



Sustainability Appraisal of the North Herts Submission Local Plan

MODIFICATIONS FOLLOWING PUBLIC EXAMINATION -SA
REPORT ADDENDUM

North Herts District Council

Sustainability Appraisal of the North Herts Submission Local Plan

Modifications following Public Examination - SA Report Addendum

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1 Introduction

The Local Plan

- 1.1 The North Hertfordshire Local Plan sets a strategic vision and spatial strategy for the District over the period 2011 to 2031. It includes strategic policies which provide the guidance on the main issues that the Plan seeks to address, and development management policies on the detailed requirements that must be met for planning permission to be granted. It also sets out the site allocations for each community with site-specific criteria for each local housing allocation.
- 1.2 The Plan was formally published in October 2016 and submitted for examination in June 2017. It was the subject of examination hearings from November 2017 to March 2018. Following the hearings, the Council submitted proposed modifications to ensure the plan's soundness to the Inspector, for his consideration. These came from a number of sources:
 - The proposed modifications submitted by the Council alongside the Plan (Examination Library Reference LP3);
 - Memoranda of Understanding, Statements of Common Ground or other agreements;
 - The Council's Matters statements submitted to the examination in advance of the hearing sessions; and
 - Changes discussed at the examination hearing sessions and recorded in the Action Lists on the Council's website.
- 1.3 The Inspector has now published his proposed Main Modifications for consultation.

Sustainability Appraisal (SA)

- 1.4 A process of Sustainability Appraisal (SA) has been undertaken alongside the development of the Local Plan. As noted in Planning Practice Guidance¹ *"sustainability appraisal is a systematic process that must be carried out during the preparation of a Local Plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives."*
- 1.5 SA must also meet the requirements for Strategic Environmental Assessment (SEA) which are outlined in the SEA Regulations². SEA is similar to SA; the most substantial difference is that it focuses on environmental protection objectives only.

Nature and purpose of this SA report addendum

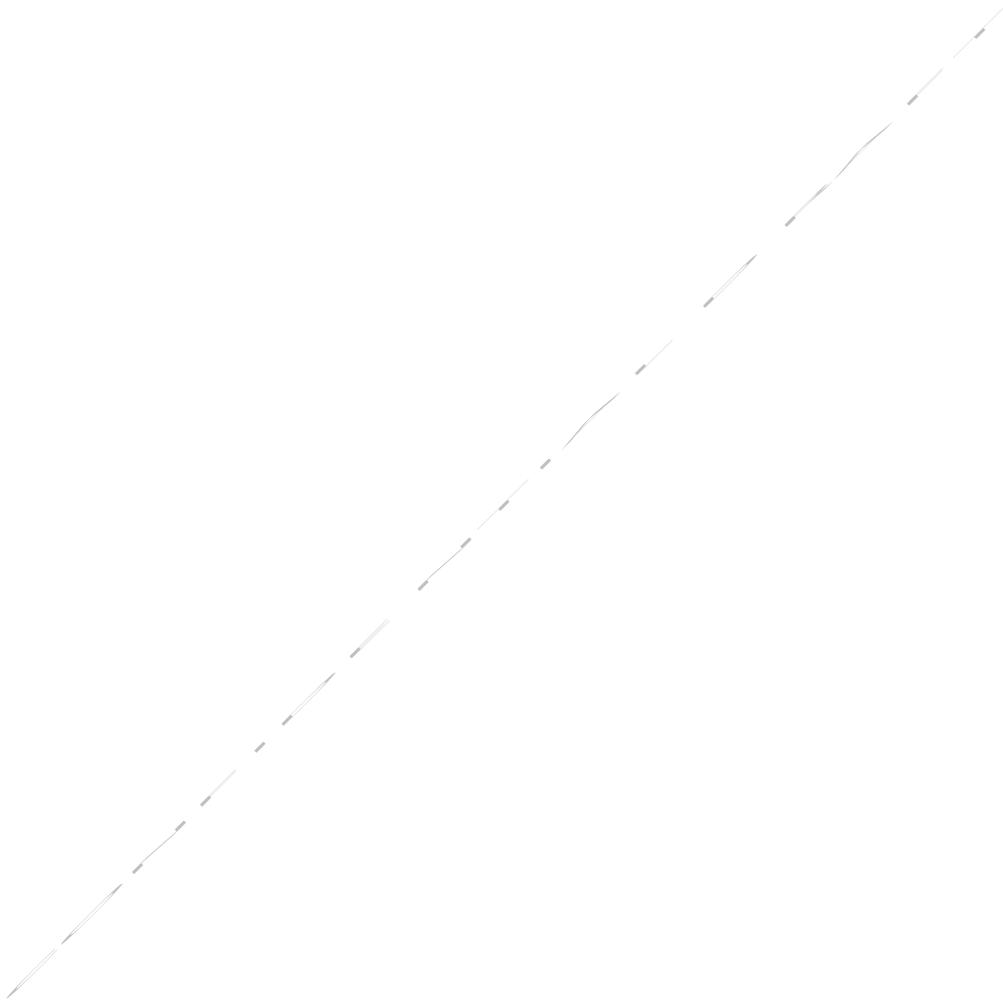
- 1.6 This report is an addendum to the SA report³ which was published alongside the Proposed Submission Local Plan (Examination Library Reference LP4) (for clarity, this is referred to as 'the Main SA Report' in this Addendum). Its purpose is to review the Main Modifications which have been proposed to ensure that the final plan has been comprehensively appraised.
- 1.7 This report contains the following sections:
 - Section 2, which outlines the sustainability appraisal framework which is used to test the sustainability of the Plan;
 - Section 3, which describes the screening process used for the modifications;

¹ Paragraph: 001 Reference ID: 11-001-20140306

² [The Environmental Assessment of Plans and Programmes Regulations 2004](#)

³ [Draft Sustainability Appraisal of North Hertfordshire Proposed Submission Local Plan](#)

- Section 4, which describes the assessment of the modifications, including the 'screened-in' policies, the appraisal of site-specific policies, and consideration of the overall effect of the modifications plus the Submitted Plan;
- Section 5 briefly describes next steps.



2 Sustainability appraisal framework

- 2.1 In the sustainability appraisal process, the potential effects of a plan are tested against a series of objectives for sustainable development. For example, for an objective *to use resources efficiently*, the appraisal asks whether the plan will have a positive or negative effect on this objective.
- 2.2 The objectives are combined into an appraisal framework. This framework was used in all the stages of the SA process to test the Plan. It is shown in the table below, along with the questions used in the testing process. A slightly modified version was used for testing proposed sites and site policies. The objectives which address the issues which are required to be covered by the SEA Regulations⁴ are shown underlined. The SA objectives were drawn up using the themes from the review of other Policies, Plans and Programmes, and drawing on the baseline review, and specifically the key sustainability issues identified. The SA is reported against the objectives, with the sub-objectives used for guidance in conducting the appraisal.

Table 1: Sustainability Appraisal framework

SA Objective ⁵	SA Sub Objective: <i>will the policy or proposal help to...</i>
ECONOMIC ACTIVITY	
1 Achieve sustainable levels of prosperity and economic growth	<ul style="list-style-type: none"> maintain a diversified economy, with increased resilience to external shocks? encourage new business to start-up and thrive in the District? support and encourage the rural economy and diversification? support and promote sustainable tourism in towns and rural areas? improve the quality of local jobs available to people in the District? increase the skills base? make the cost of housing more affordable to those employed in the District?
LAND USE AND DEVELOPMENT PATTERNS	
<u>2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?</u>	<ul style="list-style-type: none"> promote the use of brownfield sites and if brownfield sites are not available, land of low environmental and amenity value? maximise reuse of vacant buildings and derelict land? minimise the loss of the best and most versatile agricultural land? reduce quantity of unremediated contaminated land?
<u>2(b) Provide access to green spaces</u>	<ul style="list-style-type: none"> provide/improve access for all residents of the District to green spaces? provide opportunities for people to come into contact with and appreciate wildlife and wild places? maintain/improve the public right of way network?
<u>2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles</u>	<ul style="list-style-type: none"> locate development so as to reduce the need to travel? reduce car reliance, encourage walking, cycle, bus, and train use? reduce road freight movements? avoid exacerbating local traffic congestion? provide affordable, accessible public transport in towns and in rural areas?

⁴ Listed in Schedule 2

⁵ Those relevant to the SEA Regulations are shown underlined

SA Objective⁵SA Sub Objective: *will the policy or proposal help to...*

ENVIRONMENTAL PROTECTION

<u>3(a) Protect and enhance biodiversity</u>	<ul style="list-style-type: none"> • protect habitats and species, especially those designated as being of importance, and provide opportunities for creation of new habitats? • support and maintain extent of wetland habitat and river habitats?
<u>3(b) Protect and enhance landscapes</u>	<ul style="list-style-type: none"> • protect and enhance landscapes, especially those of historic, recreational or amenity value, and within the Chilterns AONB?
<u>3(c) Conserve and where appropriate, enhance the historic environment</u>	<ul style="list-style-type: none"> • conserve and enhance the historic built character of the District's town's and villages? • protect sites of archaeological and historic importance, whether designated or not?
<u>3(d) Reduce pollution from any source</u>	<ul style="list-style-type: none"> • improve the water quality of rivers and groundwater supplies? • achieve good air quality? • reduce ambient noise, especially from traffic? • reduce light pollution in the District? • protect soil quality?

CLIMATE CHANGE

<u>4(a) Reduce greenhouse gas emissions</u>	<ul style="list-style-type: none"> • minimise energy consumption by transport and in buildings? • increase proportion of energy generated by renewable sources? • encourage use of local suppliers and the consumption of local produce?
<u>4(b) Improve the District's ability to adapt to climate change</u>	<ul style="list-style-type: none"> • reduce vulnerability to climate change, exploit any benefits? • avoid development in areas at risk from flooding?

A JUST SOCIETY

<u>5(a) Share benefits of prosperity fairly</u>	<ul style="list-style-type: none"> • reduce disparities in income levels? • contribute to regeneration of deprived areas (estates in Letchworth and Hitchin)? • provide employment and other opportunities for unemployed, especially long term unemployed and the disabled? • encourage entrepreneurial activity in deprived areas?
<u>5(b) Provide access to services and facilities for all</u>	<ul style="list-style-type: none"> • provide access to services and facilities without need to use a car? • retain rural services, especially shops, post offices, schools, health centres and bus services? • recognise the needs of specific groups such as minority ethnic groups, the young, the elderly and the disabled?
<u>5(c) Promote community cohesion</u>	<ul style="list-style-type: none"> • support development of voluntary sector? • encourage development of community run business? • encourage people's feelings of belonging, for example by providing community meeting places? • recognise and value cultural and ethnic diversity?
<u>5(d) Increase access to decent and affordable housing</u>	<ul style="list-style-type: none"> • help improve the quality of the housing stock and reduce the number of unfit homes? • increase access to affordable housing, particularly for the young, the disabled and key workers?

SA Objective ⁵	SA Sub Objective: <i>will the policy or proposal help to...</i>
5(e) Reduce crime rates and fear of crime	<ul style="list-style-type: none"> • encourage crime reduction, particularly through the appropriate design of new development? • help reduce the fear of crime?
<u>5(f) Improve conditions and services that engender good health and reduce health inequalities</u>	<ul style="list-style-type: none"> • help promote healthy lifestyles? • improve access to health services by means other than private cars? • reduce ambient noise near residential and amenity areas? • reduce road accidents? • reduce accidents and damage from fires?
5(g) Increase participation in education and life-long learning	<ul style="list-style-type: none"> • improve access to skills learning by young people? • improve access to skills learning by adults?
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	<ul style="list-style-type: none"> • increase access to culture, leisure and recreational activities?
RESOURCE USE AND WASTE	
<u>6(a) Use natural resources efficiently; reuse, use recycled where possible</u>	<ul style="list-style-type: none"> • minimise the demand for raw materials? • encourage sustainable design, use of sustainable building materials and minimise wastage caused by construction methods? • limit water consumption to levels supportable by natural process and storage systems? • protect groundwater resources? • promote sustainable drainage systems? • reduce minerals extracted and imported?
<u>6(b) Reduce waste</u>	<ul style="list-style-type: none"> • reduce, reuse or recycle waste generated?
TOWN CENTRES	
7 Promote sustainable urban living	<ul style="list-style-type: none"> • encourage wider range of shops and services in town centres? • encourage more people to live in town centres? • encourage mixed use developments in town centres? • improve transport connections in, and to, town centres? • encourage synergy in land uses, which supports the continued and enhanced viability of a wide range of shops and services? • protect or improve the quality of the public realm in towns?

3 Screening of proposed modifications

Introduction

- 3.1 All the modifications have been through a through a review process, called screening to assess whether they are likely to have significant sustainability effects.
- 3.2 In addition, an appraisal of all the site-specific policies (including the modifications of them) has been undertaken. This is because these policies were not previously appraised having been produced following the appraisal of the submission version of the Plan⁶. More information on this process is included in section 4.
- 3.3 The screening reviewed all the proposed modifications to the Plan to answer the following questions:
- Is the proposed modification a significant change which is likely to have significant effects?
 - Does the proposed modification constitute new Plan content which has not been appraised previously?
 - Do any of the proposed modifications in combination with each other or with existing Plan content, result in cumulative, secondary or synergistic effects which are significant?
- 3.4 If the answer to any of these questions was yes, the modification was ‘screened in’ for further SA assessment. In this process a precautionary approach was taken, i.e. if there was uncertainty about the significance of the proposed modifications, they were screened in for further appraisal.

‘Screened-in’ modifications

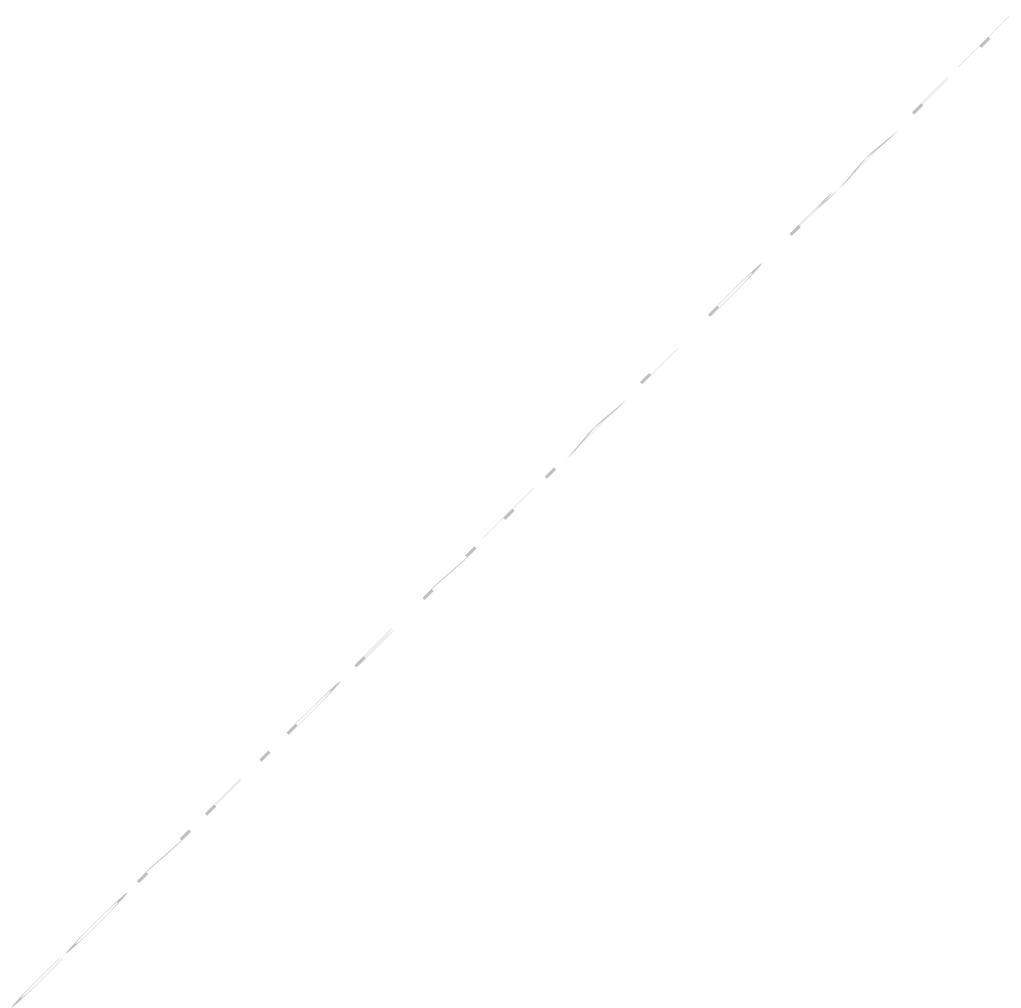
- 3.5 The full findings of the screening process are included in Appendix A. This includes details of each modification, along with comment on the SA implications of the modification, and whether or not the modification was then screened in to the SA. Most of the proposed modifications were screened out as they do not materially alter the findings of the previous SA work. Table 2 includes all the modifications which were ‘screened in’ and the reasons for this.

Table 2: ‘Screened-in’ modifications

Sec.	Ref.	Policy/para.	Modification	SA implications
02	MM047 MM049	Policy SP11 New para	Addition of policy provision for additional wastewater treatment capacity and commentary on this	Likely to significantly affect the appraisal of this policy against the Resource Use and Waste objectives in the appraisal framework
03	MM168	New Policy NEx and new paragraph 11.18	New policy: New and improved open space and new supporting text	This policy contains much of the previous policy NE5 but is specifically focused on open space, rather than NE5’s focus on open space and biodiversity. This, along with the additional supporting text may affect the appraisal of significant effects, particularly in relation to objective 3a (protect and enhance biodiversity) so needs to be fully

⁶ The allocated sites had previously been assessed in the Main SA report, and this appraisal had informed the site- specific criteria in the submission Plan. However, through the examination process it was determined that these criteria should be viewed as policies, and it was agreed to appraise them to identify any significant effects that might arise from the application of the criteria.

				assessed against the SA framework.
04	MM230	New Policy CD6	Addition of new site for Gypsy and Traveller accommodation - Land at Woodside Place, Danesbury Park Road	The new site will need to be fully assessed against the SA framework.
05	MM372	New Policy IMR1	New policy: IMR1 Five Year Housing Land Supply	New policy needs to be assessed against the SA framework



4 Appraisal of the modifications

Appraisal of the 'screened-in' modifications

4.1 Appraisals were undertaken of the four screened-in modifications listed in the previous section. As described in section 2 above, this was done by testing them against the sustainability objectives contained in the SA Framework, as was done in all the earlier stages of the SA process. The results of this process are presented in appraisal matrices, which can be seen in Appendix B.

4.2 The findings are summarised below:

Table 3: Summary of appraisal of screened-in modifications

Ref.	Policy/para.	Modification	Significant sustainability effects and uncertainties	Changes recommended
MM047 MM049	Policy SP11 New para	Addition of policy provision for additional wastewater treatment capacity and commentary on this	The modification is likely to have a significant positive effect on reducing waste.	None
MM168	New Policy NEx and new paragraph 11.18	New policy: New and improved open space and new supporting text	The modification focuses the policy more tightly on provision of open space, and in doing so removes some of the previous significant positive effects of the previous policy on biodiversity, landscape and water quality.	None, as protection for biodiversity, landscape and water quality is provided for in separate policies in the Plan.
MM230	New Policy CD6	Addition of new site for Gypsy and Traveller accommodation - Land at Woodside Place, Danesbury Park Road	The new site will have a significant positive effect on access to housing. A significant negative effect has been identified on use of motor vehicles as there is no nearby bus stop. There are also uncertainties around potential land contamination and noise impacts from the M1.	Mitigation will be identified in the updated mitigation table and needs to be considered for inclusion in the site-specific criteria for this policy.
MM372	New Policy IMR1	New policy: IMR1 Five Year Housing Land Supply	The policy provides clarity about the procedures for monitoring the planned scale of housing which will be delivered in the District up to 2031. Therefore, it will have significant positive effects on access to housing, economic growth, and access to services, through increasing local demand and spend and creating jobs in construction and other development-related industry. The use of greenfield sites means that it is likely to have significant negative effects on development of greenfield land, access to green spaces, biodiversity, and the historic	None; this policy does not provide for increased development, it outlines a programme for monitoring the housing development proposed in the Plan. Mitigation of the negative environmental effects of this is addressed in other policies in the Plan.

			environment. This scale of development also means it is likely to have significant negative effects on pollution, greenhouse gas emissions, and resource use.	
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Appraisal of site specific policies

4.3 As noted above, an appraisal of all the site-specific policies (including the modifications of them) has been undertaken. This covers the Strategic Housing Site policies in Section 02 (Policy SP14 onwards) and the whole of Section 04 (Allocations). The results of the appraisal are attached as Appendix C, which also includes recommendations. The recommendations and the Council's response are shown in the tables below.

Table 4 Recommendations for strategic sites

Strategic policy/site	Recommendations	Council response
SP14 Site BA1 –North of Baldock	The masterplan should also consider how the provision of a local centre and retail facilities can be planned to complement existing provision in Baldock.	Will be addressed by policy SP4. The scale of retail development in Site BA1 has been guided by the Council's evidence base which seeks to distribute future District-wide needs proportionately and having regard to the role and function of existing centres.
SP16 Site NS1 – North of Stevenage	The masterplan should consider opportunities for enhancement of greenspace and access to green spaces.	Will be addressed by policy NEx: New and improved open space
SP17 Site HT1- Highover Farm Hitchin	The policy should require and ecological appraisal in relation to Hitchin Railway Banks Wildlife Site	Hitchin Railway Banks Wildlife Site to be added to criterion j of Policy SP17.

Table 5 Recommendations for other sites

Policy/Site	Recommendations	Council response
Baldock		
BA3- Land south of Clothall Common, Baldock	Consider how access to the town centre through public transport, walking and cycling can be improved for the development.	Will be addressed by policies SP6, SP7, T1
Codicote		
CD1 –Land south of Cowards Lane, Codicote	Transport assessment should consider public transport	Will be addressed by policies SP6, SP7, T1

Policy/Site	Recommendations	Council response
	improvements to the village as potential mitigation of transport impacts	
CD2 – Codicote Garden Centre	Consider public transport improvements to the village as potential mitigation of transport impacts	Will be addressed by policies SP6, SP7, T1
CD3 -Land NE of The Close, Codicote	Consider public transport improvements to the village as potential mitigation of transport impacts	Will be addressed by policies SP6, SP7, T1
CD5 - Land south of Heath Road, Codicote	Consider public transport improvements to the village as potential mitigation of transport impacts	Will be addressed by policies SP6, SP7, T1
CD6 - Land at Woodside Place, Danesbury Park Road, Codicote	Ensure potential impacts from noise and air pollution are mitigated	Will be addressed by policies D3 & D4
Graveley		
GR1- Land at Milksey Lane	Mitigation for noise from A1(M) should be provided	Will be addressed by policy D3
Hitchin		
HT11 – Churchgate, Hitchin	Ensure that development addresses fluvial and pluvial flood risks	Criterion relating to River Hiz amended; to be read in conjunction with Policies NE7 & NE8
Ickleford		
IC3 - Land at Bedford Road	Consider opportunities for improving public transport provision for site	Will be addressed by policies SP6, SP7 and T1
Knebworth		
KB1 –Land at Deards End, Knebworth	Transport Assessment to consider ways of enhancing access routes to nearest open space, particularly for non-motorised transport.	Will be addressed by policy D1
KB2 –Land at Gypsy Lane, Knebworth	Transport Assessment to consider ways of enhancing access routes to nearest open space, particularly for non-	Will be addressed by policy D1

Policy/Site	Recommendations	Council response
	motorised transport.	
Letchworth Garden City		
LG8 - Pixmore Centre, Letchworth	Consider requirement for SUDs or other appropriate measures in line with requirements for other sites affected by surface water flood risk.	Will be addressed by policies NE7 & NE8
LG14 - Nursery, Icknield Way, Letchworth.	As with other sites adjoining employment uses, consider inclusion of requirement to ensure appropriate residential amenity for any properties adjoining employment area.	Will be addressed by policy D3
LG15 - Garages, Icknield Way, Letchworth.	Consider inclusion of requirement to mitigate the impact of the nearby railway line.	Will be addressed policy D3
LG18-Former Depot, Icknield Way, Letchworth	Consider inclusion of requirement to mitigate the impact of the nearby railway line.	Will be addressed by policy D3
LG19 – The Wynd, Letchworth	Consider inclusion of requirement to address fluvial flood risks to site. Only pluvial risks currently addressed in the policy.	<p>Make the following changes to the policy:</p> <ul style="list-style-type: none"> • Deleting ‘more vulnerable’ A4 uses from the list of permitted uses in the first bullet; • Adding “flood risk” to the two ‘sub-bullets’ under the first bullet point: “...where these can additionally be accommodated in design, layout, flood risk and transport terms;”; • Striking through “surface water” in the final bullet so it refers to all types of flood risk and requiring a site-specific FRA
Royston		
RY1 –Land west of Ivy Farm, Royston	It is recommended that a Mitigation Strategy be developed in consultation with Natural England to ensure that the developer contributes towards appropriate measures to protect the SSSI from	Existing criteria require mitigation of SSSI impacts. Statement of Common Ground with Natural England (ED52) requires completion of mitigation strategy in advance of Plan adoption. Outline planning permission granted

Policy/Site	Recommendations	Council response
	recreational pressures. The mitigation strategy should include appropriate monitoring.	subject to completion of legal agreement securing appropriate contributions.

Update to mitigation tables

4.4 The SA process is required to identify mitigation for the significant negative effects and uncertainties that it identifies. In the Main SA report⁷ which was published alongside the Proposed Submission Local Plan (Examination Library Reference LP4) this was done primarily through the production of two tables identifying mitigation (referred to as ‘mitigation tables’) for the identified negative effects and uncertainties for all the sites allocated. The mitigation table for strategic sites is in Appendix 8 of that document, and the mitigation table for other sites is in Appendix 9. They each show:

- all the significant negative effects and uncertainties for the sites in the Plan;
- the policies in the Plan which address these effects and uncertainties;
- any suggested further mitigation measures necessary; and
- any remaining residual effects.

4.5 In the Main SA report, the mitigation tables did not include all the mitigation provided for in the site-specific policies discussed above. In this Annex, the Mitigation Tables have now been updated to include reference to all relevant site-specific policies in the Proposed Submission Local Plan (Strategic Housing Sites and allocations in the Communities section). They also include reference to any relevant new or revised site-specific policies contained in the proposed modifications. The updated Mitigation Tables are included as Appendix D.

Appraisal of the Submitted Plan including modifications

4.6 The Main SA report identifies the likely significant effects and uncertainties of the Proposed Submission Local Plan. This includes local and District-wide cumulative effects and cumulative effects which are likely to rise in combination with other plans, programmes and strategies. As discussed above, it also identifies mitigation for significant negative effects and uncertainties. Finally, it identifies residual significant sustainability effects of the Plan after mitigation (table 35 in the Main SA report).

4.7 The appraisal of the proposed modifications identified a small number of additional significant effects resulting from the changed policies, but these are very minor in the scale of the Plan as a whole, and cumulatively do not make a significant difference to the effect of the Submitted Plan. The addition of policy IMR1 simply reflects the need to manage overall housing delivery and does not represent an increased impact of the Plan. The appraisal of the site-specific policies identified some additional opportunities for mitigating significant negative effects and uncertainties of the Plan, but these effects arise from the site allocation, which had been assessed in the Main SA Report. The main impact of the proposed modifications in sustainability terms is to improve the mitigation of the effects of site provision, but this will not change the significance of the residual effects identified in the Main SA Report.

⁷ [Draft Sustainability Appraisal of North Hertfordshire Proposed Submission Local Plan](#)

5 Next steps

- 5.1 Following on from the current consultation, the Inspector will consider all the representations received and decide on whether the Plan is 'sound' (potentially with further modifications) or whether further examination hearings are required.
- 5.2 Once the Inspector has considered the issues arising from the Main Modifications consultation, he will issue his final report. Subject to this deciding that the Plan is sound, or is capable of being made sound with Modifications, it will be adopted by the Council and published alongside a Final SA Report. Once the Plan is adopted, a SA Statement will be produced.

