



# **Dacorum Local Development Framework Site Allocations – Focused Changes**

## **Sustainability Report Addendum**

**July 2015**

# **PROJECT REPORT: CPR2086**

## **Dacorum Local Development Framework**

### **Site Allocations – Focused Changes**

Sustainability Appraisal Report Addendum

July 2015

**Rob Gardner and Katie Millard (C4S at TRL Ltd)**

**Prepared for: Dacorum Borough Council, Strategic Planning and Regeneration**

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# 1 Introduction

## 1.1 Background

This Sustainability Appraisal Report Addendum summarises the findings of the combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) that has been undertaken in relation to the proposed amendments to the Dacorum Site Allocations that are being proposed by Dacorum BC following the representation on the Site Allocations in Autumn 2014. This report addendum covers three main areas:

- Analysis and responses to the representations made in relation to the SA Report during the publication of the Pre-Submission Site Allocations;
- Assessment of proposed amendments to the Site Allocations; and
- Clarifications and updated assessments to the SA Report (September 2014).

The proposed amendments that are being recommended to the Site Allocations are varied in nature, including:

- Correction of minor mapping errors;
- Providing clarifying text;
- The inclusion of new allocations and the amendment/reclassification or removal of some originally proposed allocations; and
- Updating the planning requirements linked to individual allocations.

The proposed amendments have been classified by Dacorum BC as follows:

- Minor Change (MC): Changes of a minor nature that are required to reflect minor changes arising from the representations.
- Editorial Change (E): Editorial changes are intended to clarify meaning, update facts and correct any inaccuracies.
- Significant change (SC): Changes of a more significant nature that relate to amendments that reflect the Council's response to the main issues raised through the representations.

This document reports on the SEA/SA consideration of the proposed amendments and, where appropriate, includes the re-assessment of the relevant parts of the Plan. It does not repeat information provided in the Pre-Submission SA Report (September 2014) and should therefore be read alongside that earlier report.

Consultation on the Minor Changes and Significant Changes will be undertaken as part of a "Focused Changes" consultation, with this SA Report Addendum forming part of that consultation.

## 1.2 Stages of SA/SEA

Table 1-1 shows the stages of Site Allocations and Sustainability Appraisal development undertaken to date, along with those that will need to be completed prior to the adoption of the Site Allocations.

**Table 1-1: Stages in the SA/SEA and Dacorum Site Allocations**

Dacorum Site Allocations	SA/SEA Stages	Dates
Begin document preparation	<p>Stage A: Setting the context, establishing the baseline and deciding on the scope.</p> <p>A1: Identify other relevant policies, plans and document programmes, and sustainability objectives.</p> <p>A2: Collecting baseline information.</p> <p>A3: Identifying sustainability issues and problems.</p> <p>A4: Developing the SA framework.</p> <p>A5: Consulting on the scope of the SA (<b>Scoping Report</b>).</p>	<p>SA Scoping Report, prepared February 2006.</p> <p>Consultation on Scoping Report February 2006.</p>
Preparation of Issues and Options (I&O) paper and consultation Preparation of preferred options, including consultation on possible preferred option	<p>Stage B: Developing and refining options and assessing of effects.</p> <p>B1: Testing the DPD objectives against the SA framework.</p> <p>B2: Developing the DPD options.</p> <p>B3: Predicting the effects of the DPD.</p> <p>B4: Evaluating the effects of the DPD.</p> <p>B5: Considering ways of mitigating adverse effects preferred and maximising beneficial effects.</p> <p>B6: Proposing measures to monitor the significant effects of implementing the DPDs.</p>	<p>Preparation of SA Working Note on Issues and Options December 2006. Consultation on the SA Working Note, alongside the Site Allocations Issues Paper November 2006 – February 2007.</p> <p>Preparation of SA Working Note on Supplementary Issues and Options October 2008. Consultation on the SA Working Note, alongside the Site Allocations Supplementary Issues Paper November 2008 – December 2008.</p> <p>Preparation of SA Working Note on Supplementary Schedule of Site Appraisals April 2014.</p>
Public consultation on Preferred options	<p>Stage C: Preparing the Sustainability Appraisal Report.</p> <p>C1: Preparing <b>the SA Report</b>.</p>	<p>Preparation of SA Report of the Pre-Submission Site Allocations September 2014.</p> <p><b><i>Preparation of an Addendum to the SA Report to reflect changes to the Site Allocations proposed in the Focused Changes [this addendum]</i></b></p>
	<p>Stage D: Consulting on the preferred options of the DPD and SA Report.</p> <p>D1: Public participation on the preferred options of the DPD and the SA Report.</p> <p>D2 (i) Appraising significant changes.</p> <p>D2 (ii) Appraising significant changes resulting from representations.</p> <p>D3: Making decisions and providing Information.</p>	<p>Consultation on the Pre-Submission Site Allocations and accompanying SA Report – September-November 2014.</p> <p><b><i>Consultation on the SA Report Addendum for the Focused Changes to the Pre-Submission Site Allocations [this addendum].</i></b></p>
Submission of DPD to Secretary of State	<p>Stage E: Monitoring the significant effects of implementing the DPD.</p> <p>E1: Finalising aims and methods for monitoring.</p> <p>E2: Responding to adverse effects.</p> <p>Preparing the <b>SEA Statement</b>.</p>	<p>To be completed when the Site Allocations document is adopted.</p> <p>This is scheduled for summer / autumn 2016, depending upon the timing of the examination</p>

## **2 Pre-Submission Representations**

Representations on the Pre-Submission Site Allocations and its accompanying SA Report were received following the consultation in Autumn 2014. Amongst the representations received, some were directly or indirectly related to the Sustainability Appraisal. These SA specific representations were made by the following organisations/individuals:

- Natural England;
- Hertfordshire County Council Ecology Officer; and
- Boyer Planning on behalf of W. Lamb Ltd

Details of the representations received and the SA/SEA responses to the representations are provided in Appendix 1.

Whilst none of the representations have resulted in major changes being made to the information or findings that were included in the Pre-Submission SA Report, the comments received have resulted in some updates to the assessments, along with some recommendations for updates to the assessment methodology for future work on the SA/SEA of the new Local Plan.

## **3 Assessment of proposed amendments to the Site Allocations**

### **3.1 Introduction**

This section summarises the findings of the SA/SEA that has been undertaken in relation to the proposed amendments to the Site Allocations that are being proposed by Dacorum BC as a response to representations on the Pre-Submission Site Allocations.

The amendments to the Site Allocations that are being proposed are detailed in the Council's Report of Representations that will form one of the formal submission documents passed to the Planning Inspectorate. The Report of Representations uses a methodology that classifies each change in one of three categories: Minor Change (MC); Editorial Change (E); or Significant Change (SC).

The SA/SEA has been updated to consider the implications of the amendments in terms of whether or not the Site Allocations, based on the amendments proposed, would be more, or less, likely to deliver towards the achievement of the SA objectives.

### **3.2 Assessment methodology**

The aim of this stage of the SA/SEA process is to determine whether there are likely to be any significant sustainability effects arising from the proposed amendments to the Pre-Submission Site Allocations.

Given that many of the proposed amendments are minor in nature, it would not be proportionate to undertake a full assessment on all of the amendments and it is therefore necessary to identify those amendments which could potentially result in significant effects. This was undertaken through an initial screening process which considered the significance of the amendment and whether there was likely to be a significant sustainability effect as a result of that change. The screening was undertaken on the amendments relating to the Site Allocations and to the supporting text.

The results of the Screening Assessment of all proposed amendments are provided in Appendix 2.

### **3.3 Screening assessment findings**

Of the proposed amendments to the Pre-Submission Site Allocations, one amendment was identified as requiring new assessment. In addition, a range of other proposed amendments were identified in the screening as having the potential to have minor implications in relation to the sustainability appraisal objectives and the original findings of the SA. The remainder of the changes were considered as negligible in terms of their effects on sustainability and were not considered further in the SA/SEA.

#### **3.3.1 New assessments**

The proposed amendment that required new assessment and the findings of that assessment are shown in Table 2. Details of the new assessment is provided in Appendix 3 and summarised below.

#### **3.3.2 Minor updates to assessments**

The proposed amendments for which minor implications on the SA objectives have been identified are outlined in Table 3.

### **3.4 Additional updates to the SA Report (September 2014)**

In addition to the assessment updates relating to the proposed amendments (Section 3.3) some new assessment was also undertaken for elements of the Site Allocations either not previously considered in the SA/SEA or for which the assessment required an update.

In particular, the additional assessment picks up on the new designations proposed in the "Looking after the Environment" section of the Site Allocations document. Only those designations that are determined through the Local Plan process have been assessed. These are Regionally Important Geological Site designations and Locally Registered Park or Garden of Historic Interest designations.

Other designations were included in the Map Book, with some additions now being included as proposed amendments (e.g. wildlife sites) but as they do not form part of the Plan proposals (other than for mapping purposes) they have not been assessed.

The new and amended assessments are summarised in Table 2, with full details being provided in Appendix 3.

**Table 2: Proposed amendments and other Plan elements requiring additional assessment**

Amendment Reference	Summary of Proposed Amendment	Implications for Sustainability Appraisal
<b>SC10</b>	Proposal L/4: Dunsley Farm, London Road, Tring	This is a new allocation and therefore a full new assessment has been carried out consistent with those previously undertaken for all the other allocations (see Appendix 3). The allocation of this new leisure site will have positive effects for the health (SA12) and equality (SA14) objectives, through the additional school playing fields which will also be made available to the community.
<b>N/A</b> The updated assessment does not relate to a proposed amendment but to a previous assessment	Policy LA4: Hanburys, Shootersway.	Updates to the assessment that was included in the SA Report (September 2014) are shown in bold italics. The assessment finding of minor negative remains unchanged. SA1 Biodiversity: The site is greenfield and there would therefore be loss or damage of some habitats, <b>including high quality grassland</b> . Retaining the pond, mature planting on to Shootersway and providing a coherent, and wildlife friendly open space network that links to the surrounding countryside could help to mitigate these effects. As could potential developer contributions towards offsetting the loss of wildlife resource.
<b>N/A</b> New assessment. Plan element from Pre-submission Site Allocations	New Regionally Important Geological Site designations: <ul style="list-style-type: none"> <li>• Pingo on Boxmoor – new designation</li> <li>• Bourne Gutter – new designation</li> <li>• Tring Park – new designation</li> </ul>	Designation of these new Regionally Important Geological Sites directly supports this SA objective and therefore <b>significant positive</b> effects have been identified for the Biodiversity (and geodiversity) objective (SA1). The protection of the new sites that will be afforded through the new designation will have positive effects for the local landscape (SA11).

<p><b>N/A</b> New assessment. Plan element from Pre-submission Site Allocations</p>	<p>New Locally Registered Park or Garden of Historic Interest designations:</p> <ul style="list-style-type: none"> <li>• Amersfort, Potters End – new designation</li> <li>• Champneys, Wiggington – new designation</li> <li>• Beechwood Park, near Markyate – new designation</li> <li>• Cheverells, near Markyate – new designation</li> <li>• Gaddesden Park, Bridens Camp - new designation</li> <li>• Gaddesden Place - new designation</li> <li>• Victoria Wood, Wiggington - new designation</li> <li>• Westbook Hay - new designation</li> </ul>	<p>These new Registered Park or Garden of Historic Interest designations directly support the heritage SA objective (SA10) and therefore <b>significant positive</b> effects have been identified.</p> <p>The protection of the new sites that will be afforded through the new designation will have positive effects for the local landscape (SA11).</p>
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**Table 3: Proposed amendments with minor implications for the SA**

Amendment Reference	Summary of Proposed Amendment	Implications for Sustainability Appraisal
<b>SC2</b>	<p>New proposal (MDS/1) to be inserted in the schedule, with site added to Policies Map.</p> <p>Additional requirements relating to respecting the site’s heritage designation / assets.</p>	<p>The inclusion of MDS/1 in the schedule and in the Policies Map is largely procedural and will not result in any new effects. The site will be covered by Core Strategy Policy CS5.</p> <p>This amendment does however have some positive implications for the heritage objective (SA10) through the additional requirements to respect the heritage assets.</p>
<b>SC4</b>	<p>Amendment to boundary of MDS/8 (Bourne End Mills Employment Area)</p> <p>New requirement for environmental improvements to be required throughout the site.</p>	<p>This significant change (SC) has minor positive implications for the environmental SA objectives, through the new requirement for environmental improvements to be made throughout the site.</p> <p>The change to the boundary is procedural in nature and will not result in any change to the SA.</p>
<b>MC3, MC4, MC6, MC7, MC9, MC19, MC22, MC43, MC44, MC45, MC46, MC49, MC51, MC52, MC53, MC54, MC55, MC58</b>	<p>New requirement relating to liaison with Thames Water to develop a Drainage Strategy to identify any infrastructure upgrades required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of this site.</p>	<p>Minor positive implications for the water quality (SA2) and flood risk (SA3) objectives.</p>
<b>MC7</b>	<p>Proposal MU/4 Hemel Hempstead Station Gateway – new requirement to protect Roughdown Common SSSI.</p>	<p>Minor positive implications relating to the biodiversity objective (SA1).</p>

Amendment Reference	Summary of Proposed Amendment	Implications for Sustainability Appraisal
<b>MC8 and MC48</b>	Proposal MU/5 Bunkers Park, Bunkers Lane and Proposal H/7 Leverstock Green Tennis Club - new text added in relation to provision of new tennis facilities.	Minor positive implications for the health (SA10) and equality (SA14) objectives.
<b>MC10 and MC11</b>	Proposal MU/8: Former Police Station and library site, Berkhamsted; and Proposal MU/9: Berkhamsted Civic Centre – additional planning requirements relating to design.	Minor positive implications for the heritage (SA10) and townscape (SA11) objectives.
<b>MC17</b>	Policy LA1 (Marchmont Farm) - Amend section on Key Development Principles to require development to be appropriate in terms of topography and visual impact.	Minor positive implications for the townscape objective (SA11).
<b>MC21</b>	Policy LA2 (Old Town) - Amend section on Key Development Principles to require development to not be harmful to the historic environment.	Minor positive implications for the heritage objective (SA10).
<b>MC24</b>	Policy LA3 (West Hemel Hempstead) - Amend section on Key Development Principles to require development design to safeguard the archaeological and heritage assets within and adjoining the development.	Minor positive implications for the heritage objective (SA10).
<b>MC32</b>	Policy LA5 (west of Tring) - Amend section on Key Development Principles to require that a significant area of the cemetery is provided for natural burials.	Minor positive implications for the equality objective (SA14).
<b>MC46</b>	Proposal H/5 Former Hewden Hire site – additional requirements relating to design.	Minor positive implications for townscape objective (SA11).
<b>MC47</b>	Delete Proposal H/6 39-41 Marlowes to reflect its re-use for social and community purposes rather than residential	The effects previously identified in relation to H/6 will no longer be valid. Minor positive implications for the equality (SA14), community participation (SA16) and economy (SA18) objectives. Minor negative implications for the housing objective (SA15).
<b>MC56</b>	Replace housing Proposal H/15 with a new mixed-use proposal MU/8 (Former Police Station and Library)	Minor positive effects for the equality (SA14), access (SA19) and town centre (SA20) objectives.
<b>MC57</b>	Replace housing Proposal H/16 with a new mixed-use proposal MU/9 (Berkhamsted Civic centre)	Minor positive effects for the equality (SA14), access (SA19) and town centre (SA20) objectives.
<b>MC59</b>	Proposal H/22 Corner of Hicks Road / High Street – new text relating to heritage merit of one existing property. New requirement for a flood risk assessment.	Minor positive implications for flooding (SA3) and heritage (SA10) objectives.

Amendment Reference	Summary of Proposed Amendment	Implications for Sustainability Appraisal
<b>MC63, MC64 and MC68</b>	Proposals C/1(Land West of Tring); C/2 (Amaravati Buddhist Monastery); and L/3 (Land to the West of Local Allocation LA5: Icknield Way, Tring) amended to include requirements to liaise with the Chilterns Conservation Board in relation to design.	Minor positive implications for the landscape objective (SA11).
<b>MC63</b>	Proposals C/1(Land West of Tring) – new requirement relating to protected species.	Minor positive implications for the biodiversity objective (SA1).

### 3.5 Implications for Habitats Regulations Assessment (HRA)

The SA report for the Site Allocations Pre-Submission (September 2014) identified that whilst the Site Allocations DPD provides a greater level of detail to the location of development to that which was included in the Core Strategy, it does not put forward any sites that are of a scale and/or location that will alter the findings of the previous HRA (of the Core Strategy). Based on their review of the current Site Allocations Natural England were satisfied with this conclusion (See Appendix A for their representation on this topic).

The amendments now being proposed to the Site Allocations have been screened to determine whether there are any that are of a nature that could alter the findings of the Core Strategy HRA.

The result of this additional screening process is that it is considered that none of the proposed amendments are of a scale and/or location that will alter the findings of the previous HRA. Therefore the conclusions of the Core Strategy HRA Report remain unchanged.

## 4 Next steps

Following consultation on the Focused Changes to the Site Allocations and its accompanying SA Report Addendum, the Site Allocations will be finalised for submission to the Secretary of State. If necessary a further SA Report addendum will be prepared to document any sustainability appraisal activities undertaken between the end of the consultation and Submission.

Following submission to the Secretary of State, it may also be necessary to undertake further additional sustainability appraisal to respond to any Site Allocations changes that are recommended by the Inspector, or put forward by the Council, during the Examination process. Any such additional sustainability appraisal will be documented in a further addendum to the SA Report.

When the Site Allocations is adopted it will be accompanied by an SA Adoption Statement that describes. In line with the SEA Regulations, the SA Adoption Statement will provide the following information:

- How environmental/sustainability considerations have been integrated into the Site Allocations;
- How the SA Report has been taken into account;
- How opinions expressed in relation to the consultations on the Site Allocations and SA Report have been taken into account;
- The reasons for choosing the Site Allocations as adopted, in the light of the other reasonable alternatives dealt with; and
- The measures that are to be taken to monitor the significant environmental/sustainability effects of the implementation of the Site Allocations.

## **5 Conclusions**

The new and updated assessments summarised in Sections 3.3 and 3.4 found that the majority of the proposed amendments to the Site Allocations would only have minor implications in relation to the findings of the original SA Report (September 2014).

Two new significant positive effects were identified, these relating to the designations of three new Regionally Important Geological Site and eight new Locally Registered Park or Garden of Historic Interest designations. These significant effects were predicted against the biodiversity (SA1) and heritage (SA10) objectives respectively.

No new significant adverse effects were identified in the assessment of the proposed amendments.

In addition, it has been concluded that the proposed amendments do not alter the findings of the Habitats Regulations Assessment.