might encourage private car use, the effects on greenhouse gas and airborne emissions are more uncertain and in some cases have been assessed as negative. For a number of the larger sites, where there will be provision for new local facilities within the site, these effects could be reduced which would therefore be potentially positive against the ‘greenhouse gas’ and ‘air quality’ objectives.

Through enhancing footpath and cycle networks, and supporting improvements to the bus network Policy SA3 (Improving Transport Infrastructure) is identified as having positive effects on reducing emissions. In addition, the majority of the individual transport proposals are also forecast as positive for the ‘greenhouse gas’ and ‘air quality’ objectives.

Some of the sites are located within or adjacent to Air Quality Management Areas (AQMAs) which could be adversely affected by any additional traffic generated, however the sites are distributed such that there should not be significant increases in traffic at individual AQMAs.

**Cultural heritage and landscape**

Development of the greenfield allocations will inevitably have some adverse effects on local landscape character, although the requirements of Core Strategy Policy CS25: Landscape Character will ensure that effects are minimised. In some cases new development will provide the opportunity to improve local landscape and townscape, with Core Strategy Policy CS12: Quality of Site Design providing the necessary drivers. The cluster of development sites in Hemel Hempstead town centre provide the opportunity for cumulative positive effects to arise in the long term, with these new developments contributing towards the objectives of the Town Centre Masterplan.

The site selection process has ensured that the heritage assets of the Borough have been taken into consideration when allocating sites. The avoidance of key designations and the requirements of Core Strategy Policy CS27: Quality of the Historic Environment will ensure that there will be no significant adverse effects on the Borough’s historic environment. The redevelopment of sites in the area around the Water Gardens Historic
Park and Garden provide the opportunity for cumulative positive effects on the setting of this designated area.

Population and human health

The locations and scale of the sites proposed for inclusion in the DPD, along with the associated policy elements relating to the details of individual sites (e.g. provision of open space) will help towards achieving the ‘population’ and ‘health’ objectives. The transport proposals should assist in providing more opportunity for local residents to take up active modes of travel to and from the town and local centres.

Equity, housing, communities and crime

The number and scale of the sites proposed for new housing development will deliver the housing requirement adopted in the Core Strategy and therefore furthers the delivery of the positive effects predicted in the Core Strategy SA. The Core Strategy also requires an affordable housing contribution from all new housing developments and therefore the effects of the site specific policies/allocations have no additional cumulative effects on the ‘housing’ objective.

The detailed development proposals in the Site Allocations DPD for three of the local allocations that were adopted in the Core Strategy require provision of pitches for the gypsy and traveller communities. This helps to support the ‘equity’ objective.

The open space and community facilities that form part of the larger proposals will help to enhance the overall provision of such facilities in the Borough.

Economic factors

Site allocations associated with the ‘Supporting Economic Prosperity’ theme of the DPD will help to deliver the Core Strategy’s requirements for this theme across the Borough. The mixed-use sites proposed will help to help to improve accessibility to jobs by siting employment and population centres in close proximity to one another.

Where site allocation proposals change the site from employment use to other uses (e.g. housing) some adverse effects against the ‘economic’ objective are likely due to the loss of existing jobs, or the loss of the potential for a redundant employment site to provide jobs in the future. Where new housing will help to support existing facilities and services that make up the local economy positive effects have been predicted.

The redevelopment of town centre sites and the improved sustainable travel links that are planned should help improve the vibrancy of the town centres.
Mitigation and Recommendations

A key role of the SA/SEA is to provide recommendations as to how the sustainability performance of the plan can be improved. While undertaking the SA/SEA a range of recommendations were identified for individual sites. The recommendations are provided the Detailed Assessment matrices in Appendix A of the SA Report.

Monitoring

Once the Site Allocations DPD is adopted, its effects against sustainability topics are to be monitored to allow action to be taken to reduce and/or offset any significant effects. This monitoring will be tied into the monitoring for the Core Strategy SA/SEA and will make use of existing arrangements, particularly those being developed to monitor the performance of the Local Planning Framework. The final monitoring plan will be published in the SA/SEA Adoption Statement, alongside the adopted DPD.

Next Steps

The publication of this SA Report signifies the start of the consultation process whereby key stakeholders and the public are given the opportunity to comment on the contents of both the Pre-Submission Site Allocations DPD and the SA Report. Following the end of the consultation, the SA will need to assess any substantive changes made to the DPD prior to the Submission stage. Depending on the scale of changes these will either be provided as an addendum to the consultation SA Report, or as an updated SA Report.

Making your Views Known

This SA Report will be published for consultation alongside the Pre-Submission Site Allocations DPD. Copies of the SA documents can be found on the Council’s website www.dacorum.gov.uk/planning, at local libraries or at Borough Council Offices subject to opening times. Comments on the SA Report should be sent in writing by 5th November 2014 to:

By email: spatial.planning@dacorum.gov.uk

By post: Spatial Planning Team
Strategic Planning and Regeneration
Dacorum Borough Council
Civic Centre
Marlowes
Hemel Hempstead
Hertfordshire
HP1 1HH

By fax: 01442 228771

All comments received will be publicly available. When the consultation period has finished, the comments received will be considered during the next stage of the SA/SEA process.